

COMMENTS: LOS BANOS GRANDES

The Service agrees that the special status plant and animal species mentioned in the Los Banos Grandes proposal warrant additional consideration before the project proceeds. Analysis of the potential effects of the project on each of these species is appropriate. Therefore, the Service recommends thorough and adequate biological surveys be conducted to determine the effects of the project on the species mentioned in the proposal.

The Service is concerned about the effect of the Los Banos Grandes proposed project on federal plant species of concern. The Service recommends thorough plant surveys be conducted for all federal species of concern in the project area. In particular, Arbura Ranch jewelflower (*Streptanthus insignis* ssp. *lyonii*) is known from only three quadrangles (quads). The proposal notes that a previous botanical survey identified a number of populations of the species on the project site and two which could be inundated by the project. Because all of the quads on which the species occurs are in the vicinity of the project, the Service is concerned that the direct, indirect and cumulative effects of the project could potentially place the species in danger of extinction. Complete and thorough survey of the project site and surrounding areas would be necessary to accurately determine whether the project is likely to adversely affect Arbura Ranch jewelflower throughout its range. Surveys would also be appropriate for hairless popcorn flower (*Plagiobothrys glaber*) which is presumed extinct but which was known from the quad most affected by the project. All collections of this species since the 1930's have been in the Hollister area. In addition, the Service is concerned about the effect of the project on the special status sycamore alluvial woodland (State rank S1.1) that occurs along Los Banos Creek. This natural community is a valuable biological resource that needs to be considered before the project proceeds.

The Service recommends that botanical surveys for federal species of concern be conducted well before any project construction efforts are undertaken. Federal species of concern include all listed, proposed, and candidate species as well as species of concern that have been identified in species lists that have been generated by the Sacramento Field Office. Botanical surveys need to be conducted as per Service protocols which are attached. Timing of botanical surveys is crucial to ensure that species are present and qualified botanists are able to make determinations to species (or subspecies) level.

In reviewing the proposed projects that have been identified in the CALFED process, an adequate biological assessment of the impacts to any of the proposed projects needs to include an effects analysis. At a minimum, the effects analysis needs to include direct, indirect, and cumulative effects. Additionally, growth-inducing, interrelated and interdependent effects should be clearly and concisely described and analyzed in terms of what projects have been completed in the past, what other projects are proposed, and what the individual and collective effects of these projects are likely to be.

Attachment 1