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WATER SUPPLY IMPROVEMENTS

February 29, 1996

Maria Morrison
Project Engineer
East Bay Municipal Utility District
375 Eleventh Street
Oakland, California 94607-4240

SENT TO FAX NUMBER: (510) 287-1295

RE: Notice of Preparation (NOP) and Notice of Scoping Meetings for the Folsom South Canal (FSC) Connection Project Environmental Impact Report (EIR)

Dear Ms. Morrison:

Thank you for the opportunity to comment on the above referenced NOP. My copy of the NOP was originally sent to Sally de Becker of the East Bay California Native Plant Society (CNPS) Chapter, and she was kind enough to forward it to me as the project is within the boundaries of the Sacramento Valley Chapter. Please address all future documentation and correspondence to myself at the above address. I look forward to reviewing the Draft Environmental Impact Report (DEIR) for this project when it is circulated.

The California Native Plant Society has also just published a book on the vegetation communities of California called *A Manual of California Vegetation* (Sawyer and Keeler-Wolf, 1996) which is an updated description of the plant communities in California. I recommend using these classifications in the DEIR as they will most likely become the new standards for describing California's plant communities.

The California Native Plant Society is greatly concerned with the destruction of California's wetlands. We suggest that the pipeline alignment be designed to avoid wetlands within the FSC Connection and LAR study areas wherever possible. The proposed alignment included in the NOP, entitled NOP Alternative Regional View, traverses areas of Sacramento County that still contain exceptional vernal pool resources. For this reason, we urge inclusion of the Folsom South Canal Connection project alternative selection process in the Sacramento Vernal Pool/Wetland Habitat Conservation Plan being developed for Sacramento County. A contact for information on the status of the Habitat Conservation Plan is George Clark, California Native Plant Society President, who may be reached at (916) 988-6919.

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As part of DEIR preparation, rare plant surveys should be conducted at the appropriate time of year to coincide with the blooming periods of rare plants potentially occurring within the project area. Table 1 in Attachment A of the NOP is an excellent reference as it seems that *California Native Plant Society's Inventory of Rare and Endangered Vascular Plants* (CNPS Inventory) (Skinner and Pavlik, 1994) was used as a source for the Table. Was the U.S. Fish and Wildlife Service also contacted regarding the project? The letter they provide regarding potential occurrence of federally listed species and candidates the proposed pipeline alignment should also be cited as a reference for Table 1. In addition, rare plant surveys should be conducted as outlined in the CNPS Inventory, page 29, Guidelines for Assessing Effects of Proposed Developments on Rare Plants and Plant Communities (Skinner and Pavlik, 1994). Any rare plant populations that are discovered should be reported to the Department of Fish and Game's Natural Diversity Data Base and should be avoided by project activities wherever feasible.

Specific comments on the NOP follow:

- The last sentence of paragraph 1, page 28, suggests that special status plants are "protected" by the CNPS. Actually, we provide a list of rare species which in turn is used as the scientific basis for protection under CEQA, and serves as a tool for state and federal agencies in the CESA and ESA listing processes.
- Thank you for including the statement "If known populations cannot be avoided, stringent mitigation measures would be implemented." This is located on page 29, in paragraph 1. Following that statement is a list of potential mitigations that includes the mitigation outside the study area. We suggest, where appropriate, that mitigation should be performed on-site. For example, if the pipeline alignment would bisect a vernal pool, the soil profile could be carefully removed, layer by layer, and replaced in its original configuration to re-create the original vernal pool. While this scenario is certainly inferior to avoidance, it would be preferable to removing the genetic material from the destroyed vernal pool to an off-site location.
- The above comment regarding on-site mitigation also applies to the second paragraph on page 29.
- CNPS is concerned with alteration of flows below Nimbus Dam that might impact the riparian vegetation of the American River Parkway. Please include an analysis of the potential impacts of flow alteration to the riparian vegetation below Nimbus Dam.
- Several rare plants of the Delta region are listed in Table 1. Please include an analysis of the potential impacts to rare plants in the Delta region as a result of the proposed project.

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- It is stated that "overall impact to these environments as a result of the project would be minor" in reference to wetlands, riparian areas and vernal pools (page 31, paragraph VII(d)). This seems a premature conclusion given the fact that all of the above listed wetlands (wetlands, riparian areas and vernal pools) could have the potential to be destroyed by project activities.
Please provide a quantification of the impacts to these wetland types and an analysis of their functions and values in the DEIR.
- The National Wetland Inventory (NWI) is cited as a source for wetland location data along the vicinity of the existing canal and the proposed pipeline route (pages 33 and 34, last and first paragraphs respectively). While the NWI maps offer a general accounting of wetlands potentially present within a given area, their coverage is sporadic and the information contained on them is usually several years old. Reasonably current information is available on the locations of vernal pools in that area of Sacramento County. This information would be available from participants in the Habitat Conservation Plan effort referenced above. In addition, color aerial photos flown during the wet season are an excellent resource and should be available for the project area.
- What is meant by "unavoidable temporary impacts" to wetlands (page 34, paragraph 1)? Does this mean construction during the dry season?

Thank you once again for the opportunity to comment on this NOP. If you have any questions concerning these comments, please call me at (916) 451-9820.

Sincerely,

Ramona Robison
Conservation Chair
Sacramento Valley Chapter

cc: George Clark, CNPS President
Eva Butler, CNPS, Sacramento Valley Chapter President
David Magney, CNPS, State Vice President of Conservation
Sally de Becker, CNPS, East Bay Chapter President

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