

FWS A.R.T. "Issues Matrix", 6/11/98

Issue	When			Type			Workplan Efforts	Agency Participants
	Pref. Alt.	Final	Phase III	Elevate	Decision	Process		
The PEIS/PEIR incorrectly models the CVPIA b(2) actions, and should be revised to incorporate the 11/20/97 decision in the existing conditions and no action alternative.	X					X	<i>Is it in the workplan? if so what if not what are ramifications</i>	check EIS FWS Finger Guinice FWS USBR
The PEIS states that impact descriptions "generally include the upper range or most severe effects that are expected to be associated with each alternative" (p. 1-10). However, the "most severe" potential effects on special status wildlife and plant species are not clearly presented in the document. Certain projects that may be implemented under one or more CALFED alternatives could have potentially significant and unmitigable effects on special status species. As long as these specific projects remain potential parts of the CALFED program, the PEIS/PEIR should identify the potential for these impacts.		?				?	<i>trade conservation strategy, modify special based on effort</i>	DWR?

<p>The PEIS/PEIR (see Tables 7.2-1 and 7.2-2) suggests that the only "significant and unavoidable" impacts of the CALFED Program to vegetation and wildlife occur as a result of "fragmentation". While habitat fragmentation does need to be addressed, this seems to be an incomplete list of the ways potential components of the CALFED program could have significant and unmitigable effects on terrestrial vegetation and wildlife. For example, construction of storage reservoirs could inundate entire populations of special status plant species. As many of the listed plant species in the Central Valley watershed are obligates of certain specific microhabitat conditions (e.g., rare soil types), compensatory mitigation for these impacts is usually not feasible. (While the impacts may be "avoidable", in that different storage sites may be chosen, the PEIS/PEIR has an obligation to disclose the "upper range or most severe" potential impacts.)</p> <p>These concerns are not limited to listed species. For example, construction of a new storage reservoir at the Auburn site would have unmitigable effects on upland wildlife habitat in the American River canyon; similarly, the loss of the sycamore alluvial woodlands should a storage reservoir be constructed at the Los Banos Grandes site would also be unmitigable.</p>	?				?	<p><i>Modify text & table in Chap 7</i></p> <p><i>Rationale for feasibility of mitigation report of Findings</i></p> <p><i>Remove Screening team</i></p>	<p>FWS DFG</p>
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<p>The PEIS/PEIR (see Table 7.2-2) summarizes environmental impacts to listed and proposed species by habitat type, rather than the actual listed and proposed species that may be affected. While relying on habitats as an indicator of impacts to listed species is often appropriate (especially when the mechanism of impact is through habitat conversion), it may not capture all potential effects. Even when the mechanism is habitat conversion or loss, the summary may not actually capture the degree of impact (or our ability to mitigate these impacts) to listed and proposed species. For example, impacts to "grassland habitat" may be mitigable, but the impacts to listed plant species dependent on specific microhabitat conditions (e.g., soil type, aspect, elevation, slope, etc.) within "grasslands" may not. The PEIS/PEIR should address impacts to listed and proposed species directly, rather than by proxy.</p>	X				X	<p>Rely on Conservation Strategy? <i>Modify Final Final on results</i></p>	
<p>The PEIS/PEIR acknowledges (p. 7.2-8) construction of new storage facilities will have effects on vegetation and wildlife, but that specific impacts will depend on the specific sites chosen and can not be anticipated at this time. In that case, the PEIS should identify the "upper range or most severe" known potential impacts of construction of any of the sites still under consideration by CALFED.</p>	?				?	<p><i>Similar to second issue</i> <i>Attempt to identify most severe examples.</i> <i>100% screening effort</i></p>	<p><i>FWS DFG</i></p>

<p>Why are impacts to biological resources in the "SWP and CVP Service Areas Outside the Central Valley" given such limited consideration? Is this assessment on a par with, for example, the assessment of water supply and related economic impacts contained in the CALFED environmental documentation?</p> <p>For that matter, chapter 7 does not even suggest that CALFED's improvements to water supply reliability will affect fish and wildlife resources within the Central Valley (although, strangely enough, there is a brief discussion of how the Water Use Efficiency program could change cropping patterns, which could affect wildlife using ag lands). While this may be addressed in chapter 8 (probably not), it should be included in chapter 7. Improving water supply reliability is a major CALFED goal; the PEIS/PEIR should describe the environmental consequences of meeting that goal, even if it is a difficult task.</p>							
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