

From: Kevin Shaffer <KSHAFFER@hq.dfg.ca.gov>
To: NET.mime("mkie@water.ca.gov")
Date: 5/18/99 1:02PM
Subject: ERP, its goals, other species goals

Marti,

RE: what exactly are the founding goals and the ground rules?

The issue/question/answer seems quite simple to me. My understanding is that the ERPP has the goals of increasing and enhancing ecosystems within the greater delta area for several purposes, amongst which are habitat and [identified] species conservation. Further, CALFED made three unique conservation categories for species. These categories represented various levels of activity/responsibility CALFED was shouldering for the conservation. Those categories were R, r, and m.

For several years, 'we' have been operating on these categories. Additionally, I and other biologists and environmental specialists w/i DFG were told that actions under the ERP had nothing to do with proposed projects under CALFED. * That ERP was proceeding with its actions/goals, in parallel with the other common programs. That ERP was a restoration/protection program. That ERP actions were not to be construed as or connected with mitigation/compensation actions.

So, actions/measures that were developed during the MSCS process and which were thought to be essential to protection/ restoration of R and r species seem to be reasonably placed into the text or as an appendix/addendum of ERP.

And yes, if ERP has sufficient measures/actions [goals-tasks] for each species to meet the outcome of protection/restoration, CALFED goes beyond a normal project proposal and meets the objectives/aims of NCCP and federal recovery planning.

--- if ERP does not have sufficient measures and, rather, has goals-tasks that would likely compensate for loss due to other common programs and/or project(s) implementation, then the R and r categories are meaningless, and everything is m OR maybe even simply are measures for something like 2081 permits.

The 'simple' part is this: is what I described above fairly close to what ERP is all about? If not, then what is ERP about? Everything I have been involved with, whether dealing with CALFED as total or specifically MSCS, is based on what I have described above. And, the specialists within our department that have been involved have the same assumptions.

I do not believe the expert meetings process was a 'let's get whatever we can/didn't get before'. Rather, it was a process to determine what most persons thought were needed to conserve the species that were or likely were going to be R or r and/or be considered 'covered' [yes, we dealt with all the m species too, but were told and dealt with the R/r/m distinctions].

In many cases, the group consensus was that additional measures were essential to meet the R and r goals. I think there's a different threshold for a 'take' permitting. Yet, we were operating on conservation, not regulatory compliance. And, if the NCCP/Section 10 (?) permits are really tied to a NCCP, then there is a connection because the 'above and beyond' is necessary/mandatory.

ERP supposedly represents the part of CALFED, and thus a NCCP, that translates into "we are doing more than compensating for impacts, we are establishing a natural community conservation plan for X affected habitats and Y affected species".

So, how close to CALFED's reality have we been?

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CC: NET.mime("csteam@water.ca.gov","mike_fris@mail.fws...