



**The Wildlife Society  
Western Section  
Michael Morrison, President  
Department of Biological Sciences  
6000 J Street  
California State University  
Sacramento, CA 95819**

19 May, 2000

Richard Atkinson, President  
University of California  
1111 Franklin Street  
Oakland, CA 94607-5200

Dear President Atkinson,

The Wildlife Society (TWS) is an international, nonprofit scientific and educational organization serving professionals in all areas of wildlife conservation and resource management. The Western Section of TWS is composed of professional wildlife biologists working for government agencies, consulting firms, universities, non-profit NGOs and as individuals in the states of California, Nevada, and Hawaii. For over 60 years our membership of nearly 1,000 dedicated women and men has sought to enhance the capability of wildlife professionals in conserving diversity, sustaining productivity, and ensuring responsible use of wildlife resources for the benefit of society. The principal objectives of TWS include the following:

- (1) To develop and promote sound stewardship of wildlife resources and of the environments upon which wildlife and humans depend;
- (2) To undertake an active role in preventing human-induced environmental degradation;
- (3) To increase awareness and appreciation of wildlife values; and
- (4) To seek the highest standards in all activities of the wildlife profession.

Given the mission and objectives of TWS, the Western Section of TWS is concerned about the conversion of >9,000 vernal pools and associated grassland into the University of California's Merced campus, as well as into residential and commercial uses, at the 10,300 acre Lake Yosemite site. This proposed siting of the UC Merced campus would be devastating to the species of wildlife that depend on the vernal pool-grassland complex at this site, and it would be a tremendous loss to California's natural history.

The Lake Yosemite site is one of the eight known sites that supports the endangered Conservancy Fairy Shrimp (*Branchinecta conservatio*), which was found in the CalTrans Campus Parkway right-of-way. On 8 April, 2000, some of our members observed Northern Harrier (*Circus cyaneus*; CSC), Loggerhead Shrike (*Lanius ludovicianus*; CSC, FSC), and California Horned Lark (*Eremophila alpestris actia*, CSC) at this site, and the consultants hired by the University of California recently reported finding California tiger salamander (*Ambystoma californiense*; CSC, FC), Merced kangaroo rat (*Dipodomys heermanni dixonii*; FSC), and badger (*Taxidea taxus*; CFP). The many burrows in the upland areas, constructed

by ground squirrels and pocket gophers, could potentially support western spadefoot toad (*Scaphiopus hammondi*; CSC, FSC), giant garter snake (*Thamnophis gigas*; ST, FT), San Joaquin kit fox (*Vulpes macrotis mutica*; ST, FE), and Western Burrowing Owl (*Athene cunicularia hypugea*; CSC, FSC). The Lake Yosemite site is likely used by White-tailed Kite (*Elanus leucurus*; CFP), Ferruginous Hawk (*Buteo regalis*; CSC, FSC), Prairie Falcon (*Falco mexicanus*; CSC), and Golden Eagle (*Aquila chrysaetos*; CSC), as well as many species that lack special status under state and federal laws and policies.

Contrary to Chancellor Carol Tomlinson-Keasey's claim that UC Merced would maintain a light footprint on the environment (reported by the Fresno Bee, March 21, 2000), we do not think this campus could be constructed at any part of the site or in any configuration that would avoid a devastating impact to the vernal pool-grassland complex and associated wildlife. Vernal pools occur across the entire site, so constructing the campus on the uplands will not avoid destroying many of them. Besides, many of the wildlife species that require vernal pools for crucial parts of their life cycle also require upland areas for daily or seasonal refuge in mammal burrows. A reserve of vernal pools in the lowland portion of the Lake Yosemite site is a reserve of only part of the habitat for many of the associated wildlife species.

Furthermore, the vernal pools proposed for protection in a reserve will be at risk of sheet runoff, eroded sediment accumulation, and contamination from air- and water-borne effluent from the campus and community. The recent conversion of part of the UC Davis Burrowing Owl Reserve into student housing, as well as the ongoing filling of ground squirrel burrows on the remaining portion of this Reserve, does not bode well for any reserve proposed for the UC Merced campus. Nature Reserves held by the UC are apparently vulnerable to future campus expansions.

We recommend that the UC acquire the Lake Yosemite site as partial or full mitigation for construction of the campus at another location. We have no objection to siting the campus in Fresno, which was recommended by the UC's consulting firm in the Programmatic Site Selection EIR (EIP Associates 1994), and encouraged by the California Departments of Fish and Game and Transportation, and welcomed by the City and County of Fresno (Comments appended to Site Selection FEIR). TWS-Western Section firmly supports the advancement and expansion of higher education in California, but we think that these accomplishments should be made with minimal impacts to wildlife. We would enthusiastically support a low-impact, alternative site.

TWS-Western Section hopes that the University of California, a leading institution of higher education in California, will set the examples in expressing sensitivity toward California's natural resources and in the use of science and professional standards in environmental document preparation. The Programmatic Site Selection EIR inadequately disclosed the environmental setting and possible impacts of the project at each of the alternative sites, perhaps because the consultants were restricted in their site visits. For example, the 10,300 acre site now being discussed was only 7,000 acres in the EIR. Many vernal pools have since been discovered, occurring across the entire site rather than on the one small portion of it depicted in the EIR. Also, multiple special status species of plants and animals have since been discovered there. TWS-Western Section encourages the University of California to replace the Site Selection EIR of 1994 with a new, much improved one.

The Wildlife Society-Western Section is willing to assist the University of California in any way that it can to ensure that our goals and objectives are met. Please feel free to call and

discuss our concerns.

Sincerely,

Michael Morrison, President

cc: Governor Gray Davis

Vice President Al Gore

Dr. Carol Tomlinson-Keasey, Chancellor, UC Merced

The Honorable Tom Hayden, Chair, Senate Committee on Natural Resources and Wildlife

Mary Nicholls, Secretary, California Resources Agency

Robert Hight, Director, California Department of Fish and Game

Michael Spear, Manager, California-Nevada Operations Office, US Fish and Wildlife Service

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