

MAR 06 1998

**M e m o r a n d u m**

To : Mr. Lester A. Snow  
Executive Director  
CALFED Bay-Delta Program

Date : February 25, 1998

From : Department of Fish and Game

Subject : CALFED Phase II Interim Report, Agency Review Draft, February 16, 1998

The Department of Fish and Game (DFG) has reviewed the subject document and offers the following comments to assist the CALFED Bay-Delta Program in completing the draft of this report for inclusion in the Programmatic DEIS/EIR.

We appreciated the opportunity to review and comment on this draft. Overall, you, your staff and consultant team along with the agency representatives involved in the formulation of this report have done a good job. The report summarizes, in a clear and concise manner, the process used to arrive at the three refined alternatives, how they compare, and the future steps needed to arrive at selecting a preferred alternative.

Our comments consist of a summary of the DFG's main concerns and an attached table of page-specific comments for which we used the same format as was used for comments solicited on the Administrative Draft of the Programmatic DEIS/EIR.

Several of those specific comments help illustrate where in the document our main concerns occur. Our page-specific comments range from general descriptions of the overall concern to recommended text deletions, modifications, and additions that we believe should be made to address our concerns or improve clarity. We refrained from commenting on editorial issues.

#### **Summary of Main Concerns**

1. **Characterization of the Ecosystem Restoration Program (ERP) as providing mitigation-**

The ERP continues to be represented as providing mitigation for impacts from construction of the alternatives. Examples of this can be found on page 94 under the section titled "Habitat Impacts". The text should be clarified that the ERP will not be used to offset any permanent or temporary construction impacts associated with any other program beside the ERP.

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**2. The Description of Adaptive Management Does not Recognize that There is a Need to Offset Impacts of Some Terrestrial Listed Species**

The "Adaptive Management" section starting on page 28 needs to state clearly that the terrestrial habitat targets and acreages in the ERP took into consideration not only what was needed to help restore waterfowl populations and special status species such as the Swainson's hawk and greater sandhill crane but also needs to offset losses of suitable habitat that will be converted to unsuitable habitat such as conversion of agricultural land to tidal emergent wetland. The adaptive management program should recognize this so that adverse effects on these species are fully mitigated. Without careful and complete implementation of the ERP the program could have unmitigated adverse affects on some plant communities and their wildlife.

**Page Specific Comments**

Page specific comments are attached in tabular form.

This concludes our comments. Again thank you for the opportunity to provide our input. If you have any questions, please contact Mr. Frank Wernette of our Bay-Delta Division, 4001 N. Wilson Way, Stockton, California 95205-2486, (209) 948-7800.

*Cindy Corta*  
Pete Chadwick *for*  
CALFED/DFG Liaison

Attachment

cc: Mr. Frank Wernette, BDD

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