

SUMMARY OF COMMENT LETTERS RECEIVED ON ECOSYSTEM OBJECTIVES,
IMPLEMENTATION OBJECTIVES AND TARGETS

Comment #	Respondent/Name	Comments, Recommendation or Criticism
# 97-30	Gore Lands Inc. Valley Water Protection Sharon Gore	Concern over third party impacts of water transfers. Need realistic measures of target success. Targets should take into consideration changes made for the benefit of people and future growth. Duplication and overlap must be recognized. Water quality concerns over wetlands.
# 97-28	San Francisco Bay Joint Venture Nancy Schaefer	Recommends incorporation of all of S.F. Bay in our Program. Not to do so could lead to less than optimal results. CALFED needs to work with Wetlands Goals Project. Need to identify targets by source.
# 97-27	Delta Protection Commission Margit Aramburu	Concerned that the Program does not integrate causes of degradation . The draft targets are too general to evaluate effect or benefit. Targets should be set for human uses, ie.: swim-ability. Concern over impacts to prime ag. land and a request for site specific identification of habitat restoration locations. Several specific comments on objectives and targets which clarify our intent.
# 97-26	East Bay Municipal Utility District Joe Miyamoto	The Eco Program should be integrated with other CALFED common programs and conveyance options. Our targets for flow on the Mokelumne and American are not consistent with plans currently being developed. Public education should be a part of the Eco plan. Concern over the use of "natural flow patterns." Statement that "...many, if not most, of the existing stocks of chinook salmon did not evolve under a natural hydro graph." Concern over negative connotation given hatcheries.

# 97-25	California Department of Food and Agriculture Robin Reynolds	Where impacts on agricultural resources are identified, the provisions of CEQA should be followed. Changes in tidal prism could impact beneficial uses, comments on natural flow regime as inappropriate. We should develop a programmatic approach to exotic species.
# 97-24	U.S. Bureau of Reclamation Jim Arthur	Support for Program direction. Suggests we look at AAAS "San Francisco Bay - The Ecosystem." We need to focus on below normal water years. Supports restoration in bypasses and suggest they may be a source of fill material.
# 97-31	Environmental Defense Fund Dr. Terry Young	"Attention given to Ecosystem Elements has strengthened the scientific foundation of the restoration plan and will help assure its successful implementation." Need quantitative performance criteria, numerical objectives and logical approach to scientific uncertainty. Numerical targets appear to be far too low. Hatcheries must be regarded as a last resort. Objectives and targets that are judged only by acceptance by stakeholders may be inappropriate. Objectives need rewording. Stronger measures to deal with exotics are needed. Removal of some dams should be considered. Salmon run size targets should be replaced with targets for egg production and freshwater survival rates.
# 97-32	Northern California Power Agency Hari Modi	Need to establish measurable objectives first, then actions. Would like a flow chart and time table for stakeholder input. Monitoring progress on the objectives is important. Do not use the Roundtable to set objectives. Peer review is important. Does not think "vision statements" are necessary. "We believe there is enough linkage and understanding among the various components on tables 8, 9, 10, etc.

# 97-23	U.S. Fish and Wildlife Service Scott Spaulding (Stockton office of AFRP)	Numeric targets similar to those in the AFRP would be beneficial. We should not ignore existing hatchery programs but should integrate them to minimize negative effects to natural production.
# 97-16	California Department of Fish and Game Pete Chadwick	We need to be very explicit that the Program is not an ecosystem restoration program for the solution area. The Ecosystem Objectives need to be improved to focus on the Delta and Suisun Bay. Need an objective covering salmon and steelhead spawning gravel. Need a sub-objective to deal with entrainment of fish. Need to condense riparian-objective. Need an objective to deal with exotic species. Critical of characterization of hatcheries and harvest as stressors. Implementation objectives need to be specific. Hydro graph targets need rewording. The word "sustainable" is dissatisfying. The level of target development should be expanded for salmon and other fish species. Targets should be presented as ranges and as short-term intermediate, and long-term targets. "The ERPP should identify opportunities for creating/enhancing larger blocks of riparian habitat even if these opportunities do not occur along the water side of Delta waterways." Explaining the rationale for targets would improve creditability. (DFG provided 14 pages of very specific comments and suggested word changes).
# 97-9	East Bay Regional Park District Pat O'Brien	Sources of funds for O & M should be identified. Public education should be a component. San Francisco Bay should be included as an ecological zone. Ecological zones should include streams in the East Bay.

# 97-7	Westlands Water District David Orth	Quantifiable targets are necessary. The ERPP should yield a comprehensive habitat conservation plan and should include ESA assurances and mitigation necessary for all facilities associated with the preferred alternative. Critical that the ERPP continues to put forth the Bay-Delta paradigm that a lack of flows and the state and federal water projects are the principal cause of ecosystem problems. Water quality objectives should include load reduction. "Natural" hydraulic regime should be dropped. "Water quality improvements should be expanded to basin-wide ..." in many instances, the growing body of scientific evidence suggests that a lack of flows are not the problem. In-Delta habitat restoration objectives and targets are inadequate.
# 97-33	Urban Creeks Council of California Beth Stone	The council wishes to participate in establishing a final direction for the Program. They provide a list of East Bay stream restoration projects we should fund and offer their services.

# 97-22	The Bay Institute Gary Bobker	<p>A landscape-level vision is needed. Implementation objectives should be measurable performance criteria. Targets should be best available quantitative estimates. The quantified implementation objectives and targets are inadequate. The time available for review is insufficient. "An implementation objective should be considered a measurable performance criterion which quantitatively defines the desired condition of ecological health expressed in the narrative language ecosystem quality objectives and integrated vision." "A target should be considered a quantitative program component which results in or contributes to achieving the desired ecological condition objective." "The ecosystem objectives as currently written do not accurately reflect the mission of the Program..." "Implementation objectives and targets to control urban development should also be included under land use." More specific targets related to exotic species are needed. Removal of obsolete dams should be a target. AFRP flows should be adopted as targets. "The implementation objective for all habitat restoration elements should read: "Increase the area of [habitat types] to no less than 33 percent of pre-disturbance level. Tidal wetland targets are a minuscule fraction of the original habitat. Targets for SRA and riparian woodland should be consistent with the 1,000 percent increase called for in the CCMP. "More detailed technical recommendations on implementation objectives and targets for a number of key ecosystem elements are being prepared by a joint Bay Institute - Environmental Defense Fund team for consideration later this year."</p>
---------	----------------------------------	--

# 97-21	San Francisco Bay Area Wetlands Ecosystem Goals Project Michael Monroe	The process used for setting targets should be delayed or documented better. A potential exists for conflict between their goals and our targets. They will release their goals next spring. CALFED should develop implementation objectives and targets for Central Bay and South Bay.
# 97-20	Central Valley Project Water Association Serge Berk	The ERPP should identify proposed actions and specific actions should be linked to all measurable targets.
# 97-19	California Urban Water Agencies Byron Buck	Use of mid-1960's conditions as a tool to set targets could cause an unacceptable impact on water diverters. Levels of in-Delta restoration are inadequate. In-Delta restoration focuses on edge habitat. Some targets could lead to very high costs, e.g. use of sunken islands for wetlands. They recommend to evaluate use of Yolo and Sutter bypasses for habitat. "We feel that the restoration of large areas of aquatic habitat in the Delta may be a better strategy for meeting habitat needs than additional outflow related concepts..." There is no target for load reductions in toxic discharges. "We are very concerned with how the programmatic environmental mitigation needs of selected facilities are going to be addressed in the plan."
# 97-18	Turlock Irrigation District Paul Elias	"CALFED has expanded the Problem Area to include the upstream portion of the Solution Area and such an expansion is not within CALFED's mandate." "...we appreciate the initial efforts of Cindy Darling of the CALFED staff, to get San Joaquin Basin fish habitat projects into the CALFED funding pipeline."
# 97-17	Department of Water Resources Steve Ford, Staff	Objectives are in conflict with one another. Linkages between objectives or targets need to be identified. The word "natural" should be replaced with "a more natural." (DWR staff also included 6 pages of technical or word change recommendations)

# 97-14	William J. (B.J.) Miller, Consulting Engineer	There is too much reliance on the idea that the water projects are the sole significant cause of fish problems. There is no critical analysis of what could be expected from habitat improvement. CALFED should make the control of things which are harming or killing fish a first priority. We should engage in a process to better define the problem. “Although the program is nominally broad in scope, in fact it appears to be focused almost entirely on flow changes and physical habitat improvements. We need a more balanced approach.” “How do we know that the problem with fish in this estuary is not toxics?”
# 97-13	Upper Sacramento River Advisory Council Bob Bosworth	The identification of specific restoration targets on the Sacramento River is premature. The most critical role of the CALFED process in the Sacramento River Ecological Zone should be to support the existing and ongoing locally based planning efforts. (The Riparian Habitat Committee submitted a complete set of objectives and targets for the Sacramento River Ecological Zone modeled after the CALFED implementation objectives and targets).

# 97-12	U.S. Environmental Protection Agency Karen Schwinn	Comments on terminology. Confusion over definition of implementation objectives and targets. Recommend that "in general, an objective does not need to include quantitative measures, but should identify appropriate indicators and levels of those indicators that would signal success." "Numeric or qualitative targets should describe desired effects of CALFED sponsored activities." A recommendation is provided which would have CALFED take a more active role in influencing land use decisions. In more specific comments, EPA suggests it is important to identify and preserve features of the current hydro graph. They suggest the use of quantifiable targets where documentation exists. They suggest use of historical mosaics, the need to restore large contiguous areas and that we wait for the Ecosystem Goals Project to set targets for tidally influenced wetlands. A range of targets may be the best way to deal with uncertainty and possible changes in future circumstances. They also suggest we look at short and long-term targets to meet our objectives. (EPA also provided 10 pages of very specific comments and suggested wording changes).
# 97-34	The Nature Conservancy Steve Johnson	They support the natural process orientation of the Program. They recommend that implementation objectives be measurable and that a time scale for completion be developed. They urge that indicators or performance criteria be chosen carefully in order to avoid limiting the range of expected ecological outcomes. They suggest a peer review of the landscape level vision statements. They believe the targets for Delta and riparian restoration are too low. They recommend a more comprehensive treatment of exotic species objectives and targets. (TNC also provided several specific comments which are either technical or wording changes).

# 97-37	U.S. Fish & Wildlife Service Joel Medlin	The service points out that the scope of the ERPP is in fact a subset of the Bay-Delta Ecosystem. They ask for the rationale behind the targets and suggest ranges where uncertainty exists. They are concerned about the absence of vernal pool plants in the plan and suggest we use an existing standardized habitat classification. They would like a greater level of detail in the plan. The Service points out the lack of function or process in our Ecosystem Quality Objectives. They recommend against the use of hatcheries as a means to improve fish production. They ask for a clear description of how the Program will interface with ongoing programs. The Service expressed concern over the lack of implementation objectives or targets specific to X2. (The Service also provided about 16 pages of specific technical comments or wording changes and a table of Plants in the solution scope area that they recommend we address).
---------	---	--