



DATE: March 30, 1998
TO: Sharon Gross - CALFED
FROM: ^{SPC} Paul Cylinder and ^{PR} Pete Rawlings - Jones & Stokes Associates
SUBJECT: Summary of Comments Reviewed on the Special-Status Species Matrices

This memorandum summarizes our review of comments provided by the California Department of Fish and Game (DFG) and the U.S. Fish and Wildlife Service (USFWS) review teams on the 12 species matrix tables. We appreciate the efforts of the DFG and USFWS technical staff in reviewing and providing comments on the matrices. Many of the comments are specific to technical and species issues, which will be useful when assembling the species database.

The comments are timely and will be useful in helping the Endangered Species Act Compliance Team (Team) develop a focused approach to preparation of the Conservation Strategy in general and preparation of the species database in particular. Correcting potentially confusing text identified by the commenters will provide a useful and understandable final product to a wide audience. The following recommendations would resolve many of the concerns expressed in the comments if they are addressed in the development of the Conservation Strategy and species database:

- Describe the magnitude of likely beneficial or adverse impacts.
- Clarify whether the Ecosystem Restoration Program (ERP) and other CALFED programs are self-mitigating in cases where beneficial effects of an action are greater than the adverse effects (particularly for potential impacts on state-listed or federally listed species) or whether mitigation is required for each action.
- Define the level of analysis and level of detail in descriptions of the effects of actions on species and mitigation strategies.
- Incorporate species recovery plan actions if feasible.
- Define the relationship between what is being analyzed (i.e., CALFED program actions) and what is needed for maintenance or recovery of a species.
- Describe assumptions or recommendations relevant to the level of certainty that a species will be affected by an action. For example, if "x" acres of saline emergent wetland is to be restored under the ERP, recommend what amount would or should be of a type suitable for the clapper rail.

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Many of the review comments relate to issues or concerns regarding the CALFED program and content and level of detail in the matrices. Numerous comments appear to result from misunderstandings related to the CALFED program, level of detail required for a programmatic assessment of CALFED programs, or intent of the matrices. To better facilitate review of work products in the future, we recommend that technical review teams be provided with written documentation of the process, guidelines, and assumptions used by the Team to develop species matrices or other work products. We also believe that refocusing the Team's efforts from preparing a habitat conservation plan, for which the species matrices tables were originally intended, to developing a Conservation Strategy will resolve format concerns identified by some reviewers. For example, cross-referencing descriptions of summary outcomes in the tables to the actual ERP actions is a time-consuming process. We anticipate that development of a comprehensive species database will allow reports to be developed that are tailored to the needs of reviewers, depending on the product being reviewed (e.g., reports could include the full action descriptions).

Before beginning to compile the species database, the Team should meet to discuss uses of the database by CALFED and identify database fields and content, including level of detail. We also recommend that a regional habitat-based approach to analysis and planning be conducted under the Conservation Strategy for the CALFED program area before we develop mitigation measures for individual species. A spatial and temporal analysis will be particularly valuable in assessing the distribution of suitable habitat for special-status species over time as the ERP, Conservation Strategy, and other CALFED programs are implemented. We have enjoyed working with the Team and appreciate the opportunity to provide more assistance.

PR:jp

cc: Tiki Baron - USFWS
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