



CALIFORNIA NATIVE PLANT SOCIETY

East Bay Chapter, www.ebcnps.org
PO Box 5597, Elmwood Station, Berkeley, CA 94705

July 29, 2014

Submitted via email to:

Ryan Wulff
National Marine Fisheries Service
BDCP.comments@noaa.gov

Re: Bay Delta Conservation Plan Comments from California Native Plant Society

Dear Mr. Wulff,

The California Native Plant Society's East Bay Chapter is writing to comment on the draft Bay Delta Conservation Plan (BDCP) and its accompanying Draft Environmental Impact Report.

The California Native Plant Society is a statewide non-profit organization that works to protect California's native plant heritage and preserve it for future generations. The Society's mission is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat. We promote native plant appreciation, research, education, and conservation through our 5 statewide programs and 34 regional chapters in California. The East Bay Chapter (EBCNPS) covers Alameda and Contra Costa Counties and represents some 1000 members.

General Considerations

- The goal of the plan for Covered Plant Species should be for the *recovery* of the target species, not just for the "conservation and management" of the species.
- The plan should prioritize conservation of edge populations that can contribute to the recovery of species not entirely within the Plan Area
- Some plants require disturbance to persist (e.g., spear scale - *Atriplex joaquiniana*); success criteria need to incorporate disturbance as a natural ecosystem process for these types of plants.

Incomplete Consideration of Growth Inducing Impacts of Plan

EBCNPS is concerned that the preferred alternative will have unstudied and unmitigated growth inducing impacts. The construction of new pipelines carrying water from the Delta to the southern California will facilitate the construction of thousands of new homes – especially in the southern San Joaquin Valley, resulting in the destruction of intact native habitat for urban development.

In Alameda and Contra Costa Counties, the SR239 roadway that has been proposed to connect Byron

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and Antioch with Tracy and the Highway 580 corridor would already have substantial growth inducing impacts in the region. The increased water conveyance planned as part of the BDCP will exacerbate these effects and these impacts should be considered.

The large economic benefits of this project stated in the economic analysis rely upon models which forecast high levels of urban development in the areas served by the pipeline. This development and the resulting economic benefits would not be possible without the increased water supply that this project will provide. If this project hopes to consider this economic gain as a benefit, it must also accept responsibility for the resulting harm to the areas of native habitat that will be destroyed. This cause-effect relationship needs to be explicitly mentioned and considered in the final BDCP and EIR.

The potential for the preferred alternative to reduce incentives for water conservation in the agricultural and urban areas of Southern California also needs to be considered as part of this report.

Classification and Mitigation for Alkali Seasonal Wetlands

Objective ASWNC1.2 of the Conservation Strategy reads:

Restore or create alkali seasonal wetlands in Conservation Zones 1, 8, and/or 11 to achieve no net loss of wetted acres (up to 72 acres of alkali seasonal wetland complex restoration, assuming all anticipated impacts occur).

EBCNPS first notes the importance of differentiating between alkali seasonal wetlands and alkali sink scrub plant community types. The alkali sink scrub that occurs near the Byron Airport and Clifton Court Forebay is a unique plant community at the northernmost limit of its range (*Allenrolfea occidentalis* Shrubland Alliance in MCV2) that should be mitigated for with conservation/restoration of the same community type if any impacts to it are unavoidable.

Alkali wetlands and alkali sink scrub are both plant communities that cannot be successfully created. The plan should therefore prioritize the conservation and avoidance of what remains today rather than considering creation as a viable mitigation option.

While EBCNPS agrees that Conservation Zone 8 does have potential as an area to work to conserve alkali wetlands and alkali sink scrub, we disagree that Conservation Zone 1 is a feasible option. There is no alkali sink scrub habitat (*Allenrolfea* dominated) currently existing in Yolo County, and creation of this habitat type in an area that does not currently contain the requisite salty soils, climate, groundwater, and drainage would undoubtedly fail. Any attempt to mitigate for alkali sink scrub and alkali seasonal wetland beyond the regions where the impacts will take place would constitute as out of kind mitigation and would not be valid.

EBCNPS notes that Alkali communities in general have naturally low cover. It is therefore important that success criteria for these areas *not* include high cover for the areas being restored or enhanced.

Potential Conflict with East Contra Costa County Habitat Conservation Plan

The conservation goals of the East Contra Costa County Habitat Conservation Plan (ECCCHCP) for alkaline wetlands and grassland were based on what was available at the time the plan was developed. If the BDCP impacts some of this habitat, it may make it difficult for ECCCHCP to reach its conservation goals. BDCP should have to mitigate for those impacts in Contra Costa by acquiring 2:1 the amount of alkaline acreage they impact in the County. Minimizing any conflict between ECCCHCP should be a priority issue, especially since the area in question may be one of the only places where the ECCCHCP can secure occupied habitat for *Delphinium recurvatum*.

EBCNPS appreciates the consideration of these comments and will look forward to following this project in the future. Please do not hesitate to contact us with questions at conservation@ebcnps.org or by phone at (510) 734-0335.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mack Casterman", with a long horizontal flourish extending to the right.

Mack Casterman
Conservation Analyst
California Native Plant Society, East Bay Chapter