



**The Wildlife Society
Western Section
San Joaquin Valley Chapter
P.O. Box 25992
Fresno, CA 93729-5992**

September 23, 2001

Ric Notini
Environmental and Permitting Manager
University of California, Merced
1170 West Olive Avenue, Suite I
Merced CA, 95348-1959

Re: Comments on the UC Merced Community Plan EIR, Comment Period Ending 9/27/2001,
SCH #2001021056

Dear Mr. Notini,

The San Joaquin Valley Chapter of the Wildlife Society (SJVC-TWS) is a local chapter of an international, nonprofit scientific and educational organization that serves professionals in all areas of wildlife conservation and resource management. The principal objectives of The San Joaquin Valley Chapter include the following:

- (1) To seek the highest standards in all activities of the wildlife profession;
- (2) To develop and promote sound stewardship of San Joaquin Valley wildlife and habitats; and
- (3) To keep Chapter members well informed and provide opportunities for continued education.

SJVC-TWS appreciates the opportunity to review the Draft Environmental Impact Report for the UC Merced Community Plan. SJVC comments on the DEIR are as follows:

- SJVC recognizes the significant effort made by project proponents to relocate the UC Merced and the associated community to areas primarily (80%) composed of actively tilled farmland,

rather than primarily on grazing land, as was initially proposed. Minimizing impacts to the vernal pool landscape surrounding the University Community Planning Area (UCPA) will reduce potential impacts to several special status plants and animals. However, although the current and future build out scenarios do not anticipate development on the vernal pool complex surrounding the UCPA, unless conservation easements or land purchases have been made that protect this land in perpetuity, development on this adjacent land is probable. Measures should be taken to ensure permanent protection of the grazing land that surrounds the UCPA, since native-naturalized rangelands hold many wildlife and aesthetic values, and may serve as critical buffer zones adjacent to more sensitive lands.

- Maintenance of natural drainage corridors should include a buffer strip of sufficient width that minimizes disturbance to the unique plants and wildlife associated with temporary or permanent aquatic habitat, which also would minimize any potential non-point source pollution. The DEIS should identify the proposed buffer strip width around natural drainages in the UCPA.
- During biological surveys conducted during spring 2001, Western spadefoot toad (*Spea (Scaphiopus) hammondi*) was observed by California Department of Fish and Game (DFG) and California Department of Water Resources (DWR) biologists in grassland habitat south of the Merced River, just east of the SR 59 bridge. It is probable that this species inhabits the grassland habitat in and around the UCPA, and potential impacts to this DFG protected species should be addressed in the final EIR. This sighting was just recently submitted to the CNDDDB.
- In addition to the known Swainson's Hawk (*Buteo swainsonii*) nesting locations described in the DEIR, a nesting pair of Swainson's Hawk was also documented by DWR and DFG biologists along the Merced River, approximately 2.5 miles east of the SR 59 bridge during spring 2001. This sighting was just recently submitted to the CNDDDB.
- San Joaquin kit fox (*Vulpes macrotis mutica*): Page 4.4-21 of the DEIR states "Extensive surveys have failed to document SJKF use within the UCP area and adjacent existing University Community SUDP." DFG funded surveys conducted during August 2001 documented SJKF approximately 1 mile east of the UCPA, on the Ichord Ranch. Additionally, during 2001, Caltrans biologists documented one SJKF on Cunningham Road, about 1 mile north of Le Grand, about 6 miles south of the intersection of Cunningham Road and Hwy 140, and 2 SJKF approximately 4 miles west of this location (C. Johnson, pers. comm., see enclosed map). The final DEIR should disclose these recent SJKF sightings, and re-evaluate the potential project related impacts to this species and its habitat.
- Page 4.4-42 of the DEIR: The location of 551 acres of annual grassland habitat and 61.2 acres of vernal pool fairy shrimp habitat that will be preserved should be disclosed.

- Page 4.4-49 of the DEIR states in reference to SJKF dens that “The survey/den clearance protocol implemented would be consistent with the June 1999 USFWS Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance.” The standardized recommendations require a 50-foot exclusion zone around potential SJKF dens. Since Burrowing Owl (*Athene cunicularia*) burrows are considered potential SJKF dens, Burrowing Owl burrows should be avoided not only to protect Burrowing Owl nest locations, but also to protect a potential SJKF den.
- The UCPA should be planned around habitat conservation and minimal environmental impacts. It is critical that permanent protection of the vernal pool landscape that surrounds the UCPA also be incorporated into the campus plan. At a minimum, acreage equal to that which will be impacted by the campus and its associated development should be permanently protected in the native landscape surrounding the UCPA. This protected acreage should be protected in the form of conservation easements, habitat management agreements tied to the title of the land, or the UC Natural Reserve System prior to ground breaking.

Thank you again for opportunity to review and comment on this document. The San Joaquin Valley Chapter of the Wildlife Society is willing to assist the University of California in any way to ensure that the Central Valley’s newest campus is developed with minimal environmental impacts and habitat conservation as a focus. Please feel free to contact us to discuss our concerns.

Sincerely,

Julie Vance
Conservation Committee Chair
San Joaquin Valley Chapter
The Wildlife Society

