



DESERT TORTOISE COUNCIL

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Via email only

29 August 2023

Attn: April Keigwin, Dena E. Giacomini
100 W California Ave
Ridgecrest, CA. 93555
akeigwin@rgs.ca.gov, dgiacomini@ppeng.com

RE: Notice of preparation of draft environmental impact report and notice of public scoping meeting regarding the proposed Indian Wells Valley Groundwater Authority imported pipeline project

Dear Ms. Keigwin, Ms. Giacomini,

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

Both our physical and email addresses are provided above in our letterhead for your use when providing future correspondence to us. When given a choice, we prefer to receive emails for future correspondence, as mail delivered via the U.S. Postal Service may take several days to be delivered. Email is an "environmentally friendlier way" of receiving correspondence and documents rather than "snail mail."

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats known to be occupied by Mojave desert tortoise (*Gopherus agassizii*) (synonymous with Agassiz's desert tortoise), our comments pertain to enhancing protection of this species during activities planned for and promoted by the Indian Wells Valley Groundwater Authority (IWVGA), which we assume will be added to the Decision Record for this project as needed. Please accept, carefully review, and include in the relevant project file the Council's following comments for the proposed project.

The Mojave desert tortoise is among the top 50 species on the list of the world's most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), "... based on population reduction (decreasing density), habit loss of over 80% over three generations (90 years), including past reductions and predicted future declines, as well as the effects of disease (upper respiratory tract disease/mycoplasmosis). *Gopherus agassizii* (sensu stricto) comprises tortoises in the most well-studied 30% of the larger range; this portion of the original range has seen the most human impacts and is where the largest past population losses had been documented. A recent rigorous rangewide population reassessment of *G. agassizii* (sensu stricto) has demonstrated continued adult population and density declines of about 90% over three generations (two in the past and one ongoing) in four of the five *G. agassizii* recovery units and inadequate recruitment with decreasing percentages of juveniles in all five recovery units."

This status, in part, prompted the Council to join Defenders of Wildlife and Desert Tortoise Preserve Committee (Defenders of Wildlife et al. 2020) to petition the California Fish and Game Commission in March 2020 to elevate the listing of the Mojave desert tortoise from threatened to endangered in California.

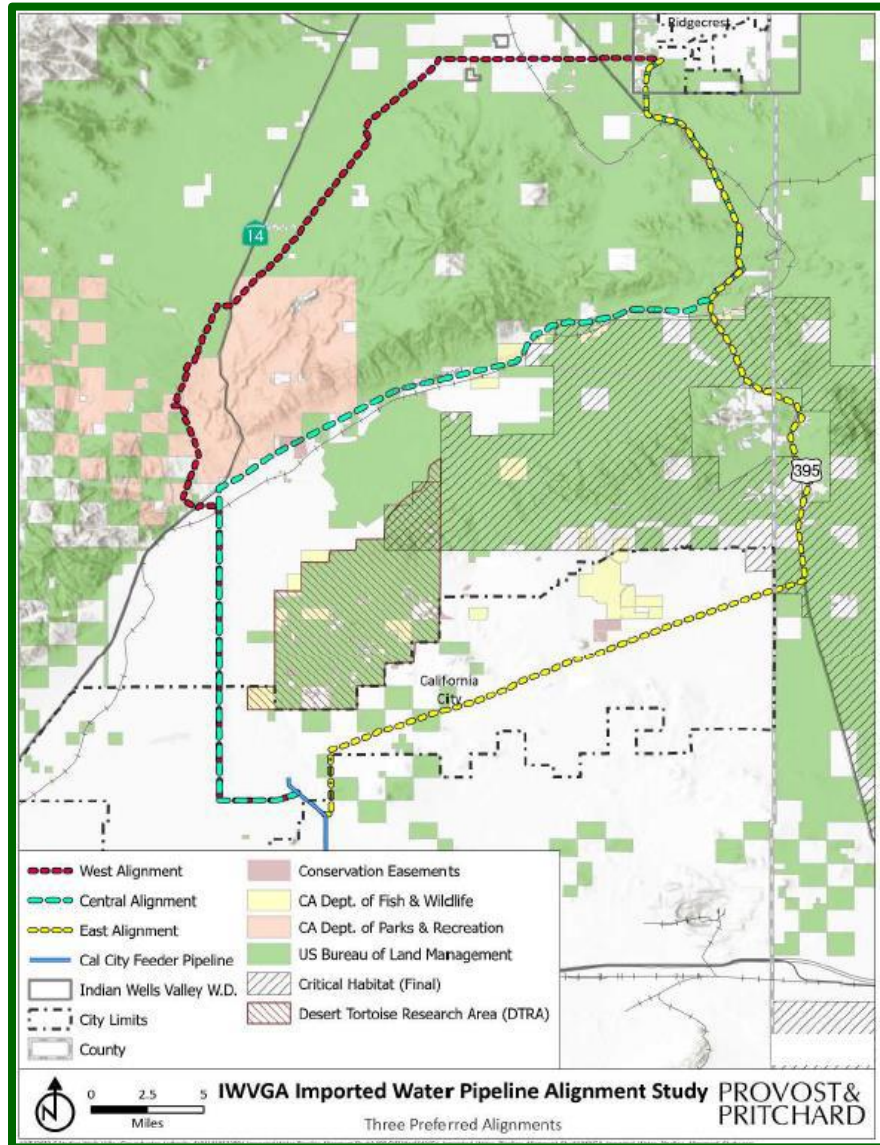
The undated Notice of Preparation (NOP) for the draft environmental impact report (DEIR) for the above-referenced project¹ provided the following statement on unnumbered page 1: "IWVGA is requesting any responsible/trustee/cooperating agency or interested person to participate, review, and provide input on how the Project may affect the environment. If you are an authorized representative of an agency with authorization of facilities that may be affected, IWVGA needs to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the Project. Agencies will need to use the EIR [DEIR, draft environmental impact report] when considering permits or other approvals. Please provide the name, address, telephone number and email address of the contact person for your agency."

The NOP does not provide a list of who these agencies are. Given that the project will affect resources protected by the following entities, we expect that they will be among the many agencies that need to be contacted: Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and Red Rock Canyon State Park (RRCSP). Also, given the number of public lands managed by the BLM that are likely to be impacted, we ask if it is appropriate that the environmental document be a joint EIR/EIS (environmental impact statement) rather than a stand-alone EIR?

According to the NOP, "The Project is located between the Cities of California City and Ridgecrest, in Kern County, California (see attached Figure 1). The Project begins in the City of California City at 35°06'55.20" N and 117°56'07.10" W. The centroid of the Project site is 35°22'37.4" N and 117°52'06.46" W. The Project ends in the City of Ridgecrest at 35°35'09.20" N and 117°42'14.61" W. Affected roadways include Redwood Boulevard, Neuralia Road, Redrock Randsburg Road, State Highway 395, and South China Lake Boulevard."

¹ <https://www.dropbox.com/scl/fi/63122buh154hdle44bhgt/IWV-Pipeline.pdf?rlkey=d9qz6w160wzvutwjh0kg209r&dl=0>

Figure 1 – IWVGA Imported Pipeline Alignment Alternatives



We note that the NOP fails to describe any alternatives for the project, but that at least three alternatives are depicted in Figure 1 above. We recognize that the East Alternative likely runs along Twenty Mule Team Road then along Highway 395, where it bisects the desert tortoise Fremont-Kramer Critical Habitat Unit (USFWS 1994). The Central Alternative would run along Neuralia Road, then northeast along Redrock-Randsburg Road, then northwards along Highway 395. And the West Alternative would apparently run along dirt roads (or even cross country) through RRCSP, northeast along Red Rock-Inyokern Road, then east along (apparently) Bowman Road. Although we suspect that the West Alternative is chosen to be the controversial, untenable alternative to demonstrate how severe environmental impacts can be, we question why the West Alternative would not be constructed along Highway 14, where there would still be significant impacts, but not as serious as those resulting from the depicted alignment?

In future versions of this map, it is important to depict BLM-designated Areas of Critical Environmental Concern (ACECs) and National Conservation Lands (NCL), which are depicted in DRECP documents (BLM 2015, 2016). We also note that the DTPC is actively acquiring lands east of the Desert Tortoise Research Natural Area (DTRNA) and manages other lands along Bowman Road that should be depicted in this map. There are also reserve lands owned and managed by CDFW that occur in the vicinity of the northern reaches of the West Alternative that are not depicted in this map. Other designated areas that are missing that must be depicted in the DEIR are the El Paso Wilderness area adjacent to the Central Alternative and the BLM-designated Spangler Hills Vehicle Open Area adjacent to both the East and Central Alternatives.

We read on page 2 of the NOP the following statement, “The goal of the imported water pipeline is to bring as estimated 6,431 acre-ft of water per year (AFY) into the Basin [Indian Wells Valley] by 2070 by delivering it to IWVWD [Indian Wells Valley Water District] and allowing IWVWD to shut off some of its groundwater wells and base load its system with the imported water. The proposed pipeline facility would be used to convey water from other sources through AVEK’s [Antelope Valley-East Kern Water Agency] system to the Basin. The sustainability goal is to preserve the Basin’s groundwater resource as a sustainable water supply, to continue to provide the residents with quality drinking water, and to sustain the mission of the China Lake NAWS.”

Given this goal, we are seriously concerned with the growth-inducing impacts resulting from residential and agricultural development within the Indian Wells Valley Groundwater Basin (Basin). The NOP concludes, “The Basin has been designated by DWR [California Department of Water Resources] as a critically overdrafted [sic] basin.” We firmly believe that the current overdraft conditions prevail because the desert ecosystem comprising the Basin has already exceeded its human carrying capacity. Our Board members include those who have lived in Ridgecrest and Inyokern for decades, who have witnessed the disappearance of tortoises and common wildlife from the Basin in response to residential, commercial, and agricultural development, particularly the hundreds of acres of water-thirsty pistachio orchards that are not sustainable. Importing water into the Basin will have the predictable, negative impact of eliminating even more natural resources, including desert tortoises. Therefore, it is essential that the environmental documents analyze and document the continued loss of natural resources that would not occur *but for* this project.

Given these observations, we seriously question the pre-decisional conclusion given in the following statement in the Summary portion of the NOP, and contend that the bold-font resources listed below must be analyzed in the DEIR, which would otherwise be deficient: “The IWVGA anticipates that the Project *would not result in significant environmental impacts* in the following resource areas, *which will not be further evaluated in the draft EIR* [italicized emphasis added]: **Agricultural and Forestry Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Transportation.**” More water shipped into the Basin may equate to more pistachio farms and/or persistence of existing orchards, hence Agricultural Resources would be affected; and will predictably result in more people and more associated development to accommodate them, hence Land Use and Planning, Population and Housing, Public Services, Recreation, and Transportation are pertinent resources that must be analyzed. The DEIR must not limit its discussion to physical impacts associated with construction and operation of the pipeline; it must also analyze the predictable direct, indirect, growth-inducing, and cumulative impacts to the entire Basin area, including the tortoise population.

Furthermore, these impacts are very likely to affect existing lands managed by the Desert Tortoise Preserve Committee (DTPC) and several other nonprofit land managers, since the NOP indicates that "...seven (7) private conservation parcels" would be impacted. These lands are set aside in perpetuity as mitigation for previous impacts, so to further damage them with this project would undermine existing agreements, some of which likely prohibit any ground disturbance within their boundaries. So, the DEIR must fully disclose the locations of such parcels and document existing agreements that may be violated by development of this project within their boundaries.

Similarly, both the West Mojave Plan (BLM 2005, 2006) and the Desert Renewable Energy Conservation Plan (DRECP; BLM 2015, 2016) have designated conservation areas for the desert tortoise (e.g., Areas of Critical Environmental Concern) and other rare species (e.g., Mohave Ground Squirrel Conservation Area) that may be directly impacted by construction and operation and indirectly impacted by growth-inducing impacts facilitated in the region by project development. So, these documents and the recently completed RRCSP General Plan must all be analyzed in the DEIR as to the direct, indirect, growth-inducing, and cumulative impacts of the proposed project on these areas designated for resource conservation.

Page 3 of the NOP indicates, "The lack of existing sub-transmission and distribution power lines ... would require IWVGA to work with Southern California Edison (SCE) to construct the necessary power facilities. This could include transmission lines and substations to power two booster pump stations and the regulating station." Please be sure that the potential for these facilities to subsidize common ravens and their associated impacts to tortoises is analyzed in the document, and that all standard measures to mitigate the local, regional, and cumulative impacts of raven predation on the tortoise are included in this DEIS, including developing a raven management plan for this specific project. USFWS (2010) provides a template for a project-specific management plan for common ravens. This template includes sections on construction, operation, maintenance, and decommissioning (including restoration) with monitoring and adaptive management during each project phase (USFWS 2010).

Some or all of the alternatives may require the construction and/or maintenance of access roads as well as a road that is adjacent to the length of the pipeline. Road construction, use, and maintenance may impact wildlife in numerous ways that can include mortality from vehicle collisions, and loss, fragmentation, and alteration of habitat. For example, regarding direct mortality, field studies (LaRue 1992; Nafus et al. 2013; von Seckendorff Hoff and Marlow 2002) have shown impact zones from road use eliminate or substantially reduce tortoise numbers up to 0.25 mile from roadways. These impacts are attributed to road kill with roads acting as a population sinks for tortoises.

In addition, road use impacts wildlife populations in other ways. The five major categories of primary road effects to wildlife including the tortoise and special status species are:

- (1) wildlife mortality from collisions with vehicles;
- (2) hindrance/barrier to animal movements thereby reducing access to resources and mates;
- (3) degradation of habitat quality (e.g., invasive plant species introduction and proliferation; competition with and reduction of native vegetation; reduction in nutritive value of the diet available to herbivores and omnivores; increased fuels that support the intensive, frequency, and size of wildfires that destroy/severely degrade native

- vegetation and soils; increased human subsidies for tortoise predators including common ravens (identified earlier in this letter), etc.)
- (4) habitat loss caused by disturbance effects in the wider environment and from the physical occupation of land by the road; and
 - (5) subdividing animal populations into smaller and more vulnerable fractions (Jaeger et al. 2005a, 2005b, Roedenbeck et al. 2007).

The impacts of the “road effect zone” to the tortoise and other special status wildlife species should be fully described and analyzed in the DEIR.

After being excluded from mitigation areas and special management areas for the tortoise and/or other special status species (that is, avoidance), we request that roads used for the construction, operation, and maintenance of the proposed pipeline and associate facilities be closed and their use by the public be effectively blocked to minimize the impacts of the road effect zone on tortoises and other special status species.

Given the 50-mile length of the proposed project, it is highly unlikely that the following statement in the NOP is true: “An estimated total of fifteen (15) crossings of ephemeral water courses would be completed;” nor is the statement supported by any studies associated with the NOP. As part of the baseline information to be provided in the DEIR, a jurisdictional waters analysis should be performed for all potential impacts to washes, streams, and drainages. This analysis should be reviewed by the CDFW as part of the permitting process and a Streambed Alteration Agreement acquired.

For the DEIR to fully assess the effects and identify potentially significant impacts, the following surveys must be performed **along all alternatives** to determine the extent of rare plant and animal populations occurring within the potential impact areas. Results of the surveys will determine appropriate permits from CDFW and USFWS and associated minimization and mitigation measures.

- Formal protocol surveys for Mojave desert tortoise (USFWS 2019) must be conducted at the proper times of year. It is appropriate that surveys be performed in the time periods of April-May or September-October so that a statistical estimate of tortoise densities can be determined for all impact areas along all alternatives and reported in the DEIR. If any tortoise signs are found, state and federal incidental take permits must be obtained prior to ground disturbance. We strongly recommend that only experienced biologists perform protocol surveys, which may mean that CDFW and USFWS biologists review their credentials prior to the surveys.

- To determine the full extent of impacts to tortoises and to facilitate compliance with the Federal Endangered Species Act (FESA), qualified biologist(s) should consult with the Palm Springs office of the USFWS to determine the action area for this project. The USFWS defines “action area” in 50 Code of Federal Regulations 402.2 and their Desert Tortoise Field Manual (USFWS 2009) as “all areas to be affected directly or indirectly by proposed development and not merely the immediate area involved in the action (50 CFR §402.02).” A similar consultation should occur with the CDFW for compliance with the California Endangered Species Act (CESA).

- To ensure compliance with the CESA, the CDFW Fresno regional office should be contacted to determine what must be implemented to determine whether an incidental take permit under Section 2081 of California's Fish and Game Code is required for CESA listed species in the project area including the tortoise and the Mohave ground squirrel.

- Prior to conducting surveys of all alternatives, a knowledgeable biologist must perform a records search of the California Natural Diversity Data Base (CNDDDB; CDFW 2023a) for rare plant and animal species reported from the region. The results of the CNDDDB review would be reported in the DEIR with an indication of suitable and occupied habitats for all rare species reported from the region based on performing species specific surveys described below.

- Protocol surveys for western burrowing owl (*Athene cunicularia*) (CDFG 2012) should be completed along all alternatives. Note that the protocol (CDFG 2012) requires that peripheral transects be surveyed at 30-, 60-, 90-, 120-, and 150-meter intervals in all suitable habitats adjacent to the alignments to determine the potential indirect impacts of the project on this species. If burrowing owl sign is found, CDFG (2012) describes appropriate minimization and mitigation measures that would be required.

- There are special status plant species found in the region of the Project area as determined by a CNDDDB (CDFW 2023b) literature review that should be sought during field surveys and their presence/absence discussed in the DEIR. Surveys must be completed at the appropriate time of year by qualified biologists (preferably botanists) using the latest acceptable methodologies (CDFG 2009).

- CDFG (2010) lists hundreds of plant communities occurring in California, including those that are considered Communities of Highest Inventory Priority, or "CHIPs." Biologists completing surveys on behalf of the Proponent should document such communities where they occur and indicate how impacts to them will be minimized.

The DEIR should include a thorough analysis and discussion of the status and trend of the tortoise in the action area, tortoise conservation area(s), West Mojave Recovery Unit (USFWS 2011), and range wide. Tied to this analysis should be a discussion of all likely sources of mortality for the tortoise and degradation and loss of habitat from project construction, operation and maintenance, and if the project will be decommissioned, restoration.

The DEIR should include appropriate mitigation and monitoring plans for all direct, indirect, growth-inducing, and cumulative effects to the tortoise and its habitats; the mitigation and monitoring plan should use the best available science with a commitment to implement the mitigation commensurate to impacts to the tortoise and its habitats. Mitigation and monitoring should include a fully-developed desert tortoise relocation plan; raven management plan; weed management plan; fire management plan; compensation plan for the degradation and loss of tortoise habitat that includes protection of the acquired, improved, and restored habitat in perpetuity for the tortoise from future development and human use; a plan to protect tortoise relocation area(s) from future development and human use in perpetuity; and habitat restoration plan.

These mitigation and monitoring plans should include an implementation schedule that is tied to key actions of the construction, operation, maintenance, and restoration phases of the project so that mitigation occurs concurrently with or in advance of the impacts. The plans should specify success criteria, include a monitoring plan to collect data to determine whether success criteria have been met, and identify actions that would be required if the mitigation measures do not meet the success criteria.

We request that the DEIR address the effects of the proposed action on global warming and the effects that global warming may have on the proposed action. For the latter, we recommend including: an analysis of habitats within the project alternatives that may provide refugia for tortoise populations; an analysis of how the proposed action would contribute to the spread and proliferation of nonnative invasive plant species; how this spread/proliferation would affect the desert tortoise and its habitats (including the frequency and size of human-caused fires); and how the proposed action may affect the likelihood of human-caused fires. We strongly urge the proponent to develop and implement a management and monitoring plan using this analysis and other relevant data that would reduce the transport to and spread of nonnative seeds and other plant propagules within the project area and eliminate/reduce the likelihood of human-caused fires. The plan should integrate vegetation management with fire management and fire response.

We appreciate this opportunity to provide comments on this project and trust they will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the Desert Tortoise Council asks to be identified as an Affected Interest for this project, and that any subsequent environmental documentation for this project be provided to us at the contact information listed above. Additionally, we ask that you respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this project.

Respectfully,



Mari Quillman, Chairperson
Desert Tortoise Council

cc. Rollie White, Assistant Field Supervisor, Palm Spring Fish and Wildlife Office, U.S. Fish and Wildlife Office, rollie_white@fws.gov

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