



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Sacramento Field Office

3310 El Camino Avenue, Suite 130
Sacramento, California 95821

97-74
97-A12
MAR 03 1997

February 26, 1997

Mr. Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Subject: Preliminary Working Draft CALFED BAY- DELTA PROGRAM
STORAGE AND CONVEYANCE COMPONENT INVENTORIES,
February 5, 1997

Dear Mr. Snow:

We have completed a cursory review of the subject document and strongly support the concept of developing matrices for each potential site as a very good means of documenting projects screened for alternatives and for making preliminary cuts in the number of alternatives when environmental, engineering, and economic areas are given equal consideration. However, this is true only when the information contained in each matrix is accurate. Unfortunately our cursory review indicates that some of the references to endangered species in the "Component-Specific Environmental Evaluation" information is incorrect. This situation could lead reviewers to conclude that the document at a minimum is unreliable and at a maximum could adversely affect the integrity of the Program. My staff has discussed this with Mr. Stein Buer, CALFED Bay-Delta Storage and Conveyance Team Leader, and our understanding is that this document has not, and will not, receive wide distribution prior to modification. This letter is to document these discussions.

Statements in six of the potential sites -- Garza, Little-Salado-Crow, Los Banos Grandes, Oristimba, Sunflower and Chain of Lakes -- state that no endangered species are known to be at the site. This may be because site specific surveys had not been conducted at the time the cited reference was prepared. For example, we note that information included for the Los Banos Grandes Reservoir is in this category, stating that "No known rare or endangered plants, fish, or wildlife exist." However, there are currently three known Federally listed species with habitats in the Los Banos Creek drainage -- the San Joaquin kit fox (*Vulpus macrotis mutica*), the blunt-nosed leopard lizard (*Gambelia silus*), and the red legged frog (*Rana aurora draytonii*). A great deal of environmental information has been gathered for this project and its alternative reservoir sites. Although the subject document cites a Department of Water Resources document dated

H - 0 0 0 0 4 9

H-000049

August 1991, in 1991 the kit fox and blunt-nosed lizard were known to have been observed in the Los Banos Creek drainage and were discussed within the Environmental Impact Statement/Report (EIR/EIS) for the Los Banos Grandes Project. Staff from the Service, Department of Water Resources, and Corps of Engineers have been on site and observed kit fox entering a den located on the centerline of one of the saddle dams. For high profile projects such as the Los Banos Grandes Project, seemingly minor errors as these potentially have significant repercussions.

Because of the high potential for threatened, endangered, or sensitive species to be located at each of the proposed storage and conveyance sites and because of the sensitivity associated with endangered species, we recommend that this inventory be revised to delete statements that "no endangered species are known to be at the site" and substitute "Threatened, endangered and/or sensitive species may be located at the site" if species information is not available or list the species known.

are we looking at these?

In addition, the Service firmly believes that the Dominigoni Reservoir should be evaluated as an alternative for south of Delta storage. We did not find this as one of the sites in the inventory. It should be added.

For future analysis refinement, we recommend that all facilities be evaluated for potential effects on the baseline established by the Delta Accord and Biological Opinions. Additionally, screening criteria for alternative selection should be developed, and every attempt made to obtain the most recent environmental information, such as Environmental Impact Statements, Environmental Impact Reports, and technical reports, for each site rather than continue to use summarized information, which in some cases has been summarized from other summaries. This would minimize the potential for misinformation in the CALFED documents.

We appreciate the consideration of your staff. If you have questions, contact Jean Elder at (916)979-2129 or Bob Pine at (916)979-2710 .

Sincerely,

Bob A. Pine

for

Wayne S. White
Field Supervisor