

COMMENTS
Ecosystem Restoration Program Plan
Visions for Ecosystem Elements

Volume I

- Page 5, **STRESSORS** - Although the definition of “stressors” includes “. . . natural and unnatural events . . .” there is no discussion of natural phenomena that would act as stressors. While these are not usually controllable, the success of the vision may depend on taking them into account. Where the vision deals with sediment load, hydraulics, contaminants, or protecting islands and shoals, you have to expect some adversity due to drought, flood, fire or earthquake. Other ecosystem elements, particularly species and species groups might also be affected by these natural stressors.
- Page 26, “Species directly linked to stream flow include:” Add resident fish, wading birds and inhabitants of riparian zones (e.g. riparian brush rabbit).
- Page 30, page 52,- “outmigrating” is not a word. Use “ocean bound” or “migrating downstream”.
- Page 36: How do wildfires in the riparian zone impair stream meanders? The three characteristics of a river that indicate it will meander, would all result from a fire. This is one of those natural stressors omitted from the discussion.
- Page 39, first paragraph: The information in the bullets here was already presented, nearly word for word, in the third paragraph on page 38. It is easier to understand in this format, but both are not necessary.
- Pages 49 and 50: The Implementation Actions include compensation to PG&E (on page 49) for energy losses, which you indicate (on page 50) may come from limiting hydropower diversions. There are other hydropower suppliers in the Central Valley, including Western. Will they (we) also be compensated for loss of revenue?
- Page 115: One of the Implementation Actions for agricultural land should be education. It is relatively inexpensive, and can reach more landowners than individual agreements. Most people want to help, they are unaware as to how.
- Pages 126 through 171: The discussions in these pages regard aquatic organisms found in the bays and rivers of central California. The desire to increase numbers of both native and non-native species seems to be an oxymoron. The report notes that several fish species were introduced a century ago and Asian clams and gobies have been recently introduced, but all the solutions to the problems deal with increasing flows and removing levees and diversions. The desire to increase striped bass populations, which are predatory on smaller fish such as smelt, and fry and larvae of native fish, will not assist in the recovery of native species particularly those whose populations are in trouble. Also,

the invertebrates whose populations have declined will not recover if the fix does not somehow reduce predation. We would draw attention to the graph on page 161. Without reviewing the raw data and the statistical evidence, it would appear that recovery of native fishes in the Suisun Marsh follows declines in the non-native populations. It would appear further that while the non-native fish, which have no natural biological controls, have larger populations than the native fish, the native prey species, vertebrate and invertebrate, which already have natural controls, will not recover fully. The report recognizes (on page 172, second column, second paragraph) the effects of non-native amphibious species "The greatest threat to the continued existence . . . is habitat loss and competition with non-native species."

Volume II:

- Much of the information in this volume seems to be a repeat of that in Volume I. Would it be difficult to incorporate this information into Volume I?
- Many of the comments made for Volume I are appropriate for this volume.

Volume III:

- The Introduction to Volume III is difficult to comprehend, particularly the last sentence.
- Page 27, "CALFED Solution Principles" - "Reduce conflicts in the system" - There is no mention of conflicts with hydropower and the potential curtailment of it. The last discussion in this section, "No Significant Redirected Impacts" may come into play if hydropower is curtailed or diminished.
- Additionally, restoring the populations of listed species will merely provide increased prey base for the striped bass population. While this may help striped bass, the population of prey species trying to migrate to and from the Pacific will not be helped.