

# Sites comments from Sacramento Valley Chapter of the California Native Plant Society

Glen Holstein <holstein@cal.net>

Thu 1/11/2018 4:47 PM

To: EIR-EIS-Comments <eir-eis-comments@sitesproject.org>;

To Mr. Jim Watson, Sites Project Authority and Mr. Mike Dietl, Bureau of Reclamation

Re: Comments on Sites DEIR/S and Draft Feasibility Report

Dear Mr. Watson and Mr. Diehl

This is to reiterate public comments I made in person at the Sites open house in Maxwell on December 7, 2017. The proposed Sites Project will permanently destroy 15,000 acres of intact California natural communities at just when the California Biodiversity Council and legislation it proposed and subsequently helped pass emphasize the extremely high value of these communities even as they are being rapidly destroyed throughout the state. These communities at Sites include oak woodlands, chaparral, California prairie, riparian areas, and fresh and alkaline wetlands. Collectively they represent a cross section of why California is the richest of all 50 states in biodiversity according to the World Wildlife Fund and the Nature Conservancy. Unfortunately it is also among the states where that biodiversity is being lost most rapidly.

The DEIR/S does not even claim to have done adequate surveys for rare plants despite the very likely occurrence of several in the proposed project's footprint. Other important biological surveys of Sites are also inadequate or non-existent. For example a preliminary survey I personally conducted in the project's footprint suggests it is used for nesting and foraging by over half California's population of Horned Larks (*Eremophila alpestris*), the world's most beautiful lark and the only one occurring in the Americas. That also goes unmentioned in the DEIR/S.

Enough of California is already flooded even as rising sea levels promise such losses will increase dramatically. Unflooded natural treasures like Sites Valley need to remain that way.

Sincerely,

Glen Holstein, PhD

Botanist and state Council Delegate

California Native Plant Society, Sacramento Valley Chapter