

Memorandum

To : Ms. Marti Kie
CALFED Bay-Delta Program

Date : May 5, 1998

From : Department of Fish and Game

Subject : Review of Draft Delta Species List for the Program's Conservation Strategy

We appreciate the opportunity to review the draft Delta species list for the CALFED Bay-Delta Program's Conservation Strategy. To assist in the CALFED effort we offer the following comments:

- Add criteria for a species to be included that addresses future habitat impacts. For example, habitat may be created with implementation of the ERP and later impacted. This habitat could support species in the future that do not now occur. The habitat developed or restored in the Delta could also represent a more significant part of a species habitat in the future.
- We don't agree with the exclusion of the following species which are in the shaded areas: American white pelican, loggerhead shrike, long-billed curlew, and sharp-shinned hawk. These are species that currently occur in the Delta and may be affected by CALFED activities. The species list addressed with the Conservation Strategy should be as inclusive as possible. Including these species will maintain consistency since two species, the California gull and northern harrier, although California species of special concern, both have statewide distribution.
- Page 2 of 9, Species Addressed by the Conservation Strategy, Bullet 4: Define that the *term of CALFED implementation* is considered to be at least 30 years.
- Page 3 of 9, Aleutian Canada Goose: This species is checked as one that is not likely to be affected. However, the Aleutian Canada goose feeds in some agricultural lands, particularly cultivated fields and therefore should be listed as a species that may be affected.
- Page 4 of 9, Suisun thistle: This species is Federally listed as endangered; additionally it should be included only on the list created for the Bay and not included on this (Delta) list.
- Page 5 of 9, Ferruginous hawk: This species is checked as one that is not likely to be affected. However, the ferruginous hawk hunts in some agricultural lands, particularly in grassland habitats, and therefore should be listed as a species that may be affected.

Ms. Marti Kie
May 5, 1998
Page Two

- Page 6 of 9, Hoary bat and silver-haired bat: We recommend not excluding these species. Hoary bats and silver-haired bats are summer residents of riparian and wooded habitats that roost in trees and therefore could be affected by CALFED activities.
- Hoary bat and Western big-eared bat: Change genus name to *Corynorhinus*.
- Page 10 of 9, Not Likely to be Affected: The argument that a species is not being included due to the fact that the *species is mobile* is not appropriate and could be made, improperly, for all birds and bats and most other mammals that occur in the Delta. We recommend eliminating the use of the X1 notation as it is currently described.
- Habitat is limiting for these bat species. These bats feed throughout riparian habitat and over water. These bats depend on riparian habitat year round or during elevational migration. Loss of riparian habitat is one of the main factors of the decline of these species and even though these species are mobile, it does not mean that they can find the proper habitat for roosting or foraging. Roost sites may be very limited and their loss may not be mitigatable. Although there is little information on bat use in the Delta, we recommend a change from "Not likely to be Affected" to "May be Affected".
- We also believe that the bank swallow should be included in the species list even though they are only presently found north of Sacramento.

That concludes our comments at this time. Thank you again for the opportunity to provide our input and we look forward to reviewing additional lists for other geographic areas in which the Program may have an effect. If you have any questions, please contact Ms. Laurie Briden of my staff at (209) 942-6071 or CALNET 423-6071.



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cc: Ms. Laurie Briden, BDD
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