14.2.5 Non-Governmental Organizations

14.2.5.1 CWA—California Waterfowl Association, Gregory S. Yarris, Vice President, Policy and Communications, December 28, 2010

CALIFORNIA WATERFOWL

December 28, 2010

Ms. Becky Victorine,
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825
Submitted via email to rvictorine@usbr.gov

Subject: Suisun Marsh Habitat Management, Preservation, and Restoration Plan Draft EIR/EIS

To Whom it Concerns:

On behalf of the California Waterfowl Association (CWA), I am pleased to provide comments concerning the Suisun Marsh Habitat Management, Preservation, and Restoration Plan Draft EIR/EIS (hereafter, "Draft EIR/EIS"). CWA is a charitable 501 (c)(3) organization dedicated to conserving California's waterfowl, wetlands, and outdoor heritage. We represent the interests of over 20,000 members statewide, and our waterfowl and wetlands programs are implemented throughout the state.

CWA has been involved in the Suisun Marsh (hereafter, "Marsh") since our inception in 1945, and our staff and members were instrumental in securing its long-term protection while advocating for the Suisun Marsh Preservation Act of 1977. We continue to work to protect and enhance the Marsh, working closely with the Department of Fish and Game (DFG), Suisun Resource Conservation District (SRCD), and the many private landowners who have a vested interest in the Marsh's resources. We are active in wetland management and enhancement on both private lands and state-owned wildlife area lands. In addition, we conduct waterfowl research and monitoring in cooperation with the staff and students of the University of California at Davis (UCD) and the U.S. Geological Survey Western Ecological Research Center. Our cooperative research on nesting waterfowl ecology at the Grizzly Island Wildlife Area (WA) has been ongoing since 1985, and is one of the longest running studies in North America (Mclandress et al. 1996, Journal of Wildlife Management). In addition, we partner with DFG to conduct annual waterfowl banding and breeding population surveys in the Marsh, providing critical data for population management and determining annual waterfowl hunting regulations for California.

The Suisun Marsh is unique because it is important as both a wintering and breeding area for waterfowl and other birds and wildlife. As such, our conservation efforts include not only wetland enhancement, but also restoration of upland areas critical for locally-nesting ducks. According to cooperative surveys conducted in 2009, almost 200,000 ducks and

4630 Northgate Blvd., Suite 150, Sacramento, CA 95834
916.648.1406 • www.calwaterfowl.org

geese were present in the Marsh last winter. And over 25,000 ducks were observed during the most recent breeding season surveys (2010). Most of the breeding ducks were mallards, and nest surveys indicate the Grizzly Island WA remains one of the most productive nesting areas in North America for this ecologically and economically important species.

Because of the importance of the Suisun Marsh to waterfowl and other waterbirds, and their reliance on managed wetlands year-round, our comments will focus on the project's proposed conversion of 5000-7000 acres of managed wetlands to tidal wetlands. In our opinion, the implications of this conversion for migrating, wintering and breeding birds have not been adequately addressed. The proposed project will eliminate 5000-7000 acres of managed wetlands, by converting them to tidal wetlands. The Draft EIR/EIS has determined that this is not significant, because the value of managed wetlands will be more than offset by improved management of remaining managed wetlands and the new tidal wetlands. We disagree with this assessment, and question the analysis that was used to come to this decision.

Throughout the document, the general underlining theme is that the conversion of tidal wetlands as a result of diking has resulted in a loss of habitat for many species, including those now listed as threatened or endangered. While this is undoubtedly true, some of the diked lands, specifically managed wetlands, are required for maintaining populations of other important species (including some threatened and endangered). While tidal wetlands in California have been lost at an alarming rate, it does not exceed the losses of seasonal wetlands (freshwater and brackish). Currently, the managed wetlands in Suisun Marsh provide a critical fragment of the original seasonal wetlands available for wildlife in the Central Valley. These managed wetlands were preserved by foreword-thinking conservationists and considerable time and expense have been sacrificed to maintain and manage them. The outcome of any wetland restoration program (included that which is proposed) should be consistent with current state and federal policies, and should result in a net **increase** in wetland habitat, not sacrificing one wetland type for another.

The conclusion that losing 5000-7000 acres of managed wetland (Impact VEG-3) will not have a significant impact, and does not require mitigation, is premature and not supported by the analysis. Potential impacts include direct loss of foraging habitat, and indirect loss of foraging and breeding habitat if salinities in channels or wetlands increase greater than predicted.

Direct loss of foraging habitat will result from the conversion of up to 7000 acres of managed wetlands to tidal wetlands in the preferred alternative. Managed wetlands provide the preferred habitat for waterfowl, because managers can manipulate water levels throughout the year and create ideal conditions for maximizing seed production of preferred plants. The Central Valley Joint Venture (CVJV), a collective of conservation organizations and government agencies advocating for the conservation of migratory birds and their habitats, has identified the Suisun Marsh as critical to the Pacific Flyway. The CVJV Implementation Plan (Plan), which was prepared by avian experts, is based on the energetic requirements of waterfowl in the Central Valley (including the Delta and

Suisun Marsh). The Plan evaluated the impacts of converting 5000 acres of managed wetlands to tidal wetlands in the Suisun Marsh. The analysis determined such actions could result in the depletion of food supplies for desired wintering waterfowl populations by early February. Currently, managed wetlands provide sufficient food supplies for the entire winter.

It is possible that improving management on existing managed wetlands can partially compensate for lost benefits, as suggested in the Draft EIR/EIS, but this conclusion is largely speculative because no data are provided in support. Without knowing what wetlands provide in their existing conditions, and under what management scenarios, it is impossible to predict if annual incremental increases are even possible through improved management. In general, brackish managed wetlands are considered to provide less food value than their freshwater counterparts (see CVJV Implementation Plan), and the opportunity to increase their productivity may also be less due to constraints of an estuarine environment and unpredictability of water quality each year.

There may also be indirect negative impacts to the value of waterfowl habitat from the proposed project. Increasing tidal flows to channels that connect the bay to restored tidal wetland could impact quality of water used to flood and irrigate existing managed wetlands. The cumulative impact of increasingly saline water, and eventually soils, could result in decreased seed production and reduced waterfowl carrying capacity. This is not adequately addressed the Draft EIR/EIS. Increased salinity in Marsh channels (Impact WQ-1) and influence of changes to salinity of water used for managed wetlands (Impact WQ-2), were deemed less then significant because models predicted changes in salinity which were less than 10%. This analysis relies on two assumptions; 1) Increases in channel and wetland salinities of less than 10% will not negatively impact food production; 2) The models used to make the predictions are appropriate and valid. It is critical that if the restoration activities outlined in the preferred alternative proceed, that data is collected to verify the above assumptions. Models are useful planning tools, but also must be validated. As such, a monitoring and evaluation plan must be developed and provided in the final EIR/EIS. This should also describe potential remediation should water salinity increase or productivity of affected wetlands deteriorate due to salinity changes.

In addition to impacts on wintering waterfowl habitat, the preferred alternative could also have impacts on breeding waterfowl, which are not addressed in the Draft EIR/EIS. As previously mentioned, the Suisun Marsh is one of the most important duck nesting areas in the Pacific Flyway. The primary reason is the combination of upland nesting areas and managed wetlands, required habitat elements for dabbling duck species and many non-waterfowl species. The conversion of managed wetlands to tidal wetlands can impact breeding ducks in several ways. The most critical is the direct impact on duckling survival. Young ducklings do not have well-developed nasal glands to excrete salts, and saline conditions can kill ducklings either directly, or by retarding their growth making them more susceptible to predators or other mortality factors. The preferred alternative could result in duck broods using tidal wetlands with higher salinity (a possible result of VEG-3), or increased salinity of managed wetlands used by broods (a possible outcome

of WQ-1). The impacts on breeding waterfowl have not been adequately addressed in the Draft EIR/EIS.

In conclusion, the Draft EIR/EIS does not adequately address the potential impacts of converting managed wetlands to tidal wetlands, especially in regard to wintering and breeding waterfowl and other migratory and resident birds. While improving the infrastructure and management of existing managed wetlands is a desirable goal in Suisun Marsh, there is no scientific evidence presented that indicates this activity would compensate for the lost value of converting 5000-7000 acres to tidal marsh. The document ignores the goals and objectives for the Suisun Marsh as outlined in of CVJV Implementation Plan, a plan which is based on sound science and endorsed by organizations and agencies whose goals are to conserve migratory bird habitat. The conversion of functioning managed wetlands to tidal wetlands without compensating for lost habitat values is a misconceived idea, possibly setting a precedent that could negate previous habitat conservation and restoration efforts.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions regarding our concerns.

Sincerely,

Gregory S. Yarris
Vice President, Policy and Communications

Responses to Comment Letter CWA

CWA-1 through CWA 4-b

See Master Response 6: Significance of Wetland Conversion.

CWA-5

See Master Response 5: Inclusion of an Adaptive Management Plan, Master Response 6: Significance of Wetland Conversion, and Master Response 1: Project-Specific Analysis.

CWA-6

See Master Response 6: Significance of Wetland Conversion.

14.2.5.2 DU—Ducks Unlimited, Mark Biddlecomb, Director, Western Region, December 23, 2010

Comment Letter DU

DUCKS UNLIMITED

WESTERN REGIONAL OFFICE
3074 Gold Canal Drive
Rancho Cordova, CA 95670-6116
(916) 852-2000 Fax (916) 852-2200
www.ducks.org

December 22, 2010

United States Department of the Interior
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way, MP-700
Sacramento, CA 95825
Attention: Rebecca Victoreen

U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, CA 85825
Attention: Cay Goude

California Department of Fish and Game
7329 Silverado Trail
Napa, CA 94558
Attention: Scott Wilson

Subject: **Suisun Marsh Habitat Management, Preservation, and Restoration Plan Draft EIS/EIR**

To Whom It May Concern:

Below, please find comments prepared by Ducks Unlimited on the on the Suisun Marsh Habitat Management, Preservation, and Restoration Plan Draft EIR/EIS document (hereafter, "Draft EIR/EIS"). Ducks Unlimited has been an active stakeholder in the Suisun Marsh for over 25 years. Ducks Unlimited's seasonal wetland conservation activities in the Marsh are undertaken with a specific focus on the Marsh while keeping the larger vision in sight about how to provide for the needs of migrating and wintering waterfowl and other migratory birds in the Pacific Flyway through providing the highest quality wetland habitat possible.

Our conservation program in the Marsh is targeted to improve both wintering and breeding habitat conditions for waterfowl and other wetland dependent wildlife species. To do this, our specific conservation activities focus on providing both private and public wetland managers the most effective and efficient wetland management possible to achieve optimal habitat conditions. Our activities are part of a coordinated effort to provide for the annual life cycle needs of Pacific Flyway migratory waterfowl and other water birds throughout California, in which the Suisun Marsh plays a key role.

LEADER IN WETLANDS CONSERVATION

General Comments:

Historically, the Suisun Marsh was composed of large tracts of salt, brackish and freshwater marshes, and grasslands, encompassing approximately 287 km^2 from Benicia east to Collinsville (Dedrick 1989). A gradient of tidal influence, salinities, micro-elevations, and marsh vegetation existed from Suisun Bay inland to the surrounding hills (Heitmeyer et al. 1989). The balance between saline and freshwater conditions was delicate and fluctuated seasonally, resulting in plant species typical of both salt and freshwater wetlands. Although extensive attempts were made to farm the lands, high soil and water salinities precluded most crop production and most of the lands were maintained as freshwater wetlands and specifically managed duck clubs.

Urbanization of the San Francisco Bay eliminated a similar array of wetlands along the estuary margin. Offsetting this lost habitat, seasonal wetlands in Suisun Marsh were managed for moist-soil plants by the duck clubs, extremely valuable to waterfowl and other wetland water birds. Private landowners invested millions of dollars in protection, restoration, and management of these habitats. Today the Suisun Marsh provides critical habitat to Central Valley/SF Bay migratory bird wintering populations. Among the species that currently rely on managed, seasonal brackish/freshwater wetlands in the Suisun Marsh (hereafter, "managed wetlands") are northern pintail, American wigeon, canvasback, and lesser scaup, all avian species that currently require special management out of concern for their population status.

Tidal restorations in Suisun Marsh as proposed in the Suisun Marsh Plan and analyzed by the Draft EIR/EIS will reduce foraging opportunities and further decrease vital resources for these waterfowl and other avian species. Currently, managed wetlands compensate for natural wetlands lost in the San Francisco Bay region that will never be replaced, as the zone has been forever converted to housing and other urban infrastructure. Any purposeful conversion of managed wetlands to tidal systems must consider what amount of the former would provide sufficient mitigation. It is highly unlikely that improved management of existing managed wetlands will be sufficient to replace the loss of functions and waterfowl food resources that come about due to tidal conversion. Protection of remaining managed wetlands through annual levee maintenance is helpful, but inadequate.

By contrast, the Draft EIR/EIS finds that the impact of converting 5-7,000 acres of managed wetlands to tidal marsh is insignificant. In our view, this contention is inaccurate, and certainly unsupported. The environmental documents provide no basis for the finding of "no significance": there is no research reported, no literature cited, nor is there any explanation as to why there would be no significant impacts associated with habitat conversion of this magnitude. From an economic standpoint, conversion of 5-7,000 acres of existing managed wetlands represents an enormous opportunity cost in the investment value of conservation dollars.

DU-1

Land acquisition for replacement acreage would likely cost in excess of $5000/ac, or more than $25m-$35m; restoration could cost up to a similar amount depending on a variety of factors; management costs of such acreage, presently borne by private duck clubs, would be equivalent in cost to

DU-2

2

management of a similarly sized state wildlife management area or federal wildlife refuge. That cost is significant and source funding is in short supply. Moreover, loss of established functions and values cannot be easily replaced by immature wetlands even if they were to be created. DU-2 cont'd DU-3

It is also important to recognize that a finding of "no significance" has a precedential adverse impact on future and related activities within the Bay-Delta system. It is almost a certainty that conversion from managed wetland to tidal wetlands will be repeated elsewhere as the ecosystem is "restored" through implementation of the Bay Delta Conservation Plan. If a project of this magnitude is deemed insignificant, additional proposals could be expected to be treated similarly. The total cumulative effect of this precedent would be a major setback for wintering migratory birds and many other guilds of species that utilize managed wetlands. DU-4 DU-5

The Central Valley Joint Venture Implementation Plan (hereafter, "Implementation Plan"), prepared and updated by experts in avian and wetland ecology, and endorsed by organizations that have been active in promoting wetland conservation and engaged in wetland restoration in the Bay-Delta-Suisun Marsh ecosystem for over 20 years, attributes significant value to the existing habitats of the Suisun.

Approximately 44% of the Pacific Flyway's waterfowl depend on the seasonal wetland complex of the Central Valley-SF Bay Area as these habitats provide the energy necessary to survive the winter season and build body reserves to fuel the spring migration. The Suisun Marsh is one of a limited number of areas that remain available to supply these food supplies. The managed wetlands found presently in the Suisun Marsh provide the full suite of nutritional requirements that these birds need, including both proteins and carbohydrates. Agricultural foods such as rice and corn, while abundant in the Central Valley, supply the necessary carbohydrates to build fat reserves but lack the other essential nutrients. Tidal wetlands, while contributory, do not support many of the plant species found in seasonal wetlands and as such do not support the dietary needs of the wintering waterfowl that presently use the Suisun Marsh.

The Implementation Plan also examined the direct implications of habitat conversion such as proposed by the Draft EIR/EIS. The Implementation Plan indicates that "restoring tidal flow to 5,000 acres of existing habitat could result in food supplies being exhausted by early February" which is the lower end of the range of tidal restoration called for in the Suisun Marsh Plan. No attempt is made in the Draft EIR/EIS to describe that impact, to analyze it, and evaluate its significance, although the Implementation Plan has been an established reference document for wetland conservation in the Central Valley and Suisun Marsh for years. DU-6

Beyond energy and nutrition, there are other functions and values of seasonal wetlands that will be lost as a direct result of this project. They include nesting habitat for resident waterfowl, shorebirds and other wetland dependent species, and availability as a staging location to Pacific Flyway migrants. Regarding the former, the Suisun Marsh has one of the highest nest success rates in the Lower 48 states. Long-term data demonstrate consistently high nest production rates for waterfowl stemming from the presence of the combination of seasonal wetlands and adjacent uplands located in the Marsh. Providing

3

fall migration/early winter habitat is an additional function of Suisun Marsh. It is one of the few seasonal wetland areas in central California with reliable water supplies available to early arriving waterfowl. Suisun Marsh wetlands are flooded up long before most of the Central Valley's wetlands or rice fields, where wetland water is dependent on timing of harvest. This provides rare and critical early season habitat for early migrants such as pintail. While water may be present in tidal wetlands, it does not provide suitable the food resources needed by the migrants. DU-7

The cultural and social values of seasonal wetlands should also be recognized. That includes the significant use of the Suisun Marsh for waterfowl hunting and bird watching by residents of the San Francisco Bay area and beyond. Waterfowl hunting in this location is steeped in tradition, having been practiced in the Suisun Marsh, first by market hunters and then by sportsmen and women, for over 150 years. Clubs have memberships that span many generations and have invested huge sums of money over the years to pursue their sport and improve the habitat. These same supporters of their personal recreation are also avid supporters of wetlands conservation. They represent a sizable and active faction that demand protection of wetlands and demand the government programs designed to preserve, protect and restore wetlands and their ecological function. Further, reducing the acreage of seasonal wetlands reduces the quality of the hunting experience and may lead to declining participation in the activity. Without a demonstrated, assured quid pro quo to improve the function and values of the remaining seasonal wetlands, or the restoration of a similar amount of functionally equivalent wetlands, it is likely that participation in duck hunting and to a lesser extent bird watching will decline faster than it is declining at present in the Suisun Marsh. The result will be loss of an important recreational resource as well as support for long-term protection and management of the Marsh. DU-8 DU-9

The Draft EIR/EIS suggests that, because habitat for state and federally listed species and even certain species of waterfowl and shorebirds is improved and therefore their status is improved, the net result of the project is positive. In fact, habitat for some waterfowl and shorebirds is likely improved by providing additional tidal wetlands –although no analysis of this result is proffered. However, it is our strong belief that the welfare of one species, or group of species, dependent on the habitats presently found in the Suisun Marsh should not be traded off for improvement to another. The Plan should recognize these impacts and their significance and lay out a clear path to ensure that the net result of its implementation is positive for all species and groups of species that rely on the Suisun Marsh. Not only that, but the Plan should provide for a periodic assessment in conservation measures and adjustment to them when needed in the section of the Plan that addresses monitoring and adaptive management. The end result of implementation of the Suisun Marsh Plan should be "no net loss" of the functions and values of seasonal wetlands. DU-10 DU-11

Each sub-watershed or historically significant wetland area within the Central Valley is vital to migratory birds, and must continue to produce a no less than its existing share of the overall nutritional and energy needs, nesting, migratory staging, recreation and other functions and values. The Draft EIR/EIS and Suisun Marsh Plan as presently drafted fails to provide evidence that such an outcome will result, and it is our contention that it will fail with regards to waterfowl and numerous other bird groups. DU-12

4

Specific Comments:

There is no discussion regarding the potential of beneficial re-use of dredge material for tidal restoration activities to bring restored tidal marsh areas to desired elevation. This concept should be discussed and identified as it can substantially increase the ability of subsided areas to be restored to historic tidal marsh plain elevations. DU-13

The use of the term "continuing" as opposed to "improving" function and values is common throughout the document and should be modified. For example on page 4-3 the EIR/EIR states: "As a trade-off for implementing this restoration, the remaining managed wetlands/duck clubs would be allowed to *continue* (emphasis added) managed wetland activities, leading to better habitats for waterfowl, shorebirds, and other species that depend on or rely on managed wetlands." These areas are already "continuing" these activities to sustain the status quo of seasonal wetland functions and values. This term should be changed to "enhancing" or "improving" managed wetland activities beyond those currently employed. "(C)ontinuing" implies maintaining, not offsetting any seasonal wetland losses from any tidal restoration. The whole purpose of the preferred alternative is to at least sustain overall functions and values by improving the quality of managed wetlands to compensate for losses from tidal restoration, not to maintain the status quo on existing seasonal wetlands. This is the fundamental flaw of and the basis for all the deficiencies in this document. DU-14

Managed Wetland Activity Impacts WTR-3 – The Managed Wetland Activity list does not include the installation of new larger &/or the replacement of existing water inlets and/or outlet pipes, or the potential for additional discharge pumps. Flooding and draining to maintain the 30-day cycle is critical to include as one of the options that will improve seasonal wetland habitat functions and values. The major problem with the quality of the managed wetlands is that many duck clubs cannot meet the 30-day flood and drain requirement. This is due to subsidence on the outer clubs and the issue that these areas cannot drain fast enough as there must be a sufficiently low enough tide to drop below the existing outlet. Further, many areas are also restricted on the current outlet pipe size to drain sufficiently in the particular low tide cycle. The 30-day flood and drain is mentioned as the optimum scenario on page 2-20, yet no wetland management activities are mentioned that will sufficiently achieve that end point. Further, this impact is titled incorrectly. This is not only a water supply issue; it is an improved water management issue. Further, improving the flood and drain capacity can ultimately only be sufficiently achieved throughout the area with additional or larger inlet and/or drain facilities. DU-15

Flood control and levee stability impacts FC- 1&4 – How will the new interior tidal levees be maintained in the future if there is no nearby channel, or suitable material within a nearby channel, to add new material to the degraded levee? FC-4 suggests that improvements to managed wetlands will decrease flood risk, and page 2-35 suggests that tidal restoration will decrease levee linear-miles. The assumption of decreased levee linear miles is entirely dependent on the selected site(s). Tidal restoration activities on some properties could easily and significantly increase the linear mileage of exterior levees. This assumption should not be made in light of preferred alternatives lack of identifying specific parcels, and the determination of significance should reflect the uncertainty. DU-16

5

Sediment Transport Impact ST-1 – The significance of this impact is not sufficiently analyzed. Increased scour will depend on the geomorphology and location of the tidal project as well as the geomorphology of the receiving water body. Further, current studies suggest there is a sediment deficiency in the Bay Area, how will tidal restoration efforts in Suisun Marsh affect downstream sediment availability in recent and planned tidal restoration activities in the San Francisco Bay? This is not addressed. DU-17

Vegetation and Wetlands Impact VEG-3 – How is the loss of 5-7,000 acres of seasonal wetlands not significant regardless of what improvements are made in the quality of the remaining managed areas? This is a 13.4% change in the habitat composition of the Suisun Marsh. Further, the discussion of the impact on page 6.2-27 does not include analysis of the quality of existing managed wetlands to be converted to tidal. There is no analysis of the current state of functions and values within the Suisun Marsh's managed wetlands and no baseline to gauge the extent of loss from converting seasonal wetland to tidal on any property within the marsh. There is no described methodology to quantify and compare any losses and/or gains in functions and values of all wetlands affected by this proposed action. There is no methodology to compare the losses of functions and values of managed wetlands to any gains from tidal wetland restoration. As such, there is no way to justify the current determination of "no significance" of this project's effect on managed wetlands. DU-18

Wildlife Impacts WLD-11 – This impact assumes that the managed wetland activities will offset any reduction in waterfowl benefits due to the tidal restoration activities by improving the overall quality of the managed wetlands on the remaining 40k+ acres of the Marsh. The proposed wetland management activities are not sufficient to improve the quality of seasonal wetland functions and values on the remaining seasonal wetlands following implementation of the preferred alternative.
Further, the discussion on page 6.3-46 suggests there is no impact on breeding waterfowl during construction; however, the document fails to address the loss of waterfowl breeding habitat due to tidal restoration. Suisun Marsh is one of the most productive waterfowl breeding areas in the lower 48 states. This is due to the relationship of seasonal wetlands and adjacent uplands. The impact from the loss of these habitats through the tidal restoration efforts on breeding waterfowl is not addressed and should be analyzed. DU-19

The Draft EIR/EIS states that restoration activities "are expected" to offset the loss of habitat. What assurances are there to ensure that losses are actually offset? Long term monitoring will help to identify the state of gain or loss, but no actions are proposed for "adaptive management" if the proposed/listed wetland management activities are insufficient at replacing lost functions and values. DU-20

Page 2-13 – How was it determined that dabbling and diving ducks would have significant foraging habitat in tidal restoration areas? There is no justification for this assumption. Tidal wetlands are highly variable in water depth, inundation duration, tidal cycle, substrate, and vegetation communities. Few combinations of these tidal wetlands biogeomorphological characteristics are beneficial to waterfowl. How was it determined that any of the proposed tidal wetland activities will be beneficial to waterfowl? What assurances are being made that those combinations will be planned for and/or obtain before and during implementation of tidal wetland restoration efforts? DU-21

6

Restoration of Tidal Wetlands page 2 -12 – The first paragraph says nothing about waterfowl benefits. Page 2-13 states there are significant foraging opportunities for waterfowl. All of this is dependent of the final marsh biogeomorphological characteristics of the restored site, as was previously stated as being insufficient for stating the value of tidal wetlands for waterfowl in such generalities. DU-22

Sea Level Rise Page 2-48 – "Managed wetland operation and levee maintenance would be adjusted over time with sea level rise." This statement does not include identification of how a 30-day flood and drain cycle of seasonal wetlands will stay constant given their existing flood and drain facilities in light of sea level rise. Low tides will be higher making it even more difficult to drain with existing water management facilities. DU-23

The document does not address how sea level rise will affect salinities in the Suisun Marsh. Some projections show 36-inches of rise by 2100. This document's analysis of sea level rise impacts on marsh functions and values is insufficient. DU-24

Water Quality Page 5.2-22 – Why did the salinity model use water years 2002 and 2003? These are typical years and not the driest/least discharge years. The driest water years should be used to get a fuller understanding of the worst-case salinity impacts on managed wetlands given the potential variable of water years in light of climate change. DU-25

Flood control and levee stability Page 5.4-3 – The middle paragraph discusses levee failures in the marsh and the consequences of increasing local salinities. A specific example is given in which a levee failure had increased local salinities. Further, the paragraph states that "larger region-wide breaches and flooding the Marsh as (which occurred) in 1998, can have water quality effects in the Delta that can affect SWP and CVP operation." With this logic, why would intentional tidal breaches not differ from the above examples and result in increased salinities locally that would affect managed wetlands in the Suisun Marsh as well as the described increases sufficient to affect the state and federal pumping projects?

This discrepancy should be clarified and the assumptions of the model should be re-evaluated or corrected. DU-26

Climate Change Page 5.9-33 – The second full paragraph discusses climate change on tidal restoration, however it does not discuss the effect on managed wetlands, increases in Suisun Marsh salinity levels, or difficulty in achieving the 30-day flood and drain management cycle given sea level rise. DU-27

Vegetation and Wetlands Page 6.2-12 – The second paragraph discusses beneficial plants to waterfowl, some of which are more salt tolerant and less beneficial than more freshwater dependent species. How will the proposed wetland management activities improve the salinity conditions to allow for more beneficial species to flourish and improve the quality of managed wetlands for waterfowl? The proposed wetland management activities are not sufficient to change plant communities to more productive species, thereby improving the functions and values of managed wetlands to offset any DU-28

7

losses from tidal restoration activities. Achieving the 30-day flood and drain cycle is described as the optimal way to achieve the desired functions and values within the Suisun Marsh by sustaining beneficial wetland plant communities. However, just achieving a 30-day flood and drain cycle alone may not increase the existing functions and values of managed wetlands sufficient to offset any losses of managed wetland due to tidal restoration activities. This is not addressed in the document. DU-28 cont'd

Wildlife Significance Criteria page 6.3-37 – Why is a permanent loss of upland considered significant, whereas a permanent loss of managed wetland is not considered significant? What is the amount of "substantially reducing the habitat for a wildlife species" that is considered significant? The addition of 7,000 acres of tidal wetlands in the Suisun Marsh is equivalent to ~13% of the total wetland acreage. How is this not a significant change in the landscape? What is the basis of the significance criteria when changing one habitat type to another? DU-29

Page 7.4-7 – The last paragraph indicates that 7,000 acres of managed wetlands providing hunting opportunities would be purchased and converted to tidal, and that this represents a potential loss of up to 10% of existing managed wetlands. From Page 2-16: "The total amount of existing managed wetlands and uplands that could be affected by tidal restoration and managed wetland activities is 52,112 acres." This represents a 13.4% decline. How is this not a significant change in the landscape? What is the basis of the significance criteria when changing one habitat type to another? DU-30

Further, this paragraph states: "It is expected however that the newly restored areas and remaining duck clubs would provide *plenty* (emphasis added) of hunting opportunities during most days of the year." What is the definition "plenty?" How was this amount quantified and the differences from the status quo assessed or analyzed? Changes in hunting opportunity should be clearly analyzed and documented. Determining the level of significance cannot be determined without proper analysis. The document does incorporate the potential cumulative impacts of other potential projects, such as the Bay Delta Conservation Plan (BDCP). The BDCP is well documented to have identified the Suisun Marsh as a potential mitigation/restoration area. Failure to incorporate the potential impacts of BDCP implementation on the preferred alternative raises multiple questions.

How will the potential implementation of BDCP change the amount of tidal wetland restoration and/or seasonal wetland losses in the Suisun Marsh relative to the preferred alternative? How does the preferred alternative account for the construction of any Delta conveyance facility and the potential for reduced outflows from the Delta into Suisun Marsh?

Specifically, how may BDCP alter that salinity levels within the Suisun Marsh and the potential impacts on managed wetland function and values? What will be the cumulative impact of the implementation of both the preferred alternative and BDCP on Suisun Marsh wetlands? How did the salinity model take into account BDCP? DU-31

8

Thank you for the opportunity to comment on the Suisun Marsh Habitat Management, Preservation, and Restoration Plan and Draft EIR/EIS. Please contact me for any additional information. This project directly affects a vital part of the Pacific Flyway and its conservation is an extremely important issue to Ducks Unlimited. We hope that you will revise the Plan and the EIR/EIS to better reflect the concerns expressed above and we stand ready to assist you in that process.

Best regards,

Mark Biddlecomb
Director, Western Region

9

Responses to Comment Letter DU

DU-1a and DU-1b

See Master Response 6: Significance of Wetland Conversion.

DU-2

The SMP provides a framework for restoration in the Marsh. Only a small portion of this restoration is required to offset the ongoing and future impacts of the managed wetland activities, which are mainly from dredging. Previously, 2,500 acres had been acquired and preserved as mitigation for the ongoing impacts from managed wetland activities. The remainder of the restoration would aid in recovery of species or would be implemented as mitigation for other projects and plans. Given the current direction of many plans and policies recently adopted or under development, it is reasonable to assume that there will be parties interested in purchasing and restoring areas of the Marsh. It is not expected that the cost of restoration of the 5,000 to 7,000 acres included in the proposed project would be borne by a single source. Rather, restoration would be implemented throughout the Marsh by different entities to meet their restoration goals. The SMP helps to stabilize the regulatory environment in the Marsh, which will allow operations and maintenance of managed wetlands to continue into the future, and is also expected to improve management of managed wetlands by providing increased funding and additional tools to meet flood and drain cycle objectives. As proposed, the SMP would improve water quality through restoration and improved managed wetland management and also would provide regulatory assurances for water diversions to managed wetlands through the permitting process.

DU-3 through DU-7

See Master Response 6: Significance of Wetland Conversion.

DU-8

Chapter 1 includes a description of the historical cultural and social values of the marsh landscape, including how hunting is an integral component of the marsh culture. As described in Section 7.6, Recreation, bird watching is expected to be enhanced through creation of additional bird habitat and increased public access. This and other non-consumptive uses are recognized as important, and the SMP promotes the further development of these recreational activities in the Marsh.

DU-9

The SMP is expected to result in a shift in the type of recreation that occurs in the Marsh. Given the projected Bay Area population increase combined with an increase in public access in the Marsh, overall recreation is expected to increase. Duck hunting would remain a primary recreational activity in the Marsh in the remaining 44,000 to 46,000 acres of managed wetlands. In addition, hunting would occur at the tidal marsh sites.

DU-10

See Master Response 6: Significance of Wetland Conversion.

DU-11

See Master Response 5: Inclusion of an Adaptive Management Plan.

DU-12

See Master Response 6: Significance of Wetland Conversion.

DU-13

The restored tidal areas will be selected and designed to best accommodate vegetation growth, retention of sediments, and sea level rise. This may include grading in the restoration area prior to breaching. However, the SMP dredging program is intended specifically for levee maintenance, and importing materials into the Marsh has proven to be a significant issue. As such, restoration under the SMP does not include beneficial reuse of dredged materials in the restoration areas.

DU-14

Regarding the example cited on page 4-3, it is important to note that one impetus of the development of the SMP was the need to deal with the regulatory uncertainty as it relates to endangered species and the ongoing managed wetland activities. As such, the analysis in the EIS/EIR assumes that absent a comprehensive plan for the Marsh that balances managed wetland activities with restoration, managed wetland activities would be further constrained. During the development of the SMP and with guidance from the CALFED ROD, the SMP Principal Agencies included a component of the SMP to offset, to the extent possible, impacts on managed wetland functions and values. One such result of this is the dredging program, which was a component of the plan landowners indicated during scoping would substantially improve their ability to manage their properties. Other components of the SMP also help improve management of the managed wetlands through increased funding and regulatory stability to allow the maintenance and operations activities. This increased management would allow landowners to provide better habitat for waterfowl.

DU-15

The current RGP 3 and future proposed permits will include the following activities: replacement, installation, and maintenance of water control structures. Currently, 50 new exterior water control structures may be installed annually in the Marsh. New drain (only) structures may be installed. No new diversions or enlargement of an existing diversions is permitted unless it has a DFG-approved fish screen installed on it, or USFWS, DFG, and NMFS determine the proposed new diversion would not adversely affect any endangered species. The installation of permanent and portable pumps and pump platforms is a permitted activity. There is currently no regulatory limit on the size of managed wetland drainpipes. There are physical limitations on appropriate size of drain gates based on tide stage in the adjacent channel and desired water elevation in the managed wetlands. New drain (only) gates are permitted, as long as they comply with condition 19 of the RGP 3.

Regulatory limitations exist only when a water control structure is a dual purpose gate (it is used for both drainage and flooding of the managed wetlands). In this circumstance, enlargement of the structure is not permitted, because a diversion cannot be enlarged without the installation of a DFG-approved fish screen.

Most managed wetlands in the Suisun Marsh are not flood limited. The land surface elevations within the managed wetlands are at or below mean sea level. Therefore, applying water is not a difficulty, unless seasonal diversion restrictions are in place to protect sensitive fish populations and the diversion lacks a fish screen.

DU-16

The restoration approach described in the SMP includes preparing sites prior to breaching, which includes creating wide, gradually sloping levees that are expected to be self-sustaining once vegetation is established on them. The site preparation would allow time for vegetation to be established. This has proven to be successful at Blacklock and other locations in the Marsh. As such, it is not expected that restoration areas would require active levee maintenance. If it is discovered that a particular restoration site does not meet this assumption, the specific project proponent would need to evaluate options to ensure that flood risk to adjacent properties is properly mitigated.

DU-17

The magnitude of the suspended sediment (SS) transport within Suisun Bay, which can be characterized by an average SS concentration of 100 mg/l and an average outflow of 25,000 cfs, indicates that additional scouring at the entrance or deposition within the restored tidal marsh would not appreciably change the sediment supply in Suisun Bay or San Francisco Bay. This impact would be less than significant.

DU-18 and DU-19

See Master Response 6: Significance of Wetland Conversion.

DU-20

See Master Response 5: Inclusion of an Adaptive Management Plan.

DU-21 and DU-22

See Master Response 6: Significance of Wetland Conversion.

DU-23

Not all managed wetlands currently are operating on the optimal 30-day flood and drain cycle, and the SMP recognizes that sea level rise as a result of climate change likely will exacerbate the difficulties of draining managed wetlands in some areas of the Marsh. Operations could be adjusted through use of pumps, changes in interior drainage operations, and consolidation of discharges in areas that allow better drainage. The implementation of the SMP and the Revised SMPA PAI Fund would improve flood and drain capabilities of the managed wetlands and would not exacerbate the potential effects of sea level rise.

DU-24

An analysis of how the Marsh would respond to sea level rise is provided in both Chapter 2 and Section 5.9. Both sections describe how the restoration and managed wetland activities would be adaptively managed in light of changes related to sea level rise. The changes in salinity over the next 30 years are not expected to exceed current fluctuations, nor would the implementation of the SMP result in any substantial change in how the Marsh would need to adjust to salinity changes driven by sea level rise.

DU-25

Water years 2002 and 2003 were used for the salinity modeling because they were used to calibrate (adjust) the RMA model that was improved with new channel geometry data in 2005. These were recent years with a full set of salinity (EC) data from the Bay, Delta, and Suisun Marsh. Table 5.1-4 indicates that the total Delta outflow for water year 2002 was about 9 million acre-feet (maf) and the total outflow for 2003 was about 14 maf, compared to the long-term average Delta outflow of about 20 maf. Because the outflow was less than 5,000 cfs in both years, these represent the lowest allowable Delta outflow and the highest allowable salinity under the current Delta objectives (D-1641).

DU-26

The potential impact of tidal wetlands on localized and regional salinity is fully described in Section 5.2 and in the salinity modeling described in Appendix A. As a result of the regional restoration approach described in Chapter 2 and shown in Table 2-4, the localized effects generally will be small relative to the normal salinity gradients within the Marsh channels, because the salinity is controlled by the seasonal changes in Delta outflow. This salinity effect was found to be greatest for breaches to Suisun Bay and was less for breaches to interior channels. As committed to in Chapter 2, these potential salinity effects will be considered with modeling as each available property for tidal restoration is designed. The difference between unplanned and planned breaches relative to salinity impacts is that large-scale restoration with breaches in the southern areas of the Marsh could have substantially greater impacts on Marsh- and Delta-wide salinities compared to carefully selected breach sizes and locations. As such, the deliberate selection of breach sizes and locations is key to ensuring the salinity impacts described in the SMP are not exceeded. This cannot necessarily be achieved through passive breaching.

DU-27

The SMP would provide mechanisms and funding (through the revised SMPA) to improve management of managed wetlands. These improvements would help managed wetlands accommodate sea level rise to the extent possible. It is important to note that the SMP is a 30-year plan, and while sea level rise is expected to occur over the life of the plan, the plan does not address management beyond that time or the impacts attributable to sea level rise beyond that timeframe. Section 5.9 has been updated to include additional information related to managed wetlands and their response to sea level rise under the SMP as well as impacts of salinity on the Marsh.

DU-28

See Master Response 5: Inclusion of an Adaptive Management Plan and Master Response 6: Significance of Wetland Conversion.

The SMP recognizes a 30-day flood and drain cycle as the ultimate goal for managed wetlands to optimize their production. While not quantified, the managed wetland activities are expected to help managed wetlands get closer to achieving the 30-day flood and drain goal through providing regulatory certainty, and in some instances funding, to implement required activities. CEQA/NEPA do not require that impacts be fully offset. Rather, NEPA requires that the impacts be disclosed and CEQA requires that impacts are mitigated to a less-than-significant level when feasible. As described in Master Response 5: Adaptive Management Plan, and Master Response 6: Significance of Wetland Conversion, the conversion of managed wetlands to tidal wetlands combined with the

implementation of managed wetland activities is not expected to result in a significant change in waterfowl populations.

DU-29, DU-30, and DU-31a

See Master Response 6: Significance of Wetland Conversion.

DU-30

DU-31b

See Master Response 4: Relationship to Other Plans Affecting the Delta and Suisun Marsh.

Additionally, the cumulative chapter (Chapter 9) of this EIS/EIR describes the potential additive effects of the BDCP and the SMP to the extent information is available for the BDCP.

DU-31c

See Master Response 4: Relationship to Other Plans Affecting the Delta and Suisun Marsh.

14.2.6 Individuals

14.2.6.1 GB—George Boero, Morrow Island Land Co. #702, January 17, 2011

Comment Letter GB

From: George Boero [gboero@sbcglobal.net]
Sent: Monday, January 17, 2011 11:39 AM
To: Victorine, Rebecca A
Cc: Steve Chappell; Brian Boero
Subject: Suisun Marsh Plan

Dear Ms Victorine;

I am a land owner in the Suisun Marsh. I am concerned about the multiple partners in this plan this living up to doing what they promise. For example, 30 years ago DWR and USBR installed Morrow Island Distribution System to increase water quality. Now they are restricting water delivery and quality with no answer to our concern. Yet in a review form "Land of the West Wind" says that the plan will protect and where possible improve water quality for beneficial uses in Suisun Marsh. Multiple agencies, USFW,DWR,DFG,USBR,and SRCD have not gotten the Distribution System to work. My concerns are not only about the Distribution System but also this plan. GB-1

Sincerely,
George Boero
Morrow Island Land Co. #702

1

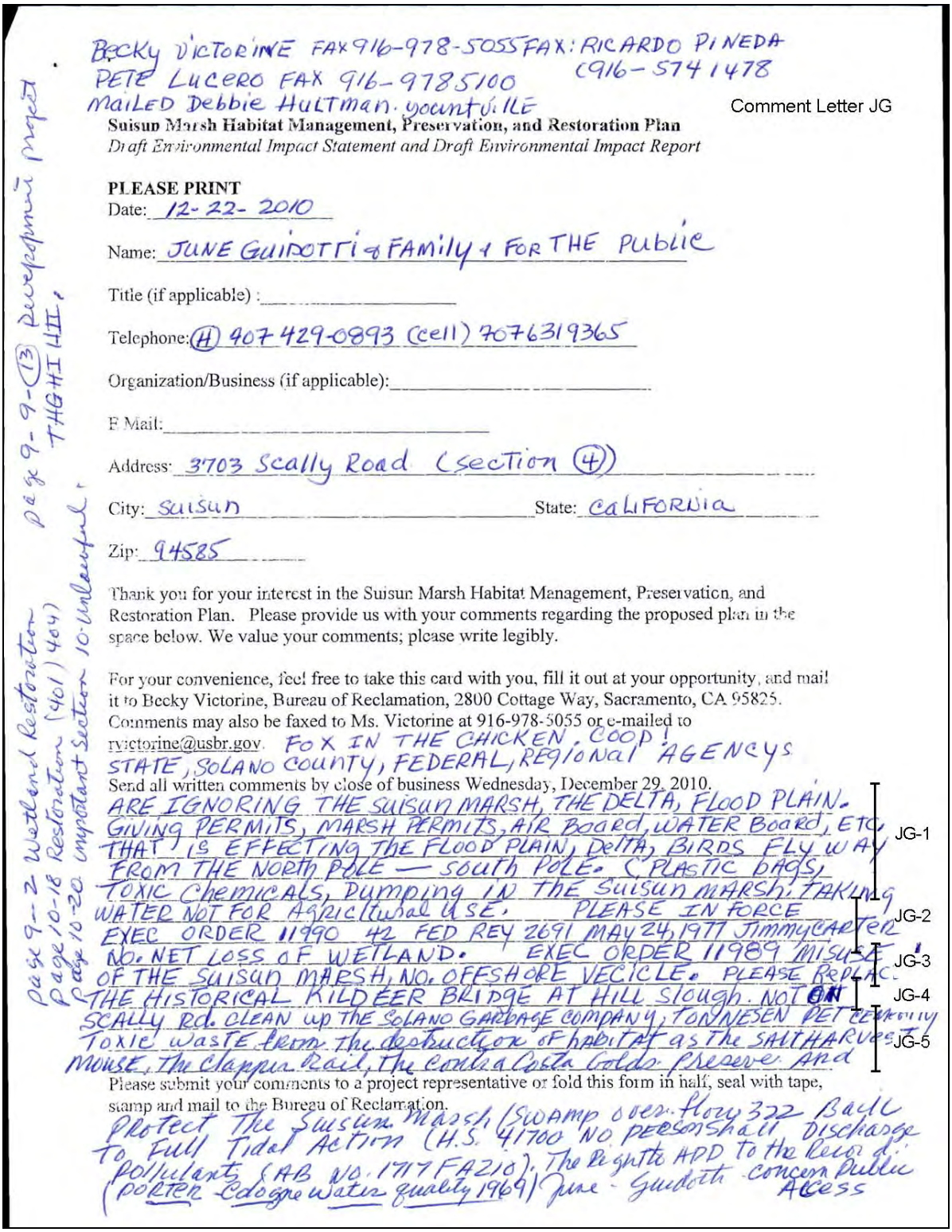
Responses to Comment Letter GB

GB-1

The SMP would help to stabilize the regulatory environment in the Marsh, which would allow operations and maintenance of managed wetlands to continue into the future. It also would provide for mechanisms and funding to improve management activities. As proposed, the SMP would improve water quality through restoration and improved managed wetland management and also would provide regulatory assurances for water diversions to managed wetlands through the permitting process.

14.2.6.2 JG—June Guidotti, December 22, 2010

(See Attachment A for attachments received during the comment period.)



BECKY VICTORINE FAX 916-978-5055 FAX: RICARDO PINEDA (916-574 1478
PETE LUCERO FAX 916-9785100
MAILED Debbie Hultman. yountville

Comment Letter JG

Suisun Marsh Habitat Management, Preservation, and Restoration Plan
Draft Environmental Impact Statement and Draft Environmental Impact Report

PLEASE PRINT
Date: 12-22-2010

Name: JUNE GUIDOTTI & FAMILY & FOR THE PUBLIC

Title (if applicable) :

Telephone: (H) 707 429-0893 (cell) 7076319365

Organization/Business (if applicable):

E Mail:

Address: 3703 Scally Road (section (4))

City: Suisun State: CALIFORNIA

Zip: 94585

Thank you for your interest in the Suisun Marsh Habitat Management, Preservation, and Restoration Plan. Please provide us with your comments regarding the proposed plan in the space below. We value your comments; please write legibly.

For your convenience, feel free to take this card with you, fill it out at your opportunity, and mail it to Becky Victorine, Bureau of Reclamation, 2800 Cottage Way, Sacramento, CA 95825. Comments may also be faxed to Ms. Victorine at 916-978-5055 or e-mailed to rvictorine@usbr.gov. FOX IN THE CHICKEN COOP! STATE, SOLANO COUNTY, FEDERAL, REGIONAL AGENCYS

Send all written comments by close of business Wednesday, December 29, 2010.

ARE IGNORING THE SUISUN MARSH, THE DELTA, FLOOD PLAIN. GIVING PERMITS, MARSH PERMITS, AIR Board, WATER Board, ETC, THAT IS EFFECTING THE FLOOD PLAIN, DELTA, BIRDS FLY WAY FROM THE NORTH POLE — SOUTH POLE. (PLASTIC BAGS), TOXIC CHEMICALS, DUMPING IN THE SUISUN MARSH, TAKING WATER NOT FOR AGRICULTURAL USE. PLEASE IN FORCE EXEC ORDER 11990 42 FED REG 2691 MAY 24, 1977 JIMMY CARTER NO. NET LOSS OF WETLAND. EXEC ORDER 11989 MISUSE OF THE SUISUN MARSH, NO. OFFSHORE VECICLE. PLEASE REPLACE THE HISTORICAL KILDEER BRIDGE AT HILL SLOUGH. NOT ON SCALLY Rd. CLEAN UP THE SOLANO GARBAGE COMPANY, TONNESEN PET CEMETERY TOXIC WASTE from the destruction of HABITAT as the SALTHARVEST MOUSE, The Clapper Rail, The Contra Costa Golds. Preserve And

JG-1
JG-2
JG-3
JG-4
JG-5

Please submit your comments to a project representative or fold this form in half, seal with tape, stamp and mail to the Bureau of Reclamation.

Protect The Suisun Marsh (SWAMP does flow 322 Bay/C To Full Tidal Action (H.S. 41700 NO PERSON shall Discharge Pollutants (AB NO. 1717 FA210). The Right to ADD to the Record (PORTER Cologne Water quality 1969) June - Guidotti Concern Public Access

Page 9-2 Wetland Restoration
Page 10-18 Restoration (401) 404)
Page 10-20 Important Section 10 Unlawful.
Page 9-9-(13) Development Impact
THANK YOU

Responses to Comment Letter JG

Please note Attachment A includes attachments received during the comment period. It does not contain specific comments on the SMP EIS/EIR; therefore, it is included for informational purposes only.

JG-1

See Master Response 7: Mitigation and Recovery Accounting.

JG-2

See Master Response 6: Significance of Wetland Conversion.

JG-3

The amendment to EO 11989 regarding off-road vehicles states "the respective-agency head shall, whenever he determines that the-use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence." In the case of the SMP, the USFWS and Reclamation have evaluated all of the potential effects related to managed wetland activities and tidal restoration and all impacts would be mitigated to less than significant impacts on the environment, except some impacts related to cultural resources (Impacts CUL-1, CUL-3, CUL-4, and CUL-8). Impacts CUL-4 and CUL-8 are related to potential effects on unidentified resources, whereas CUL-1 addresses the changes in the Montezuma Slough Historic Landscape from restoration and CUL-3 relates to the impacts of restoration by inundation of known resources. None of the significant impacts are related to managed wetland activities, except CUL-8, which acknowledges the potential for as of yet unidentified resources to be affected. The Principals will consult with the SHPO to address and minimize these potential effects to the extent possible. Impacts of off-road vehicles would not cause considerable adverse effects.

JG-4

Bridge replacement and other infrastructure improvements are outside the purview of the SMP. However, should infrastructure need to be replaced, removed, or upgraded to accommodate managed wetland or restoration activities, it would be planned as part of specific projects.

JG-5

The landfill operations are outside legal authority of the SMP Agencies and the purview of the SMP. Other land use activities predate the SMP development and should be addressed with the appropriate regulatory and permitting agency.

14.2.6.3 RM—Robert T. Marks, November 18, 2010

Comment Letter RM

Subject: Suisun Marsh Habitat Management, Preservation and Restoration Plan

From: Robert T. Marks [rtmarks@eastbayperio.com]
Sent: Thursday, November 18, 2010 9:32 AM
To: Victorine, Rebecca A
Subject: Suisun Marsh Habitat Management, Preservation and Restoration Plan

November 18, 2010

Dear Ms. Victorine:

As I will be out of the area on Nov. 18, 2010 and unable to attend either of the scheduled meetings discussing the above subject, I expect that my comments will be included in the decision making process and not discarded. I will appreciate you making sure that the above will indeed occur.

I whole heartedly applaud all efforts of habitat preservation which we as land owners and hunters carefully guard. As you area aware, were it not for concerned land owners and sports persons in union with federal and state agencies, the Suisun Marsh would cease to exist as we know it today. It is through continued improvement of the land mass by replenishing of natural grasses and feed amenable to water fowl, by maximizing fresh water flows and by consistent levee monitoring and repair that insures viability of the marsh. Should these activities cease, especially responsible levee maintenance, the marsh would definitely decline to a salty, stale environment which would certainly negatively affect water fowl and many other species that now occupy an environment consisting of fresh water grasses, minimally to non salted peat earth and ample food for support. I would hope that any decisions by the agencies involved will take the above facts into consideration.

In light of the economic situation we now face, I have serious concern that funding, in spite of all good intentions and dictates, will not be adequate. The easiest avenue to travel would be to curtail funding, which will negatively affect levee maintenance, allowing levees to breech, turning managed wetlands and habitat into a salty non productive tidal marsh. RM-1

This cannot be allowed to occur as the entire Suisun Marsh owes its success of habitat to managed wetlands by responsible and concerned land owners and sports persons. I also find the reasoning faulty that converting significant acreage into tidal marsh will improve wetland habitat. All this would accomplish would be to **increase** salinity and **decrease** habitat. RM-2

Over the past many years the Suisun Marsh has been carefully managed, wetlands and habitat have been improved and diligence remains on the part of land owners to continue in the same manner. This has been accomplished by close coordination and cooperation with state and federal agencies. Any decisions that would detract from this alliance of success should not be considered. It just seems logical that to return a productive, beautiful habitat filled with natural grasses and food for water fowl, upland game and other local species into a salt water "desert" is not the thing to do.

Most Sincerely Yours:

Robert T. Marks, DDS, FACD, FICD.

1

Responses Comment Letter RM

RM-1

See Master Response 7: Mitigation and Recovery Accounting.

RM-2

See Master Response 6: Significance of Wetland Conversion.

14.2.6.4 RV—Roberto Valdez, December 29, 2010

Comment Letter RV

From: Victorine, Rebecca A
To: gmartinelli@dfg.ca.gov; SChappell@SuisunRCD.org; Grimes, Russell (Russ) W; Pierre, Jennifer; Goude, Cay; Raabe, Andrew; kshulte@water.ca.gov
Subject: FW: Individual Comments re: DEIS/DEIR for the Suisun Marsh Habitat Management, Preservation, & Restoration Plan.
Date: Monday, January 03, 2011 7:43:30 AM

FYI

From: Roberto Valdez [roberto58valdez@hotmail.com]
Sent: Wednesday, December 29, 2010 5:08 PM
To: Victorine, Rebecca A
Subject: FW: Individual Comments re: DEIS/DEIR for the Suisun Marsh Habitat Management, Preservation, & Restoration Plan.

Please correct: Also, I am not convince that the wetland management activities within the study area will have less than significant adverse impacts on the following species:

Thank you very much.

From: roberto58valdez@hotmail.com
To: rvictorine@usbr.gov
Subject: Individual Comments re: DEIS/DEIR for the Suisun Marsh Habitat Management, Preservation, & Restoration Plan.
Date: Wed, 29 Dec 2010 16:58:35 -0800

December 29, 2010

Becky Victorine
Bureau of Reclamation (Mid-Pacific Region)
2800 Cottage Way
Sacramento, CA 95825

Subject: Individual Comments re: DEIS/DEIR for the Suisun Marsh Habitat Management, Preservation, and Restoration Plan.

Dear Ms. Victorine:

I am a long-time Solano resident and stakeholder in the proposed Multi-species Habitat Conservation Plan of Solano County. I am responding to the proposed SHMPRP on account that the Suisun Marsh is considered to be an utmost significant habitat area to many threatened/endangered/special status/species of concern within Solano County, as an integral part of the entire Bay Area Delta. Reviewing this 30-year plan, I am disappointed that it is really a mini-version of the proposed HCP of Solano County which has not been adopted by both local and county government during the past 11 years. Worst, it is based on piecemeal conservation efforts such as CALFEDROD which the San Francisco Bay Conservation Development Districts continues to implement with regards to the Suisun Marsh Preservation Plan. RV-1

Also, I am not convince that the wetland management activites within the study area will not have less than significant adverse impacts on the following species: swainson's hawk, western burrowing owl, tri-colored blackbird, white-tailed kite, loggerhead shrike, Canada goose, California black rail, least tern, western pond turtle, salt marsh harvest mouse, papoose tarplant, Contra Costa Goldfields, delta/longfin smelt, chinook salmon, and steelhead fish. RV-2

In addition, I am disappointed that the Vallejo Inter-Tribal Council was not contacted with regards to the most likely descendant for the Native American sacred CAL-SOL sites within the study area. RV-3

Thank you very much.

Roberto Valdez, 248 Plantation Way, Vacaville, CA 95687.

Having reviewed the executive summary, biological (Chapter 6) and cultural (Chapter 7) sections,

Responses to Comment Letter RV

RV-1

The SMP is designed to meet the objectives of CALFED, portions of the USFWS tidal marsh restoration plan, and recovery of listed species that use the Marsh. While these goals may overlap other plans and policies, the SMP was developed specifically to address land use and management issues in the Marsh. Implementation of the SMP is expected to result in a more stable regulatory environment compared to current conditions.

RV-2

The existing management activities are a component of the baseline, and therefore the current level of implementation of these activities is not analyzed as part of the project alternatives. However, the impacts of the proposed increase in magnitude for some of these activities as well as the impacts of new activities (e.g., dredging) have been described in this EIS/EIR. As described in the Wildlife section (6.3) and in the Environmental Commitments section of Chapter 2, many restrictions and minimization measures currently in place would continue to avoid and minimize effects on these species. Additionally, restoration of tidal wetland is expected to improve ecosystem conditions for many native Marsh species, including those listed in the comment.

RV-3

Reclamation will seek and consider the views of the Vallejo Inter-Tribal Council during the Section 106 process for the PAI projects (see Mitigation Measure CUL-MM-7). As applicable, the lead state and federal agencies responsible for implementation of non-PAI projects will seek and consider the views of the Vallejo Inter-Tribal Council during implementation of Mitigation Measures CUL-MM-2, CUL-MM-3, CUL-MM-4, and CUL-MM-5).