



SANTA CRUZ COUNTY GROUP

Of The Ventana Chapter

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To: Pajaro Valley Water Management Agency
ATTN: Brian Lockwood, General Manager
36 Brennan Street, Watsonville, CA 95076
eir@pvwater.org

Re: Response to College Lake Integrated Resources Management Project Draft Environmental Impact Report

The Sierra Club recognizes that the Pajaro Valley Water Management Agency seeks to utilize College Lake for water storage through summer to ease pressure from groundwater pumping on an already overdrafted water basin that is threatened by saltwater intrusion. College Lake currently provides seasonal wetland and mudflat habitat that is crucial for migrating birds and other species.

The College Lake Integrated Resources Management Project Draft Environmental Impact Report does not appear to take this habitat fully into consideration. College Lake hosts an abundance of biodiversity due to its seasonal wetland habitat. Currently, the water in College Lake is drained by late spring. This seasonal drainage promotes biodiversity in two seasons. In spring, draining provides emergent wetland and mudflat habitat for migrating birds. College Lake supports peak bird migration in April and May when mudflats and shallow water are available. By late summer and fall, plants have gone to seed and provide food for wildlife. If water is held through late summer, most plants will not have gone to seed by fall migration, eliminating a valuable food source for many birds. The DEIR for the College Lake plan does not fully analyze the biological impacts of water impoundment through the end of summer.

The Sierra Club submits the following questions:

- How will the Project mitigate for the loss of shallow water and mudflats for migrating bird species that currently depend on the draining of College Lake in spring?
- How will the project ensure that plants below the 57 foot elevation mark provide seed and other food for birds and other species during late summer and early fall?

The Sierra Club also seeks a more creative alternatives analysis. The project aims to yield between 1,800 - 3,000 Acre Feet/Year of water. We understand the need to support the life cycle of salmonids by releasing water in April and May.

- Is it possible to achieve the water yield targets earlier in the season and still provide enough water for salmonids?
- In an average year, how many acre-feet can be released by May 1, while still retaining enough water for salmonid reproduction?
- How much demand can be met by serving farmers in early summer (rather than late summer) to reduce groundwater pumping pressure?
- How does the PVWMA work with landowners, including farmers, to encourage appropriate swales and berms and other features that passively restore groundwater?

Finally, we submit the following questions on specific mitigation measures:

Mitigation Measure BIO 1a: The mitigation for “substantial adverse effect on special status species” is fish relocation.

- 1) What is an estimated number of special-status fish to be relocated?
- 2) Of these, is there an estimated loss during the relocation process?
- 3) What is an estimated number of special-status fish to remain in College Lake?
- 4) Where will the special-status fish be released?
- 5) For salmonids, the young require a time adjusting from fresh to salt water. How will this be addressed for captured fish?
- 6) What is the survival rate for relocated fish?

Mitigation Measure BIO 1c states that riparian and other wetland habitat will be replaced at a 3:1 ratio.

- Where will the replacement riparian and other wetland habitats, respectively, be located?
- What measures will be taken to ensure ecological function of the riparian and wetland restorations?

Mitigation Measure BIO 1d involves special-status bat species. What measures will be taken to address light and noise pollution near potential bat roosting and feeding sites, during both construction and also after project completion?

Impact BR-2: “Construction of Project components would result in a substantial adverse effect on riparian habitat or other sensitive natural community or on state or federally protected wetlands or waters” is said to be mitigated by creating buffer planting zones. What funding mechanism will ensure that these plantings mature and reach “success criteria”?

“C-BR-1: The Project, in combination with past, present, and probable future projects in the Project area, could result in significant adverse impacts on special-status species, sensitive natural communities and wetlands, wildlife corridors or nursery sites, or conflicts with local plans

and policies.” The DEIR states that no mitigation is necessary for C-BR-1. Why is no mitigation necessary?

The Sierra Club also recognizes that the Santa Cruz Bird Club has much expertise about the bird species present at College Lake. We refer to the Santa Cruz Bird Club’s letter, submitted by Lisa Sheridan, and look forward to seeing the responses to questions submitted by the Santa Cruz Bird Club.

Thank you for taking the time to answer our questions fully.



Respectfully submitted,

Dr. Rachel O'Malley

Vice Chair, Santa Cruz County Group of the Sierra Club