

COMMENTS: SITES/COLUSA RESERVOIR

The Service agrees that the special status plant and animal species mentioned in the Sites/Colusa Reservoir proposal warrant additional consideration before the project proceeds. Analysis of the potential effects of the project on each of these species is appropriate. Therefore, the Service recommends thorough and adequate biological surveys be conducted to determine the effects of the project on the species mentioned in the proposal as well as on the plant and animal species discussed below.

The Service is concerned about the effect of the Sites/Colusa Reservoir project on federal plant species of concern. The Service recommends thorough plant surveys be conducted for all federal species of concern in the project area. The Service notes that several plant species mentioned in the proposal have recently been federally listed: Hoover's spurge (*Chamaesyce hooveri*), Colusa grass (*Neostapfia colusana*), slender Orcutt grass (*Orcuttia tenuis*), and Greene's tuctoria (*Tuctoria greenei*). Greene's tuctoria is federally listed endangered and the remaining species federally listed threatened. Botanical surveys in the project area and adjacent affected areas are necessary to accurately determine the effects of the project on these species. Surveys would also be appropriate for diamond-petaled California poppy (*Eschscholzia rhombipetala*) and adobe lily (*Fritillaria pluriflora*). The former, which is considered extinct, was known from the Sites quadrangle (quad). The latter is identified in the proposal as a species with large amounts of potential habitat in the project area.

The Service is also concerned that the submitted proposal does not fully consider the potential effects of the project on the federally endangered Conservancy fairy shrimp (*Branchinecta conservatio*) and the federally threatened giant garter snake (*Thamnophis gigas*) that are known from quads likely to be affected by the project.

The Service recommends that botanical surveys for federal species of concern be conducted well before any project construction efforts are undertaken. Federal species of concern include all listed, proposed, and candidate species as well as species of concern that have been identified in species lists that have been generated by the Sacramento Field Office. Botanical surveys need to be conducted as per Service protocols which are attached. Timing of botanical surveys is crucial to ensure that species are present and qualified botanists are able to make determinations to species (or subspecies) level.

In reviewing the proposed projects that have been identified in the CALFED process, an adequate biological assessment of the impacts to any of the proposed projects needs to include an effects analysis. At a minimum, the effects analysis needs to include direct, indirect, and cumulative effects. Additionally, growth-inducing, interrelated and interdependent effects should be clearly and concisely described and analyzed in terms of what projects have been completed in the past, what other projects are proposed, and what the individual and collective effects of these projects are likely to be.

Attached hereto 6