From: Grace Espino-Salcedo
To: Mark Gross
Date: Apr 8, 2013 5:26 PM
Subject: FW: Draft EIR Response
Attachment(s): 1

FYI…

From: Karyn L. Drennen [mailto:kdrennen@biomonitoringrca.org]
Sent: Monday, April 08, 2013 5:23 PM
To: Planning Email
Subject: Draft EIR Response

Comments on World Logistics Center (WLC) Draft Environmental Impact Stateme

April 8, 2013

Karen L. Drennen

Plant Program Lead

Biological Monitoring Program

Western Riverside Multi-Species Habtiat Conservation Plan

Specifically regarding the Habitat Assessment, MSHCP Consistency Analysis and Review, it is my opinion that results of the surveys conducted by Michael Brandı Associates for the DEIR may under-represent the occurrence of the species surv the WLC study area.

Detectability ranges according to the Jepson manual and actual detections by th
Monitoring Program (BMP).

Jepson: Detectability range by month according to the Jepson manual

Jepson and BMP: Jepson detectability period and observation by the BMP

BMP only: Not within Jepson detectability period by observed by the BMP

BMP partial month:

Key to Sp Codes:

ACNO- San Jacinto Valley crownscale (Atriplex coronata var. notatior)

ALMU- Munz's onion (Allium munzii)

AMPU- San Diego ambrosia (Ambrosia pumila)

ASDA- Davidson's saltscale (Atriplex serenana var. davidsonii)

ATPA- Parish's brittlescale (Atriplex parishii)

BRFI- Thread-leaved brodiaea (Brodiaea filifolia)

CPLA- Smooth tarplant (Centromadia pungens ssp. laevis)

DUMU- Many-stemmed dudleya (Dudleya multicaulis)

ERMA- Round-leafed filaree (California macrophylla)

LGCO- Coulter's goldfields (Lasthenia glabrata spp. coulteri)

MYMI- Little mousetail (Myosurus minimus ssp. apus)

NAFO- Spreading navarretia (Navarretia fossalis)

NAST- Mud nama (Nama stenocarpum)

ORCA_ California Orcutt grass (Orcuttii californica)

TWWR- Wright's trichocoronis (Trichocoronis wrightii)

Dates of surveys for these species, according to Section 3.1 Survey Protocol pg.
June 9, 10, 11, 16, 22, 23, and 24, 2010 (page 338).

The DEIR surveys were all conducted during June of 2010, which presents the fo
problems:

* The assumption is that species will always be identifiable in the full range
may be present, but this varies from year to year. If June is the beginning or tail
species' range, it may be long gone or not yet germinated.
* Early germinating species such as Allium munzii are usually not present at
time as late germinating species such as Centromadia pungens ssp. laevis. Just
potential ranges appear to overlap, does not mean they occur simultaneously. I
conditions cause an early season, species will likely be present at the beginning
respective ranges. Likewise, they may be present at the end of their ranges, or
depending on conditions.
* Many of these species are particularly sensitive and have very specific germ
requirements. They are not found every year. For example, Trichocoronis wrigh
found by the Biological Monitoring Program until 2011, though surveys were re

conducted in the same location beginning in 2005.
* Depending upon the weather conditions, the length of species presence ca
well. Some species may only be detectable for a couple of weeks, if at all, in a d
2010 was a relatively dry year.

In conclusion, surveys conducted in one month of one dry year are insufficient t
species presence. Results of the surveys conducted by Michael Brandman Assoc
DEIR may under-represent the occurrence of the species surveyed within the Wl
area.

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