



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



December 12, 2022  
*Sent via email*

Governor's Office of Planning & Research

**Dec 12 2022**

**STATE CLEARINGHOUSE**

William Patterson  
Coachella Valley Water District  
75-519 Hovley Lane East  
Palm Desert, CA 92211

Subject: CVWD Response to CDFW Comments on the Draft Environmental Impact Report, Thousand Palms Flood Control Project, State Clearinghouse No. 2016111053

Dear Mr. Patterson:

On May 16, 2022, the California Department of Fish and Wildlife (CDFW) submitted comments on the Draft Environmental Impact Report (DEIR) for the Thousand Palms Flood Control Project (SCH #2016111053; Project) in its capacity as Trustee and Responsible Agency (Pub. Resources Code, § 21069 & 21070; Fish & G. Code, §§ 711.7, subd. (a) & 1802). On December 2, 2022, CDFW received a response from Coachella Valley Water District (CVWD) to those comments and notification that the Final EIR is scheduled for consideration by the CVWD Board of Directors at its meeting on December 13, 2022.

To support CVWD in its environmental review efforts for this Project, CDFW provides the following additional guidance related to the comment identified by CVWD in its response as "CDFW-1." CDFW is concerned that mitigation for impacts to CDFW lands was not properly identified in the DEIR and that the lack of appropriate mitigation fails to offset impacts to CDFW lands. CDFW requests that compensatory mitigation for impacts to CDFW lands is incorporated into the Final EIR to substantially lessen impacts to below a level of significance before its adoption by CVWD.

The DEIR points to the purchase of 550 acres for Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) mitigation as compensation for impacts to CDFW lands; however, the impacts to CDFW lands were not contemplated in the development of the CVMSHCP. Therefore, these 550 acres should not apply to impacts to state lands. In addition, the proposed alignment of the Project's flood control levees was last revised in 2021. Compared with the previous alignment proposed in 2000, the new alignment will result in additional impacts to multiple parcels owned by CDFW. These additional impacts to CDFW lands were also not anticipated during the planning of the CVMSHCP nor incorporated in Required Measure 1 for the Thousand Palms Conservation Area (Section 4.3.11) of the CVMSHCP. To compensate for impacts to CDFW lands, CDFW recommends, as discussed in its May 16, 2022, DEIR comment letter, that the Final EIR includes an analysis of impacts to CDFW lands and a

William Patterson, Environmental Supervisor  
Coachella Valley Water District  
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discussion of compensatory mitigation to offset these impacts to below a level of significance. CDFW requests that the identification of appropriate mitigation for impacts to CDFW lands is done in consultation with CDFW.

The inclusion of mitigation acceptable to CDFW in the Final EIR will support CVWD in appropriately offsetting Project impacts and streamlining the review of other Project deliverables such as the forthcoming Compensatory Mitigation Plan and access easements on CDFW parcels. CDFW recommends that these items be incorporated into the Final EIR prior to its adoption.

CDFW appreciates the opportunity to provide additional guidance on the Thousand Palms Flood Control Project to assist CVWD in identifying and mitigating Project impacts on biological resources to reduce impacts to below a level of significance. CDFW requests that CVWD address CDFW's concerns prior to adoption of the Final EIR. If you have questions or comments regarding this letter, please contact Heather Brashear, Senior Environmental Scientist (Supervisor), at [heather.brashear@wildlife.ca.gov](mailto:heather.brashear@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Kim Freeburn  
Environmental Program Manager

Enclosure

Copy of CDFW comment letter dated May 16, 2022:  
"2016111053\_DEIR\_ThousandPalms\_ThousandPalmsFloodControlProject.pdf"

ec:

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