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Subject: Coments on CALFED documents
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MEMORANDUM

To: Frank Piccola
CALFED

July 25, 1997

From: Heidi Bratovich and Jean Witzman
Environmental Services Office

Subject: Comments on CAL-FED Vegetation and Wildlife sections of
Environmental Impacts Technical Report

Given the short period of review, we have only a few comments. We may become more involved in this project and be better able to provide comments in the future. Our comments are as follows:

Specific comment:

Page 5-16: Riparian Communities

The first sentence of the first paragraph appears to be unusually specific for this document, however, if it is included it could be written in two sentences for clarification, as follows:

Restoration of habitat corridors, of greater than typical width present in the Delta, will increase habitat area for species that require large continuous tracts of habitat. Wider riparian corridors will also reduce the likelihood of nest parasitism on passerine birds by brown-headed cowbirds, which typically parasitize nests along the edge of riparian habitats.

General Comments:

Page 4-1 to 4-3: Significance Criteria

"These qualitative and general thresholds provide the basis for the establishment of more specific or quantitative thresholds in the project-specific Phase II EIR/EIS."

The concern is that significant impacts cannot be adequately detected with the qualitative threshold approach. This could make the selection of alternatives, relative to environmental impacts, unreliable. If the thresholds are only qualitative at the programmatic level of documentation, the determination of significance could be obscured.

Two of the selected significance criteria include the word "substantial" which implies knowledge of the amount of habitat impacted relative to the existing habitat, a quantitative assessment. The determination of "substantial" will be based on some threshold, level of comparison or perhaps percentage of the existing habitat relative to the habitat impacted.

The impact assessment should be quantitative, if not precise at the programmatic stage, in order to make a sound determination of significance of the impact and to more effectively evaluate the alternatives.

Page 5-14: Alternative 1 Compared to No Action Alternative
Ecosystem Restoration Program Plan Variations 1A-1C

"The ERPP under Variations 1A-1C would result in a net increase in the following natural plant community types: .."

There is a wide range in the acreage, of different habitat types; the most noteworthy is the increase in riparian habitat which ranges from 700-8,000 acres. This is apparently the same Alternatives 2A and 3A-3I as well. This is of concern because the evaluation of the relative merits of an alternative are not clear when the range in acreage is so broad. (It is not clear how or if these figures relate to those in Table 5.1-2). This is a similar concern to the comment above regarding the significance of impacts; the benefits, as well as the impacts, should be quantified to a level where they are meaningful.

Page 5-44: Mitigation Strategies

The approach to mitigation strategies, which include avoidance, restoration and enhancement, are appropriate. Monitoring and success criteria are also an integral part of mitigation and should be included.

If you have any questions regarding these comments, please contact Heidi Bratovich at hbratovi@water.ca.gov or Jean Witzman at jwitzman@eso.water.ca.gov.

cc: Chuck Voglesang
Steve Ford