

Comment Number	Page Number	Section, Figure, or Table No.	Commentor	Comment
<b>Long-term Levee Protection Plan</b>				
1	Long-term Levee Protection Plan	All Tables in this document	DFG	<i>Table descriptions should occur at the top of all table not the bottom.</i>
2	Page 6	Long-term levee protection plan	DFG	<i>Delta Flood Protection Plan did not start in 90-91. SB 1065 was enacted that year which specified funding. The program effectively started in July, 1987 by SB 34 (1988).</i>
3	Page 7		DFG	<i>All levees other than project levees could be considered non-project. However, levees built as part of the two deep water channels are referred to as "Direct Agreement Levees," and could be considered a third kind.</i>
4	Page 11		DFG	<i>See comment number 2.</i>
5	Page 43	1st paragraph	DFG	<i>This section describes that there is 229 miles of levee in the Suisun Marsh, however, in earlier text the number of 230 miles is used to describe exterior levees. This needs to be resolved.</i>

ERPP Volume 1 General Comments				
1	ERPP Vol 1 General Comment	Short- and Long-term objectives	DFG	<i>In several of the Short- and Long-term objectives dates are given as a condition in which restoration efforts will restore the system or desired element. It might be that conditions during that time period might be worse or might not be able to be achieved. Dates as targets for conditions should be removed from the objectives.</i>
2	ERPP Vol 1 General Comment	All Vision sections	DFG	<i>The section labeled Strategic Objective, Targets, and Programmatic Actions does not contain Targets or Programmatic Actions and this section should be redescribed as containing Long- and Short-term objectives, Strategic Objective, Rationale and Stage 1 Expectations.</i>
ERPP Volume 1 Specific Comments				
3	Page 6	2nd paragraph; left column	DFG	<i>The last sentence should be deleted since the statement is not correct.:</i>  ——— <i>“Many of the species identified in the Conservation Strategy as “contribute to recovery” or “maintain” are found the secondary areas”</i>
4	Page 13	Restoration Objective Definition; left column	DFG	<i>Change the term here to “Strategic Objective”. In the current draft the use of the term “Restoration Objective” is sporadic and appears to be an artifact of a previous draft that had not been changed in editing.</i>

<p>5</p>	<p>Page 18</p>	<p>2nd paragraph; right column</p>	<p>DFG</p>	<p><i>Add the following section:</i></p> <p>Suisun Marsh Levee Improvements Interrelationships: Suisun Marsh levee improvements reduce the risk that levees will fail during flood periods. This can protect property and wildlife habitat from inundation. Widespread levee failures in the Suisun Marsh pose a risk to maintaining Delta water quality.</p> <p>Improvements to Suisun Marsh levees can be made in a way that avoids significant impacts to fish and wildlife, results in protection for areas being retained as managed wetlands, and minimizes the expenditure of funds on levees that, in the short-term, may be breached to allow for restored tidal action consistent with the goals and objectives of the ERPP.</p>
<p>6</p>	<p>Page 20</p>	<p>Eco. Zone Tables</p>	<p>DFG</p>	<p><i>In the Biological Communities line of the tables it should include a statement about non-native species for mammals, fish, invertebrates, and plants.</i></p>
<p>7</p>	<p>Page 43</p>	<p>Goal 2 Strategic Plan Objectives</p>	<p>DFG</p>	<p><i>The Bay-Delta Hydraulics Process Strategic Plan Objective should be modified as follows:</i></p> <p>Establish and maintain Manage the hydrologic a hydraulic regime for the Bay-Delta estuary in ways that favors native species, desirable non-native species, and natural habitats by providing species needs such as migratory cues, transport, food web support, and rearing habitat and restoring and maintaining important aquatic and terrestrial habitats.</p> <p>Manage channels in the Delta and Suisun Marsh in ways that favor the maintenance of islands and shallow water habitat.</p>

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8	Page 46	Bay-Delta Hydraulics; Basis for Selection	DFG	<p><i>The Basis for Selection should be modified as follows:</i></p> <p><i>Strike out the existing two paragraphs and replace with:</i></p> <p>Bay-Delta hydraulics refers to the direction and velocity of flows in the Bay-Delta channels on a temporal, tidal, and seasonal basis for a given hydrologic condition. The direction and velocity of flows and their distribution in time and location help define the extent to which the Bay-Delta can support important ecological functions such as sustaining a productive food web, providing spawning, rearing, and feeding habitat for estuarine and anadromous fish, and supporting migration of adult and juvenile fish. Human activities such as reduced Delta inflow, exports from the Delta, and conversion of tidal wetlands have had a large influence on the natural hydraulic regime of the Bay-Delta. There are opportunities to restore or simulate, where and when appropriate, a more natural hydraulic regime that sustains ecological functions and meets the life requirements of the fish and wildlife in or dependent on the Bay-Delta.</p>
9	Page 87	left column, 2nd paragraph	DFG	<p><i>Brackish water intrusion into the Delta is more likely to occur into the western and northern Delta rather than the eastern and northern as described.</i></p>
10	Page 88	Last paragraph; left column	DFG	<p>Modify "mid-1950s" to state "mid-1960s".</p>

11	Page 89	Strategic Objective Section for Bay-Delta Hydraulics	DFG	<p><i>Modify Strategic Objective as follows:</i></p> <p>The Strategic Objective is to <del>establish and maintain</del> <b>manage the hydrologic a hydraulic regime</b> for the Bay-Delta estuary in ways that favors native species, desirable non-native species, and natural habitats by providing species needs such as migratory cues, transport, food web support, and rearing habitat and restoring and maintaining important aquatic and terrestrial habitats.</p>
12	Pages 89	Strategic Objective Section for Bay-Delta Hydraulics	DFG	<p><i>Modify Long-Term and Short-Term Objectives as follows:</i></p> <p><b>Long-Term Objective:</b> Have a hydrologic <del>hydraulic</del> regime in the Delta, Suisun Bay, San Pablo Bay, and San Francisco Bay that is favorable to maintenance of large, self-sustaining populations of species and habitats.</p> <p><b>Short-term Objective:</b> <del>Continue to adjust and evaluate the X2 position as a standard to measure success of establishing a favorable hydrologic regime in the Bay-Delta system.</del> Develop a more favorable hydraulic regime during key spawning and rearing times for native species and desirable non-native species. Select and implement water project operation measures to the extent feasible to support this hydraulic regime. Evaluate other measures and actions designed to create favorable conditions for depleted species and implement them where feasible.</p>

13	Pages 89	Strategic Objective Section for Bay-Delta Hydraulics	DFG	<p><i>Modify Rationale as follows:</i></p> <p><b>Rationale:</b> The restoration to abundance of most, if not all, of the native species and habitats in the Sacramento-San Joaquin estuary depends on the restoration and maintenance of a Bay-Delta hydraulic regime that supports important ecological functions such as sustaining a productive food web, providing spawning, rearing, and feeding habitat for estuarine and anadromous fish, and supporting migration of adult and juvenile fish. Human activities such as reduced Delta inflow, exports from the Delta, and conversion of tidal wetlands have had a large influence on the natural hydraulic regime of the Bay-Delta. There are opportunities to restore or simulate, where and when appropriate, a more natural hydraulic regime, particularly in the February through June period, that sustains ecological functions and meets the life requirements of the fish and wildlife in or dependent on the Bay-Delta, having a dynamic hydrologic regime (and associated hydraulic processes) that creates conditions favorable for all portions of the life cycles of the "key" species. The principal measure in place today of the suitability of the hydrologic regime for key species is the X2 relationship [the number of kilometers the 2 ppt salinity isohaline is from the Golden Gate], which indicates the position of the salinity gradient in the estuary. The suitability of X2 as measure is still being tested and studies are underway to determine why it seems to be a reasonably good predictor of the annual success of any species. As more is learned about the hydrodynamics of the estuary, especially about the importance of the low-salinity zone, direct and indirect modifications of estuarine processes (in an adaptive management context) should continue.</p>
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<p>14</p>	<p>Pages 89</p>	<p>Strategic Objective Section for Bay-Delta Hydraulics</p>	<p>DFG</p>	<p><i>Modify the Stage 1 Expectation as follows:</i></p> <p>Stage 1 Expectations: Implementation of actions to restore or simulate a more natural hydraulic regime in the February through June period will be underway. Actions will include modifications to Delta inflow patterns and export operations during that period as well as restoration of tidal action to areas within the Bay-Delta. Studies on the factors affecting the relationship between X2 and the abundance of key organisms should be on-going and but a basic understanding of how effective the water operations measures have been for the at-risk species with continued exports from the south Delta should be developed and used to assess the need for a dual conveyance facility and to implement other strategies for their recovery.</p>
<p>15</p>	<p>Pages 89</p>	<p>Strategic Objective Section for Bay-Delta Hydraulics</p>	<p>DFG</p>	<p><i>Add the following:</i></p> <p>The general approach to attain the target include the following:</p> <ul style="list-style-type: none"> <li> <p>Modify Delta inflow patterns and export operations during the February through June period to more closely mimic hydraulic conditions that would have occurred under conditions in the mid-1960s</p> </li> </ul>

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16	Pages 96	Strategic Objective Section for Bay-Delta Aquatic Foodweb	DFG	<p><i>Modify the Short-term Objective as follows:</i></p> <p><b>Short-term Objectives:</b> Determine the limits on productivity and the major sources of organic carbon contributing to the estuarine ecosystem. Evaluate large scale restoration projects associated with the restoration of tidal emergent, seasonal, nontidal perennial wetlands, generate hypotheses as to the actions that might be effective at increasing productivity, and conduct pilot studies based on those findings.</p>
17	Pages 96	Strategic Objective Section for Bay-Delta Aquatic Foodweb	DFG	<p><i>Modify the Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> Studies of large scale restoration projects associated with the restoration of tidal emergent, seasonal, nontidal perennial wetlands will be undertaken to assess organic carbon sources and cycling should be encouraged in order and to generate hypotheses as to factors limiting their availability. These hypothesis (and findings generated from testing them) should be applied to help set priorities for restoration actions taken in future stages.</p>
18	Pages 99-100	Table 6 Strategic Objectives for Habitat Elements	DFG	<p><i>Modify this table to be consistent with the updated Strategic Objectives. The current objectives appear to be the old Implementation Objectives.</i></p>
19	Page 100	Table 7	DFG	<p><i>Table 7 should be moved to the end of Table 6 and not stuck in the middle of the table.</i></p>

20	Pages 108-109	Strategic Objective Section for Tidal Perennial Aquatic Habitat	DFG	<p><i>Modify the Strategic Objective as follows:</i></p> <p><del>Tidal perennial aquatic habitat is addressed in two strategic objective: one which includes restoring all major habitats in the Delta and the other which includes all major habitats in Suisun Bay, Suisun Marsh, and San Pablo Bay.</del></p> <p>The Strategic Objective is to increase the area of tidal perennial aquatic habitat as an integrated component of restoring is to restore large expanses of all major historical habitat types in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objectives 1 and 2).</p> <p><i>Delete the second strategic objective.</i></p>
21	Page 109	Strategic Objective Section for Tidal Perennial Aquatic Habitat	DFG	<p><i>Short and long term objectives:</i></p> <p>Delete the second short term and long term objectives and second Stage I Expectation. Combine to cover the Delta, Suisun Bay and Marsh, and San Pablo Bay.</p>

22	Page 110	Strategic Objective Section for Tidal Perennial Aquatic Habitat	DFG	<p><i>Modify the Stage 1 Expectation as follows:</i></p> <p><b>Stage 1 Expectations:</b> A classification system for Delta, Suisun Bay and Marsh, and San Pablo Bay habitats that can be used as a basis for conservation actions will have been developed. Specific, numeric objectives should be formulated for each habitat type with restoration objectives based on clearly stated conceptual models. Within and between habitat types, conservation and restoration activities should be prioritized. Work should begin on those projects given highest priority within a year of adoption of the Strategic Plan.</p>
23	Pages 113-115	Strategic Objective Section for Nontidal Perennial Aquatic Habitat	DFG	<p><i>Modify the Strategic Objective as follows:</i></p> <p><del>Nontidal perennial aquatic habitat is addressed in two strategic objectives: one which includes restoring all major habitats in the Delta and the other which includes all major habitats in Suisun Bay, Suisun Marsh, and San Pablo Bay.</del></p> <p><del>The Strategic Objective is to increase the area of nontidal perennial aquatic habitat as an integrated component of restoring is to restore large expanses of all major historical habitat types in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objectives 1 and 2).</del></p> <p>Delete the second strategic objective. Make same changes described for the Tidal Perennial Section.</p>

24	Page 114	Strategic Objective Section for Nontidal Perennial Aquatic Habitat	DFG	<p><i>Short and long term objectives:</i></p> <p>Delete the second short term and long term objectives and second Stage 1 Expectation. Combine to cover the Delta, Suisun Bay and Marsh, and San Pablo Bay.</p>
25	Page 114	Strategic Objective Section for Nontidal Perennial Aquatic Habitat	DFG	<p><i>Modify the Stage 1 Expectation as follows:</i></p> <p><b>Stage 1 Expectations:</b> A classification system for Delta, Suisun Bay and Marsh, and San Pablo Bay habitats that can be used as a basis for conservation actions will have been developed. Specific, numeric objectives should be formulated for each habitat type with restoration objectives based on clearly stated conceptual models. Within and between habitat types, conservation and restoration activities should be prioritized. Work should begin on those projects given highest priority within a year of adoption of the Strategic Plan.</p>

26	Page 118	Strategic Objective Section for Delta Sloughs	DFG	<p><i>Modify the Strategic Objective as follows:</i></p> <p><del>Nontidal perennial aquatic habitat is addressed in two strategic objective: one which includes restoring all major habitats in the Delta and the other which includes all major habitats in Suisun Bay, Suisun Marsh, and San Pablo Bay.</del></p> <p>The Strategic Objective is to increase the area and linear extent of Delta sloughs as an integrated component of restoring <del>is to restore</del> large expanses of all major historical habitat types in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objectives 1 and 2).</p> <p>Delete the second strategic objective. Make same changes described for the Tidal Perennial Section.</p>
27	Page 119	Strategic Objective Section for Delta Sloughs	DFG	<p><i>Short and long term objectives:</i></p> <p>Delete the second short term and long term objectives and second Stage 1 Expectation. Combine to cover the Delta, Suisun Bay and Marsh, and San Pablo Bay.</p>

28	Page 119	Strategic Objective Section for Delta Sloughs	DFG	<p><i>Modify the Stage 1 Expectation as follows:</i></p> <p><b>Stage 1 Expectations:</b> A classification system for Delta, Suisun Bay and Marsh, and San Pablo Bay habitats that can be used as a basis for conservation actions will have been developed. Specific, numeric objectives should be formulated for each habitat type with restoration objectives based on clearly stated conceptual models. Within and between habitat types, conservation and restoration activities should be prioritized. Work should begin on those projects given highest priority within a year of adoption of the Strategic Plan.</p>
29	Page 123	Strategic Objective Section for Midchannel Islands and Shoals	DFG	<p><i>Modify first Strategic Objective as follows:</i></p> <p>The Strategic Objective is to increase the area of midchannel island and shoal habitat as an integrated component of restoring is to restore large expanses of all major historical habitat types in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objective 1).</p>
30	Page 124	Strategic Objective Section for Midchannel Islands and Shoals	DFG	<p><i>Modify objectives as follows:</i></p> <p><b>Long-term Objective:</b> Restore midchannel island and shoal habitat major-habitat types in the Delta to a substantial fraction of their presettlement areas, or to a point where all at-risk species that depend on the habitats are no longer at risk.</p> <p><b>Short-term Objective:</b> Develop and being implementation of action plans for restoring large and significant examples of midchannel island and shoal habitat major-habitat types in the Delta.</p>

31	Page 129	Strategic Objective Section for Saline Emergent Wetland	DFG	<p><i>Modify Strategic Objective as follows:</i></p> <p>The Strategic Objective is to increase the area of tidal saline emergent wetland habitat (both brackish and salt) is addressed in several strategic objectives, one of which addresses freshwater marshes. Other relevant objectives address as an integrated component of restoring large expanses of all major historical habitats in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objective 4). The primary method will be removing or breaching levees in areas with suitable topography and elevation or, where needed, increase the elevation of subsided leveed former tidal marsh prior to restoring tidal action.</p> <p>The Strategic Objective (for saline emergent wetland habitat) is to increase the area of tidal marsh (freshwater, brackish, and salt) by removing or breaching levees (opening them to tidal action) and by increasing the elevation of subsided leveed former marsh (Strategic Plan Goal 4, Objective 4).</p>
32	Page 129	Strategic Objective Section for Saline Emergent Wetland	DFG	<p><i>Modify Objectives as follows:</i></p> <p><b>Short-term Objective:</b> Inventory and prioritize for restoration diked former tidal marsh sites, and develop techniques for restoration through implementation of pilot restoration projects, and begin implementation of large-scale manipulations of high-priority areas, especially in the Suisun Marsh on Delta islands.</p>

33	Page 129	Strategic Objective Section for Saline Emergent Wetland	DFG	<p><i>Modify Rationale as follows:</i></p> <p><b>Rationale:</b> Tidal wetlands are a diverse group of habitats included under Objective 1 and 2 in this series. However, they merit additional attention beyond those objectives because their restoration is urgently needed for the benefit of many species. They also represent, by acreage, some of the largest restoration projects that are likely to be attempted in the system. Restoration of tidal marshes in the Suisun Marsh and San Pablo Bay Delta in particular will require innovation and a concerted and collaborative effort with existing landowners major effort and innovation, because restoration of tidal action to one parcel may result in special levee rehabilitation needs on adjacent lands and because successful restoration of natural marsh building processes requires careful consideration of any potential site's elevation, topography, and geomorphology so many of the islands that could be restored to tidal marsh now have elevations considerably below sea level. If flooded, they will be too deep for marsh restoration at the present time. Therefore, restoration will initially require large-scale pilot projects to ensure the success of larger scale tidal restoration projects. to find ways to restore marsh lands to such islands.</p>
34	Page 130	Strategic Objective Section for Saline Emergent Wetland	DFG	<p><i>Modify Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> Ongoing efforts to restore large expanses of tidal marsh should continue and experimental pilot projects to restore tidal marshes to areas in the Suisun Marsh and San Pablo Bay Delta islands should be undertaken.</p>

35	Page 134	Strategic Objective Section for Fresh Emergent Wetland	DFG	<p><i>Modify Strategic Objective as follows:</i></p> <p>The Strategic Objective is to increase the area of tidal fresh emergent wetland habitat is addressed in several strategic objectives, one of which addresses freshwater marshes. Other relevant objectives address as an integrated component of restoring large expanses of all major historical habitats in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay (Strategic Plan Goal 4, Objective 4). The primary method will be removing or breaching levees in areas with suitable topography and elevation or, where needed, increase the elevation of subsided leveed former tidal marsh prior to restoring tidal action.</p> <p>The Strategic Objective (for fresh emergent wetland habitat) is to increase the area of tidal marsh (freshwater, brackish, salt) by removing or breaching levees (opening them to tidal action) and by increasing the elevation of subsided, leveed former marsh (Strategic Plan Goal 4, Objective 4).</p>
36	Page 134	Strategic Objective Section for Fresh Emergent Wetland	DFG	<p><i>Modify Short-term Objective as follows:</i></p> <p><b>Short-term Objective:</b> Inventory and prioritize for restoration diked former tidal marsh sites, and develop techniques for restoration through implementation of pilot restoration projects, and begin implementation of large-scale manipulations of high-priority areas, especially on Delta islands.</p>

37	Page 134	Strategic Objective Section for Fresh Emergent Wetland	DFG	<p><i>Modify Rationale as follows:</i></p> <p><b>Rationale:</b> Tidal wetlands are a diverse group of habitats included under Objectives 1 and 2 in this series. However, they merit additional attention beyond those objectives because their restoration is urgently needed for the benefit of many species. They also represent, by acreage, some of the largest restoration projects that are likely to be attempted in the system. Restoration of tidal marshes in the Delta in particular will require major effort and innovation, because so many of the islands that could be restored to tidal marsh now have elevations considerably below sea level. If flooded, they will be too deep for tidal marsh restoration at the present time. Therefore, restoration will require large-scale pilot projects to find ways to effectively restore tidal marsh lands to such islands prior to implementing larger scale tidal restoration projects.</p> <p>Restoration of tidal marshes in the Delta will also require a concerted and collaborative effort with existing landowners to obtain parcels that already have suitable elevation, topography, and geomorphological conditions to allow the successful restoration of natural marsh building processes without the need to restore the site's elevation.</p>
38	Page 138	Strategic Objective Section for Seasonal Wetland	DFG	<p><i>Modify Strategic Objective as follows:</i></p> <p>The Strategic Objective is to protect existing and restore and increase the area of seasonal wetland habitat as an integrated component of restoring <del>is to restore</del> large expanses of all major historical habitat types in the Delta, in Suisun Bay, Suisun Marsh, and San Francisco Bay and other areas of the Central Valley (Strategic Plan Goal 4, Objectives 1, 2 and 3).</p>

39	Page 138	Strategic Objective Section for Seasonal Wetland	DFG	<p><i>Modify Objectives as follows:</i></p> <p><b>Long-term Objective:</b> Restore, protect and manage, <del>on a self-sustaining basis</del> throughout the watershed, multiple large areas of seasonal wetlands in association with other aquatic, wetlands, and riparian habitat types in the Central Valley and its rivers <del>to a substantial fraction of their pre-settlement areas or to a point where the wintering needs of waterfowl and shorebirds are met and all at-risk species that depend on the habitat are no longer at risk.</del></p> <p><b>Short-term Objective:</b> <del>Conserve-Systematically identify and locate the best examples of seasonal wetlands, particularly in the Bay-Delta, the aquatic habitat types, and prioritize them for conservation.</del> Develop and begin implementation of action plans for restoring significant, large areas of seasonal wetland. <del>examples of each habitat type.</del></p>
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40	Page 139	Strategic Objective Section for Seasonal Wetland	DFG	<p><i>Modify Rationale as follows:</i></p> <p>Restoring seasonal wetlands in combination with other wetland habitat types will help restore and maintain the ecological health of aquatic and terrestrial resources in the Delta and other areas of the Central Valley. Foodweb processes will be supported and the effects of contaminants reduced. Seasonal wetlands will provide high quality foraging and resting habitat for wintering waterfowl, greater sandhill cranes, and migratory and wintering shorebirds. Restoration of seasonal wetlands will occur as a by product of restoring floodplain processes in a manner that improves spawning habitat for fish species such as splittail while avoiding concurrent increases in non-native predatory fish. Furthermore, restoring other wetland habitats in the Delta, such as tidal emergent wetland and tidal perennial aquatic habitat, can reduce habitat values for species such as waterfowl and the State listed greater sandhill crane. Increasing seasonal wetlands in the Delta will ensure that any adverse impacts associated with those habitat losses will be fully mitigated.</p> <p>Moyle and Ellison (1991) and Moyle (1996) developed a scheme for classifying the aquatic habitats of California for the purposes of conservation. Other classification schemes of aquatic habitats also exist. Whatever the system, it is obvious that the diversity of aquatic habitats is declining in Central Valley watersheds, especially, in lowland areas. Each habitat, including seasonal wetlands, supports a different assemblage of organisms and quite likely many of the invertebrates and plants are still unrecognized as endemic forms. Thus systematic protection of examples of the entire array of habitats in the region provides some assurance that rare and unusual aquatic organisms will also be protected, preventing contentious endangered species listings.</p>
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41	Page 139	Strategic Objective Section for Seasonal Wetland	DFG	<p><i>Modify the Stage 1 Expectation as follows:</i></p> <p>Several large seasonal wetland projects will be initiated in the Delta. At least two of the projects will be associated with floodplain process restoration projects. At least two projects will be associated with restoring seasonal wetlands in heavily subsided areas where land elevations are too low to support actions to restore aquatic habitat.</p> <p><del>A classification system for riverine and riparian habitats that can be used as a basis for conservation actions will have been developed. Inventory of habitat types should be completed and areas prioritized for conservation actions. Restoration actions should be evaluated and initiated where feasible.</del></p>
42	Page 149	right col. 2nd to last paragraph	DFG	<p><i>The word desiccate is spelt wrong. In addition, the word desiccate is typically not associated with the drying up of water. The word desiccate is used to denote the loss of water from an organism or structure. Desiccate should be deleted from this sentence.</i></p>
43	Page 169	Strategic Objective Section for Agricultural Lands	DFG	<p><i>Modify Strategic Objective as follows:</i></p> <p>The Strategic Objective for agricultural lands is to co-manage agricultural uplands and wetland habitat to provide enhanced wildlife forage and resting habitat for wintering and migrating waterfowl, shorebirds, and other associated wildlife in the Delta. This objective includes halting <del>halt as much as possible</del> the conversion of agricultural lands to crop types of low value for wildlife or conversion to urban, <del>and</del> suburban, or industrial uses particularly in areas adjacent to restored aquatic, riparian, and wetland habitats <del>and manage these lands in ways that are favorable to birds and other wildlife.</del></p>

44	Page 169	Strategic Objective Section for Agricultural Lands	DFG	<p><i>Modify Rationale as follows:</i></p> <p><b>Add to end of Rationale section-</b></p> <p>Managing significant areas of agricultural lands in the Delta in a wildlife friendly manner will help offset some of the effects of ERP actions which will convert other agricultural lands in the Delta to tidal wetlands thus reducing their value to species such as the greater sandhill crane or the Swainson's hawk.</p>
45	Pages 169-170	Strategic Objective Section for Agricultural Lands	DFG	<p><i>Modify Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> High priority agricultural lands should be identified and the process begun to acquire easements from willing sellers; incentive programs should be developed and implemented to encourage the planting of crops favored by wildlife and to farm in ways that minimize environmental damage to adjacent areas.</p>
46	Page 181	Table 11	DFG	<p>Splittail should be added to several other zones such as Colusa Basin; spring-run should be listed for zones 6 and 7 but not for zones 11, 12, and 13; fall-run should be listed for zone 6; winter-run should not be shown for zones 7 through 13.</p>
47	Page 182	Table 11	DFG	<p><i>The riparian brush rabbit and San Joaquin woodrat need to have dots added to column 12 of Table 11 for the San Joaquin River.</i></p>
48	Page 190	right col. First bullet	DFG	<p><i>Delta smelt do not fair very well when handled and transported during normal salvage activities at the fish facilities. It would be to costly and time consuming to transport the adult fish caught during salvage activities. This bullet should be removed from the list of possible actions.</i></p>

49	Page 202	Long- and short-term objectives and Stage 1	DFG	<p><i>Replace the Current Long-term and short-term objectives and Stage 1 Expectations with the following:</i></p> <p>Long-term Objective:  Increase the population of green sturgeon utilizing the Sacramento-San Joaquin Estuary and its tributaries so that the recreational fishery benefits.</p> <p>Short-term Objective:  Continue the efforts established under Stage 1 Expectations and implement findings of habitat needs.</p> <p>Stage 1 Expectations:  Develop a better understanding about the life history and usage of the Sacramento-San Joaquin Estuary and its watershed as spawning and rearing habitats. in addition, monitor the ocean migration and its usage in the life history of the species.</p>
50	Page 206	Long-term objectives	DFG	<p><i>Replace the Current Long-term objective with the following:</i></p> <p>Long-term Objective:  Restore the Sacramento splittail so that it is on of the most abundant fish species in the Sacramento-San Joaquin Estuary and its tributaries.</p>

51	Page 226	right col. Long- and short-term objectives and Stage 1 Expectations	DFG	<p><i>Replace the Current Long-term and short-term objectives with the following:</i></p> <p>Population Goal:  Increase naturally spawning population number and sizes sufficient to maintain population resiliency and to allow metapopulation persistence through periods of adverse climatic and ecological conditions. This would entail, at a minimum, restoring and maintaining viable populations in the upper Sacramento, Feather, Yuba, American, Mokelumne, Stanislaus, Tuolumne, and Merced rivers, and Battle, Clear, Big Chico, Butte, Antelope, Mill, and Deer creeks.</p> <p>Long-term Objective:  Restore self-sustaining populations of steelhead to all streams that historically supported steelhead populations and contain suitable habitat, or could contain suitable habitat with the implementation of reasonable restoration and protection measures. Numbers of fish of natural origin should equal or exceed the average number of fish of both hatchery and natural origin from 1980-1998.</p> <p>Short-term Objective:  Determine the abundance, distribution, and structure of existing steelhead populations, and develop and implement restoration measures and protections that have a relatively high degree of certainty of increasing number and size of naturally spawning populations.</p>
52	Page 248	Strategic Objective	DFG	<p><i>Change the first sentence to read, "The Strategic Objective is to restore Swainson's hawk populations."</i></p>

53	Page 248	Short-term Objective	DFG	Reword the sentence to read, "Determine the importance to the species of the small numbers that overwinter in the Delta and determine and develop plans to expand the number of overwintering birds."
54	Page 248	Stage 1 Expectations	DFG	Delete or reword the last bulleted item. Creation of land use in important habitats should not be a goal. This land should either not be used, or if it is, the management should be improved to be compatible with Swainson's hawks.
55	Page 248	Long-term Objective	DFG	Add the objective of having habitat to support increased numbers of Swainson's hawks that migrate from overwintering in Argentina. This is needed as there are efforts to reduce mortality on these hawks.
56	Page 251	Strategic Objective	DFG	Change the first sentence to read, "The Strategic Objective is to increase suitable habitat and restore the population of Suisun song sparrow to representative habitats within its range."
57	Page 285	Long-term Objective	DFG	Change to read, "Establish 5 self-sustaining populations of riparian brush rabbits along the San Joaquin River and in the Delta."
58	Page 285	Long- and short-term Objectives	DFG	Reconsider the order of long- and short-term objectives. Perhaps establishment of additional populations is the short-term objective and removal of the species from the endangered species list is the result and therefore the long-term objective.
59	Page 285	Rationale	DFG	Change the third sentence to read, "It currently exists as one tiny remnant populations population..." Change the fourth sentence to read, "It has declined ... conversion of adjacent upland habitats from conversion to cropland."

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60	Page 285	Stage 1 Expectations	DFG	<i>Change the first sentence to read, " The existing population ... decline by protect protecting the species ..."</i>
61	Page 285	General Targets	DFG	<i>Add the following: Investigate the health of riparian brush rabbits in the existing population to determine the effect of non-native rabbit populations, if any, and take measures to improve their health if necessary.</i>
62	Page 293	second paragraph	DFG	<i>This paragraph describes that a target for Sacramento perch would be to increase the abundance index of Sacramento Perch by the year 2010 as measured by the DFG fall mid-water trawl survey. However, the short-term objective is to determine if they can be reintroduced into native ranges is feasible. These two conditions need to be resolved and modified to support one another.</i>
63	Page 295	Strategic Objective	DFG	<i>Change the first sentence to read, "The Strategic Plan is ... populations to in California."</i>
64	Page 295	Long-term Objective	DFG	<p>This objective states: "Restore the greater sandhill crane to a bird with significant breeding populations in the Central Valley."</p> <p>The Central Valley population of this crane breeds mainly in south-central and southeastern Oregon and northeastern California with additional breeding areas up to southern British Columbia and Vancouver Island. It is in the winter that these bird migrate to the Central Valley. Therefore if breeding habitat is to be addressed, it needs to focus in the small area in northeastern California. If Central Valley efforts are to be addressed, the focus needs to be on roosting, foraging, and loafing habitat. We recommend that the efforts be focused in the Central Valley.</p>

65	Page 295	Rationale	DFG	Because this species is not a year around resident of the Central Valley and therefore does not nest in grasslands and wetlands of the Central Valley, we recommend deleting the second sentence.
66	Page 296	Rationale	DFG	Foraging habitat: The most important foraging habitat in the Delta region is waste corn and in the Sacramento Valley, waste rice; this is covered by the term <i>moist cropland</i> . However, newly planted and sprouting crops, harvested crops, fallow fields, and uncultivated areas, canal and irrigation ditch banks also provide food sources. Not all of these are covered by the term <i>moist cropland</i> therefore we recommend specifically mentioning newly planted and sprouting winter wheat, harvested row crops, fallow fields, and uncultivated areas such as rice check levees, canal and irrigation ditch banks.
67	Page 296	Rationale	DFG	The rationale states that sandhill cranes need, "... open areas with fresh water for drinking and bathing." This species needs access to <i>shallow</i> water for drinking and bathing and we recommend adding this.
68	Page 296	Stage 1 Expectations	DFG	<i>The last sentence states that protection of nesting sites will occur. This needs to be clarified and stated that protection of nesting sites will occur where this species breeds or delete the statement.</i>

69	Page 296	General program actions	DFG	<p><i>Add the following general programmatic actions:</i>  Decrease disturbance at roosting sites due to waterfowl, pheasant, and rabbit hunters.  Increase the number and sizes of "closed areas" on wildlife areas to provide undisturbed areas for the crane.</p> <p><i>Reword the existing programmatic action:</i>  "protect existing ... emergent wetlands and grasslands, and" to include riparian woodlands, fallow fields, and harvested fields.</p> <p><i>Add the following programmatic action:</i>  Increase the number of duck clubs that retain water after waterfowl season ends.</p> <p><i>Add the following to the programmatic action:</i>  "Improve agricultural land management" to reduce disturbance caused by human activities.</p>
70	Page 298	General program actions	DFG	<p><i>Reword the programmatic action to read:</i> "improve and restore riparian forest habitat <i>suitable for the yellow-billed cuckoo</i> in the Central and <i>Sacramento</i> Valleys.</p>

71	Page 352	Strategic Objective Section for Waterfowl	DFG	<p><i>Delete existing Rationale and substitute with the following:</i></p> <p><b>Rationale:</b> Waterfowl resources will be enhanced by protecting existing and restoring additional seasonal, permanent, and tidal wetlands. Improved management of agricultural lands using wildlife friendly methods will contribute to sustaining waterfowl resources in the Bay-Delta. The focus for seasonal wetlands should be in areas that may be too deep for tidal marsh restoration over the next 20 years. In concert with efforts to reduce or reverse subsidence, selected areas or islands would be managed as waterfowl habitat. Besides increasing waterfowl resources, efforts to sustain waterfowl and their habitat will help offset some of the effects of converting agricultural or seasonal wetlands to tidal action when such actions may reduce the value of an area to waterfowl such as white-fronted geese or mallard. Efforts should also be focused on improving waterfowl nesting success by improving nesting and brood habitat. Improving waterfowl populations will be done in a manner that reduces conflict with broader ecosystem restoration goals or with goals to recover endangered species.</p> <p>For example: Flooding of rice fields for waterfowl in late winter may require water needed by migratory salmon. Careful management of the amount and timing of those diversions and the manner in which the diversions occur (e.g. through screened diversions) can help reduce conflicts. Management of waterfowl areas will occur using management strategies developed for existing and new waterfowl areas that provide benefits to at-risk species.</p>
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<p><i>Modify the Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> Acquisition and development of new wetlands favorable for wintering and nesting waterfowl (e.g., Yolo Basin Wildlife Area) should be continued. Significant areas of existing agriculture will be managed using wildlife friendly practices. For existing public wildlife areas, plans to reduce conflicts between waterfowl management and management for other native species, including provisions for emergency situations (e.g., levee repairs), should be developed. For private waterfowl areas, incentives for implementing broader, ecosystem-based management goals should be improved.</p>	<p><i>Protection and restoration of seasonal and emergent wetlands, midchannel island and shoal, will provide minimal benefits to upland game. Restoration of healthy populations of upland game will only result from focusing on habitats that provide the essential nesting habitat such as grasslands, woodlands, and shrubland habitats. The other habitats mentioned within this vision may indeed provide some foraging habitat for species such as snipe, but minimal or no benefits will be provided for the rest of the species such as quail, turkeys, squirrels, etc.. The key to improving the populations of upland game will be in providing increased nesting habitat and escape cover which will not be obtained through the restoration of wetlands and shoals.</i></p>
<p>DFG</p>	<p>DFG</p>
<p>Strategic Objective Section for Waterfowl</p>	<p>Page 354</p>
<p>72</p>	<p>Page 359-360 Vision on Upland Game</p>
<p>73</p>	<p>73</p>

74	Page 360	column 1, paragraph 2	DFG	<i>This paragraph needs to be explained better. Just state that grassland, woodland, and shrub habitats will be developed, maintained, protected, and restored in those areas that are out of the inundation zones of high water. This will provide an area that will serve as a transition zone which will greatly increase the natural processes necessary for restoring native habitats and plant communities.</i>
75	Page 360	column 1, paragraph 4	DFG	<i>Identify what those restoration processes are that are providing habitat for upland game that occur "elsewhere in the Central Valley" and identify what those areas are.</i>
76	Page 360	column 1, bullet 1	DFG	<i>Change the bullet to read "DFG wildlife programs branch"</i>
77	Page 360	column 1, integration	DFG	<i>Add a bullet that reads "DFG Game Bird Heritage Program" and delete the sentence after the last bullet entitled Quail Unlimited.</i>
78	Page 360	column 2, strategic objective	DFG	<i>Change it to read: The Strategic Objective for upland game is to maintain healthy populations and restore habitats that promote the expansion of populations at levels that can support both consumptive and nonconsumptive uses and provide additional opportunities for those uses.</i>
79	Page 360	column 2, general targets	DFG	<i>Add a bullet: Restore grassland, shrub, and woodland habitats.</i>

80	Page 370	Strategic Objective Section for Tidal Brackish and Freshwater Marsh Habitat Plant Community Group	DFG	<p><i>Add the following Long- and Short-Term Objectives:</i></p> <p><b>Long-term Objective:</b> Protect and restore, on a self-sustaining basis, throughout the Bay-Delta, multiple large areas of tidal brackish and freshwater marsh in association with tidal perennial and perennial grassland to a point where all at-risk species that depend on the habitat are no longer at risk.</p> <p><b>Short-term Objective:</b> Identify, locate, and conserve existing, high quality tidal brackish and freshwater marsh. Restore several large areas of tidal brackish marsh in the Suisun Marsh and several large areas of tidal freshwater marsh in the Delta.</p>
81	Page 370	Strategic Objective Section for Tidal Brackish and Freshwater Marsh Habitat Plant Community Group	DFG	<p><i>Add the following Rationale:</i></p> <p><b>Rationale:</b> Tidal brackish and freshwater marsh wetlands are two habitats that support a diverse and unique plant assemblage. Some of the most endangered plants, such as the Suisun thistle, is found only in tidal brackish marsh wetlands in the Suisun Marsh. They merit special attention because their restoration is urgently needed for the benefit of many species, both plant and animal. They also represent, by acreage, some of the largest restoration projects that are likely to be attempted in the system. Prior to implementing larger scale tidal restoration projects, a determination will be made about whether suitable elevation, topography, and geomorphological conditions exist to allow the successful restoration of natural marsh building processes.</p>

82	Page 370	Strategic Objective Section for Tidal Brackish and Freshwater Marsh Habitat Plant Community Group	DFG	<p><i>Add the following Stage 1 Expectation:</i></p> <p><b>Stage 1 Expectations:</b> Ongoing efforts to restore large expanses of tidal brackish and freshwater marsh should continue and experimental pilot projects to restore tidal marshes to areas in the Suisun Marsh and San Pablo Bay and Delta islands should be undertaken.</p>
83	Page 375	Strategic Objective Section for Seasonal Wetland Habitat Plant Community Group	DFG	<p><i>Add the following Long- and Short-Term Objectives:</i></p> <p><b>Long-term Objective:</b> Restore, protect and manage, throughout the watershed, multiple large areas of seasonal wetlands in association with other aquatic, wetlands, riparian, and perennial grassland habitat types in the Central Valley to a point where the needs of seasonal wetland associated plants such as Sanford's arrowhead and alkali heath are met and all at-risk species that depend on the habitat are no longer at risk.</p> <p><b>Short-term Objective:</b> Conserve the best examples of seasonal wetlands, particularly in the Bay-Delta, and begin implementation of action plans for restoring significant, large areas of seasonal wetland.</p>

84	Page 375	Strategic Objective Section for Seasonal Wetland Habitat Plant Community Group	DFG	<p><i>Add the following Rationale:</i></p> <p>Restoring seasonal wetlands in combination with other wetland and upland habitat types will help restore and maintain the ecological health of aquatic, terrestrial, and plant resources in the Delta and other areas of the Central Valley. Foodweb processes will be supported and the effects of contaminants reduced. Seasonal wetlands will provide high quality foraging and resting habitat for wintering waterfowl, greater sandhill cranes, and migratory and wintering shorebirds. Restoration of seasonal wetlands will occur as a by product of restoring floodplain processes in a manner that improves spawning habitat for fish species such as splittail while avoiding concurrent increases in non-native predatory fish. Furthermore, restoring other wetland habitats in the Delta, such as tidal emergent wetland and tidal perennial aquatic habitat, can reduce habitat values for species such as waterfowl and the State listed greater sandhill crane. Increasing seasonal wetlands in the Delta will ensure that any adverse impacts associated with those habitat losses will be fully mitigated. Each habitat, including seasonal wetlands, supports a different assemblage of organisms and quite likely many of the invertebrates and plants are still unrecognized as endemic forms. Thus systematic protection of examples of the entire array of habitats in the region provides some assurance that rare and unusual aquatic organisms and rare plants will also be protected, preventing contentious endangered species listings.</p>
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85	Page 375	Strategic Objective Section for Seasonal Wetland Habitat Plant Community Group	DFG	<p><i>Add the following Stage 1 Expectation:</i></p> <p>Several large seasonal wetland projects will be initiated in the Delta. At least two of the projects will be associated with floodplain process restoration projects. At least two projects will be associated with restoring seasonal wetlands in heavily subsided areas where land elevations are too low to support actions to restore aquatic habitat. At least one project will be associated with expanding the vernal pool wetlands in the northeastern Suisun Marsh zone adjacent to the Yolo Basin zone.</p>
86	Page 383	Strategic Objective Section for Tidal Riparian Habitat Plant Community Group	DFG	<p><i>Add the following Long- and Short-Term Objectives:</i></p> <p><b>Long-term Objective:</b> Protect and restore, on a self-sustaining basis throughout the Delta, large blocks of tidal riparian habitat as a mosaic with other aquatic and wetland habitat types to a point where all at-risk species such as the valley elderberry longhorn beetle and yellow-billed cuckoo that depend on this habitat are no longer at risk.</p> <p><b>Short-term Objective:</b> Conserve the best examples of riparian habitats in the Delta. Begin to restore large areas of tidal riparian habitat.</p>

87	Page 383	Strategic Objective Section for Seasonal Wetland Habitat Plant Community Group	DFG	<p><i>Add the following Rationale:</i></p> <p>Restoring tidal riparian habitat in combination with other aquatic, wetland, and upland habitat types will help restore and maintain the ecological health of aquatic, terrestrial, and plant resources in the Delta and other areas of the Central Valley. Foodweb processes will be supported and the effects of contaminants reduced. Tidal riparian habitat will provide high quality foraging and nesting habitat for migratory and wintering songbirds, neotropical migrants such as the Swainson's hawk and yellow-billed cuckoo. Restoration of tidal riparian habitat will occur as a by product of restoring floodplain processes in a manner that improves spawning habitat for fish species such as splittail while avoiding concurrent increases in non-native predatory fish. Each habitat, including tidal riparian habitat, supports a different assemblage of organisms and quite likely many of the invertebrates and plants are still unrecognized as endemic forms. Thus systematic protection of examples of the entire array of habitats in the region provides some assurance that rare and unusual aquatic organisms will also be protected, preventing contentious endangered species listings.</p>
88	Page 383	Strategic Objective Section for Seasonal Wetland Habitat Plant Community Group	DFG	<p><i>Add the following Stage I Expectation:</i></p> <p>Several large tidal riparian habitat projects will be initiated in the Delta. At least two of the projects will be associated with floodplain process restoration projects. At least two projects will be associated with restoring tidal riparian habitat in areas at the edges of the Delta where lands are not heavily subsided land elevations are appropriate to support actions to restore tidal riparian habitat.</p>

89	Pages 390 and 391	Long- and Short-term, and Stage 1 Expectations	DFG	<p><i>Replace the Long- and Short-term Objectives and the Stage 1 Expectations with the following wording:</i></p> <p>Long-term Objective:  Restore the adult population (greater than 18 inches total length) to 3 million fish through such actions as improving, maintaining, and restoring habitat, pen-rearing of fish salvaged at water project screens, and artificial propagation. In addition, all measures will be taken to assure that stripe bass restoration efforts do not interfere with the recover of threatened and endangered species and other species of special concern covered under public trust responsibilities.</p> <p>Short-term Objective:  Restore the adult population (greater than 18 inches total length) to 1.1 million fish within the next 10 years. In addition, all measures will be taken to assure that stripe bass restoration efforts do not interfere with the recover of threatened and endangered species and other species of special concern covered under public trust responsibilities.</p> <p>Stage 1 Expectations:  Continue investigations into the causes of striped bass decline throughout the Sacramento-San Joaquin Estuary. In addition, all efforts shall be undertaken to ensure that programs are developed that ensure, enhance, and prevent the loss of sport fishing opportunities.</p>
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90	Page 394	Long-term Objective	DFG	<p><i>Add the following words to the end of the current Long-term Objective so that it reads as follows:</i></p> <p>"...habitat conditions for spawning and rearing throughout the Sacramento-San Joaquin Estuary and tributaries."</p>
91	Page 398 Programmatic Actions	American Shad	DFG	<p><i>It appears to me that some of the Programmatic actions (bullets 1-4) as described would interfere with the Short-term objective of "no special intervention". This needs to be resolved.</i></p>
92	Page 418	Strategic Objective Section for Water Diversions	DFG	<p><i>Modify the Short-term Objective as follows:</i></p> <p><b>Short-term Objective:</b> Construct and screen a new SWP intake to Clifton Court Forebay. Upgrade the screen at the CVP intake. Screen the largest of the remaining unscreened diversions then begin screening the smaller diversions. Develop a science and data based analysis/evaluation process by which to set priorities for screening.</p>

93	Page 418	Strategic Objective Section for Water Diversions	DFG	<p><i>Modify the Rationale as follows:</i></p> <p><b>Rationale:</b> Storage and diversion of water from Central Valley rivers and streams and from the Delta has produced significant detrimental effects on the ecosystem, including functions such as spawning, rearing, and migration, the processes that create and maintain habitat, habitat, and species that depend on the aquatic habitats. The relocation, consolidation and installation of positive barrier fish screens does not reduce the amount of water extracted, but such actions are encouraged as they will reduce the mortality resulting from the direct entrainment of young fish. The intent of the restoration program is to eliminate loss of fish resulting from the unscreened diversion of water to a level that no longer impairs efforts to rebuild fish populations to healthy levels. Likewise, the potential future relocation of the SWP and CVP intakes and installation of positive barrier fish screens does not reduce the amount of water extracted, but will reduce the mortality resulting from the direct entrainment of young fish and contribute to restoring the ecological functions of the Delta such as food web support, and spawning and rearing habitat.</p>
94	Page 418	Strategic Objective Section for Water Diversions	DFG	<p><i>Modify the Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> During Stage 1 of the implementation program, a new screened intake will be installed at Clifton Court Forebay, the CVP intake at Tracy will be upgraded, all diversions greater than 250 cfs will be screened, the majority of diversions between 100 and 250 cfs will be screened, and a process will be in place to set priorities and screen diversions smaller than 100 cfs. During this period, fish populations will exhibit a positive response and increase in abundance.</p>

95	Page 451	Long-term Objective	DFG	<i>Drop the word organism from the sentence that reads: "Eliminate the dumping of all organism-contaminated ballast water and ballast sediment..."</i>
96	Page 463	right col. 1st full para.	DFG	The Delta Flood Protection Program is AB 360, not 369. We produce habitat assessments, not habitat assistance
97	Page 486	Contaminants: Strategic Objective No. 1	DFG	The Stage 1 Expectations and Rationale are not broad enough as stated to address the Long and Short-term Objectives to 'reduce concentrations and loadings of contaminants in water and sediments that affect the health of organisms and ecosystems'. The Rationale discussion is primarily limited to organic contaminants. The Stage 1 Expectations needs to address mine remediation measures and strategies to limit heavy metal impacts to freshwater aquatic life in river systems.
98	Page 488	Contaminants: Strategic Objective No. 3	DFG	<i>Both Long and Short-term objectives, as well as the Rationale and Stage 1 Expectations need to include waterfowl as a harvestable species with current health warnings advising against human consumption. Due to high selenium body burdens, health warnings exist for limited consumption of waterfowl from the Bay, as well as the Grassland Area of the San Joaquin River watershed.</i>
99	Page 502	Strategic Objective Section for Artificial Fish Propagation	DFG	<i>Modify the Short-term Objective as follows:</i>  <b>Short-term Objective:</b> Evaluate closely all salmon and steelhead hatcheries and hatchery practices in the CALFED region to determine their effects on wild populations of salmon and steelhead. Take the first steps to change these practices if needed. Construct, where needed, additional artificial production capacity to augment salmon and steelhead using hatchery operation plans that avoid impacts to wild stocks and retain stock genetic integrity.

100	Page 502 Continued	Strategic Objective Section for Artificial Fish Propagation	DFG	<p><i>Modify Rationale as follows:</i></p> <p>The hatchery system in the Central Valley for salmon and steelhead was developed with the best of intentions, to maintain the fishery for these species that would otherwise be lost or severely depleted as the result of dams and diversions blocking access to spawning habitat. Hatcheries have generally <del>To a certain extent, it has succeeded</del> by maintaining the commercial and sport fishery for chinook salmon, particularly <del>Unfortunatley, the focus on hatcheries, which have been successful mainly for fall-run chinook salmon.</del> Regardless of the hatcheries, there has been a <del>associated with the</del> continued decline of other runs of salmon, of wild runs of fall-run chinook, and of native steelhead stocks. Salmon and steelhead originating from hatcheries may actually have aggravated this problem by interacting with wild fish and may have resulted in elevated <del>by encouraging high</del> harvest levels on those other runs of salmon and on wild fall-run in fisheries. A major emphasis of the CALFED ERP is to restore wild runs of salmon and steelhead by improving habitat conditions for them and by augmenting flows in spawning streams. The role that hatcheries, whether state, federal, or private (non-profit) can play in this recovery is uncertain. Recent strategies have focused on hatcheries that simply augment runs under poor hydrologic conditions when under pre-water development conditions a rivers system would have supported a much larger run. For severely depleted stocks hatchery rearing can provide a temporary insurance policy against extinction due to major natural and unnatural events. For more abundant stocks, however, hatcheries producing large numbers of salmon have the potential to confuse and contravene natural means. <del>Clearly</del> The role of hatcheries on every run of salmon and steelhead needs to be carefully evaluated to determine if and how hatchery practices should be changed <del>or if artificial propagation of some stocks should be halted completely.</del></p>
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101	Page 503		DFG	<p><i>Modify the Stage 1 Expectations as follows:</i></p> <p><b>Stage 1 Expectations:</b> The role of every hatchery in the Central Valley in restoring salmon should be evaluated by an independent panel of experts. Where information is lacking, research programs should be conducted. Artificial propagation of salmon smolts of the San Joaquin basin as a research tool for designing and operating an augmentation hatchery that uses methods that do not conflict with restoring Central Valley salmon and steelhead. San Joaquin Basin artificial propagation will be providing needed juvenile salmon fry and smolts critical for adaptive management experiments on the San Joaquin River. No new hatcheries or hatchery programs should be started until the evaluation for the entire system is completed.</p>
ERPP Volume 2				
1	Page 11	Column 2, Last Sentence	DFG	<p><i>Reword the sentence to read as follows:</i></p> <p>“...ecological outcomes valued by society is <i>enhanced, restored, or at the least maintained.</i>”</p> <p><i>The original order of these suggested that maintenance of current values was the goal. Enhancement and restoration should be the goals and maintenance strived for when this was the best that could be achieved.</i></p>
2	Page 31	Black rail: Program Action	DFG	<p><i>Reword as follows:</i></p> <p>“Restoring tidal marsh habitat <i>and adjacent upland habitat or perennial grassland...</i>”</p>

3		Black rail: Population Target	DFG	Add upland habitat.
4	Page 32	Riparian Brush Rabbit	DFG	<b>Four additional self-sustaining populations of the riparian brush rabbit should be established.</b>
5	Page 34	Tiger Salamander	DFG	<i>Reword as follows: "Reduce The use of fumigants..."</i>
6	Page 53	Column 2, Paragraph 2	DFG	Duck clubs are listed as a seasonal wetland habitat along with vernal pools and wet meadows or pastures. We recommend a clear differentiation between naturally occurring habitat versus created and or habitat maintained by human activities.
7	Page 114	Column 1, Last Paragraph	DFG	Duck clubs are listed as a seasonal wetland habitat along with vernal pools and wet meadows or pastures. We recommend a clear differentiation between naturally occurring habitat versus created and or habitat maintained by human activities.
8	Page 114	Column 2, Paragraph 2, Last Sentence	DFG	Land management actions such as mowing and discing of riparian forests results in habitat destruction and conversion of the habitat type to some other classification such as agriculture. Therefore, resulting in a habitat type that can no longer be considered riparian forest.
9	Page 396	Paragraph 2, Last Paragraph	DFG	Add a sentence to this paragraph stating habitat for the riparian brush rabbit will be restored and additional habitat will be created.
10	Page 429	Column 2, First full paragraph	DFG	State that Los Banos and Orestimba creeks are the two significant stands of sycamore alluvial woodland mentioned.

Storage and Conveyance Refinement Process Overview				
1	Storage and Conveyance Refinement Process Overview Page 1	Paragraph 2, Sentence 1	DFG	The March 1998 version of the Programmatic EIS/EIR refers to <i>watershed management coordination</i> ; this latest version simply calls this element <i>watershed management</i> . These are two very different things; coordination implies oversight which management implies an active role. Be consistent.
2	Page 8	Facilities Inventory	DFG	<i>The last sentence of the first paragraph of this section states that DWR Bulletin 160-98 Program and the Los Banos Grandes Program were reviewed but earlier in the paragraph it states that numerous studies and ongoing investigations were reviewed. We recommend dropping the mention of Los Banos Grandes or adding names of the other studies, investigations, etc. that were reviewed.</i>
3	Page 9	Facility Description	DFG	<i>It is not clear if the 23 sites listed were the sites that were evaluated with the 4 criteria or if these are the sites that were left after the screening procedure.</i>  <i>If these are the sites remaining after the initial screening with the 4 listed criteria, show which of the sites were "red flagged".</i>

4	Page 15	Ongoing Storage and Conveyance Screening Process	DFG	San Luis Reservoir should be listed as <i>San Luis Reservoir Enlargement</i> .  Consider including some explanation on why Cottonwood Creek Complex was dropped and why the following were added: Glenn Reservoir, Folsom Reservoir Enlargement, Garden Bar Reservoir, Waldo Reservoir, Garzas Reservoir, Panoche Reservoir, and Cooperstown Reservoir. Consider adding a list comparing the first list with this one.
5	Page 16	Delta Consumptive Use	DFG	<i>Reword the first sentence as follows:</i>  "As part of an evaluation of the Isolated Facility..."
6	Page 19	Second DWRSIM Study paragraph	DFG	The second set of DWRSIM runs show Alternative 1 without ERPP. It is not clear why this is being considered and modelled.
<b>Species and Habitat Conservation Strategy</b>				
1	Species and Habitat Conservation Strategy  Page 1	1st para. under section 1.2	DFG	<i>The first sentence should read as follows:</i>  The Conservation Strategy addresses all federally and State listed, proposed, candidate, and State fully protected species that may be affected by the CALFED Program;....

2	Page 11	2nd para. under section 2.2	DFG	<p><i>The following wording should replace the sentence beginning with "A natural community conservation plan...":</i></p> <p>A Natural Community Conservation Plan (NCCP) is a plan for the conservation of natural communities that takes an ecosystem approach and encourages cooperation between private and government interests. The NCCP identifies and provides for the regional or areawide protection and perpetuation of plants, animals, and their habitats, while allowing compatible land use and economic activity. Approved NCCPs may provide the basis for issuance of state authorizations for the take of species specifically identified in the NCCP. It is important to note that the NCCP process must ensure consistency with the federal and state Endangered Species Acts.</p>
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3	Page 12	1st para. under section 2.2.2	DFG	<p><i>The following wording should replace the existing paragraph as follows (strikeout delete, underline add):</i></p> <p>The Natural Community Conservation Planning Act authorizes CDFG to permit the taking of <u>any certain identified</u> species whose conservation and management is provided for in a CDFG-approved NCCP. <u>A NCCP cannot authorize the take of a State listed "fully protected" species (see next section).</u> <u>Therefore any NCCP should include measures designed to avoid the take of fully protected species. The Fish and Game Commission may authorize take of fully protected species under certain narrowly defined circumstances (see next section).</u> Under CESA, CDFG may also permit the take of <u>certain identified</u> species incidental to an otherwise lawful activity provided the impacts of the take are minimized and fully mitigated, and the continued existence of the species is not jeopardized. <del>Incidental take by a state agency following consultation which finds that the take will not jeopardize the species or destroy habitat essential to its existence may also be authorized, but this Fish and Game Code (section 2090) expires on January 1, 1999. The authority to permit take of animals designated as "Fully Protected" is reserved to the Fish and Game Commission, which may allow such take for the purposes of essential research and management.</del></p>
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4	Page 12	add section 2.2.3	DFG	<p><i>This section should be added and now becomes section 2.2.3 and existing 2.2.3 now becomes 2.2.4.</i></p> <p><b><u>2.2.3 Species Not Subject to CDFG Take Authority</u></b></p> <p><u>CDFG may not authorize the take of a species when take of that species is expressly prohibited by statute without an applicable exception in law. These species appear in Fish and Game Code Section 3505 (specified birds), Section 3511 (fully protected birds), Section 4700 (fully protected mammals), Section 5050 (fully protected reptiles and amphibians), Section 5515 (fully protected fish) and Section 5517 (white shark). The Fish and Game Commission may, however, authorize take of fully protected species when such take is needed for scientific research.</u></p> <p><b>2.2.4 Natural Community Conservation Planning Act</b></p>
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5	Page 12	existing section 2.2.3	DFG	<p><i>Add the following sentence to the end of the existing section 2.2.3, that begins with "The Natural Community Conservation Planning Act promotes..."</i></p> <p>NCCPs are also subject to review under the California Environmental Quality Act (CEQA), Public Resources Code section 21000, et seq.</p> <p><i>Delete the following paragraphs from the existing section 2.2.3:</i></p> <p>An NCCP must be approved by CDFG before it is implemented. To be approved, an NCCP must meet standards established by CDFG. CDFG is authorized to prepare non-regulatory guidelines to establish NCCP standards and to guide the development and implementation of NCCPs. NCCPs are also subject to review under the California Environmental Quality Act (CEQA), Public Resources Code section 21000, et seq.</p> <p>CDFG may authorize the "taking" of any identified species whose conservation and management is provided for in a CDFG approved NCCP.</p>
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6	Page 12	add section	DFG	<p><i>Add the following Planning Agreement section before the Implementing Agreement paragraph on page 12:</i></p> <p><b>Planning Agreement</b></p> <p>One of the components of an NCCP is a Planning Agreement. A Planning Agreement identifies the scope of the NCCP to be prepared and the participating parties. The Planning Agreement must be entered into by all parties, including appropriate regulatory agencies and participating private landowners. The Planning Agreement must identify the natural communities and species covered by the NCCP, establish the process for identifying target species, and the process for data collection, scientific input, and public participation, set forth an interim project review process during NCCP development, and provide public review periods for NCCP documents prior to adoption.</p>
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7	Page 12	Implementing Agreement	DFG	<p><i>The Implementing Agreement section should be modified as follows (strikeout delete, underline add):</i></p> <p><b>Implementing Agreement</b></p> <p><u>Another component of each NCCP</u> <del>will be</del> <u>is an Implementing Agreement.</u> <del>implemented according to an</del> <u>An Implementing Agreement</u> <del>must be</del> between the entities or agencies responsible for implementing the plan, CDFG and other regulatory agencies as appropriate, <del>such as the USFWS and participating private landowners.</del> The purpose of the Implementing Agreement(s) is to ensure the implementation <u>and adequate funding</u> of the NCCP, to bind each party to the terms of the NCCP, <u>provide a process for amendment of the NCCP,</u> and to provide remedies and recourse for failure to adhere to the terms of the NCCP.</p>
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<p>8</p>	<p>Pages 13-14</p>	<p>Guidelines Section</p>	<p>DFG</p>	<p><i>The Guidelines section should be modified as follows (strikeout delete, underline add):</i></p> <p style="text-align: center;"><b>Guidelines</b></p> <p><u>CDFG has adopted guidelines, entitled <i>Natural Community Conservation Planning General Process Guidelines (January 22, 1998) (Guidelines)</i> for the general application of the NCCP Act. The Guidelines are designed to help planners provide for regional protection and perpetuation of biological diversity, meet NCCP regulatory requirements and allow for flexibility in NCCP development.</u></p> <p><u>The Guidelines list the following NCCP components:</u></p> <ol style="list-style-type: none"> <li><u>1. Planning Agreement,</u></li> <li><u>2. Planning Document,</u></li> <li><u>3. Implementation Agreement,</u></li> <li><u>4. Take Authorization, and</u></li> <li><u>5. Environmental Documentation.</u></li> </ol> <p><del>All NCCPs must contain certain substantive elements identified in the Natural Community Conservation Planning Act. In addition, the NCCP must comply with the guidelines adopted by CDFG for natural community conservation planning. CDFG has adopted the entitled <i>Natural Community Conservation Planning General Process Guidelines (January 22, 1998) (Guidelines)</i>.</del></p>
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9	Pages 13-14	Guidelines Section	DFG	<p><i>The Guidelines section should be modified as follows (strikeout delete, underline add):(Continued)</i></p> <p>_____ In addressing the scope and purpose of NCCPs, the Natural Community Conservation Planning Act identifies the following essential NCCP elements:</p> <p>_____ (1) An NCCP must be regional or area-wide in scope (section 2805(a)).</p> <p>_____ (2) An NCCP must protect and perpetuate natural wildlife diversity (section 2805(a)).</p> <p>_____ (3) An NCCP must allow compatible and appropriate development and growth (section 2805(a)).</p> <p>_____ (4) An NCCP must be consistent with NCCP planning agreement (section 2820).</p> <p>_____ (5) An NCCP must provide for the conservation and management of species subject to take (section 2835).</p>
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<p>10</p>	<p>Pages 13-14</p>	<p>Guidelines Section</p>	<p>DFG</p>	<p><i>The Guidelines section should be modified as follows (strikeout delete, underline add):</i>(Continued)</p> <p>The Guidelines provide guidance for natural community conservation planning within the Planning Area and do not represent specific criteria for EDFG approval. However, they address certain key natural community conservation planning elements identified in section 2825(a) of the NCCP Act:</p> <p>(1) Defining the scope of a conservation planning area (section 2825(a)(1));</p> <p>(2) Determining conservation standards, guidelines and objectives for the planning area (section 2825(a)(2));</p> <p>(3) Appointing one or more advisory committees to review and make recommendations regarding the preparation and implementation of NCCPs (section 2825(a)(3));</p> <p>(4) Coordinating with local, State, and Federal agencies (section 2825(a)(4));</p> <p>(5) Incorporating public input (section 2825(a)(5));</p> <p>(6) Ensuring compatibility with the Federal Endangered Species Act (section 2825(a)(6));</p> <p>(7) Obtaining approval of the NCCP by EDFG (section 2825(7));</p>
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11	Pages 13-14	Guidelines Section	DFG	<p><i>The Guidelines section should be modified as follows (strikeout delete, underline add):(Continued)</i></p> <p>(7) Obtaining approval of the NCCP by CDFG (section 2825(7));</p> <p>(8) Provisions for implementation of the plan (section 2825(a)(8));</p> <p>(9) Providing direction for monitoring and reporting on plan implementation (section 2825(a)(9));</p> <p>(10) Amending the NCCP consistent with the initial intent of the NCCP (section 2825(a)(10));</p> <p>(11) Projects proposed in a NCCP area are not exempt from CEQA (2825(b));</p> <p>(12) NCCPs, as appropriate, shall be implemented pursuant to section 2081 (2825(c)); and</p> <p>(13) Implementation of NCCPs shall use the California Conservation Corps or local community conservation corps as practicable.</p>
12	Page 14	Section 2.2.4 CESA 2081	DFG	<p><i>Section 2.2.4 CESA 2081 should have the following sentence added to the end of the paragraph:</i></p> <p>At this time, it is anticipated that take will be authorized solely through the creation of an NCCP and that additional 2081 permits will not be required for the Calfed actions.</p>

13	Pages 14-15	2081(b) para. number 2	DFG	<p><i>Paragraph labled 2 should be replaced with the following wording:</i></p> <p>(2) The impacts of the authorized take shall be minimized and fully mitigated. The measures required to meet this obligation shall be roughly proportional in extent tot he impact of the aurhorized taking on the species. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation. For purposes of this section only, impacts of taking include all impacts on the species that result from any act that would cause the proposed taking.</p>
14	Page 15	2081(b)	DFG	<p><i>The sentecnes labled (5) should be a stand alone sentence and read as follows:</i></p> <p><del>(5)</del> Permits may not be issued if the issuance of the proposed permit would jeopardize the continued existence of the species.</p>
15	Page 18	Maintain paragraph	DFG	<p><i>Reword the third sentence as follows:</i></p> <p>"For this category ... addressed <i>in a manner</i> commensurate..."</p>
16	Page 22	Third Bullet	DFG	<p>It is not clear what is meant by, "an undefined level of support for actions that are being or will be implemented under other local, state, or federal programs". This is labeled an action not considered to affect covered species or habitats yet any support for an action that affects covered species or habitats should not be dismissed. This statement needs to be clarified or reconsidered.</p>
17	Page 25	#14	DFG	<p>The Delta region should be included for restoration of vernal pools and surrounding lands.</p>

18	Page 26	#16	DFG	The San Joaquin River region should have a goal for restoration of perennial grassland. This region is probably as, if not more, suitable for restoration of perennial grassland than any of the others.
19	Page 27	#19	DFG	Some acreage could be included in the San Joaquin River region. This is especially critical for species such as the riparian brush rabbit.
20	Page 33	6.4	DFG	Are these non-CALFED projects the same as, "... actions that are being or will be implemented under other local, state, or federal programs" as mentioned on page 22, bullet #3. It is not clear what is meant by non-CALFED projects.
21	Page 44	Paragraph 3, Sentence 1	DFG	Consider rewording that part of the first sentence that states CALFED, "... will have incorporated some or all of the recommended changes..." This wording is too vague as to which changes will be incorporated. Wording as follows is less vague: "... will have incorporated appropriate recommended changes..."
<b>Strategic Plan for Ecosystem Restoration</b>				
1	Following Page A-11.	Table A-1	DFG	<i>Re-label far right hand column:</i>  The term "percent reduction" is incorrect. It should read "percent remaining" or the percentages should be recalculated

2	Page A-6	Appendix A	DFG	<p><i>Add the following section above the "Temporal Variability" section:</i></p> <p><b>Delta Hydraulics and Ecological Functions.</b> Bay-Delta channels were characterized by channel hydraulics that on a temporal, tidal, and seasonal basis for a given hydrologic condition supported important ecological functions such as sustaining a productive food web, providing spawning, rearing, and feeding habitat for estuarine and anadromous fish, and supporting migration of adult and juvenile fish. Reduced Delta inflow, exports from the Delta, and conversion of tidal wetlands have had a large influence on the natural hydraulic regime of the Bay-Delta. Actions such as modified water project management and flood plain and tidal wetlands restoration can contribute to restoring or a more natural hydraulic regime that sustains ecological functions and meets the life requirements of the fish and wildlife in or dependent on the Bay-Delta.</p>
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3	Page A-13	Appendix A	DFG	<p><i>Modify the section entitled "Effects of Water Diversions from the Delta on Native Fishes" as follows:</i></p> <p>Effects of Water Diversions from the Delta on Native Fishes. Water diversions from the Delta affect fish in two principle ways, the direct diversion of fish and adverse effects on Delta channel hydraulics.</p> <p>Delta diversions result in losses of all life stages of fish particularly eggs, larvae, and juveniles as well as the loss of nutrients and primary and secondary production needed to support a healthy aquatic foodweb.</p> <p>Changes in Delta channel hydraulics began in the mid-19th century with land reclamation that restricted flows to narrow channels defined with levees. These same channels later became conduits for carrying water to the water export facilities in the central and south Delta. In 1951, the CVP began to transport water from the south Delta to the Delta-Mendota Canal. Operation of the Delta Cross Channel in the north Delta began to allow Sacramento River water to flow through interior Delta channels from the north to the southern Delta export facilities. South Delta export facilities were increased with the addition of the SWP pumping plant in the late 1960s. Delta channel hydraulics in the June through September period were adversely affected by Delta diversions as early as the mid 1950s. In the 1960s, impacts extended into the April and May period. Delta channel hydraulics, particularly in the November through April period, were dramatically affected beginning in the early 1970s and continuing into the 1980s, a period of steep declines <i>in the</i> abundance of native fish species.</p>
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<p>4</p>	<p>Page A-13</p>	<p>Appendix A</p>	<p>DFG</p>	<p><i>Modify the section entitled "Effects of Water Diversions from the Delta on Native Fishes" as follows: (CONTINUED)</i></p> <p>Existing Delta hydraulic conditions inhibit the ecological functions of the Delta as a migration corridor and rearing habitat for native species such as Chinook salmon and important non-natives such as striped bass. Native residents such as Delta smelt, which depend on natural hydraulic processes that help support spawning habitat and a productive foodweb, have been impacted by changed hydraulic conditions, particularly in the last two decades.</p> <p><del>With construction of the Central Valley Project, Shasta Dam completely changed the hydraulic regime of the Sacramento River by storing winter flows and increasing summer flows. The construction of massive pumps in the south Delta to deliver Sacramento River water to the San Joaquin Valley essentially turned the Delta into a freshwater system because brackish water was kept at bay (usually) by the inflows.</del></p> <p><b>Note: Move this sentence to the Reservoir and Diversions section on page A-12:</b></p> <p>(In the San Joaquin Valley, Friant Dam delivered the entire flow of the upper San Joaquin River south, abruptly eliminating a major run of Chinook salmon.)</p> <p>The fish fauna of the rivers and Delta changed abruptly as well because resident non-native fishes were favored over native fishes, resident and anadromous. Thicktail chub and Sacramento perch gradually were driven to extinction in the system. In the 1960s, the State Water Project went into operation with the completion of Oroville Dam on the Feather River (1967) and the construction of another set of big pumps in the south Delta. By this time, nearly every major river and creek feeding the Central Valley and the estuary was dammed. Not only was the water available for natural ecosystem processes increasingly diminished in amount, but it was increasingly polluted, the result of the ever increasing urbanization of the region and more intensive agriculture. Native resident and anadromous fishes continued to decline, as did the native flora and fauna of riparian areas and wetlands as water diversions increased and as wetland and riparian habitats continued to be diminished. (In dry years, migratory waterfowl were largely confined to artificial wetlands and showed marked downward trends as well.)</p>
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5	Page 3-9	Chapter 3	DFG	<p>The following changes should be made to this issue:</p> <p>11. <del>Entrainment of fish at</del> Diversion effects of pumps. The entrainment of fish and other biota in the CVP and SWP pumps and agricultural water diversions in the Delta and tributaries stimulate conflicts among stakeholders. However, it is not clear to what extent entrainment affects the population size of any one species of fish or invertebrate (Diversion Effects on Fish Team 1998). The CVP and SWP pumps also affect internal Delta hydrodynamics. Delta channel flows can be modified to such an extent that net flows occur toward the south Delta rather than west toward Suisun Bay. Migration cues and rearing functions for juvenile fish can be adversely affected. More information on the effects of entrainment will be pivotal in choosing a water conveyance method, because it will help determine to what extent an "isolated facility" can be expected to alleviate any problems. Reducing this uncertainty is also essential to ensure the most efficient allocation of restoration funds because proposed solutions to this problem include potentially tens of millions of dollars spent constructing fish screens and new intake facilities throughout the Bay-Delta system, not all of which may be as effective as intended at reducing population declines.</p>
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6	Page 3-15	Chapter 3	DFG	<p>An additional decision rule is needed to ensure that a balanced approach to restoring the Bay-Delta system is taken and that adverse impacts of converting one habitat type that has a high value for one species to another with little or no value are fully mitigated.</p> <p>Additional suggested rules would be:</p> <ul style="list-style-type: none"> <li>• Will provide a balanced approach to restoring a mosaic of terrestrial and aquatic habitats in the Bay-Delta.</li> <li>• Will fully mitigate the adverse impacts of other restoration actions that reduced the habitat value for a species or species group covered in the ERPP.</li> </ul>
7	Page 4-2	Chapter 4	DFG	<p><i>Modify the following paragraph:</i></p> <p>CALFED will evaluate the need to develop a new must develop an institutional structure for implementing all of its programs into which the ERP implementation must fit. Additionally, CMARP is developing institutional structures for monitoring and research that must fit within the ERP framework. Adaptive management requires institutional arrangements that are sufficiently flexible to accommodate and respond to new information produced by ecosystem monitoring and new ideas about how to manage natural resources.</p>

8	Page 4-2	Chapter 4	DFG	<p><i>Add language such as the following as a second paragraph under Section 4.2:</i></p> <p>Some stakeholders have proposed the creation of a "new entity" as the mechanism for implementing the ERP component of CALFED. Those stakeholders advance the hypothesis that a new entity, independent of existing state and federal agencies, and with its own funding authority, is needed to ensure success of the ERP and guard against using regulatory mechanisms to secure new environmental improvements. Some stakeholders are not comfortable with trying to implement the ERP through existing institutional arrangements and are concerned that the transition of CALFED from a planning to an action-oriented program will highlight the deficiencies of current arrangements (Rieke and Kenney 1998). This concern relates to the entire program in addition to the ERP.</p> <p>Concerns have also been raised by the Strategic Plan Core Team that problems will arise when implementation begins because of problems with regional coordination of budgeting, permitting and public participation processes, compliance document preparation, research and monitoring and related functions that should be integrated.</p> <p>Some CALFED agencies, however, believe there are potential drawbacks of a proposed "new entity" and flaws with the justification for that entity. They offer an alternative approach to implementing the ERP, describing how that approach can address the institutional needs during program implementation and how it can address the needs associated with adaptive management.</p> <p>Consideration will be given to a reform option that provides the desired level of interagency and programmatic coordination and includes a greater role for stakeholders while leaving the existing administrative structure largely intact. Such an approach could have all the benefits and functions of a new implementation entity but accomplishing that in a less disruptive and more politically viable manner (Rieke and Kenney 1998).</p>
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9	4-4	Chapter 4	DFG	<p><i>Make the following modifications to the following paragraph:</i></p> <p><b>Independence vs. connection:</b> The entity or its associated agencies require a degree of independence body must be independent to prevent political and other concerns from interfering with the scientific aspects of the program. Yet, it must retain connections with stakeholders, agencies, and the other CALFED programs to ensure coordination.</p>
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10	5-1	Section 5.1.2	DFG	<p><i>This section should be modified as follows:</i></p> <p>5.1.2 CALFED Ecosystem Restoration Program Goals</p> <p>This document is a guide for achieving a reasonable level of ecosystem quality for the Bay-Delta system in a way that still allows sufficient water to be available to drive the diverse California economy.</p> <p>Although many specific targets and actions and goals to achieve a high level of ecosystem quality for the parts of the estuary and watershed within the purview of CALFED are identified in the ERPP, the broader, overall goals are less clear. Overall goals will help provide the ecological context for long and short-term objectives and for the targets and actions needed to restore ecosystem health. CALFED scientists and other scientists recognize that the key term "ecosystem quality" is not well defined but is presumed to equate to and is presumable "ecosystem health" and "ecosystem integrity" (e.g., Woodley et al. 1993 ). All these terms imply the desirability of ecosystems that not only will maintain themselves through natural processes with the minimal human interference possible (i.e., at low cost) , but also will be aesthetically attractive and produce goods and services in abundance for humans.</p> <p>CALFED's overall goals for ecosystem restoration are as follows:</p> <p><i>The word recovery should be spelled correctly in the third line.</i></p>
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11	6-1	Chapter 6	DFG	<p>The fifth bullet should be modified to read:</p> <ul style="list-style-type: none"> <li data-bbox="956 261 1843 407">■ The institutional entity and its associated agencies responsible for implementing the ERP would be fully operational and have the authority and independence needed to successfully implement the ERP.</li> </ul>