Message

From: Scianni, Melissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=96DF5A77C72A4D109141A14DCF9E5C9B-MSCIANNI]
Sent: 4/16/2021 10:12:46 PM
To: Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]; Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]; Gymer, Lisa@Wildlife [Lisa.Gymer@wildlife.ca.gov]; Steinert, Tiffany@Waterboards [Tiffany.Steinert@waterboards.ca.gov]; Mahdavi, Sarvy [Mahdavi.Sarvy@epa.gov]
CC: Nate Bello [bello@wra-ca.com]; Tracey Brownfield [tracey@landveritas.com]; Mayer, David@Wildlife [David.Mayer@wildlife.ca.gov]; Zimmerman, Jan@Waterboards [jan.zimmerman@waterboards.ca.gov]
Subject: RE: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

Hi Marlene,

I don't have any additional comments on the revised Proposal.

Shannon- EPA is ok with implementing this plan for 2021. We suggest discussing the results in the fall before deciding whether to incorporate the grazing plan into the Interim or Long-Term Management Plans.

Thanks,
Melissa

Melissa Scianni
Wetlands Office
US EPA, Region IX, Southern CA Field Office
600 Wilshire Blvd, Suite 940
Los Angeles, CA 90017
(213) 244-1817
scianni.melissa@epa.gov

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>
Sent: Thursday, April 15, 2021 5:07 PM
To: Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Scianni, Melissa <Scianni.Melissa@epa.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@waterboards.ca.gov>; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>
Cc: Nate Bello <bello@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Subject: Re: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

Thank you for your comment, Shannon. **A revised version of the flash grazing proposal is attached** to address compaction monitoring during flash grazing activities.

Thanks,
Marlene

On Thu, Apr 15, 2021 at 1:24 PM Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil> wrote:

> Hi Marlene,

The only comment I have to add on to what Tiffany already covered is compaction. The document lists steps taken to address compaction, and Section 4.3 mentions in October RDM monitoring would be done (to include compaction indicators). But for these specific spring occurrences of flash grazing, I would like to see some monitoring of compaction as well.

Shannon L. Pankratz, Senior Project Manager

Regulatory Division, North Coast Branch, Los Angeles and San Bernardino Counties Section

Los Angeles District, U.S. Army Corps of Engineers

shannon.l.pankratz@usace.army.mil

Office: 213-452-3412

Government Mobile: 213-453-8586

https://www.spl.usace.army.mil/

IMPORTANT NOTE: During the Coronavirus Health Emergency, Regulatory Program staff are teleworking. Please do not mail hard copy documents to any Regulatory staff or office. For further details on corresponding with us, please view our COVID-19 special public notice at:

https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory_SPN.pdf?ver=2020-03-19-134532-833

Assist us in better serving you! Please complete our brief customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

---

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>
Sent: Wednesday, April 14, 2021 5:04 PM
To: Scianni, Melissa <Scianni.Melissa@epa.gov>; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>; Gan, Janice@Wildlife <Janice.Gan@wildlife.ca.gov>; Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@waterboards.ca.gov>
Cc: Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Nate Bello <bello@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Subject: [Non-DoD Source] Re: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

Hi all,

Please find attached a revised version of the Rift Valley flash grazing proposal that incorporates the Lahontan Regional Board's feedback to update Figure 1 and address water quality in the plan. I have included a redlined version of the document so you can easily see where changes have been made.

With respect to water quality, our intent is to hit the grasses right now over the next month before they send out seed. The Rift Valley wetlands are already dry (no standing water or saturated soils present) and we don't anticipate any more precipitation over the next month so we don't think WQ issues are a concern. However, we recognize that water quality is always an important consideration, and particularly because the Bank is in the Santa Clara River watershed, which has a TMDL for nutrients, so this was a great comment by the Lahontan Board and we agree it is important to address in this plan.

Lastly, to reiterate, we are just looking for IRT authorization to complete this targeted grazing effort within a very small window of time this year (2021). We very much appreciate the IRT's quick attention to this review and authorization!

As always, please feel free to reach out with questions as they arise.

Best,

Marlene

On Wed, Apr 14, 2021 at 12:56 PM Scianni, Melissa <Scianni.Melissa@epa.gov> wrote:

> Hi Marlene,
>
> I likely won't have time to substantively review the document until Friday.
>
> Thanks,
>
> Melissa
>
> _____

Melissa Scianni

Wetlands Office

US EPA, Region IX, Southern CA Field Office

600 Wilshire Blvd, Suite 940

Los Angeles, CA 90017

(213) 244-1817

scianni.melissa@epa.gov

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>
Sent: Wednesday, April 14, 2021 12:29 PM
To: Steinert, Tiffany@Waterboards <Tiffany.Steinert@waterboards.ca.gov>
Cc: Scianni, Melissa <Scianni.Melissa@epa.gov>; Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Gan, Janice@Wildlife <Janice.Gan@wildlife.ca.gov>; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>; Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Nate Bello <bello@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Subject: Re: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

Thanks Tiffany, we'll make those two changes and re-distribute to the IRT. Does anyone else have any initial comments we can start incorporating?

Thanks,

Marlene

On Tue, Apr 13, 2021 at 5:00 PM Steinert, Tiffany@Waterboards <Tiffany.Steinert@waterboards.ca.gov> wrote:

> Hi Melissa,
>
> I understand Petersen Ranch would like to use cattle grazing in wetland areas to control invasive species and improve habitat quality, however, there is nothing in the guidance to protect water quality. The document will need to be revised to add protections for water quality. Thanks!

P.S. Can you add the Reginal Board boundary to the figure?

Tiffany Steinert

Engineering Geologist

Regional Water Quality Control Board - Lahontan Region 6

15095 Amargosa Road – Bldg 2, Ste 210

Victorville, CA 92394

Direct (760) 241-7305

Front desk (760) 241-6583

Fax (760) 241-7308

The majority of Lahontan Water Board staff are teleworking due to an Executive Order from Governor Newsom. However, we are available via email and voicemail. We are responding to emails throughout the workday. Responses to voicemail may take more than one business day.

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>
Sent: Tuesday, April 13, 2021 12:58 PM
To: Scianni, Melissa <Scianni.Melissa@epa.gov>
Cc: Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Gan, Janice@Wildlife <Janice.Gan@wildlife.ca.gov>; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Nate Bello <bello@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>
Subject: Re: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

EXTERNAL:

Hi Melissa,

Thanks for your questions. We are definitely requesting approval of the plan for implementation in 2021 via email authorization. If the IRT can provide email authorization for implementation of this plan in future years that sounds like it would be very efficient, and we did write the plan to be flexible in case implementation in future years was an option. If the IRT has guidance or a recommendation on how we can obtain approval for use of the plan in future years please let us know. However, our immediate need is to implement this plan in 2021.

Yes, given the short turnaround we would appreciate prioritization of the review and approval of this grazing plan and then back to Area A Release 3. If anyone would like us to set up a quick call this week to walk through the plan to help expedite the review process we would be happy to do so.

Thank you and let me know if you have any other questions!

Marlene

On Mon, Apr 12, 2021 at 8:30 PM Scianni, Melissa <Scianni.Melissa@epa.gov> wrote:

Hi Marlene,

Are you requesting IRT approval to incorporate this grazing plan into the Interim Management Plan such that it would be implemented annually? Or are you asking for approval to implement this plan in 2021, followed by reporting in the fall, and subsequent IRT approval for grazing after 2021?

Also, given the very quick turnaround requested for this review, are you asking that IRT prioritize review of this grazing plan over the other actions pending for Peterson and/or Soquel?

Thanks,

Melissa

Melissa Scianni

Wetlands Office

US EPA, Region IX, Southern CA Field Office

600 Wilshire Blvd, Suite 940

Los Angeles, CA 90017

(213) 244-1817

scianni.melissa@epa.gov

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>
Sent: Monday, April 12, 2021 5:23 PM
To: Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Gan, Janice@Wildlife <Janice.Gan@wildlife.ca.gov>; Scianni, Melissa <Scianni.Melissa@epa.gov>; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>; Steinert, Tiffany@Waterboards <tiffany.steinert@waterboards.ca.gov>; Gymer, Lisa@Wildlife <lisa.gymer@wildlife.ca.gov>
Cc: Nate Bello <bello@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Mayer, David@Wildlife <David.Mayer@wildlife.ca.gov>
Subject: PRMB - Rift Valley Flash Grazing Proposal for IRT Email Authorization

Hello Petersen Ranch IRT,

We are about to begin adaptive management efforts at the Bank. During our December 15, 2020 meeting, the IRT requested the Bank Sponsor submit adaptive management proposals to the IRT for review and email authorization/approval.

Per that discussion, please find attached our proposal for completing flash grazing in the Rift Valley to control non-native annual grasses encroaching on the restored wetland complex. We prepared the proposal in the form of a guidance document that can be referenced during implementation by the Ranch manager. It includes a pasture and infrastructure map, stocking rate recommendations, field indicators of adaptively managing the intensity of grazing, and monitoring recommendations.

The goals of the plan are to (1) reduce stress on native plant species in Rift Valley wetland communities and (2) increase habitat quality for native plants and animals. Flash grazing will help shape the community composition of the wetlands to favor native species, and reduce the evapotranspiration of soil water during native perennial grass dormancy by reducing biomass of annual grasses.

To summarize, the plan recommends the following:

- Begin grazing in mid-April and end May 31 to target non-native annual grasses ahead of emergence of natives;
- Targeted grazing of four pastures dividing up the Rift Valley, starting from the west and working east, in two passes within the grazing timeframe;
- Regular monitoring and reporting on metrics such as stocking rate, stubble height, regular photographs, and autumn RDM measurements; and
- Summary of effort will be presented in the 2021 annual monitoring report, submitted to the IRT by November 15, 2021.

We have confirmed via review of the BEI, LTMP, and conservation easement that grazing within the Rift Valley is allowed with IRT approval.

Please review and provide us with approval and email authorization to implement the plan. Please note that we anticipate grazing would need to begin very soon (within the next 1-2 weeks) so we appreciate your timely attention to this.

Thanks and please reach out with any questions.
Marlene

--

MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: 858.682.2699 | o: 858.842.1800 x 2210 | c: 248.499.0805 | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg | Denver
Our San Diego office has moved! Please note our new address.

--

MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: 858.682.2699 | o: 858.842.1800 x 2210 | c: 248.499.0805 | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg | Denver
Our San Diego office has moved! Please note our new address.

--

MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: 858.682.2699 | o: 858.842.1800 x 2210 | c: 248.499.0805 | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg | Denver
Our San Diego office has moved! Please note our new address.

--

MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: 858.682.2699 | o: 858.842.1800 x 2210 | c: 248.499.0805 | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg | Denver

Our San Diego office has moved! Please note our new address.

--

MARLENE TYNER-VALENCOURT, MESM | Conservation Project Manager | d: 858.682.2699 | o: 858.842.1800 x 2210 | c: 248.499.0805 | tyner-valencourt@wra-ca.com

WRA, Inc. | www.wra-ca.com | 3033 5th Avenue, Suite 315, San Diego, CA 92103 | San Rafael | Emeryville | Petaluma | Fort Bragg | Denver

Our San Diego office has moved! Please note our new address.