

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

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 Western Riverside Multi-Species Habitat Conservation Plan

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

<i>SP Code</i>	<i>January</i>	<i>February</i>	<i>March</i>	<i>April</i>	<i>May</i>	<i>June</i>	<i>July</i>	<i>August</i>	<i>September</i>	<i>October</i>	<i>November</i>	<i>December</i>
ALMU			Dark Green	Light and Dark Green Hatched	Light Green							
AMPU				Light Green	Dark Green							
ACNO				Light and Dark Green Hatched	Light Green							
ATPA						Light Green	Light Green	Light Green	Light Green	Light Green		
ASDA			Dark Green	Light and Dark Green Hatched	Light Green	Light Green						
BRFI			Light Green	Light and Dark Green Hatched								
CPLA				Light and Dark Green Hatched	Dark Green	Dark Green	Dark Green					
DUMU	Dark Green	Dark Green	Dark Green	Dark Green	Light and Dark Green Hatched	Light and Dark Green Hatched	Dark Green					
ERMA		Dark Green	Dark Green	Dark Green	Light Green	Light Green	Light Green	Light Green				
LGCO		Dark Green	Dark Green	Light and Dark Green Hatched	Light and Dark Green Hatched	Dark Green	Dark Green					
MYMI			Dark Green	Light Green	Light and Dark Green Hatched	Light Green						
NAST			Light Green	Light Green	Light and Dark Green Hatched	Light Green	Light Green	Light Green	Light Green	Light Green		
NAFO				Light and Dark Green Hatched	Light and Dark Green Hatched	Light and Dark Green Hatched	Dark Green					
ORCA				Light Green	Light and Dark Green Hatched	Light Green	Light Green	Light Green	Light Green			
TWWR					Light Green	Light Green	Light and Dark Green Hatched	Light Green	Light Green			

**Detectability ranges according to the Jepson manual and actual detections by the Biological Monitoring Program (BMP).** The light green cells represent months within the range according to the Jepson Manual, but during which no BMP detections have occurred. The dark green cells represent months during which the species has been detected by the BMP which are outside of the range given in Jepson. The light and dark green hatched cells represent both the Jepson range and actual detections by the BMP.

Species:

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-leaved 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. 10 were June 9, 10, 11, 16, 22, 23, and 24, 2010 (page 338).

The EIR surveys were all conducted during June of 2010, which presents the following problems:

- The assumption is that species will always be identifiable in the full range of when it may be present, but this varies from year to year. If June is the beginning or tail end of a species' range, it may be long gone or not yet germinated.
- Early germinating species such as *Allium munzii* are usually not present at the same time as late germinating species such as *Centromadia pungens* ssp.  *laevis*. Just because the potential ranges *appear* to overlap, does not mean they occur simultaneously. If weather conditions cause an early season, species will likely be present at the beginning of their respective ranges. Likewise, they may be present at the end of their ranges, or not at all, depending on conditions.
- Many of these species are particularly sensitive and have very specific germination requirements. They are not found every year. For example, *Trichocoronis wrightii* was not found by the Biological Monitoring Program until 2011, though surveys were repeatedly conducted in the same location beginning in 2005.
- Depending upon the weather conditions, the length of species presence can vary as well. Some species may only be detectable for a couple of weeks, if at all, in a dry year. 2010 was a relatively dry year.

For example, the following species have been detected in locations that have been searched in June and other months according to Jepson's detectability, but were found only in months other than June. These include:

- *California macrophylla*- found in Feb, Mar and April
- *Myosurus minimus* ssp.  *apus* – found in March and May

- *Orcuttii californica*- found in May
- *Trichocoronis wrightii*- found in July

In conclusion, surveys conducted in one month of one dry year are insufficient to determine species presence. Results of the surveys conducted by Michael Brandman Associates for the DEIR may under-represent the occurrence of the species surveyed within the WLC study area.

Signed,

Karyn Drennen

The opinions expressed are my own and not necessarily those of the Biological Monitoring Program  
also sent by email