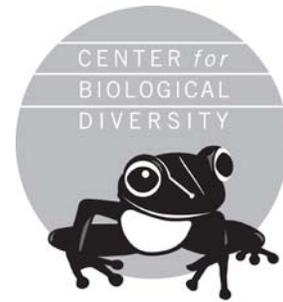


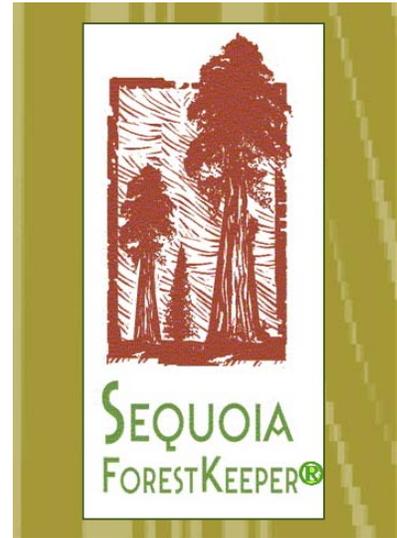
SIERRA CLUB



KERN-KAWEAH CHAPTER



Because life is good.



VIA ELECTRONIC MAIL

May 12, 2015

U.S. Army Corps of Engineers
Sacramento District Public Affairs Office
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**RE: Draft Supplemental EA Phase II Real Estate Acquisition and
Location Isabella Lake Dam Safety Modification Project.**

Dear Responsible Officer:

The Kern-Kaweah Chapter of the Sierra Club, Sequoia ForestKeeper, and the Center for Biological Diversity (“Center”) (collectively “conservation groups”) thank you for this opportunity to submit comments on the Draft Supplemental Environmental Assessment (“SEA”) for Phase II Real Estate Acquisition and Location associated with the Isabella Lake Dam Safety Modification Project. Our groups have participated in the public review process for the U.S. Army Corps of Engineers (“Corps” or “ACOE”) Isabella Lake Dam Safety Modification Project including by submitting comments on the DEIS on May 21, 2012 and supplemental comments on the DEIS providing new information to the Corps on January 7, 2015. Those comments are incorporated as though fully set forth herein.

The SEA relates primarily to project refinement but fails to address several issues. In addition to ongoing questions raise in our earlier comments regarding the adequacy and implementation of mitigation measures for Southwestern Willow Flycatcher and the need for additional mitigation for the Western Yellow-Billed Cuckoo, the conservation groups

*Comments Re: SEA Phase II Isabella Lake
May 12, 2015*

are concerned that the Corps has not adequately addressed the following issues related to impact avoidance, minimization and mitigation measures for the project:

- Impacts to Alkali Mariposa Lily from the proposed siting of a small visitor center in the Bob Marshal Preserve
- The need for effective measures to prevent the spread of invasive weeds particularly during the drawdown and for specific measures to be adopted to reduce and eliminate invasive tamarisk.

Alkali Mariposa Lily

The Alkali Mariposa Lily (*Calochortus striatus*) is a species of concern limited to the edges of alkali marshland. It grows in mineralized soil in four distinct areas in the Kern River Valley and was one of the reasons the Bob Powers Preserve was set aside as a natural area. It was last reviewed for listing as endangered in 1993 [9-30-1993 58 FR 51144 51190]. It is included in the CNPS Inventory of Rare and Endangered Plants on list 1B.2 (rare, threatened, or endangered in CA and elsewhere).

For several years, Alison Sheehey and other botanists conducted surveys of the fecundity of the Alkali Mariposa Lily on the preserve during the flowering season which occurs between May 1 and June 4. The best date for survey is typically the third week of May under average precipitation and temperature patterns.

The Army Corps of Engineers is considering placing a tiny visitor center on the Bob Powers Preserve that is in line with their strategic plan. (See <http://www.co.kern.ca.us/artman2/main/uploads/1/bob-powers-gateway-preserve.pdf>) Unfortunately, the footprint of potential new visitor center and footpaths are directly adjacent to the lily which doesn't appear conducive to protection. We urge the Corps to consider other alternatives to avoid impacts to the lily.

Invasive Weeds and Tamarisk Control

The drawdown of the reservoir for the "repair" has had an unintended consequence of exposing millions of invasive species seeds, specifically salt cedar. Five species of Tamarix have been identified in California: *T. ramosissima*, *T. chinensis*, *T. gallica*, *T. parviflora*, and the less-invasive *T. aphylla*. The four highly invasive species are finely-branched shrubs or trees less than twenty-six feet tall with small scale-like leaves that look similar to conifers in the juniper group. These fast growing invasives crowd out native riparian vegetation and create an overly alkaline condition from leaf drop. The habitat created is less than optimum for many of the riparian obligate species but in areas with no native habitat available, salt cedar becomes an important albeit poor substitute.

As the drawdown of the reservoir is wholly a condition of the Army Corps of Engineers repair of the Isabella dam but has been compounded by the continuing drought, the underfunded effort by the U.S. Forest Service is understandable but completely

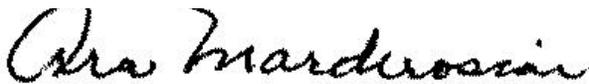
unsatisfactory. The removal of salt cedar is best when the entire plant is pulled and removed. The larger plants also respond to being pulled and removed but treating the trunks immediately with herbicide applied directly to the quickly healing cut is necessary. Broadcast spray by unsupervised operators is absolutely ineffective and dangerous in an area that supplies the potable water for over ½ million people.

The conservation groups believe that time is of the essence but the removal of the salt cedar must be funded and done by licensed and well-trained contractors in order to alleviate this problem. In addition, interspersed within the salt cedar seedlings and saplings are red, black, and yellow willow and Fremont cottonwood that must be protected as extremely valuable primary and mid-stage seral habitat for Southwestern Willow Flycatcher and Western Yellow-billed Cuckoo.

U.S. Forest Service has indicated that funding for surveys of the lakebed for evidence of archeological and cultural sites must be completed prior to implementation of the tamarisk (tamarix) removal project, so these resources are protected from damage. This should provide more than sufficient time for the Corps to consider and adopt a meaningful and effective protocol for tamarisk removal during the drawdown period.

Given this information we urge the Corps to revise the SEA to include alternatives and other measures to protect the Alkali Mariposa Lily and to reduce and eliminate the spread of invasive weeds including tamarisk during the drawdown as part of the refinement of the Isabella Lake Dam Safety Modification Project.

Respectfully submitted,



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