

California Native Plant Society

Metropolitan Water District
Water Resources Management Group
P.O. Box 54152
Los Angeles, CA 90054-0153
Attn: Mr. Dirk Reed
Mr. Jack Safely

Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, CA 92507-0714
Attn: Mr. James Williams

G10

March 8, 2000

**RE: Comments on the Cadiz Ground Water Storage and Dry-Year Supply Program
Draft Environmental Impact Report and Draft Environmental Impact Statement
No. 99021039**

Dear Mr. Reed, Mr. Safely and Mr. Williams,

The California Native Plant Society is a non-profit group dedicated to the conservation and protection of California's native plant life and to the education of members and the public about the California flora. Our comments on the Cadiz Ground Water Storage and Dry-Year Supply Program Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/EIS) follow in two sections. The first section contains general comments about the proposed project and the second section includes document-specific comments. We urge you to consider and address these constructive comments.

G10-1

General comments:

The 150,000 acre-feet that this project would supply (Table ES-1) during dry years could be more efficiently and less-expensively provided through additional aggressive water conservation efforts. CNPS supports efforts to reduce the utilization of water in southern California by the horticultural use of indigenous native plants, which require less water than "traditional" exotic plantings and also provide benefits of animal habitat creation, as part of the solution of water conservation.

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An alternative needs to be included that uses previously disturbed areas and existing energy corridors, that would "1) minimize the number of separate right's of way by utilizing existing rights-of-way... and 2) encourage joint use of corridors for transmission lines, canals, pipelines and cables" as identified in the California Desert Conservation Area Plan as amended (1980). This alternative would use the existing transmission line corridor from the Iron Mountain Pumping Station across Danby dry lake, to Cadiz Road, and then along the All American Pipeline right-of-way or the railroad right-of-way. These right's-of-way are previously disturbed, provide easy access for maintenance and

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Dedicated to the preservation of California native flora

eliminate impacts to undisturbed vegetation communities that would happen in all proposed alternatives. This alternative would prevent further fragmentation of plant communities and the habitat they provide, decrease the spread of exotics and retain the values of undisturbed habitat.

G10-3

With the creation of inundation basins, we anticipate a likely environment for the establishment of tamarisk (*Tamarix* sp.). This highly invasive weed whose tiny seeds are dispersed by wind will establish wherever water is available, such as the spreading basins proposed in this project. MWD desert facilities currently support tamarisk infestations (Copper Mountain reservoir as seen on Huell Howser). Large-scale abatement projects near the proposed project site (Camp Cady, Afton Canyon) are currently funded at taxpayer expense to eradicate tamarisk. A tamarisk abatement program needs to be addressed, established and implemented for all MWD desert projects to minimize the spread of tamarisk in the California deserts.

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The document was unclear as to the actual fluctuation of the groundwater and its range in quality during the duration of the project. Therefore, no analysis was provided on the impacts to the existing vegetation types. Will the water quality change and affect the existing vegetation, some of which are sensitive to elevated levels of total dissolved solids and others (halophytes) that require saline conditions to persist? Many of the halophytic chenopod communities (Desert Iodine Bush Scrub, Greasewood, and others) are considered "rare and worthy of consideration" communities by the California Department of Fish and Game (NDDB 1997), and could be impacted through groundwater fluctuations. Although no halophytic communities were addressed in the DEIR/EIS, presumably because they occur outside of the footprint of the conveyance alternatives, their occurrences in the area of influence of this project should be documented and an analysis of impacts should be provided.

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Document Specific Comments:

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Page 5-119, AQ-4. CNPS recognizes the need for dust abatement during construction and supports suppression in an ecologically sound manner. The use of water in conjunction with construction disturbance encourages the establishment of weedy exotic vegetation and leads to possible invasion into other communities (especially naturally disturbed vegetation types as dunes and sand fields). When dust abatement is performed, do not use watering as a technique.

California Department of Fish and Game (CDFG) threatened plant communities as identified on Page 5-143, include 1) Mojave wash scrub and 2) stabilized and partially stabilized desert dunes and desert sand fields. Further discussion ensues on page 5-155, where stabilized and partially stabilized desert dunes and desert sand fields are identified to occur on 2000-10000 acres statewide, however, in the reference provided (Sawyer and Keeler-Wolf 1995), no estimate of extant acreage is provided. How was this estimate produced?

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No estimate for worldwide acreage is given for specifically for Mojave wash scrub. It is lumped with stabilized and partially stabilized desert dunes and desert sand fields (10,000 to 50000 acres worldwide) page 5-155, last paragraph, 3rd sentence. These lacking data preclude any analyses of impacts by this project.

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No impact evaluation is given for either of these recognized sensitive plant communities other than the numbers of acres disturbed in Table 5.8-3. Our calculations conclude based on the data provided for stabilized and partially stabilized desert dunes and desert sand fields in this document the different alternatives would impact this sensitive community as follows:

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Alternative	Disturbed acreage of Stabilized and Partially stabilized desert dunes and desert sand fields	% in California (assuming regional significance)
1 & 4	165.2 acres	8.26-1.65%
2	188.8 acres	9.44-1.89%
3	197.6 acres	9.88-1.98%

Because no analyses are addressed for Stabilized and Partially Stabilized Desert Dunes and Desert Sand Fields, no mitigations are considered. Impacts could be significant and should be analyzed.

Table 5.8-1 Special Interest Plant Species indicates that 22 species were surveyed for in 1999, which was very dry and resulted in poor species germination and flowering in general. Although one Special Interest Plant Species was identified to occur commonly in the sandy areas, twelve of the Special Interest Plant Species were identified as having suitable habitat but were not found, presumably because of the dry year conditions. We advocate that additional surveys be performed this year to confirm the presence of these species.

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No quantifiable criteria are listed in Section 5.8.2 Threshold of Significance, page 5-158. What is a "substantial adverse impact"?

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We suggest that you locate the "blowoff structures" referenced on Page 5-163 at wash crossings, so the natural hydrology is more effectively mimicked, pending analysis of water quality.

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Page 5-177 Mitigation Measure B-1. This section identifies 4-6 inches of topsoil that will be salvaged, while the executive summary indicates that 3-4 inches of topsoil will be salvaged. 4-6 inches of topsoil is the preferable amount of salvaged material.

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Furthermore, the cryptobiotic soils will not survive stockpiling, due to their photosynthetic requirements, and should be salvaged separately. Vegetative material that is to be salvaged would be more effectively salvaged as whole plants that can be used as "vertical mulch" for the revegetation effort. Vertical mulch provides better water infiltration, safe sites for seed germination and more visual integrity for the revegetation effort. Mulched vegetation can result in richer soils if composting occurs, and rich soils

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will favor the establishment of exotic vegetation, especially in conjunction with disturbance. Mulching should not be allowed to occur in the stockpiles, and can be prevented by keeping the stockpiles small (no greater than four feet in height) and minimizing the time soils are stockpiled.

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Page 5-178 Mitigation Measure B-1. Last Sentence "Plans and Specifications will specify topsoil storage locations and depths and necessary equipment". These specifications should be provided in as full disclosure of the alternatives as per the NEPA process. Topsoil locations need to be identified for location and size – if stockpiles are sizable they will require large areas for proper storage and will affect the "footprint" of the project. Small stockpiles are preferable, and will be numerous and may be more likely to be inadvertently impacted, which will destroy the integrity of the stockpile, rendering it useless for revegetation purposes.

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Page 5-178. Mitigation Measure B-3. What is the scientific name for camel knapweed?

G10-17

Page 5-182. Mitigation Measure B-26. Will the 1:1 mitigation ratio be for temporary or permanent impacts? Any disturbance to sensitive resources should be mitigated.

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Because these issues and the environmentally preferred alternative (along existing right's of way) have not been sufficiently addressed in the DEIR/EIS coupled with the conflicting analyses provided by the USGS report and the independent San Bernardino County groundwater study, we request a new or supplemental DEIR/EIS be produced to address/resolve these issues.

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Please contact me with any questions (323) 654-5943

Sincerely,



Ilene Anderson
Southern California Regional Botanist
California Native Plant Society

Cc: Emily Roberson, Senior Land Management Analyst, CNPS
David Chipping, VP Conservation, CNPS
Sierra Club
Desert Watch