



*protecting and restoring natural ecosystems and imperiled species through
science, education, policy, and environmental law*

submitted via Electronic Mail

12/13/2018

Mike Antos,
SAWPA

onewateronewatershed@sawpa.org

RE: Comments on the One Water One Watershed Plan: Moving Forward Together

Dear Mike Antos,

Please accept the following comments on the *One Water One Watershed Plan Update 2018: Moving Forward Together* on behalf of the one million members and supporters of the Center for Biological Diversity (the “Center”).

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats in the Western Hemisphere through science, policy, and environmental law including numerous members in the Santa Ana River watershed. The Center has been involved in Santa Ana River natural lands and water issues for several decades because of the unique and very rare plants and animals that call the Santa Ana watershed home.

While the 2018 Update retains and refines many of the important water related issues that we support, in the spirit of community engagement and “moving forward together”, we offer the following comments on the *One Water One Watershed Plan Update 2018: Moving Forward Together* (OWOW 2018).

Biological Resources

The Santa Ana River watershed is an incredible watershed because of its unique topographic diversity. With headwaters in three different mountain ranges that include some of the highest peaks in southern California such as San Geronio at over 11,500 feet, the Santa Ana and its tributaries hurtle down to the valley floor and then wind its way to the coastal plain before emptying into the Pacific Ocean. This topographic diversity, coupled with southern California’s unique tectonics which isolates the region, creates one of the most biologically diverse areas in the nation. The three counties that the Santa Ana River and its tributaries run through are also home to over 7.8 million people. Development to support this human population in the region has put great pressure on the native plants and animals as well as its water supplies. Therefore the OWOW Update 2018 plays an important role in recognizing, supporting and planning for imperiled species within the Santa Ana Watershed.

In reviewing Section 4.1.5. Open Space, Habitat and Native Species, we note that only a subset of the species listed under the federal Endangered Species Act are included in Special-Status Species section (at pg.81).

First, other federally (and State) listed species are extant in the watershed (including the tributaries to the Santa Ana River)¹ and these species include:

Common Name	Scientific Name	Fed/State/CRPR
southern mountain yellow-legged frog	<i>Rana muscosa</i>	FE/SSC/--
Swainson's hawk	<i>Buteo swainsoni</i>	S/CT/--
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT/CE/--
white-tailed kite	<i>Elanus leucurus</i>	S/FP/--
coastal California gnatcatcher	<i>Polioptila californica californica</i>	FT/SSC/--
Federal Designation FE Federally listed as endangered. FT Federally listed as threatened. S – BLM Sensitive State Designation FP – Fully protected species CE State listed as endangered. Species whose continued existence in California is jeopardized. CT State listed as threatened. Species that although not presently threatened in California with extinction are likely to become endangered in the foreseeable future. SSC “Species of Special Concern.” Species with declining populations in California.		

These animals should be recognized as important species for conservation purposes in the OWOW Update 2018.

Due to the success of the Endangered Species Act, the bald eagle populations have rebounded to a level that enabled the species to be removed from federal Endangered Species Act protection, although is it still protected under the federal Bald and Golden Eagle Protection Act and is a “fully protected species” under California law.

Other rare species known occurrences in the watershed would benefit from recognition of their sensitive and declining populations. While the OWOW Update 2018 tends to focus on water-dependent plants, plant communities and animals, these wetland and riparian habitats are supported by the whole watershed. The OWOW Update 2018 needs to recognize this fact and expand protection to all watershed open space in order to maximize many of the goals of the Plan. State and federal resource agencies² track many of the rare plants and animals that are found in the watershed and there species should also be included in the OWOW Update 2018 as species to plan around in support of the OWOW Update 2018 goals. They include but are not limited to:

¹ California Natural Diversity DataBase (CNDDDB) 2018

² IBID

Common Name	Scientific Name	Fed/State/CRPR
Plummer's mariposa-lily	<i>Calochortus plummerae</i>	--/--/4.2
smooth tarplant	<i>Centromadia pungens</i> ssp. <i>laevis</i>	None
Parry's spineflower	<i>Chorizanthe parryi</i> var. <i>parryi</i>	S/--/1B.1
white-bracted spineflower	<i>Chorizanthe xanti</i> var. <i>leucotheca</i>	S/--/1B.2
Peruvian dodder	<i>Cuscuta obtusiflora</i> var. <i>glandulosa</i>	--/--/2B.2
California satintail	<i>Imperata brevifolia</i>	--/--/2B.2
Robinson's pepper-grass	<i>Lepidium virginicum</i> var. <i>robinsonii</i>	--/--/4.3
Parish's bush-mallow	<i>Malacothamnus parishii</i>	--/--/1A
Hall's monardella	<i>Monardella macrantha</i> ssp. <i>hallii</i>	--/--/1B.3
Parish's gooseberry	<i>Ribes divaricatum</i> var. <i>parishii</i>	--/--/1A
Parish's checkerbloom	<i>Sidalcea hickmanii</i> ssp. <i>parishii</i>	S/--/1B.2
southern jewelflower	<i>Streptanthus campestris</i>	S/--/1B.3
Busck's gallmoth	<i>Carolella busckana</i>	
Santa Ana speckled dace	<i>Rhinichthys osculus</i> ssp. 3	--/SSC/--
Arroyo chub	<i>Gila orcuttii</i>	--/SSC/--
silvery legless lizard	<i>Anniella pulchra pulchra</i>	--/SSC/--
orangethroat whiptail	<i>Aspidoscelis hyperythra</i>	--/SSC/--
California mountain kingsnake (San Bernardino population)	<i>Lampropeltis zonata</i> (<i>parvirubra</i>)	S/SSC/--
coast horned lizard	<i>Phrynosoma blainvillii</i>	S/SSC/--
two-striped garter snake	<i>Thamnophis hammondi</i>	S/SSC/--
Cooper's hawk	<i>Accipiter cooperii</i>	--/WL/--
southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	--/WL/--
burrowing owl	<i>Athene cunicularia</i>	S/SSC/--
California horned lark	<i>Eremophila alpestris actia</i>	--/WL/--
yellow-breasted chat	<i>Icteria virens</i>	--/SSC/--
loggerhead shrike	<i>Lanius ludovicianus</i>	--/SSC/--
yellow warbler	<i>Setophaga petechia</i>	--/SSC/--
pallid bat	<i>Antrozous pallidus</i>	S/SSC/--
northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	--/SSC/--
western mastiff bat	<i>Eumops perotis californicus</i>	S/SSC/--
western yellow bat	<i>Lasiurus xanthinus</i>	--/SSC/--
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	--/SSC/--
pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	--/SSC/--
Los Angeles pocket mouse	<i>Perognathus longimembris brevinasus</i>	--/SSC/--
American badger	<i>Taxidea taxus</i>	--/SSC/--
Federal Designation FE Federally listed as endangered. FT Federally listed as threatened. S – BLM Sensitive State Designation		

FP – Fully protected species
 CE State listed as endangered. Species whose continued existence in California is jeopardized.
 CT State listed as threatened. Species that although not presently threatened in California with extinction are likely to become endangered in the foreseeable future.
 SSC “Species of Special Concern.” Species with declining populations in California.
California Rare Plant Rank (CRPR)
 1A Plants presumed extinct in California
 1B.1 Plants Rare, Threatened, or Endangered in California and Elsewhere and seriously threatened in CA.
 1B.2 Plants Rare, Threatened, or Endangered in California and Elsewhere and fairly threatened in CA.
 2B.1 Plant rare, threatened or endangered in California, but more common elsewhere, and seriously threatened in CA.
 2B.2 Plant rare, threatened or endangered in California, but more common elsewhere, and fairly threatened in CA.
 4.2 Watch List - moderately threatened in CA.
 4.3 Watch List – not very threatened in CA

If the OWOW Update 2018 recognized these species as important maintaining the diversity and ecological functioning of the watershed, it could slow the declines that are occurring in these plants and animals and preclude future listings under endangered species acts. In addition, some of these plants could be used for native landscaping, appropriate revegetation and/or restoration projects, as long as local genotypes were used.

Some plant species were historically known from the riparian corridor along the Santa Ana River and its tributaries but were extirpated³. The OWOW Update 2018 has the opportunity to recognize and support reintroduction of these species into conserved areas, showing a good faith effort to recover species teetering on the brink of extinction while increasing biodiversity and re-wilding the Santa Ana River. The species include:

Common Name	Scientific Name	Fed/State/CRPR
marsh sandwort	<i>Arenaria paludicola</i>	FE/CE/1B.1
Nevin's barberry	<i>Berberis nevinii</i>	FE/CE/1B.1
salt marsh bird's-beak	<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	FE/CE/1B.2
Federal Designation FE Federally listed as endangered. State Designation CE State listed as endangered. Species whose continued existence in California is jeopardized. California Rare Plant Rank (CRPR) 1B.1 Plants Rare, Threatened, or Endangered in California and Elsewhere and seriously threatened in CA. 1B.2 Plants Rare, Threatened, or Endangered in California and Elsewhere and fairly threatened in CA.		

In addition, numerous sensitive rare plant communities, tracked by the State of California⁴, are also known to occur along the Santa Ana River and its tributaries, including Southern Cottonwood Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, Southern Riparian Forest, Southern Riparian Scrub, Southern Willow Scrub and Riversidean Alluvial Fan Sage Scrub. While all of these unique plant communities are important, numerous seral stages of the critically endangered Riversidean Alluvial Fan Sage Scrub are

3 IBID

4 IBID

dominant component of the Santa Ana River Wash and the recognition, conservation and enhancement of this rare plant community needs to be a key component of this plan.

Wildlife Movement

The OWOW Update 2018 misses the opportunity to recognize that the Santa Ana and its tributaries are essential for wildlife movement. The Santa Ana River corridor is one of the last, best, albeit tenuous, linkages for wildlife movement through the highly urbanized inland empire between larger conservation refugia. A short analysis should be included and cover movement of mammals, as well as other taxonomic groups, including birds, reptiles, amphibians, invertebrates, and vegetation communities.

Mitigation and Restoration

For sensitive habitat and vegetation types, the OWOW Update 2018 also has the opportunity to identify regional conservation investment opportunities, which could streamline mitigation for projects requiring such, and establish of effective long-term management. These efficiencies have both ecological and economic values. So for example, instead of individual project seeking individual off-site mitigation, the OWOW Update 2018 could identify regional areas for mitigation and “pool” the necessary management requirements to the benefit of the regional mitigation area.

Other Necessary Improvements

1) Craft the OWOW Update 2018 to address the unique Santa Ana Wash landscape

Recognition and incorporation of essential hydrological functions – Many of the rare plants and animals are dependent upon specific hydrological regimes that are no longer occur naturally in the Santa Ana and its tributaries because of previous hydromodification. Careful evaluation of past hydrological regimes, sediment flow, inundation durations etc., needs to be used as a basis for proposing and implementing requisite regimes that will mimic the actions of historic hydrology. This issue is essential to maintaining the Santa Ana Wash system and the plants and animals that call the wash home.

2) Prioritize protection of the rarest resources

Avoid impacts to the rarest resources – The OWOW Update 2018 should identify and support avoiding all narrow endemic species, sensitive plant species, critical population locations, and all wetlands to the maximum extent practicable. This approach - the “avoidance standard” – should also be clearly articulated in the OWOW Update 2018.

Protect critical landscape connections – Critical landscape connections and ecological linkages within the watershed should be identified and their viability ensured. These goals should be clearly articulated in the OWOW Update 2018.

3) Identify conservation funding

Identify and establish assured funding sources – Adequate assured funding sources should be established to cover all costs for the OWOW Update 2018. An adequate assured funding source should be established to help achieve the vision and goals of the OWOW Update 2018

4) Conservation activities Based on the Best Available Scientific Information

Specific biological conservation goals and objectives should be provided in the OWOW Update 2018 for natural communities and imperiled species.

Establish ecological criteria for resource surveys – Sound ecological criteria triggering species surveys should be clearly articulated in the OWOW Update 2018 so that comparable data sets are being produced throughout the watershed. Protocols for some threatened, endangered and sensitive species are already created with the wildlife agencies. For species that lack such protocols, the OWOW Update 2018 needs to provide a basic set of criteria for surveys.

5) Incorporate HCP's along the Santa Ana River and its Tributaries

Numerous Habitat Conservation Plans (HCPs) and Natural Communities Conservation Plans (NCCPs) include the Santa Ana River watershed. The OWOW Update 2018 should include references to these important conservation plans and define how the OWOW Update 2018 integrates these plans into the vision and goals.

Conclusion

Thank you for the opportunity to submit comments on the OWOW Update 2018. We believe incorporating this more comprehensive vision for the wildlife of the Santa Ana River will improve the OWOW Update 2018. Please feel free to contact me with any questions and please add us to the distribution list for the all related notices associated with the plan.

Sincerely,



Heene Anderson
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cc via email

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