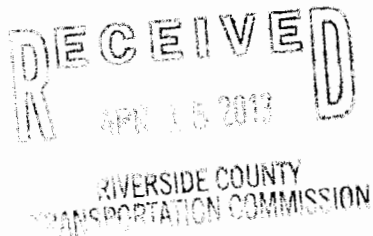




**California Native Plant Society**  
**Riverside/San Bernardino County Chapter**

4477 Picacho Drive  
 Riverside, CA 92507



Ms Cathy Bechtel,  
 RCTC  
 P.O. Box 12008, Riverside, CA 92502

April 10, 2013

RE: Mid County Parkway Recirculated Draft EIR/Supplemental Draft EIS

Dear Ms. Betchel,

The California Native Plant Society (CNPS) is a non-profit volunteer organization dedicated to the conservation and preservation of California's native flora. The Riverside/San Bernardino Counties Chapter of CNPS works to increase the public awareness of the significance of native plants and to preserve the native vegetation of Riverside and southwestern San Bernardino Counties. These comments pertain the Mid County Parkway Recirculated Draft EIR/Supplemental Draft EIS (DEIR/EIS document). We did not have time for an indepth review but we do have a few brief comments on the document.

In Section 3.9, Flooding and Hydrology, the document should clearly state impacts to the 100-year flood plain below the Ramona Expressway bridge. The document describes impacts above the bridge and suggests that the increase to the 100-year flood plain and water velocity will be minimal. However, the DEIR/EIS document should also discuss impacts or changes in flow and flooding that will take place below the bridge as well since these impacts could be significant in terms of impacting the habitat for which numerous sensitive plant species rely upon. If changes will occur, a detailed discussion regarding changes in the hydrology should be included.

The flood plain habitat below the Ramona Expressway bridge consists of alkali dependent plant communities (seasonally flooded vernal alkali plain; alkali scrub, alkali annual grassland, alkali playa, and alkali vernal pool habitats. Currently these habitats are in fairly poor condition due to soils amendments, mostly added between 2003 and 2008. However, these areas remain critical to a number of rare plant species. Some like San Jacinto Valley Crownscale (*Atriplex coronata* var. *notatior*), spreading navarretia (*Navarretia fossalis*), and thread-leaved brodiaea (*Brodiaea filifolia*), are Federal or State listed species. All three of these and many other alkali dependent rare plants are species covered by the Riverside County Multiple Species Habitat Plan, as indicated in this document and their continued existence depends on periodic flooding events.

Indirect effects on only two species were alluded to on page 3.21-15 where it was stated that “Indirect effects on San Jacinto Valley crownscale and spreading navarretia could result from localized increases in water velocity following major floods due to changes in river hydraulics caused by placement of bridge columns, abutments, and fill; however, because of the negligible increases in velocity anticipated (see Section 3.9, Hydrology and Floodplains, for a discussion of changes in velocity in the San Jacinto River), substantial indirect effects on the plant species would not be expected.” Then on 3.17.20 they say “Indirect effects on plants in the San Jacinto River floodplain may result from localized increases in water velocity with the San Jacinto River Bridge Design Variation (SJRBDV) or inundation following major floods due to changes in hydraulics caused by placement of bridge columns, abutments, and fill. However, because of the negligible increases in water velocity anticipated (refer to Section 3.9, Hydrology and Floodplains, for a more detailed discussion of water velocity changes within the San Jacinto River channel), substantial indirect effects on plant species would not be expected.”

IP-9-2

This discussion focuses only on flow rates, presumably near the bridge. However they do not address whether the overall 100-year flood plain will change as a result of the project. Increased flow could lead to increased erosion rates and removal of seeds. Seed dispersal, especially in San Jacinto Valley crown-scale is highly dependent on flooding. If the water moves too quickly, seeds will be carried downstream and out of suitable alkaline soils for germination. If the flooding footprint is reduced, seeds reach a reduced area of the flood plain. Many of the sensitive alkali species either require prolonged direct flooding (spreading navarretia) or occasional flooding of their habitat to reduce non-native exotic competition or development of climax alkali scrub communities (San Jacinto Valley crownscale).

With the current state of the habitat, natural flooding will be necessary to maintain or fully restore these habitats. The DEIR/EIS document should either show that flooding will not be altered or describe impacts that can affect as much as 2,500 acres of alkali habitat within the 100-year flood plain down stream. It does appear that the San Jacinto River Bridge Design Variation does impact downstream flooding but it is unclear as to what extent. The California Native Plant Society is opposed to any alternative that will significantly alter down-stream flood plain dynamics and endanger covered MSHCP alkali dependent species.

IP-9-3

IP-9-4

We had some difficulty reviewing impacts to special status plant species. However, it appears that the BSA concept for addressing NEPSSA, CASSA, and other special status plant species is fatally flawed in the ability to locate these species, address areas of potentially long-term conservation value, or potential impacts to these species. The type of survey conducted for this project does not appear to be consistent with the California Department of Fish and Wildlife (CDFW) guidelines for conducting botanical surveys (Protocols for surveying and evaluating impacts to special status plant populations and plant communities). The protocol can be downloaded at the following website: <http://www.dfg.ca.gov/habcon/plan/permits.html> and is attached for your convenience. These surveys do not appear to have been conducted in a manner consistent with floristic plant surveys, nor were surveys conducted for the entire ROW for this proposed project. It is not clear what areas were determined as appropriate habitat for special status species but sensitive species could occur in areas that were not surveyed.

IP-9-5

According to the DEIR/EIS document:

*“Focused surveys for narrow endemic plants were conducted from March 22 to April 15, 2005; May 4 to July 19, 2005; April 13 to April 27, 2006; and May 17 to June 29, 2006, where suitable habitat was identi-*

field based on the vegetation mapping. Additional areas included in the BSA were assessed for suitable habitat in March and April, 2011.”

The actual areas where surveys were conducted based on this methodology is displayed on maps offered in Appendix D of the Technical report. The result is a patchwork of fragmentary survey locations. Large areas within the Biological Study Area were not surveyed as a result.

IP-9-6

Some of the species listed on page 3.17.32 as survey targets, are sensitive to habitat disturbance, such as round-leaved filaree (*Erodium macrophyllum*). In the case of this species, the method used for surveys is probably reasonable. However, many of the other species, such as Davidson’s saltscale (*Atriplex serennana* var. *davidsonii*), Coulter’s goldfields (*Lasthenia glabrata* var. *coulteri*), and especially smooth tarplant (*Centromadia pungens* ssp. *laevis*), suitable habitat is much more difficult to define and these plants may occur in isolated patches or in low numbers within virtually any undeveloped field, lot, or sometimes even disced fields and presence or absence can only be determined by direct surveys.

IP-9-7

On sheet 9 of 9 for example, based on our experience, smooth tarplant could be found in almost any of the fields within the biological study area. However the actual area examined represents less than 10 percent of the Biological Study Area. Detailed examination of the Hemet region in 2005 and 2006 showed that sensitive species, especially smooth tarplant, occurred in many locations that otherwise would have been dismissed based on a standard habitat assessment. The patchy nature of the surveys described in the DEIR/EIS shows that “suitable habitat” was simply too narrowly defined.

IP-9-8

Therefore, potential habitat could extend over the entire length of the proposed project and the entire area should have been examined on foot by a qualified botanist following recognized and defensible protocols.

I was never able to locate a map that concisely indicated where sensitive plant species were encountered, with the exception of San Jacinto Valley Crownscale and spreading navarretia (Chapter 3.21). On page 3.19-2, the DEIR/EIS document states that smooth tarplant and Coulter’s goldfields were also found but I was unable to locate any information about where these species were encountered, which either suggests it is lacking or is a measure of poor organization. The document should provide this information clearly and not make it difficult to locate.

IP-9-9

Regarding Appendix N (Regional Species of Concern), which was the source for the summary provided in section 3.19-2, the discussion of these species appears to be incomplete and at time erroneous. Frequently the table simply states that many of these species were not observed in the field surveys but provides no review or discussion of previously reported sites within or near the Biological Survey Area (BSA). Many of the alkali-dependent species are somewhat irregular in their occurrence and would not be expected to germinate every year. In many cases, the presence or absence of habitat (high quality or degraded) is a reasonable indication that the species may be present in the BSA. A few comments are provided regarding Appendix N below.

IP-9-10

Chaparral sand-verbena (*Abronia villosa* var. *aurita*): The Rationale column indicates that this species was not surveyed for within low quality areas. Chaparral sand verbena has, however, been reported from sites considered of low to moderate habitat quality. All sandy areas within the BSA, within or east of the Perris Lake should have been surveyed. It occurs at the margins of wheat fields just south of Perris Lake for example.

IP-9-11

Jaeger’s milkvetch (*Astragalus jaegeri*): The common name “Peirson’s milkvetch” as it appears in the table is incorrect and should be changed to Jaeger’s milkvetch.

IP-9-12

Saltbush species (*Atriplex*): The habitat descriptions should be expanded to include degraded and marginal habitats in addition to natural quality habitats. Many of these species are relatively tolerant of at least temporary soil disturbances such as discing and dryland farming. In fact, the majority of extant population are found in relatively poor quality habitat as compared to the 1990s when the majority were found in relatively high quality habitat. The alkali habitats are relatively unique for being resilient and have high recovery potential.

IP-9-13

A simple "negative result" for Davidson's saltbush is misleading without some discussion of previously reported localities adjacent to the BSA. If any alkali habitat is present, degraded or not, the potential for this plant is high, even if it is not located during the course of a survey. If the habitat is present, this species is almost certainly in the seed bank. As indicated in the document, the correct name for this saltbush has been somewhat elusive, having also been called Pacific saltbush and Coulter's saltbush, close relatives. It appears very likely that the plants along the San Jacinto and at Hemet are actually a narrowly distributed, undescribed species that would be less common or widespread than San Jacinto Valley crowscale.

IP-9-14

Little Mousetail (*Myosurus minimus* var. *apus*): It should be noted that this species has never been historically associated with the San Jacinto River flood plain and would only be expected in the eastern portion of the BSA (the general vicinity of Warren Road east).

IP-9-15

Wright's trichocoronis (*Trichocoronis wrightii*): a simple "the results of the focused surveys for this species were negative" is misleading without some brief discussion of previously reported occurrences in the area. This is a species that is often not seen for several years at a time and generally is observed only in wet years. It is important to note that in southern California over the last 20-years, Wright's trichocoronis has only been known to occur from either just north of or just south of the Ramona Expressway and has only been reported about four of those 20-years. That suggests that in any given year there is only about a 20 percent chance this species will be seen.

IP-9-16

In addition a number of special status plant species known from the study region are not included in this table, such as the vernal barley, Palmer's grappling hook, the small-flowered microseris and the paniculate tarplant.

IP-9-17

If you have any questions, I can be reached at the address above or at [antshrike@cox.net](mailto:antshrike@cox.net)

Sincerely,



Fred M. Roberts,  
Rare Plant Botanist, Riverside/San Bernardino Chapter CNPS.

cc: Karen Cleary-Rose, Palm Springs U.S. Fish and Wildlife Service Office