

**DEPARTMENT OF WATER RESOURCES**

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Governor's Office of Planning &amp; Research

February 14, 2020

**FEB 14 2020****STATE CLEARINGHOUSE**

Michelle Dennis, Branch Chief Integrated Pest Control  
California Department of Food and Agriculture, Plant Health Division  
2800 Gateway Oaks Drive  
Sacramento, CA 95833

**RE: SCH# 2019129093 Hydrilla Eradication Program Environmental Impact Report  
Notice of Preparation (NOP)**

Dear Ms. Dennis:

The California Department of Water Resources (DWR) Division of Environmental Services (DES), Delta Field Division (DFD) and Division of Flood Management (DFM) staff have reviewed California Department of Food and Agriculture's (CDFA) Notice of Preparation for the ongoing operations of the Hydrilla Eradication Program.

**Project Description**

The hydrilla Eradication Project location consists of all freshwater bodies in the State of California. Project activities include a CDFA a *Hydrilla verticillata* (hydrilla) survey and detection program along with an eradication program. These activities will be undertaken in cooperation with other agencies. The Environmental Impact Report (EIR) will evaluate the potential effects of the ongoing operation of the three project components: 1) Prevention efforts that rely on education and commodity inspections; 2) Statewide detection survey for early identification of potential infestation, and 3) Eradication and rapid response to detections of hydrilla that may require actions anywhere hydrilla is detected. The impact evaluation will consider the effects within small ponds, large ponds, lakes and flowing water.

**DWR's Role**

DWR plays a critical role in the State's economy by constructing, operating, maintaining and managing the State Water Project (SWP). DWR works in partnership with the U.S. Bureau of Reclamation, which manages the federal Central Valley Project (CVP), to ensure that vital freshwater supplies are transported throughout California. The transported water is used to sustain California's urban and rural communities, agricultural commodities, and technological markets. SWP facilities are located at lakes, behind reservoirs and in flowing water, DWR requests the EIR's impact analysis include all these types of freshwater bodies located within SWP facilities.

DWR plays a critical role in the State's economy and safety by maintaining flood control facilities which are part of the State Plan of Flood Control. DWR maintains flood

management facilities including levees, flood channel conveyances and the Sacramento River Flood Control Project. hydrilla infestation can have a significant impact on the facilities of the State Plan of Flood Control by reducing flood channel conveyance and clogging pumping plants. Removing these hydrilla infestations increases DFM maintenance cost. Also, this invasive plant has negative environmental effects on sensitive aquatic environmental resources within the State Plan of Flood Control. DWR requests the EIR's impact analysis includes water which flows on a continuous or intermittent basis through DFM facilities.

## **Specific Comments**

### DWR Approval for Access

Under Cal. Code Regs. Tit. 23, § 600 et seq. DWR is a public agency whose approval is required when a proposed project involves work within the State Water Project (SWP) right-of-way. DFM maintains facilities for which CDFA access will need to be arranged. DWR requests. CDFA would need to coordinate to undertake critical program surveys within DWR facilities. Coordination may include the need to obtain an encroachment permit. DWR requests the EIR include information explaining that CDFA would need to obtain permission from DWR to access some waterways. CDFA may need to obtain an encroachment permit from DWR for some locations.

### Project Description

The EIR will organize the impact evaluation of the three project components (inspection, detection and eradication) by considering the effects within specific freshwater bodies, including flowing water. DWR requests the impact evaluation include an analysis of the project to DWR water conveyance and flood management facilities systems located in freshwater bodies located in continuous or intermittent flowing water.

### Project Component 1: Prevention

CDFA would work with other key agencies to develop and distribute materials that describe the target species and their risk to the environment. DWR requests that CDFA include DWR's Public Affairs Office as an agency available to distribute material on the SWP facilities.

### Project Component 2: Detection via Surveys

Excluding hydrilla from DWR facilities and the Delta is a priority for DWR. Insufficient statewide surveys for hydrilla puts DWR facilities and project areas at risk of infestation. DWR encourages CDFA to continue to conduct extensive general detection surveys across all freshwater bodies in the state to discover and to eradicate hydrilla when an infestation is in its early stages

The Sacramento-San Joaquin Delta (Delta) is the hub of California's water distribution system, an estuary with dynamic ecological conditions and a recreational oasis for the

public. The Delta's ability to satisfy these roles depends upon its ecological health and ability to sustain its native plant and animal species. One of the biggest threats to the Delta's ecological health is the introduction of invasive species.

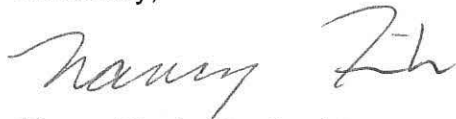
The EIR needs to explain which water bodies are considered freshwater bodies for the purpose of this project and provide the scientific basis to support its conclusion. Specifically, DWR requests the EIR include data related to salinity levels hydrilla can tolerate. This information would inform the water quality required for hydrilla survival and would be needed to analyze project impacts in areas such as the Delta - a freshwater body subject to salt water intrusion. DWR requests information regarding salinity levels influence on hydrilla survival and the significance of that information be incorporated into the EIR as appropriate.

Please provide DWR with a copy of any subsequent project environmental or other documentation when it becomes available for public review by sending the document to:

Gina M. Skurka Darin  
Senior Environmental Scientist (Supervisory)  
Department of Water Resources  
3500 Industrial Blvd.  
West Sacramento, California 95691

Thank you for the opportunity to comment on the project. If you have any questions, please contact Gina Darin at (916) 376-9825 or [Gina.Darin@water.ca.gov](mailto:Gina.Darin@water.ca.gov)

Sincerely,



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