UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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JUL 1 4 2009

Ms. Mary Grim
Section 10 Program Coordinator
U.S. Fish and Wildlife Service
2800 Cottage Way, W-2605
Sacramento, CA 95825

Subject: Draft Environmental Impact Statement (DEIS) for the Tehachapi Upland Multi-Species Habitat Conservation Plan, Kern and Los Angeles Counties, CA (CEQ # 20090011)

Dear Ms. Grim:

The U.S. Environmental Protection Agency (EPA) has reviewed the DEIS for the Tehachapi Upland Multi-Species Habitat Conservation Plan (HCP) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our comments were also prepared under the authority of, and in accordance with, the provisions of the Federal Guidelines (Guidelines) promulgated at 40 CFR 230 under Section 404(b)(1) of the Clean Water Act (CWA). Our detailed comments are enclosed.

The EPA acknowledges the intent of the Tejon Ranch Conservancy (TRC) and the U.S. Fish and Wildlife Service (Service) to develop an HCP in response to TRC's application for an incidental take permit (ITP) for the twenty-seven proposed covered species. We recognize that an HCP can result in more holistic, regional approaches to conservation of the covered species and their habitats and generally find them preferable to piece-meal, project-by-project permitting.

The above notwithstanding, we have rated the DEIS EC-2, Environmental Concerns – Insufficient Information (see attached "Summary of the EPA Rating System") due to several concerns with potential impacts to covered species and habitats resulting from covered activities, and with a lack of sufficient information in the DEIS. We are concerned that approximately 29 acres of wetlands, riparian, and wash habitats have not been sufficiently described, and that covered activities will have adverse impacts on these resources. We recommend the FEIS describe these habitats and demonstrate that they have been avoided, consistent with the CWA Section 404(b)(1) Guidelines. We also recommend additional analysis and discussion of water supply and potential impacts to covered species from potential ground and surface water impacts.

The EPA is very concerned with potential impacts to the highly sensitive population of California condor that occupy the covered area and with the negative impacts from development

The EPA is very concerned with potential impacts to the highly sensitive population of California condor that occupy the covered area and with the negative impacts from development and human population in the currently undeveloped area. We recommend the FEIS include a discussion of alternatives that would further reduce these impacts. We also recommend the FEIS include additional information regarding various impacts to other biological resources and regarding conservation measures proposed as part of the HCP.

In addition, the EPA is providing recommendations for improving the air quality analysis, for providing an appropriate assessment and disclosure of cumulative impacts and induced growth from the proposed alternatives, as well as for transportation, and visual resources. We also recommend the FEIS provide additional information describing the proposed alternatives and conservation lands, the purpose and need of the proposed project, and irreversible and unavoidable impacts of the covered activities.

We appreciated the opportunity to review this DEIS. When the FEIS is published, please send one hard copy to us at the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3521, or contact Paul Amato, the lead reviewer for this project. Paul can be reached at 415-972-3847 or amato.paul@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating System
EPA's Detailed Comments

cc:
Mr. Steve Kirkland, U.S. Fish & Wildlife Service, Ventura Office
Mr. Aaron Allen, Branch Chief, U.S. Army Corps of Engineers
Ms. Bridget Supple, Central Valley Regional Water Quality Control Board
Dr. Jeffrey R. Single, Regional Manager, California Department of Fish & Game

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Waters of the U.S.

The DEIS lacks sufficient information to determine potential direct, indirect, and cumulative impacts of the proposed project to waters of the U.S. (waters) and to the covered species that depend on these resources. Table 4.1E in the Biological Resources section of the DEIS provides a summary of the effects of covered activities on vegetation communities, including approximately 29 acres of riparian, wetland, and swale habitat combined. Section 4.2 is supposed to assess potential environmental impacts of covered activities to water resources, and does include a brief discussion of potential effects to wetlands, but it lacks clear and sufficient detail to identify the location, type, quality, and any Clean Water Act jurisdiction of the 29 acres listed in Table 4.1E. The DEIS also lacks sufficient information to determine to what extent impacts to waters would be avoided, minimized and mitigated as required by Section 404(b)(1) Guidelines of the Clean Water Act. Instead, the DEIS states that "...a comprehensive jurisdictional delineation of wetlands occurring within the Covered Lands has not been conducted" and assumes compliance with federal, state, and local regulations will reduce impacts to less than significant. Based on the information provided, it is unclear how the HCP covered activities would affect waters and the species that utilize these resources during their life cycles.

The EPA is also concerned that development of this proposal to issue an ITP for 29 acres of potentially jurisdictional waters has not occurred in close coordination with the U.S. Army Corps of Engineers (Corps), the EPA, Regional Water Quality Control Board (Regional Board), and California Department of Fish and Game (CDFG), and that the TRC has not first demonstrated adequate avoidance, minimization, and mitigation of impacts to waters. We understand that future applications for fill of waters in the covered lands will require the Corps to consult with the Service to ensure consistency with the HCP but we suggest the Service first demonstrate avoidance of these waters before issuing an ITP.

Recommendations:
The FEIS should identify and describe specific drainages and wetlands that would be affected by the covered activities and describe the extent of potential impacts to these resources and to species covered under the HCP.

The Service should coordinate with the Corps, EPA, Regional Board and CDFG prior to issuing an ITP for riparian, wetland, and wash habitats. This coordination should include a demonstration from the TRC that all impacts to waters have been avoided and minimized to the maximum practicable extent and that unavoidable impacts will be mitigated appropriately.

The Service should correct, in the FEIS, errors from Section 4.2 of the DEIS.

Recommendations:
Section 4.2.2.3 says that Section 3.1.2.1 describes surface waters as "...primarily <u>ephemeral</u> streams that flow for short periods of time following significant storm events."

This description is actually in Section 3.2.1.2 and it says that "streams and watercourses within the Covered Lands are generally intermittent and sustain flows only after extended wet periods or large storm events" (emphasis added). Ephemeral and intermittent streams are different hydrologic regimes that could support different species. The Service should correct the section number that is referenced and clarify the type of hydrologic regime it intends to refer to in the FEIS.

The description of the proposed MSHCP alternative in Section 4.2.3 says that development would not occur within the 166,523-acre area. This should be changed to 116,523 in the FEIS to be consistent with other sections of the document.

Water Resources

The FEIS should provide additional information on water supply, potential impacts to ground and surface waters and covered species, and water conservation measures for the proposed development. The DEIS mentions that the Tejon Castac Water District would provide water to the Tejon Mountain Village (TMV) project but does not discuss the amount of water demand, water availability, nor potential direct, indirect, nor cumulative impacts to covered species from meeting those demands. The EPA anticipates that the proposed TMV, which would include residences, golf courses, and resorts, would result in significant water demands that, if taken from the local aquifer, could have a negative impact on groundwater, surface drainage flows, wetlands, and the covered species that depend on these resources.

Recommendation:
The FEIS should include a discussion of anticipated water demands of development that would be covered under the ITP and the impacts of these demands on ground and surface waters and covered species that depend on them. The FEIS should describe water conservation measures -- such as appropriate use of recycled water for landscaping and industry; xeric landscaping; a water pricing structure that accurately reflects the economic and environmental costs of water use; and water conservation education -- and describe how such measures could reduce these impacts. We recommend that water conservation measures be considered as conditions of the HCP if they would reduce impacts to ground and surface waters and covered species.

Biological Resources

The EPA is concerned with the potential impacts to California condor as a result of covered activities in the HCP. We recognize the extent of the Tejon Ranch lands that would be placed in conservation (up to 90 percent) as part of the Ranchwide Agreement and proposed project but we remain concerned with the potential impacts that could occur to California condor due to the development and occupation of approximately 3,450 residential units and over half a million square feet of commercial and support facility development in the 28,253 acre TMV Planning Area- an area that falls largely within designated critical habitat and wholly within the range for California condor. As stated in the DEIS, primary impacts to California condors include loss of foraging habitat, habituation to human structures and activities, risk of collision with artificial structures, ingestion of microtrash, and lead poisoning. Because of the near extinction of this

species, the current population of only 35 individuals in Southern California, and the ongoing recovery efforts of the Service and other parties, we are concerned that implementation and operation of this proposed resort development would negatively affect recovery of the California condor.

> *Recommendation:*
> At a minimum, the Service and the TRC should consider an alternative that excludes development within designated California condor critical habitat. Such an alternative could consider increasing density and concentrating any development closer to the existing I-5 corridor.

Prohibitions on feeding of bald eagles at Castac Lake and other activities in open space should be enforceable. Table 2.0 *Avoidance, Minimization and Mitigation Measures* includes a measure that would provide signage near Castac Lake and at commercial and recreation areas reminding users of prohibited activities in order to protect wildlife. While EPA supports signage as a tool to protect wildlife, it is unclear whether these prohibitions will be enforceable and result in any punitive actions.

> *Recommendation:*
> The FEIS should include a commitment that all prohibitions designed to protect wildlife will be enforceable by law or local ordinance. This information should be included in any signage.

The FEIS should clarify how installation of infrastructure within open space is a mitigation measure. Table 2.0 *Avoidance, Minimization and Mitigation Measures* includes an action that would install infrastructure within open space for recreational and educational support. The EPA recognizes the potential benefits of educational features such as signage but it is less apparent how recreational infrastructure would avoid, minimize or mitigate impacts from the proposed project and aid in the conservation of the covered species.

> *Recommendation:*
> The FEIS should further describe how installation of infrastructure in open space would serve as an avoidance, minimization and/or mitigation measure for the covered species.

The FEIS should clarify the extent of vegetation disturbance that could result from development covered by the proposed HCP. Page 4.1-29 of the DEIS states that the MSHCP alternative would have 8,225 acres of permanent ground disturbance including 8,196 acres of upland communities and 29 acres of riparian/wetland. Table 2.3 reports 5,533 acres of development disturbance (plus approximately 41 acres of commercial development) while page 4.1-36 states that cumulative effects to other species would result in 5,082 acres of disturbance from mountain residential and other urban-type development. Based on this information, it is difficult to discern the extent of impacts to vegetation communities from the proposed project.

> *Recommendation:*
> The FEIS should be clear about the extent of impacts to vegetation communities that would be covered by the proposed HCP.

The FEIS should better identify potential impacts to non-covered special-status species. Page 4.1-32 states that ground disturbance from construction could impact non-covered special-status species but that their presence and distribution are unknown at this time. Potential impacts to special-status species that are not covered by the HCP should be described sufficiently in order to disclose the proposed project impacts. Presence and distribution of these species should be better understood.

> *Recommendation:*
> The FEIS should provide sufficient information regarding the presence and distribution of non-covered special-status species that could be affected by areas developed as part of the proposed project. If the Service determines that this information is not necessary in order to determine potential impacts, then a clear and defensible explanation of this reasoning should be provided in the FEIS.

The EPA is concerned with potential constraints to wildlife movement resulting from the proposed covered activities. Section 4.1 of the DEIS describes environmental consequences to biological resources, including potential effects on wildlife movement and connectivity. Wildlife movement in the area around Castac Lake would be constrained due to commercial and residential development that is considered incompatible with wildlife movement. Avoidance and mitigation measures are not discussed for the various covered species that could be prevented from accessing Castac Lake due to the TMV development.

The DEIS also discusses maintaining habitat linkages within and north of the TMV Planning Area but only mentions direct linkage between open space and the Interstate-5 (I-5) crossing GVRC6. As discussed in the DEIS, several I-5 crossings were monitored with cameras, including five directly west of the TMV Planning Area. GVRC6 represents one of these locations. The DEIS does not discuss how the remaining four known crossings would be affected and whether mitigation measures under the HCP would maintain wildlife access to these locations. It is also unapparent what the wildlife movement constraints will be going north and south due to the proposed TMV and the proposed developments to the north and south that are not part of the covered area.

> *Recommendation:*
> The FEIS should discuss the potential constraints to wildlife movement east to west and north to south of the proposed TMV Planning Area including whether known I-5 crossings would be constrained and to what extent the HCP will avoid, minimize, and mitigate potential negative effects of the TMV on wildlife movement.

The language describing the process for placing lands into conservation is confusing. On page 4.1-37 the DEIS states that "upon initiation of construction of the TMV development, the MSHCP Mitigation Lands shall be permanently protected by phased recordation of conservation easements or equivalent legal restrictions over the initial and remaining MSHCP Mitigation Lands by the end of the permit term." It is not clear at what rate the lands will be placed in conservation and what is meant by "by the end of the permit term." Based on this language, it appears that lands would be permanently protected by the end of the 50-year permit term. If this

is the case, the FEIS should be explicit. The EPA would be concerned with delaying permanent protection of conservation lands unless adequate interim protection measures could be assured and enforced as a condition of the ITP.

> *Recommendation:*
> The FEIS should describe the schedule for placing conservation lands into permanent protection and clarify whether protection of any lands would be delayed.

Air Quality

The FEIS should include additional air quality information for the proposed project. The following information, which is lacking in the DEIS air quality analysis, would aid the Service in improving the analysis in the FEIS:

1. The FEIS should specify whether the alternatives would conform to the State Implementation Plans (SIP) for National Ambient Air Quality Standards (NAAQS) for which the San Joaquin Valley Air Basin and the Mojave Air Basin are in non-attainment. A statement of general conformity is not required as part of an EIS under NEPA but this information is important for disclosure purposes.

2. The FEIS should describe specific air quality mitigation measures for the covered activities. According to the DEIS, construction of the proposed project would not result in exceedances of annual significance thresholds for NAAQS for which the proposed project air basins are in nonattainment. Nevertheless, the FEIS should commit to mitigation measures, such as best available control technologies for diesel emissions, in order to reduce impacts to air quality. The DEIS demonstrates that operational emissions from the proposed project would greatly exceed annual significance thresholds for reactive organic gasses (ROG), nitrogen dioxide (NOx), and particulate matter less than or equal to ten microns (PM_{10}) in the San Joaquin Valley Air Basin. Proposed mitigation measures are ambiguous and limited to compliance with San Joaquin Valley Air Pollution Control District fugitive dust rules and federal, state and local regulations (page 4.3-24). The FEIS should include and describe specific air quality mitigation measures and should demonstrate how emissions would be reduced as a result.

3. The DEIS lacks any discussion of cumulative impacts from proposed developments mentioned in the document. Specifically, the DEIS states on page 4.1-19 that more urban-type development is anticipated to occur in the areas around the proposed project, including expansion of the LA and Bakersfield areas and projects such as Centennial, Grapevine, and the Tejon Industrial Complex. These projects should be considered as potential sources of emissions that, in conjunction with the proposed project, could result in cumulative impacts to air quality in the air basins.

Cumulative Impacts

The DEIS does not sufficiently consider cumulative impacts from the proposed project nor other alternatives. Section 4.1.2.4 *Cumulative Effects of No Action/No MSHCP Alternative*

appears to be the only section in the DEIS intended to address cumulative impacts. However, this section -- intended to address cumulative effects to biological resources -- disregards several other developments in the valley and foothill areas outside the Tehachapi Mountains because they are "characterized by biological resources different than the mountain landscape resources considered in the proposed MSHCP." This rationale appears to state that none of the covered species in the covered area have been, or will be, directly or indirectly affected by human activities in the areas surrounding the covered area, including the areas designated as development in Figure 1.2. Lacking sufficient justification, the EPA disagrees with this approach.

The remainder of Section 4.0 *Environmental Consequences* lacks sufficient discussion of cumulative effects. Furthermore, it is not apparent why the remainder of the DEIS does not include a section for cumulative effects on specific resources. There is no consideration of past, present, and reasonably forseeable actions, which, when viewed with the proposed action, could have cumulatively significant effects (40 CFR 1508.25(a)(2)).

> *Recommendation:*
> The FEIS should include a detailed discussion of cumulative effects of each alternative, in combination with past, present, and reasonably foreseeable actions. This discussion should include an appropriate spatial and temporal scope and should clearly justify whether landscapes outside the proposed covered area have, in the past, or currently could, support covered species and their habitats. All resources should include a specific discussion of cumulative impacts.

The FEIS should include a discussion of potential cumulative impacts to covered species due to climate change. Cumulative impacts to covered species could occur over the 50-year permit term. For example, changing climate could alter habitat conditions for covered species and result in additional population reductions that were not accounted for when incidental take and conservation measures for the covered activities were considered.

> *Recommendation:*
> The FEIS should discuss potential impacts of climate to covered species and their habitats and whether the HCP has taken this into consideration.

Induced Growth

The EPA is concerned with potential impacts from induced growth that could occur as a result of the proposed project and with the lack of sufficient information in the DEIS to address these concerns. Scoping comments are summarized in the DEIS, including a request that growth-inducing impacts from removing barriers to growth be considered. The DEIS states that no specific growth-inducing impacts are included in the DEIS. The Council on Environmental Quality (CEQ) NEPA Regulations state that environmental effects include indirect effects which are caused by the action later in time or further in distance, such as induced growth and other effects related to changes in land use patterns, population density or growth rate, and related effects to natural systems (40 CFR 1508.8). We consider the proposed action of providing an ITP for the proposed project to have the potential indirect effect of induced growth by removing

a barrier to proposed development in a currently undeveloped area. We also consider the potential impacts to air, water, and other natural resources to be potential impacts of induced growth that could result.

Recommendation:
The FEIS should adequately discuss the potential indirect effects of induced growth that could result from the issuance of an ITP for the proposed project.

Transportation

The EPA is concerned with impacts related to transportation for the proposed project. Based on the DEIS, the proposed project would result in 111 miles of new roads, would eventually contribute to exceedances of the capacities of all highways considered, and would result in operational on-road emissions that greatly exceed annual significance thresholds for non-attaining NAAQS. The EPA considers these impacts to be, in part, a result of the isolated nature of the proposed developments relative to existing metropolitan areas and public transportation. For example, as described in the DEIS, the closest Amtrak station is 30-45 miles away and Metrolink is 55 miles away. Potential measures to reduce the above impacts include relocating the proposed development closer to existing metropolitan areas and public transportation that feeds into these areas; increasing the density, reducing the footprint, and concentrating development along the I-5 corridor; and committing to measures that will improve public transportation within the proposed development and to existing rail lines.

Recommendations:
The FEIS should consider whether coverage under the HCP should be limited to development closer to existing metropolitan areas and/or existing rail transportation that serve these areas. Benefits to environmental resources, including air, water and covered species that would result should be described.

The FEIS should expand the discussion of potential avoidance measures that could be implemented to reduce impacts from new roads, such as increased density and a reduced project footprint.

The FEIS should describe potential commitments to improve public transportation if the proposed project were to proceed.

Visual Resources

P 4.6-5 The DEIS states that the proposed alternative would have less than significant impacts on visual resources, but lacks any discussion of significance criteria, such as local building ordinances, used to make this conclusion. The EPA is concerned that the analysis for visual impacts underestimates the potential impacts of new developments on currently open space.

Recommendation:
The FEIS should include and describe criteria used for determining the significance of impacts from the proposed project on visual resources.

Alternatives

It is unclear why the covered area does not include the entirety of the Tejon Ranch and the proposed development that would occur outside of the currently proposed covered area. As described in the DEIS, the HCP covered area would include 141,886 acres of the 270,365 acre Tejon Ranch. It is not apparent to the EPA why the entirety of the Tejon Ranch is not considered for coverage under the HCP, especially given the extent of proposed development in areas outside the currently proposed covered area. It is assumed that covered species and their habitat could occur within areas of the Tejon Ranch that are not currently proposed for coverage, and that they could receive greater protection if conservation measures proposed for the covered area were applied throughout the Ranch.

> *Recommendation:*
> The FEIS should describe why a more comprehensive HCP was not prepared to address the entire Tejon Ranch and the proposed covered activities that would occur beyond the currently proposed covered area.

The DEIS does not describe what criteria would be used to determine whether to conserve the additional 12,795 acres. The DEIS states that the Ranchwide Agreement provides for an option to acquire an additional 12,795 acres of conservation lands but does not describe what criteria must be met in order to exercise this option.

> *Recommendation:*
> The FEIS should identify what criteria would be used to determine whether the additional 12,795 acres of conservation lands would be acquired under the Ranchwide Agreement. The likelihood that these criteria would be met would help disclose the potential extent of conservation lands.

Purpose and Need

The FEIS should further discuss why there is a need to issue an ITP for the proposed action. According to the DEIS, the purpose of the proposed action is to respond to TRC's application for an ITP, and the need is based on potential actions that could result in incidental take of covered species in the covered lands due to development. It is unclear from the DEIS that there is a need for residential and commercial development in the currently undeveloped area of Tejon Ranch that would be covered under the ITP issued by the Service. As a result, the DEIS does not sharply define the issues and provide a clear basis for choice among options by the decisionmaker and the public (40 CFR 1502.14).

> *Recommendation:*
> The FEIS should provide an analysis of housing and commercial development demands within the covered lands and tie this to the need to issue incidental take coverage as proposed in the DEIS. This analysis should take into account current and projected market demands and the current location of the proposed developments in proximity to housing and job markets.

Irreversible and Unavoidable Impacts

The DEIS would be more effective if the determination of effects from the proposed action were more clearly stated and summarized. As written, the DEIS does not clearly determine significance of effects for each resource and each alternative. Instead, the approach taken in Section 4.0, Environmental Consequences is ambiguous. CEQ NEPA Regulations state that this section of a DEIS shall include discussions of direct and indirect effects and their significance (40 CFR 1502.16 (a) & (b)). The DEIS does not consistently state the significance of the project effects and often only compares an alternative's effects to the No Action/No MSHCP Alternative without stating a level of significance.

> *Recommendation:*
> The FEIS should clearly and consistently state the level of significance of the effects of each alternative as it applies to each environmental resource. A table should be added to the executive summary that compares the significance of the effects to each resource for all alternatives. Table ES-2 could be revised for this purpose.