

**Collated Comments on the
 March 7, 2008 Draft Existing Ecological Conditions Chapter and
 Covered Species Accounts for the Bay Delta Conservation Plan
 (May 12, 2008)**

General Comments

No.	Page	Section	Line	Commenter	Comment	Disposition
1.				Karla Nemeth/ Zone 7	1. Overall, chapter 2 is looks good. Quite a lot of information packed into a relatively condensed chapter. 2. Consider one large (11 x 17 or even larger) detailed map up front in Chapter 2 for the reader to pull out for easy reference.	Complimentary comment is noted and appreciated. BDCP drafts are provided in PDF format. If practicable, we will include a separate file of the map in 11 x 17 format that can be printed by reviewers with appropriate equipment.
2.				Karla Nemeth/ Zone 7	Need this document discuss the possible listing of the Pacific Smelt? See: http://www.nmfs.noaa.gov/fishnews/2008/03242008.htm#anchor2	The potential for listing will be addressed through the Steering Committee process for identifying any additional covered species.
3.				Greg Gartrell/ CCWD	The discussion of residence time in Ch. 2 is all over the place (in some circumstances, increased residence time is good, in others bad). Summarize the anticipated benefits/impacts of increasing residence time. There should be some discussion on the differences between Corbula and Corbicula (p. 2-35, lines 6-16). Corbula filters ~400 L/g/d compared to Corbicula ~70 L/g/d. Corbula has a higher Se accumulation rate. See Variable Delta workshop presentations and reports. Corbicula has not been associated with severe ecological changes; Corbula has.	Positive and adverse effects of increased residence time will be summarized Differences will be discussed

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4.				Scott Cantrell/DFG	<p>The report provides a description of aquatic natural communities Tidal Perennial Aquatic, Tidal Freshwater Emergent Wetland, and Valley Riparian in the Delta. We are at the point where we should be addressing the broader range of natural communities in the Delta, including terrestrial natural communities and potentially other aquatic communities. Activities under consideration for restoring habitats and ecosystem functions and the footprint of new conveyance facilities will require an evaluation of impacts on natural communities and species that are not currently being addressed in the workgroups. It is very likely the number of covered species and natural communities will increase as we move forward in the planning process. We believe it will be a time-savings overall if we start to address these issues now.</p>	<p>As the BDCP development process moves forward, the Steering Committee will evaluate the need for additional covered natural communities and covered species. The identification of potential additional covered species will include an assessment of the likelihood of adverse effects resulting from implementation of conservation measures and covered activities. For any additional communities and species a description of existing conditions will be provided in Chapter 2.</p>

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5.				Scott Cantrell/DFG	<p>The BDCP Planning Area (Figure 2.1) includes only the Legal Delta, yet map products developed for the Habitat Restoration Technical Team include references to 11 hydrologic zones, including Suisun Marsh and Bay. There should be consistency in all of these work products with respect to the geographic boundaries of the Planning Area and the units (e.g. Ecological Management Unit, hydrologic “zone” or “region”) for analysis. The same applies to elevation and bathymetric data (LiDAR vs. vertical datum GRS80 vs. NGVD29 vs NAVD88). We suggest that a note be added to all figures that incorporate elevation data stating that maps are preliminary and utilize elevation information that is currently available, and that they will be revised to incorporate DWR’s LiDAR elevation data once they become available.</p>	<p>The HRPTT maps are developed specifically for use by that team in the development of conservation measures and are not related to the content of Chapter 2. Information on Suisun Marsh and Bay was provided to the HRPTT to assist in identifying the potential for conservation in this area outside the Planning Area as allowed under the Planning Agreement.</p> <p>Caveats on maps are important to identify the uniformity or lack thereof of the data displayed. Many of the maps used at HRPTT are one-time use working materials, but any maps provided in draft documents should include appropriate caveats as recommended in the comment.</p>
6.				Scott Cantrell/DFG	<p>With respect to the natural communities write-ups and the species tables that accompany them (as well as the large species table [Table 2.5]), neither white sturgeon nor fall/late fall-run Chinook salmon are included in the table (yet they are proposed “covered” species under the BDCP). We suggest that either Species of Special Concern be added to Table 2-5, or that another table be created to list Species of Special Concern (including, but not limited to, fall/late-fall run Chinook).</p>	<p>The tables only include species that are listed under ESA and CESA or fully protected and that are present in natural communities. Neither of these species mentioned in the comment are listed as such. Because these species have been identified as Covered Species in the Planning Agreement, species accounts are provided for them in App. A.</p>

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7.				Scott Cantrell/DFG	<p><i>Comments on Table 2-5:</i> Per “Appendix B: Covered Natural Community Species Lists” submitted to SAIC by DFG staff on May 24, 2007 (enclosed), we request that SAIC consultants double-check and verify the following:</p> <ul style="list-style-type: none"> • Salt marsh harvest mouse can be found in Managed Seasonal Wetlands (MSW). • San Joaquin kit fox can be found on Agricultural Lands (AL). • California tiger salamander can be found in Natural Seasonal Wetlands (NSW). • All seven fish species can be found in Tidal Freshwater Emergent Wetland (TFEW). <p>Also, there are some species of concern that occur in these natural communities, but are not included in Table 2-5 (including, but not limited to, avian species that utilize riparian habitat). We request that you review the “Appendix B”, and include those species that are listed as Species of Special Concern.</p>	<p>Species habitat relationships identified in the comment will be check and revisions made to Appendix B, if necessary.</p> <p>Table 2.5 identifies only fish and wildlife species that are currently listed as threatened or endangered under ESA and CESA or fully protected. The table was not intended to identify species of special concern or other non-listed species. Appendix B serves to provide a cross-reference of common and scientific names of all species mentioned in the text and does not provide a comprehensive list of species-status species.</p>

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8.				Scott Cantrell/DFG	<p><i>Comments on Appendix A:</i> In the species accounts, there are numerous instances in the discussion of stressors for each species, where there are descriptions of the various efforts (e.g conservation programs) that are underway to address the stressors. Since these efforts are not “stressors” per se, they do not add much value to those sections of the text. In fact, their inclusion seems to detract from the importance of the stressors. In our specific comments on the species accounts we have identified examples of this issue.</p> <p>There are many examples in the report of dubitable statements that have no citations. Citations need to be added throughout the report so that the accuracy of these statements can be checked by others. These statements and areas within the text are also called out in the attached specific comments.</p> <p>Finally, the benefits of the Environmental Water Account (EWA) are overstated in the species accounts. We suggest you acknowledge the benefits and shortcomings of the EWA.</p> <p>These comments on Appendix A (and those provided in the attached specific comments) are applicable to all instances where the text in these accounts has been duplicated in other sections. The text should be reviewed for accuracy in all of these cases, and revised as appropriate.</p>	<p>These various efforts will be removed and placed in the “Conservation Measures” section of the species accounts.</p> <p>Citations will be added where indicated or statements will be reworded do reduce any possible confusion as to the definitiveness of conclusions.</p> <p>The benefits and shortcomings of the EWA will be described in better detail and clarity, as appropriate.</p> <p>Necessary revisions to ensure accuracy will be made.</p>

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9.				Lori Rinek / FWS	<p>It is the Service’s understanding that the Existing Conditions chapter is not intended to reflect baseline conditions for the HCP and NCCP processes. With that being said, the Existing Conditions chapter is a fairly solid document that provides the “ecological setting” in a reasonable form. The report includes much of the recent information available on hydrology, climate, species, etc. The report identifies habitat types within the planning area, not currently covered by the BDCP, but may be affected by covered activities. Certain habitats (e.g. managed wetlands within the Delta) will certainly be impacted by the altered conveyance strategies. Additionally, activities involving restoration and ecosystem function will also involve impacts to multiple habitats.</p> <p>To date, the BDCP is “fish centric” and coverage is still only being requested for anadromous fish and Delta and longfin smelts. We believe we are at the point where the focus on a broader range of natural communities in the Delta should be discussed, including terrestrial natural communities and other aquatic communities, and species associated with them. We believe that addressing these issues now will allow us to move forward more quickly in the future.</p> <p>At this time, the FWS was not able to extensively review the species accounts associated with the Existing Conditions document. The FWS understands the DRERIP species models are nearing completion of their peer-review and editing and will be ready in the near future. In addition, the DRERIP models are being offered to the Steering Committee for “collegial” review. The FWS recommends that SAIC’s species accounts be amended or replaced by the independently and collegially reviewed DRERIP species models once these are finished.</p>	<p>Complimentary comment is noted and appreciated.</p> <p>As the BDCP development process moves forward, the Steering Committee will evaluate the need for additional covered natural communities and covered species. The identification of potential additional covered species will include an assessment of the likelihood of adverse effects resulting from implementation of conservation measures and covered activities. For any additional communities and species a description of existing conditions will be provided in Chapter 2.</p> <p>Species accounts will be amended, as appropriate, to add pertinent new information from the DRERIP models. To address the standards typical of HCPs and NCCPs, the format and content detail of the species accounts will not be replaced with DREPIP species models unless specifically requested by the Steering Committee.</p>

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10.				Ted Meyers/ NMFS	<p>The repetitive information within the salmon sections could be addressed.</p> <p>We found the habitat maps difficult to read (a scale issue).</p> <p>The section addressing potential effects due to climate change could be expanded.</p>	<p>The goal of these sections was to have stand-alone accounts of each species/DPS/ESU, even if there is repetition.</p> <p>The readability of habitat maps will be improved as much as possible considering page size limitations.</p> <p>This section will be expanded to the extent that new information is available specific to the species.</p>
11.				TNC	<p>The document, as an existing conditions component of the BDCP plan, generally provides a good overview of the landscape as we currently understand it. As noted in the discussion at the 4/18/08 Steering Committee meeting, there is a need to determine how this document relates to a baseline and the need for similar information in the NEPA/CEQA process.</p>	<p>Complimentary comment is noted and appreciated. This document does not attempt to describe the Section 7 environmental baseline. The description of baseline conditions will be addressed in the impacts analysis chapter, as necessary.</p>
12.				TNC	<p>The document, specifically the spring run and winter run Chinook and steelhead Covered Species Accounts appendices, should be updated to include a discussion of the recent Wanger ruling. The Legal Status sections in the appropriate Appendix A accounts, would be a good location for a summary overview.</p>	<p>Legal status of each species will be updated with the most recent information.</p>
13.				TNC	<p>The Range and Status sections of the Covered Species Accounts appendices for salmonids and steelhead should be updated to reflect the significant declines in escapement this year. According to the NMFS press release, there has been a 70% reduction, believed to be attributable to ocean conditions. This is critical information that must be included in the existing conditions report.</p>	<p>The most recent information on the ESUs/DPSs will be added to the Range and Status section</p>

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14.				TNC	The Wanger decision affecting Delta smelt should be summarized in the Legal Status section of the Delta smelt appendix, and the resulting operational restrictions should be described in the Relevant Conservation Efforts section. Currently, only a very brief mention of basis for the Wanger decision is included in the Entrainment section.	The Wanger decision did not affect the legal status of delta smelt and does not belong in the Legal Status section. The decision will be described in the Relevant Conservation Efforts section to the extent practicable.
15.				TNC	Several of the Covered Species Account appendices cite operation of the Environmental Water Account as a relevant conservation effort. It is important to note that the EWA has not been funded for several years and therefore is not currently providing any conservation benefit. Similarly, discussion of the CVPIA Water Acquisition program leads the reader to believe it is an active program. The goal of the program is appropriately stated in A.7.6, Page 7-16, line 2 and 3, but it should be mentioned that no funding has been provided and no action has been taken for many years (beyond providing the VAMP flows that some would argue is an inappropriate use of these funds). The CALFED Environmental Water Program is not mentioned, we suspect due to the fact that the program's funds were re-directed in 2005. However, the EWP has recently applied for funding for a high flow experiment on Clear Creek to benefit spring run. Nick Hindman at FWS would be a good source of information on the current status of the EWP.	Will be addressed, similar to General Comment #8 above. The benefits and shortcomings of the EWA, CVPIA Water Acquisition program, and EWP will be described in better detail and clarity, as appropriate.
16.				TNC	The covered communities should be expanded to include Seasonal Managed wetlands. Reclamation of the Delta and operation of the CVP/SWP have severely impacted the amount and quality of wetland habitats. Currently, managed seasonal wetlands are operated to compensate for these impacts. Additionally, it is anticipated that tidal habitat restoration and conveyance changes will likely impact area currently managed as seasonal wetland habitat.	A description of existing conditions will be incorporated into the Administrative Draft version of Chapter 2 for any natural communities and species that the Steering Committee agrees to cover in addition to those identified in the Planning Agreement.
17.				TNC	The covered communities sections should include discussions of stressors to the natural communities and relevant conservation efforts in the same way that the Covered Species Accounts do in Appendix A.	Comment noted. The descriptions of natural communities include the information required under NCCPA.

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18.				TNC	The Covered Species Accounts for salmonids and steelhead should be reviewed for consistency. There appear to be places where information included in one section, that one would assume would benefit the other salmonid runs and steelhead, is not included the other sections.	These sections will be reviewed for consistency.

Chapter 2 Comments

No.	Page	Section	Line	Commenter	Comment	Disposition
1.	1	n/a	n/a	DFG	Reference in “Note to Reviewers” RE “nine” covered fish species and “three” covered natural communities – see our “general comments” for thoughts on whether this is inclusive enough.	A description of existing conditions will be incorporated into the Administrative Draft version of Chapter 2 for any natural communities and species that the Steering Committee agrees to cover in addition to those identified in the Planning Agreement.
2.	2	n/a	n/a	DFG	“List of Acronyms”: a couple of corrections – “ERP” is <u>Ecosystem</u> Restoration Program, and “GCID” is <u>Glenn</u> -Colusa Irrigation District (two n’s) – this change needs to be made throughout the text	These will be corrected
3.	2-1	2.1	7	Karla Nemeth/ Zone 7	Also indicate that the Delta has a “legal” boundary.	Text will be revised as appropriate
4.	2-1	2.1	7	DFG	Suggest adding language from the Planning Agreement to the end of this line ... “It is anticipated, however, that it may be necessary for the BDCP to include conservation actions outside of the statutory Delta that advance the goals and objectives of the BDCP, including as appropriate, conservation actions in the Suisun Marsh, Suisun Bay, and areas upstream of the Delta.”	These will be added as appropriate
5.	2-1	2.1	7	Karla Nemeth/ Zone 7	Add a graphic before Fig 2.11 for context, showing more of the state of CA (size and location of Delta)	It is assumed that the commenter meant Figure 2.1. An inset of CA will be added to Figure 2.1.

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6.	2-1	2.1	7	Justin Fredrickson/ Kari Fisher/ CFBF	The Planning Area and Chapter Two do not include Suisun Marsh. To exclude this area may overlook significant opportunities in close proximity to an area known to be important habitat for the delta smelt. Suisun Marsh provides an important linkage between the inland Delta and San Francisco Bay beyond. Treating the Delta in isolation from the Marsh—or considering the Marsh as a mere add-on to actions in the Delta proper—could significantly reduce the level of conservation the BDCP might otherwise achieve.	The purpose of Chapter 2 is to describe conditions within the BDCP Planning Area, which only encompasses the Statutory Delta. BDCP is currently evaluating opportunities to restore habitats in Suisun Marsh and any such opportunities adopted by the Steering Committee would be described in Chapter 3, Conservation Strategy. Potential impacts of implementing the BDCP on any BDCP actions undertaken in Suisun Marsh would be identified in the BDCP EIR/EIS.
7.	2-2	n/a	n/a	TNC	Hydrologic and Geomorphic Conditions (historic). The section does not mention the impacts of hydrologic mining, a major event in the geomorphic history of the Delta.	A discussion of impacts of hydrologic mining will be added as appropriate
8.	2-2, 2-3	2.2.1	6, et seq.	Justin Fredrickson/ Kari Fisher/ CFBF	In this historical discussion of hydrologic and geomorphic conditions, it would be pertinent to include language acknowledging that the historic transformation of the Delta was not solely for purposes of agriculture. The Delta was reclaimed for many reasons, including water conveyance, transportation, navigation, flood control, energy, economic development, human habitation, public health, etc.	This will be corrected as appropriate.
9.	2-2	2.2.1	29-34 40-41	Greg Gartrell/ CCWD	Further references for data and analyses on soils, salinity and hydrologic conditions in the Delta and Suisun Marsh can be found in Sereno <i>et al</i> (CCWD, June 2007) (http://www.ccwater.com/salinity/HistoricalSalinity.pdf) "seasonal variation in water flows, particularly in dry water years, was greater before construction of upstream dams" (p. 2-2, line 40-41) is unsupported. This statement is vague enough to be true in some circumstances, but highly misleading for a range of interpretations.	This information will be reviewed and incorporated as appropriate.

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10.	2-2	2.2.1	41	Karla Nemeth/ Zone 7	Specify names of key dams. Consider a graphic here showing the main rivers and dams upstream of the Delta.	Key dams will be specified. Graphic will be considered.
11.	2-3	2.2.1	6-8	Greg Gartrell/ CCWD	Major dams were largely constructed in the 1940's through 1970's (see Sereno <i>et al, ibid</i> , p.75). It would be more complete to note that prior to dams, upstream and in Delta diversions increased substantially in the late 1800's through 1940's. Gross annual irrigation diversions from the Sacramento and San Joaquin rivers grew from 1.0 million acre-fee (MAF) in 1879 to 4.3 MAF in 1917 to over 6.5 MAF by 1945. (Department of Public Works, 1931. <i>Variation and Control of Salinity in Sacramento-San Joaquin Delta and Upper San Francisco Bay</i> . Bulletin No. 27). According to the same report, the upstream diversions led to severe and unprecedented salinity intrusion in the 1930's drought. Those conditions precipitated the desire to construct major reservoirs to supply water and control salinity in the Delta.	This discussion will be revised as appropriate
12.	2-3	2.2.1	8-10	Greg Gartrell/ CCWD	More accurately, <i>inflows</i> were increased in the summer and fall relative to historical conditions. Relative to historical conditions, <i>outflow</i> in the summer and fall has actually <i>decreased</i> , an important distinction because it explains the increase in salinity observed in the fall compared to historical conditions.	This discussion will be revised as appropriate
13.	2-3	2.2.1	10-11	DFG	The effect of flow alterations in more recent years has had the opposite effect on salinity intrusion (limits salinity intrusions into the Delta, not accentuating it). This section should describe the effects of existing conveyance and water exports on the Delta, creating a homogeneous freshwater system, reducing residence time, and increasing entrainment and mortality of vertebrate and invertebrate species. If are including changes up until 1960 in Historical Conditions, you should include these additional effects on the Delta.	This discussion will be revised as appropriate
14.	2-4	2.2.1	12	Greg Gartrell/ CCWD	Freshwater habitat and fluctuations attaining fresh conditions have decreased in Suisun Bay and Suisun Marsh as well. Historically (see Sereno <i>et al, ibid</i>), in the spring during the salmon out-migration.	Comment noted. A discussion of this will be added as appropriate.
15.	2-4	2.2.2	11	DFG	"Neomysis" and "Corophium" should be italicized.	We chose to make the genus name the common name for lack of a better common name. Therefore, these will not be italicized (see Appendix B for common and scientific names of all species)

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16.	2-6	2.3.1	n/a	TNC	Data Sources and Methods. Empty?	The file was on the FTP site, just not linked correctly in the READMEFIRST.pdf file. This link will be corrected in the next version.
17.	2-6	2.3.1	4-5	DFG	The e.g.'s for data sources are not acceptable in a methods section. The reader needs to know all data sources and documents used to develop the report and be capable of verifying data and information.	The text will be revised to direct the reader to the references section for a full listing of sources.
18.	2-7	2.3.1	21-22	DFG	Is this crosswalk what is represented for each community in the tables in sections 2.3.4 and 2.3.5? If so, reference them here (e.g. see tables for each community in sections 2.3.4 and 2.3.5).	The text currently indicates what data sources were used to describe covered communities. Tables 2.2 and 2.3 will be revised to footnote the data sources.
19.	2-8	2.3.2	2-6	TNC	Ecosystem Processes, first paragraph. This paragraph talks about the predominance of ecological gradients, and lack of well defined boundaries. I understand what Kimmerer is saying, but in reality, one of the most significant ecological concerns in the Delta is the well defined boundaries between aquatic habitat and rip-rap that characterizes the majority of Delta.	This will be addressed here and/or in the anthropogenic forces section as appropriate.
20.	2-8	2.3.2	7	Karla Nemeth/ Zone 7	Add a prelude here to the anthropogenic forces at work in the Delta which are described later in the section.	Text will be revised to enumerate the forces.
21.	2-8	2.3.2	28	DFG	The term "physical forcing" may be being used incorrectly. The physical forces of tides and freshwater flow influence salinity and turbidity in the estuary.	This will be investigated and updated as appropriate

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22.	2-9	2.3.2	4, 28	Greg Gartrell/ CCWD	<p>It is not clear what “high tidal events” means. Tidal flows are typically in the range of +/- 600,000 cfs near the Carquinez Strait, +/- 350,000 cfs near Chipps Island, +/- 100,000 cfs in the lower Sacramento River and San Joaquin River near Sherman Island (see CDEC, USGS flow stations). Inflows from the San Joaquin River can be less than 1000 cfs (under 300 cfs in 1977); Sacramento River inflow in 1977 drought was as low as 4000 cfs in 1977. Tidal flows and volume depend on the area being filled on the tides and the wave velocity, not on inflow (line 9). The statement seems to confuse tidal volume with upstream tidal influence.</p> <p>Why does increased residence time of nutrients help the ecosystem (page 2-9, line 28)? As recognized elsewhere, the system is not nutrient limited.</p>	<p>This section will be revised to clarify the discussion.</p> <p>Although nutrients are not limiting to the Delta ecosystem, the uptake of nutrients is not instantaneous; aquatic flora need sufficient time to matriculate nutrients into their tissues. If either the nutrients or the organisms are flushed out of the system too quickly, they cannot be used by the rest of the Delta ecosystem.</p>
23.	2-9	2.3.2	5	TNC	<p>Why compare average tidal flows to dry period flows? It would be more appropriate to compare average inflows. The point, that the system is dominantly tidal, would still be made.</p>	<p>Text will be revised for consistency.</p>
24.	2-9	2.3.2	19	TNC	<p>“and high exports” should be added to the sentence describing the effects flows have on x2.</p>	<p>Exports are addressed in the section on anthropogenic influences (pp. 2-13 to 2-14)</p>
25.	2-9	2.3.2	27-29	TNC	<p>These lines debate the merits of increasing residence time. This seems inappropriate for an existing conditions report.</p>	<p>This discussion will be revised as suggested.</p>
26.	2-9	2.3.2	38-39	DFG	<p>Delete “and local diversions”. When considering “large scale” hydrodynamics in the Delta, it’s doubtful that the smaller local diversions, even when considered cumulatively, factor much into the equation. At most, they would seem to affect only local hydrodynamics. Either delete the reference to local diversions or be specific about which local diversions are being referred to.</p>	<p>Sentence will be revised to address the comment.</p>
27.	2-10	2.3.2		Greg Gartrell/ CCWD	<p>Might be worthwhile to mention the role of ammonia in chemical processes.</p>	<p>Ammonia is mentioned in the section on anthropogenic influences (pp. 2-13 to 2-14)</p>

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28.	2-10	2.3.2	3-4	TNC	The last statement in this section is more applicable to the discussion in the biological processes section.	Text will be revised as suggested.
29.	2-10	2.3.2	5, et seq.	Justin Fredrickson/ Kari Fisher/ CFBF	Please include in the discussion of “chemical processes,” some reference to processes relating to mercury as a legacy contaminant in the Delta.	Contaminants are addressed in the section on anthropogenic influences (pp. 2-13 to 2-14)
30.	2-10	2.3.2	14	Karla Nemeth/ Zone 7	Line 4 above indicates that there has been a decline in turbidity, but perhaps a decline from very high levels of turbidity is still considered high? Clarify.	Text will be revised to clarify the discussion.
31.	2-10	2.3.2	18	DFG	“Microcystis” should be italicized.	We chose to make the genus name the common name for lack of a better common name. Therefore, these will not be italicized (see Appendix B for common and scientific names of all species)
32.	2-10	2.3.2	38-40	DFG	Floodplains are shallower and warmer <i>than what?</i> Regarding lines 36-40, add references for Cosumnes River or other areas such that this statement could be a general discussion of floodplains (not single out Yolo Bypass) ... for example, see <i>Citation: Moyle, P., P.K. Crain, and K. Whitener. 2007. Patterns in the Use of a Restored California Floodplain by Native and Alien Fishes. San Francisco Estuary & Watershed Science. Volume 5, Issue 3, Article 1. Available: http://repositories.cdlib.org/jmie/sfews/vol5/iss3/</i>	“...than the mainstem river” will be added Text will be revised to discuss the general attributes of floodplains.
33.	2-11	2.3.2		Greg Gartrell/ CCWD	Tidal transport of sediment is also highly influenced by wind generated waves and turbulence in shallow areas, and of particularly importance in Suisun Bay.	The discussion will be revised to address this factor.
34.	2-11	2.3.2	1-9	DFG	Suggest adding to end of Line 9: “Low dissolved oxygen concentrations have also been documented in Old River near the Tracy Boulevard bridge, and may occur in some dead-end sloughs where both residence time and oxygen demand from decaying plant matter are high.” <i>Citation: Lee, G.F., “Potential Impacts of Pesticides on Low DO in the San Joaquin River Deep Water Ship Channel and South Delta”. Report of G. Fred Lee and Associates, El Macero, CA. 2003.</i>	Information will be added as appropriate.

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35.	2-12	2.3.2	3	DFG	Suggest adding “ <i>Corbula amurensis</i> ” in italics after “overbite clam”. (see comment 16 below)	To avoid the need to specify both common and scientific names of all flora and fauna discussed throughout this document, readers are referred to Appendix B where species and common names are listed.
36.	2-12	2.3.2	7-8	DFG	Phytoplankton are not plants.	Statement will be clarified.
37.	2-12	2.3.2	25	DFG	Unclear whether “Asian clam” is referring to <i>Corbula</i> or <i>Corbicula</i> (both came from Asia). Suggest adding “ <i>Corbicula fluminea</i> ” in italics after “Asian clam” (if that’s the species being referred to here).	To avoid the need to specify both common and scientific names of all flora and fauna discussed throughout this document, readers are referred to Appendix B where species and common names are listed. <i>Corbicula fluminea</i> is referred to as Asian Clam and <i>Corbula amurensis</i> as Overbite Clam throughout the document.
38.	2-12	2.3.2	34	DFG	Organic input to the Delta remains quite high. Has a reduction in organic input to the Delta been implicated in zooplankton decline? Do you have a reference for this?	Reference will be added to the statement.
39.	2-13	2.3.2	11	Karla Nemeth/ Zone 7	“...of the <i>past</i> ” Provide general timeframe.	“of the past” will be replaced with “before European settlement”
40.	2-13	2.3.2	20	Greg Gartrell/ CCWD	Replace “hundreds of smaller diversions” with “thousands of smaller diversions”. Hundreds is off by an order of magnitude.	Statement will be clarified.
41.	2-13	2.3.2	20	DFG	Replace the word “hundreds” with “over 2,000” or “approximately 2,200”	Statement will be revised as suggested.
42.	2-13	2.3.2	29	Karla Nemeth/ Zone 7	Add in Flood control: “ <i>Flood control</i> levees have...”	Text will be revised as suggested.
43.	2-13	2.3.2	44	Karla Nemeth/ Zone 7	This paragraph partly implies that toxicity is limited to agricultural sources. Page 2-13 also describes return flow as a source, and there are the non-point sources. Needs clarification.	Will be clarified as appropriate
44.	2-14	2.3.2	2	Karla Nemeth/ Zone 7	Typo – intend to use <i>toxicity</i> ?	Typo will be corrected.

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45.	2-14	2.3.2	2	DFG	Add an "s" to "toxic"	Typo will be corrected.
46.	2-15	2.3.3.1	25	Karla Nemeth/ Zone 7	Page 2-17, line 13, implies that the Mokelumne plays a lesser role. Clarify or be consistent.	Text will be revised for consistency
47.	2-16	2.3.3.1	1	Karla Nemeth/ Zone 7	Fig 2.3 (and all others of this and similar format) would benefit by locating ~ 2 key cities for reference.	Distinguishing features, such as city names, will be added as necessary to improve figure clarity.
48.	2-16	2.3.3.1	1	Karla Nemeth/ Zone 7	Fig 2.5a-d would benefit by locating ~ 2 cities and the major river(s) within the inset for reference.	Distinguishing features, such as city names and major rivers, will be added as necessary to improve figure clarity.
49.	2-16	2.3.3.2	5	Karla Nemeth/ Zone 7	Consistently use degree symbol (80°)with temperature #s.	Text will be revised as suggested.
50.	2-16	2.3.3.2	21	Karla Nemeth/ Zone 7	Use of "variation" here may not be clear to all readers.	Text will be revised for clarity.
51.	2-17	2.3.3.3	21-24	DFG	This text makes reference to "the 2000 Water Year, an above normal water year." This text should also cite the percentage of water leaving the Delta as exports in dry years (when the most water is exported, at the same time the species are most in need of it). An additional figure, similar to Figure 2.7, should be generated for the "dry year" scenario.	As information is available, matching figures to Figure 2.7 (above normal year) will be created to show the Delta water balance for a representative dry year and wet year.
52.	2-17	2.3.3.3	23	Greg Gartrell/ CCWD	Change "exported via the North Bay..." to "diverted via the North Bay...". NBA and CCWD diversions are used within the watershed and/or Delta, not exported.	Text will be revised as suggested.
53.	2-17	2.3.3.3	27-30	DFG	Delete "exports and" from the end of line 27, change "are" to "is" and add "and exports" after "inflows" on line 28, and add "(depending on water year type)," after "significantly" on line 29. So the sentence would read: "Because in-Delta use is relatively consistent among years, inflows and exports affect Delta outflow most significantly (depending on water year type), with a lower proportion of water exiting to the bays during drier years and ..."	Will be revised as appropriate.
54.	2-18	2.3.3.3	12	Karla Nemeth/ Zone 7	Figure 2.6 would benefit by indentifying the Delta (Planning Area)	The Delta (Planning Area) is currently identified in Fig 2.6 in black. Figure will be revised to increase its visibility.

No.	Page	Section	Line	Commenter	Comment	Disposition
55.	2-18	2.3.3.3	n/a	DFG	Figure 2.9 (Yolo Bypass) does not include the levee and bypass area south of Liberty Island (the Little Egbert area). This should be included in the graphic.	Data for this figure were given to us by DWR. We will check the source data and revise as appropriate
56.	2-18	2.3.3.3	14	Karla Nemeth/ Zone 7	I have also heard that the tidal influence stops up near the DCC. Are there differing opinions?	The entire Delta is subject to tidal influence, but the upstream location of the influence at a particular point in time changes depending on the factors discussed in this paragraph.
57.	2-19	2.3.3.3	n/a	DFG	Figure 2.11 (Infrastructure map). Suggest adding natural gas and regional sewer pipelines to the infrastructure map (these are at least as significant as cell towers).	Regional sewer pipelines will be added if the data is readily available. As noted in the legend on page 2-19, we have had difficulty obtaining natural gas pipeline data.
58.	2-20	2.3.3.3	1-5	Greg Gartrell/ CCWD	Replace this with: "Slough (Figure 2.10). The screened Mallard Slough intake (39 cfs capacity) was constructed in the 1920's and rebuilt to make it seismically protected in 2001. It is used primarily in winter and spring during wet periods when water quality is sufficiently high. The Contra Costa Canal and its pumping plants have a capacity of 350 cfs and were built by the U.S. of Reclamation in 1940 as part of the Central Valley Project. The Contra Costa Canal is owned by Reclamation but operated and maintained by CCWD. The screened Old River Pump Station (250 cfs capacity) was built in 1997 as part of the Los Vaqueros Project to improve water quality for CCWD. The Old River pump station connects via pipelines to a transfer pump station (200 cfs) used to pump water into Los Vaqueros Reservoir (100,000 af capacity) and from the transfer station via gravity pipeline to the Contra Costa Canal." (Note that Old River pump station has nothing whatsoever to do with relieving diversion needs at Rock Slough.)	Text will be revised as suggested.
59.	2-20	2.3.3.3	7	DFG	Suggest adding to the end of line 7: "East Bay MUD, in partnership with Sacramento County, is constructing a major new diversion from the Sacramento River at Freeport. This new diversion, sized at 185 million gallons/day capacity, feeds into the Mokelumne Aqueduct."	Text will be revised as to address this diversion.

No.	Page	Section	Line	Commenter	Comment	Disposition
60.	2-20	2.3.3.3	26	Greg Gartrell/ CCWD	Add discussion of ECCID, BBID and City of Antioch's diversions.	Text will be added to address these diversions.
61.	2-20	2.3.3.4	37-38	DFG	Suggest adding the towns of Courtland, Locke, and Ryde to the list of small towns (Locke has historic status, Courtland and Ryde are undergoing some new residential development).	Text will be revised as suggested.
62.	2-20	2.3.3.4	38-40	DFG	Suggest perhaps deleting this last sentence; some might disagree with the general statement that development in the Secondary Zone is "of less Statewide concern and significance than the Primary Zone" – for example, development along the entire eastern edge of the Delta would severely limit protection of upland areas to accommodate future sea level rise; this is a concern regardless of Primary Zone, Secondary Zone, or "out of Legal Delta" status.	Text will be revised to address this comment.
63.	2-21	2.3.3.4	1	DFG	Add "and sewer" after the word "gas"	Will be added as appropriate
64.	2-21	2.3.3.4	7	DFG	Change "included" to "including".	Will be corrected
65.	2-22	2.3.4	2	Karla Nemeth/ Zone 7	Explain "proposed for coverage" for the public reader	This is a draft of Chapter 2 of the BDCP document. A discussion of natural communities and species proposed for coverage under the BDCP will be described in Chapter 1, including a definition of what is meant by BDCP "coverage".
66.	2-22	2.3.4	1-6	DFG	It is very likely the number of covered species and natural communities will increase as we move forward in the planning process. We believe it will be a time-savings overall if we start to address these issues now.	A description of existing conditions will be incorporated into the Administrative Draft version of Chapter 2 for any natural communities and species that the Steering Committee agrees to cover in addition to those identified in the Planning Agreement.
67.	2-22	2.3.4	20	DFG	Communities not defined by Hickson and Keeler-Wolf. Vegetation mapping units were lumped into communities defined by BDCP.	Text will be revised to clarify that the delineation of natural communities was based on the Hickson and Keeler-Wolf vegetation map.

No.	Page	Section	Line	Commenter	Comment	Disposition
68.	2-22	2.3.4	27; Table	DFG	In the description of “Other Natural Communities”, you should clarify that agricultural lands are not a natural community, but do provide wildlife benefits. The same caveats should be stated for Managed Wetlands. 79% is much greater than actual natural communities in the Delta.	Agricultural lands are considered as natural communities under NCCPA. Managed wetlands can also be considered as natural communities (e.g., this was a CALFED covered natural community).
69.	2-25	2.3.4	Table 2.5	TNC	Covered Communities. Species occurrence tables. Saltmarsh harvest mouse is shown to occur in Tidal Freshwater Emergent Wetland (TFEW). SHM are located in the Suisun and depend on brackish conditions.	Brackish conditions within the Planning Area are included in the definition of this community. The extreme western Delta includes a portion of Suisun Marsh.
70.	2-25+	2.3.4	n/a	DFG	Please refer to our general comments on this issue of “covered species”. We suggest either changing the title of the table so that it includes “Species of Special Concern”, or including another table that lists just “Species of Special Concern”. It’s odd that white sturgeon and fall/late-fall Chinook aren’t included in this table, yet they’re proposed as “covered species” in the BDCP; this can be addressed by modifying the table or adding another.	The tables only include species that are listed and present in natural communities. Neither of these species is listed. Because these species are identified as Covered Species in the Planning Agreement, species accounts are provided for them in App. A.
71.	2-25	2.3.4	Table 2.5	TNC	Covered Communities. Salmonids and steelhead are only shown to occur in Tidal Perennial Aquatic. They should be shown to occur in TFEW as well.	We did not identify terrestrial communities as habitat for the covered fishes, the premise being that they are still associated with the water column, which can inundate terrestrial communities. For this reason, we also did not indicate that the covered fishes are associated with agricultural lands even though they use the Yolo Bypass when inundated. The value of these water/community interfaces, however, are recognized in the species accounts and community descriptions.

No.	Page	Section	Line	Commenter	Comment	Disposition
72.	2-28	2.3.4	1	Karla Nemeth/ Zone 7	Fig 2.12a-d would benefit by locating ~ 2 cities and/or the major river(s) within the inset for reference.	Names of several distinguishing features will be added to the vegetation maps to provide greater clarity to readers.
73.	2-28			Greg Gartrell/ CCWD	Figs 2.12 : How are agricultural drainage and irrigation ditches classified here? They are not shown on the maps, but are generally considered as potential habitat for many wetland species.	Ag drainage and irrigation ditches are classified as either tidal perennial aquatic or nontidal perennial aquatic habitat depending on their connection to main channels. They are shown on the maps, but the scale is too small
74.	2-29	2.3.4.1	18-20	DFG	Eelgrass is very limited in the Delta (e.g. does not occur in Table 2.6). Although dense beds of eelgrass have the attributes described, this doesn't occur in the Delta.	Comment is unclear. First comment indicates that it does occur and text acknowledges that it is limited to locations if far western Delta. Is comment intended to indicate that eelgrass does occur, but that it does not occur in dense beds that provide the attributes described in the text?
75.	2-29	2.3.4.1	24	DFG	Should state that <i>Egeria</i> is by far the most common SAV. This paragraph is written as if eelgrass is the most important SAV and that there are some "other" less important forms. Perhaps <i>Egeria</i> should be discussed first.	Text will be revised to clarify the importance of <i>Egeria</i> relative to other SAV.
76.	2-29	2.3.4.1	39	Karla Nemeth/ Zone 7	Explain POD for the public reader	The full BDCP document will include a glossary that defines Delta-specific and scientific terms, including POD. There are numerous terms that will appear throughout the BDCP document that the lay reader will not be familiar with and defining them in this manner will alleviate need to clutter text with definitions.

No.	Page	Section	Line	Commenter	Comment	Disposition
77.	2-32	2.3.4.1	6-8	DFG	All references to Eurytemora, Pseudodiaptomus, Limnoithona, Neomysis, Daphnia, Daptomus, Limnoicalanus should be italicized. (Also applies to page 2-34, lines 19-31, and page 2-35, lines 13-15.)	We chose to make the genus name the common name for lack of a better common name. Therefore, these will not be italicized (see Appendix B for common and scientific names of all species)
78.	2-34	2.3.4.1	17	DFG	After sentence ending "shallow water habitat" we suggest adding the following text: "Brazilian waterweed also tends to trap sediments that are a key component of suitable habitat for some native fish species such as Delta smelt."	Paragraph will be modified to describe effects of Egeria on turbidity.
79.	2-35	2.3.4.1	7-16	Justin Fredrickson/ Kari Fisher/ CFBF	In designing conservation actions that would utilize fluctuating salinity as a means of controlling the overbite and Asian clams, it would be important to consider the freshwater-saline/brackish overlap in habitats between these two species and how the two species would likely respond to a fluctuating salinity regime. Dr. Jan Thompson of the USGS has indicated that a possible response of the overbite clam to an abrupt change in salinity would be to produce more eggs, thus potentially <i>worsening</i> the existing infestation. Dr. Thompson has also opined that fluctuation on the scale and of a magnitude sufficient to push the overbite clam westward would be likely unachievable with existing water supplies, and perhaps futile in proportion to any corresponding benefit that might be gained.	Comment noted. This purpose of this chapter is to state the existing ecological conditions of the planning area. Should a conservation measure be proposed that involved varying salinities for control of invasive species, the rationale for proposing the measure would be described in the Conservation Strategy chapter of the BDCP document.
80.	2-36	2.3.4.1	16	Karla Nemeth/ Zone 7	Is artificial relocation not necessary in winter?	The text refers to "low flow months", which could include winter months.

No.	Page	Section	Line	Commenter	Comment	Disposition
81.	2-36	2.3.4.1	16-17	Greg Gartrell/ CCWD	<p>“During low-flow periods, the salinity gradient has been artificially relocated farther downstream to maintain freshwater in the western Delta for human use.” This inaccurately portrays the reality and implies that the conditions are artificial. It would be accurate to say that “During low-flow periods, the salinity gradient is maintained at locations that provide for freshwater in the Delta at levels that maintain human uses. Historically, the salinity gradient was generally farther downstream than now occurs under similar hydrologic conditions.” See Sereno <i>et al., ibid.</i> Upstream diversions since 1900 have reduced outflow to the Delta to a degree that the Delta is now clearly as salty or saltier than any time in the past 2500 years, and certainly far saltier than in the past 800 years. In particular, the salinity levels in the Delta in low flow periods in the past 20 years are much higher than in the past, with the exception of the 1928-1934 drought prior to reservoir development. The salinity investigations of that era determined that the extreme salinity intrusion was greater than any previous intrusions known to local residents, dating back to about 1870, and concluded that the upstream diversions likely doubled the extent of salinity intrusion (DPW, 1931).</p>	The text will be revised to clarify the intent of the statement.
82.	2-36	2.3.4.1	35	Karla Nemeth/ Zone 7	Will/can some re-learn the environmental cues (per line 33)?	Climate change and individual learning are on different time scales. Organisms may evolve or adapt to the change in timing of environmental cues, but there is no direct evidence that this will or will not occur.
83.	2-36, 2-37	2.3.4.13	36:21 , <i>et seq.</i>	Justin Fredrickson/ Kari Fisher/ CFBF	<p>This discussion of potential effects of climate change (and, also, the description in Section 2.3.3.2, at p. 2-16, lines 25-41) strongly supports a conclusion that, in the future, many problems in the Delta cannot be effectively addressed in the Delta alone. Rather, it seems very likely that new storage facilities both North and South of the Delta, as well as improved conveyance, will be absolutely necessary to improve the timing of releases and diversions to and from the Delta. In this context, new storage would function, not only for water supply, but as an essential tool, along with improved efficiency and demand reduction, to avoid multiple extinctions in the future. While new storage is clearly beyond the scope of the BDCP, therefore, it will be very important to consider how proposed actions under the BDCP could benefit from related actions outside of the Planning Area.</p>	Comment noted. Potential future conditions within and without the Delta in future years as they relate to BDCP implementation will be addressed in the Adaptive Management Plan.

No.	Page	Section	Line	Commenter	Comment	Disposition
84.	2-36, 2-37	2.3.4.13	36:21 , <i>et</i> <i>seq.</i>	Justin Fredrickson/ Kari Fisher/ CFBF	Temperature and residence times under future climate change conditions should be considered in terms of the long-term implications for proposed restoration efforts in the South Delta and their future longevity.	Comment noted. Potential future effects of climate change are being considered in the development of conservation measures and will be addressed by the Adaptive Management Plan.
85.	2-36	2.3.4.1	37	Greg Gartrell/ CCWD	The sentence incorrectly implies that reduced inflow will result in increased salinity intrusion. Salinity intrusion is governed by outflow. Reduced inflow and rising sea level will not necessarily increase salinity intrusion, for example if exports are further decreased in a way that increases outflow, salinity intrusion will decrease.	The text will be revised to clarify the intent of the statement.
86.	2-36	2.3.4.1	40-44	Justin Fredrickson/ Kari Fisher/ CFBF	It is very pertinent to biology and, therefore, appropriate to note that ambient temperature will increase water temperatures independent of flow. If has there been any attempt in the literature to quantify this effect, this information would provide important context.	Text will be revised to clarify likely effects of increased air temperatures on water temperature.
87.	2-36	2.3.4.1	44	Karla Nemeth/ Zone 7	Add word for clarification: "...summer and fall <i>seasons</i> ..."	Text will be revised as suggested.
88.	2-37	2.3.4.1	11-12	Greg Gartrell/ CCWD	Salinity intrusion after levee failures would be a problem only if the failures occurred when outflow is sufficiently low. Only one levee failure (Andrus Island, 1972) caused significant salinity intrusion. In the other cases the outflow was sufficiently large and SWP/CVP response sufficiently fast that salinity intrusion was not an issue. This statement should be modified to clarify the conditions that would have to occur for the statement to be true with respect to salinity intrusion.	Text will be revised to specify conditions that would cause salinity intrusion.
89.	2-37	2.3.4.1	12	DFG	Add statement on the large increase in tidal prism that would accompany multi-island flooding and potential increase in salinity intrusion associated with this larger tidal influence.	Text will be revised to describe effects on tidal prism.
90.	2-37	2.3.4.1	18	DFG	Add 'e.g.' before black basses.	Text will be revised as suggested.
91.	2-37	2.3.4.1	19	DFG	Add 'e.g.' before carp.	Text will be revised as suggested.
92.	2-38	2.3.4.2	11	Karla Nemeth/ Zone 7	Use of "historically": provide general timeframe	Text will be revised as suggested.

No.	Page	Section	Line	Commenter	Comment	Disposition
93.	2-39	2.3.4.2	1	DFG	Figure 2.15: It appears that the area of Tidal Wetland habitat is being exaggerated on this map. We used the same data to map this habitat and the extent seems to be much less than this. Also, see maps of land Natural Community Cover (Figs. 2.12a-d) in this document for comparison. We suspect there is an outline on your polygons that is exaggerating the extent of habitat. We suggest removing all polygon outlines. Also, see maps of other communities for the same issue.	Maps and data will be checked for accuracy and revised as appropriate.
94.	2-40	2.3.4.2	1	Karla Nemeth/ Zone 7	Add common name wherever possible for non-biologists	This table provides the original mapping units and plant alliance titles provided by the sources. Common names are provided in Appendix B.
95.	2-42	2.3.4.2	5	Karla Nemeth/ Zone 7	Is the giant reed found throughout this community? To what extent (acres)?	Text will be updated with more detailed information if available.
96.	2-44	2.3.4.3	24-26	DFG	We recommend you describe the large number of non-native species (e.g. <i>Arundo donax</i> , <i>Rubus discolor</i> , <i>Robinia</i> , Himalayan blackberry, Pampas Grass, <i>Nicotiana</i>) that are found in the Valley Riparian natural community. Discuss dominant non-natives like Himalayan blackberry.	Non-native plants associated with this community are described on page 2-49 and the extent of mapped non-native vegetation is identified in Table 2.9.
97.	2-44	2.3.4.3	27	DFG	Replace Fremont's with Fremont.	Typo will be corrected
98.	2-44	2.3.4.3	27	DFG	Replace Gooding's with Goodding's.	Typo will be corrected
99.	2-46	2.3.4.3	Table	DFG	See comment 42. (Comment 96 in collated version)	Comment is unclear. This table is based on most recent DFG vegetation mapping. If there is another source that provides more detail regarding the distribution of non-native plants throughout the Planning Area within this and other covered natural communities, please provide source information and data will be incorporated into this and other relevant sections.
100.	2-48	2.3.4.3	2	DFG	Replace Fremont's with Fremont.	Typo will be corrected

No.	Page	Section	Line	Commenter	Comment	Disposition
101.	2-48	2.3.4.3	24	DFG	Insert "Fish and" before "Wildlife"	For reasons described in the disposition of Comment 71, fish are not considered to reside in riparian communities. The ecosystem functions of riparian habitat for fish, however, are described on pages 2-49 and 2-50.
102.	2-48	2.3.4.3	27	DFG	<p>This entire section is very light in its discussion of the benefits of riparian habitat to fish/aquatic species. Offer the following suggestions:</p> <ul style="list-style-type: none"> • After the first sentence (ending in "habitat in California"), insert the following text: "Riparian vegetation also provides shaded riverine aquatic habitat, which is important for native fish species in the Delta. Riparian trees shade and cool floodplains and channels. Overhanging vegetation, roots, and fallen woody debris (like logs and other coarse woody material) provide instream cover and habitat for fish, amphibians, and aquatic insects. Falling leaves and organic matter provide food sources for all trophic levels. Riparian vegetation also provides thermal cover by moderating air temperature during temperature extremes." • (Once this text has been added, suggest splitting the remainder of that paragraph (starting with "The rich and complex ...") into its own paragraph.) • Also note, riparian areas sometimes co-occur on natural floodplain areas, so when these riparian areas are inundated with flood flows, they provide very important habitat functions for fish and aquatic species. Text to this effect should be incorporated within this section. 	This section describes wildlife associated with the riparian community. Text under "Ecosystem Function" on pages 2-49 and 2-50 will be revised as needed to incorporate these suggestions.
103.	2-49	2.3.4.3	1 and 14-15	DFG	<p>None of the species listed on these lines is included within Table 2-5; this could be because they are not threatened or endangered.</p> <p>This comment generally applies to all of the described natural communities: the list of "covered" species in the BDCP is preliminary. At some point very soon we need to address the full range of terrestrial and aquatic species that occur in the Delta planning area. We suggest you either 1) add species of special concern to Table 2-5 or 2) create another table listing species of special concern.</p>	<p>Only listed and fully protected species are included in Table 2-5.</p> <p>Provisions for addressing additional covered species in this Chapter are addressed in the disposition described under Comment 4.</p>

No.	Page	Section	Line	Commenter	Comment	Disposition
104.	2-50	2.3.4.3	3-12	DFG	This paragraph should be revised, so as not to minimize the discussion of the benefits of Valley Riparian habitat for fish and aquatic species (see comments above regarding the very important habitat functions of floodplains in riparian and other areas). (e.g. if Valley Riparian holds such little value for fish species, as the paragraph implies, then why is Valley Riparian a “covered” habitat while Tidal Freshwater Emergent Wetland, for example, is not?)	See disposition for Comments 71 and 102. The text does not indicate that riparian habitat has little value for fish, but will be revised to better emphasize its importance. Tidal Freshwater Emergent Wetland is a proposed covered natural community as indicated in the first paragraph on page 2-22.
105.	2-51	2.3.4.3	3	DFG	After the citations (ending with “Hayhoe et al. 2004.”), suggest adding the following text: “Increased frequency and duration of flooding will require floodplain management as part of a suite of flood control activities; riparian habitat may increase as management of floodplains for flood control, as well as species benefits, increases.”	Do not recommend adding because, although this may be the case, this is speculative of potential future response to climate change effects.
106.	2-52	2.3.5	n/a	DFG	We suggest you add a qualifying statement that any and all of these “other” communities may be incorporated into the BDCP, as appropriate, as the plan develops and covered activities become more defined.	The next version of this chapter will be as part of the first administrative draft BDCP document. The chapter will be revised as appropriate at that time to address coverage of additional natural communities as identified by the Steering Committee.
107.	2-52	2.3.5	10	Karla Nemeth/ Zone 7	Explain for the reader why are they included but not proposed for coverage	This will be addressed in Chapter 1 of the BDCP document.
108.	2-52	2.3.5	10-17	Justin Fredrickson/ Kari Fisher/ CFBF	With regard to “Other Natural Communities,” it may be useful to address whether adjacent or overlapping HCP/NCCPs in and around BDCP Planning Area include these habitat types, and how this might relate to the BDCP. (This may not be the best place for this, but somewhere in “Conservation Plan,” it does seem relevant.)	It is anticipated that the relationship of the BDCP to other relevant planning efforts will be described elsewhere in the BDCP document (likely in the Conservation Strategy and/or Introduction chapters).
109.	2-54	2.3.5.1	8	Karla Nemeth/ Zone 7	Suggest re-stating the definition of the littoral zone (“influenced by light”) to “penetrable by light” or otherwise.	Text will be revised as suggested.

No.	Page	Section	Line	Commenter	Comment	Disposition
110.	2-60	2.3.5.3	21	Karla Nemeth/ Zone 7	Add the typical sizes of vernal pools for reference.	Text will be revised as suggested.
111.	2-60	2.3.5.3	23	DFG	Note that vernal pools are also found at Stone Lakes National Wildlife Refuge west of Elk Grove, and in Contra Costa County near Byron.	Text will be revised to identify other occurrences.
112.	2-69	2.3.5.6	36	Karla Nemeth/ Zone 7	Figure 2.22. Reader can easily miss the 20 acres of dune on this map. Consider use of an arrow pointing toward the area.	Figure will be modified as suggested.
113.	2-71	2.3.5.7	14-15	Justin Fredrickson/ Kari Fisher/ CFBF	The loss of one set of habitat values with a shift in crop type in one location does not preclude potential simultaneous creation of other habitat values on the same site or elsewhere in the Delta.	The sentence does not imply whether the habitat value is gained or lost, rather that these changes can have substantial effects on the value. We will add "(positive and negative)" to the sentence to confirm neutrality..
114.	2-72	2.3.5.7	19-20	Justin Fredrickson/ Kari Fisher/ CFBF	Regarding alteration from pre-European conditions, this could be said of virtually any landscape in the California. A general statement somewhere in the text should perhaps note that our starting point for the Delta is a landscape where there exists no 'pre-European' condition anywhere.	Text will be revised to remove reference to historical conditions.
115.	2-74	2.3.6	2	Karla Nemeth/ Zone 7	Add a small introduction as context for the reader (e.g., purpose of "coverage" under the BDCD)	This will be addressed in Chapter 1, Introduction of the BDCP document.
116.	2-74	2.3.6	2-12	DFG	We suggest you add a qualifying statement that more species may be added to the list of "covered" species as appropriate, as the plan develops and covered activities become more defined.	The next version of this chapter will be as part of the first administrative draft BDCP document. The chapter will be revised as appropriate at that time to address coverage of additional species as identified by the Steering Committee.
117.	2-75	2.4	28	Karla Nemeth/ Zone 7	Add the fact that 7% of species are represented on 0.7% of land to Table 2.18 for more impact.	The purpose of Table 2.18 is to indicate the number of species in the planning area relative to the state of California, not to compare the number of species per unit area between the Delta and the state.

Appendix A-Species Accounts Comments

No.	Page	Section	Line	Commenter	Comment	Disposition
1.	A.1-1	A.1	1	Karla Nemeth/ Zone 7	TNC Linkages report (CALFED; http://www.delta.dfg.ca.gov/erp/sacriverecoflows.asp) suggests there is little information on the green sturgeon and few details specific to those that spawn in the Sacramento River. Consider disclosing this upfront.	Text will be revised as appropriate.
2.	A.1-1	A.1.2	27	Karla Nemeth/ Zone 7	TNC report suggests that there are only 3 known spawning areas total; revealing this fact helps illustrate the critical nature of the Delta and the Sacramento River for their survival.	Text will be revised based on review of the TNC report.and other relevant documents.
3.	A.1-2	A.1.2	6	Karla Nemeth/ Zone 7	Potentially migrating thousands of miles	Comment noted.
4.	A.1-3	A.1.4	30	Karla Nemeth/ Zone 7	TNC report suggests it can be as frequent as 2 years	Text will be revised based on review of the TNC report.and other relevant documents.
5.	A.1-3	A.1.4	31	Karla Nemeth/ Zone 7	10-15 years conflicts with the 15-20 years presented on previous page; TNC report suggests 15-17 years	Text will be revised based on review of the TNC report.and other relevant documents.
6.	A.1-4	A..1.5	3	DFG	Should be Glenn-Colusa.	Typo will be corrected
7.	A.1-5	A.1		DFG	Table corresponding to (c) Juvenile occurrence in the Delta: There are two estimates for occurrence in “Sac-SJ Delta”. Since occurrence at South Delta is year-round, would assume that presence in “Sac-SJ Delta” is year-round, as well. (So would recommend getting rid of that portion of the graphic showing juvenile green sturgeon occurrence in only April – October), or verify which of the two estimates is accurate.	The chart will be corrected.
8.	A.1-5	A.1.4		Ted Meyers/ NMFS	Table A.1.1 is not cited	This is cited on page A.1.3, Line 36
9.	A.1-6	A.1.5	38	DFG	Consider citing Through-Delta Facility White Sturgeon Passage study.	Revise as appropriate based on review of the study.
10.	A.1-7	A.1.5	13-14	DFG	The last two sentences of the “Exposure to toxics” section should include citations.	Citations will be added.
11.	A.1-8	A.1.5	1-3	DFG	Is this sentence referring to green sturgeon or white sturgeon? If green, change “white” accordingly; if white, this sentence should be cut from the green sturgeon account and placed in the white sturgeon account.	Typo will be corrected.
12.	A.1-8	A.1.5	15-16	DFG	The first sentence of this paragraph is true for all fish, not just anadromous fish. Probably no need to include this sentence here; just start with “Exposure to water temperatures ...”	Sentence will be deleted.

No.	Page	Section	Line	Commenter	Comment	Disposition
13.	A.1-9	A.1.5	9-10	DFG	Chinese mitten crabs are virtually non-existent in the estuary this year (all data sources support a population decline since 2002 [Hieb, pers comm. 3/24/08 – from a summary article for the Chinese mitten crab that she prepared last month for the State of the Estuary report]), so their predation on green sturgeon eggs may not necessarily be an issue that should be called out in the text.	Reference will be revised to acknowledge current status of mitten crabs.
14.	A.1-9	A.1.5	11-27	DFG	This paragraph needs more citations (e.g. what citation for Brazilian waterweed raising water temperatures? [line 12]).	Citations will be provided.
15.	A.1-9	A.1.5	36-43	DFG	The discussion of reduced turbidity in the Delta on green sturgeon needs clarification and/or additional citations ... why is lack of turbidity in the Delta thought to lead to increased predation while lack of turbidity upstream in spawning areas is not?	Text will be revised for clarity.
16.	A.1-10	A.1.5	5	DFG	Glenn-Colusa	Typo will be corrected.
17.	A.2-2	A.2.3	11	Ted Meyers/ NMFS	provide citation	Citations will be provided.
18.	A.2-3	A.2.5	11	DFG	Note that there is also a seasonal maximum take limit on white sturgeon.	Text will be revised as suggested.
19.	A.2-3	A.2.5	25	Ted Meyers/ NMFS	A comma is needed after "Feather River"	Typo will be corrected.
20.	A.2-3	A.2.5	29	Ted Meyers/ NMFS	Delete one of the two commas after "fecundity".	Typo will be corrected.
21.	A.2-4	A.2.5	39	DFG	Add "agricultural," in addition to "residential and industrial areas".	Text will be revised as suggested.
22.	A.2-5	A.2.5	4-7	DFG	This sentence is not necessarily accurate, and needs a citation if it is to remain in the text. There is general agreement that while the concentrations of some pesticides/herbicides in water have decreased, the concentrations of others that have replaced those (e.g. pyrethroids, which adsorb to sediments), are toxic even at the very low detection levels, and this toxicity is of substantial concern for fish species in the Delta.	Text will be revised to address the comment.
23.	A.2-5	A.2.5	9-11	DFG	This sentence doesn't really fit in the "stressors" discussion; the monitoring and management programs on the SJR on not stressors to white sturgeon.	This statement is provided to provide the reader context regarding the status of these stressors.
24.	A.2-5	A.2.5	22	DFG	The document cited (SWRCB 1991) is not listed in the references. Is this a typo (should it read SWRCB 1999 in relation to the D-1641 reference?)	Typo will be corrected.
25.	A.2-5	A.2.5	40-41	DFG	Again, this first sentence is true for all fish, not just anadromous fish; suggest starting the paragraph with "Exposure to water temperatures ..."	Sentence will be deleted.

No.	Page	Section	Line	Commenter	Comment	Disposition
26.	A.2-6	A.2.5	28	Ted Meyers NMFS	The positive impact of non-native species on sturgeon is misleading. Even though Asian clams have been consumed by sturgeon, the bioaccumulation of toxins offsets these positive impacts.	This section will be revised to address the comment.
27.	A.2-7	A.2.5	20-24	DFG	As in the green sturgeon account (see comment 63), the discussion of reduced turbidity in the Delta on white sturgeon needs clarification and/or additional citations.	Text will be revised for clarity.
28.	A.2-7	A.2.5	34-44	DFG	Why aren't the SWP/CVP diversions even mentioned in this paragraph? If (per lines 43 and 44) effects of the other diversions mentioned in this paragraph are unknown, why are they mentioned here while SWP/CVP diversions are not?	Entrainment of larvae (found near upstream spawning grounds) is more likely than that of juveniles, subadults, and adults (found downstream near the SWP/CVP pumps) because larvae spend a few days in the water column.
29.	A.3-1	A.3.2	14-16	DFG	Reference to "Moyle et al. (2004) unless otherwise indicated" is not a true statement; there are many uncited statements in this account that are not from Moyle et al. (2004).	This was an artifact of an earlier draft and will be removed.
30.	A.3-8	A.3.3	23	DFG	Delete the words "and temperature"; Baerwald et al. 2007 does not discuss temperature.	This sentence will be revised to address the comment.
31.	A.3-12	A.3.5	33-34	DFG	It may not be true that splittail are vulnerable to entrainment "at a large number of unscreened diversions located along the Sacramento River and throughout the Delta". Either eliminate the reference to unscreened diversions throughout the Delta or provide a citation.	This sentence will be modified.
32.	A.3-12	A.3.5	40	DFG	Insert "SWP/CVP" before the word "diversions".	Text will be revised as suggested.
33.	A.3-13	A.3.5	18-20	DFG	The first sentence of this paragraph may not be a true statement, and it cites the wrong paper (Nobriga et al. 2004 makes reference to only Delta smelt, threadfin shad, inland silverside, and striped bass). (See comment 75 above.) (#31 in this collated version)	This sentence will be revised to address the comment.
34.	A.4-1	A.4	1	Karla Nemeth/ Zone 7	TNC Linkages report suggests there is little detailed information on steelhead in the Sacramento River and how they use the Delta. Consider disclosing this upfront.	Text will be revised as appropriate.
35.	A.4-1	A.4.1	16	Karla Nemeth/ Zone 7	TNC Linkages report (CALFED; http://www.delta.dfg.ca.gov/erp/sacriverecoflows.asp) suggests that 60-70% of the Steelhead in Sac River are from hatcheries.	Comment noted
36.	A.4-5	A.4.3	18	Ted Meyers NMFS	Replace "included as a Primary Constituents Element" with "important habitat elements."	Text will be revised as suggested.
37.	A.4-5	A.4.3	9-19	DFG	The discussion of ocean habitats is more of an unknown than is indicated in the text; include citations.	Text will be revised to address this comment.

No.	Page	Section	Line	Commenter	Comment	Disposition
38.	A.4-8	A.4.5	19	Karla Nemeth/ Zone 7	Steelhead likely migrated farthest upstream of all anadromous salmonids in Central Valley – areas now blocked by use due to dams, which results in overlap of steelhead and Chinook territory.	Comment noted
39.	A.4-8	A.4.5	43-44	DFG	Either provide a citation for vulnerability to entrainment in “other diversions ... throughout the Delta ...” or delete the words “and throughout the Delta” from this sentence.	Text will be revised to address this comment.
40.	A.4-8 A.4-9	A.4.5	40-42 1-7	Greg Gartrell/ CCWD	Here and elsewhere there needs to be a distinction between net flows and tidal flows. There are no analyses that I am aware of that link entrainment of salmonids at the export pumps to net flows (whether it is Qwest, OMR net flows or others). Generally during the migration periods of juveniles, when they are entrained, the key parameters are export rates and San Joaquin inflows (see more detailed discussion below). Other factors, such as in-Delta diversions can affect net flows (though these are generally small effects in the winter and early spring) but I am unaware of evidence that they affect salvage rates or entrainment at the export pumps. If there is evidence, it should be cited; if not, then it should be discussed as being suspected, or as a hypothesis, not as established.	Text will be revised to address this comment.
41.	A.4-11	A.4.5	25-28	Ted Meyers/ NMFS	This statement needs support from a citation.	Text will be revised to address this comment.
42.	A.4-13	A.4.7	12	Ted Meyers/ NMFS	Replace "spring" with "fall" here and in each of the salmon sections.	Text will be revised as suggested.
43.	A.5-3	A.5.3	9	Ted Meyers/ NMFS	Delete "but"	This will be deleted
44.	A.5-3	A.5.3	10	Ted Meyers/ NMFS	At the end of the sentence add ",among other factors" and a citation.	Text will be revised to address this comment.
45.	A.5-11	A.5.4	6-11	DFG	Fall/late-fall run Chinook may show little estuarine dependence due to current conditions in the Delta. The authors point out that current estuarine conditions in the Delta may have changed the use of these areas by fall-run Chinook.	Reference will be reviewed and text revised as appropriate.
46.	A.5-12	A.5.5	44-46	DFG	This first sentence needs a citation; considered <i>by whom</i> to be an important threat ...?	Text will be revised to address this comment.
47.	A.5-13	A.5.5	15-16	DFG	“Naturally producing Chinook ... less able to withstand high harvest rates ... hatchery based stocks.” This sentence should be clarified, and a citation given.	Text will be revised to address this comment.

No.	Page	Section	Line	Commenter	Comment	Disposition
48.	A.5-14	A.5.5	37-41	Greg Gartrell/ CCWD	Same comment as 40: Here and elsewhere there needs to be a distinction between net flows and tidal flows. There are no analyses that I am aware of that link entrainment of salmonids at the export pumps to net flows (whether it is Qwest, OMR net flows or others). Generally during the migration periods of juveniles, when they are entrained, the key parameters are export rates and San Joaquin inflows (see more detailed discussion below). Other factors, such as in-Delta diversions can affect net flows (though these are generally small effects in the winter and early spring) but I am unaware of evidence that they affect salvage rates or entrainment at the export pumps. If there is evidence, it should be cited; if not, then it should be discussed as being suspected, or as a hypothesis, not as established.	Text will be revised to address this comment.
49.	A.5-14, 15	A.5.5	43+	DFG	The last half of this paragraph (starting with "Results of salvage monitoring ...") is not a stressor, and this text seems to try to minimize this effect on Chinook.	The referenced text will be moved into Section A.5.6.
50.	A.5-15	A.5.5	12-17	Greg Gartrell/ CCWD	Note that many if not most of these intakes are not operated or are operated at low levels in the winter and early spring, during the migration period. On the other hand, some are in areas where juvenile salmonids are known to exist and entrainment can be substantial. Approach velocities to these intakes can be very large.	Comment noted.
51.	A.5-15	A.5.5	23-27	DFG	This part of the text is poorly written, and lacks citations. Selenium is a problem for aquatic species throughout the Delta (not necessarily "greatest for fall-run Chinook of San Joaquin River origin"), and is also a problem for species that use Suisun Bay, regardless of the fact that most of the selenium comes from the San Joaquin River.	Text will be revised for clarity.
52.	A.5-17	A.5.6	30-38	DFG	There are doubts about how successful the VAMP has been at actually improving juvenile and adult Chinook migration; a statement to this effect should be added to the text.	Comment noted. This section is only intended to describe major conservation efforts.
53.	A.6-2		5	Ted Meyers/ NMFS	Change "produced" to "produces".	Text will be revised as suggested.
54.	A.6-4		35	Ted Meyers/ NMFS	Add "also" after "are".	Text will be revised as suggested.
55.	A.6-6	A.6.3	13	DFG	Add the word "have" before "favorable water quantity ..."	Text will be revised as suggested.
56.	A.6-6	A.6.3	15	DFG	The inclusion of "aquatic vegetation" in this sentence should be qualified (e.g. <i>Egeria</i> is not good for salmon).	Text will be revised to address this comment.
57.	A.6-6	A.6.3	35-43	DFG	Citations should be used to support these claims.	Text will be revised to address this comment.

No.	Page	Section	Line	Commenter	Comment	Disposition
58.	A.6-7	A.6.3	5	DFG	Again, the inclusion of “aquatic vegetation” should be qualified here (see comment 56 above).	Text will be revised to address this comment.
59.	A.6-7	A.6.3	2-8	DFG	What about the benefits of tidal marsh to Chinook salmon? This should be mentioned in this paragraph.	Text will be revised to address this comment.
60.	A.6-12	A.6.5	37-38	Greg Gartrell/ CCWD	Same comment as 40: Here and elsewhere there needs to be a distinction between net flows and tidal flows. There are no analyses that I am aware of that link entrainment of salmonids at the export pumps to net flows (whether it is Qwest, OMR net flows or others). Generally during the migration periods of juveniles, when they are entrained, the key parameters are export rates and San Joaquin inflows (see more detailed discussion below). Other factors, such as in-Delta diversions can affect net flows (though these are generally small effects in the winter and early spring) but I am unaware of evidence that they affect salvage rates or entrainment at the export pumps. If there is evidence, it should be cited; if not, then it should be discussed as being suspected, or as a hypothesis, not as established.	Text will be revised to address this comment.
61.	A.6-12, 13	A.6.5	47+	DFG	The discussion relating to BOs and the multiple conservation efforts to reduce Chinook entrainment is not a “stressor” per se, and shouldn’t be included in this part of the text.	The referenced text will be moved into Section A.6.6.
62.	A.7-2	A.7.2	42-45	TNC	This list of potential catastrophes should include changes in ocean conditions. This would also be a good location to introduce the recent declines of salmonids	Text will be revised as proposed if supported by the referenced citation.
63.	A.7-3	A.7.2		Ted Meyers/ NMFS	Figure A.7.2 Update with population estimate from this year.	The most up-to-date available data will be included in the Administrative draft.
64.	A.7-3	A.7.2	18-21	TNC	What data are cited to conclude that WR utilize only the western edge of the Delta for upstream migration? What are the effects of the DCC on WR upstream migration?	Text will be revised as appropriate to address this comment.
65.	A.7-4	A.7.2	1-16	TNC	Similar information is appropriately included in Section A.7.2., Range and Status. The information provided here isn’t relevant to the planning area and appears to be inconsistent with the information provided earlier in the section.	This text refers specifically to Designated Critical Habitat of the ESU as designated by NMFS in 1994. This is different from the material presented in A.7.2 (historical and current habitat)
66.	A.7-6, 7	A.7.3	44+	DFG	This sentence is not accurate (and lacks a citation). Just because few marked salmon are salvaged at the SWP/CVP facilities does not mean that few salmon are entrained. A very small number of salmon are marked in the first place.	This discussion will be referenced and text revised as appropriate based on re-review of relevant studies.

No.	Page	Section	Line	Commenter	Comment	Disposition
67.	A.7-10	A.7.5	24-36	DFG	It seems this paragraph would fit better in the discussion of “Exposure to toxics” on page A.7-13.	Text will be revised as suggested.
68.	A.7-11	A.7.5	7-10	DFG	This first sentence needs a citation.	Text will be revised to address this comment.
69.	A.7-12	A.7.5	30-38	DFG	The last half of this paragraph (starting with “Results of monitoring at the CVP and SWP ...”) is not a “stressor”.	The referenced text will be moved into Section A.7.6.
70.	A.7-12	A.7.5	37-38	Greg Gartrell/ CCWD	Same comment as 40: Here and elsewhere there needs to be a distinction between net flows and tidal flows. There are no analyses that I am aware of that link entrainment of salmonids at the export pumps to net flows (whether it is Qwest, OMR net flows or others). Generally during the migration periods of juveniles, when they are entrained, the key parameters are export rates and San Joaquin inflows (see more detailed discussion below). Other factors, such as in-Delta diversions can affect net flows (though these are generally small effects in the winter and early spring) but I am unaware of evidence that they affect salvage rates or entrainment at the export pumps. If there is evidence, it should be cited; if not, then it should be discussed as being suspected, or as a hypothesis, not as established.	Text will be revised to address this comment.
71.	A.7-13	A.7.5	6	DFG	The 2,200 small water diversions are probably not an issue for salmon juveniles when they are small or screened.	Comment noted.
72.	A.7-13	A.7.5	6-11	Greg Gartrell/ CCWD	Same comment as 50: Note that many if not most of these intakes are not operated or are operated at low levels in the winter and early spring, during the migration period. On the other hand, some are in areas where juvenile salmonids are known to exist and entrainment can be substantial. Approach velocities to these intakes can be very large.	Comment noted
73.	A.7-13, 14	A.7.5	45+	DFG	Again, “regulations in changes in monitoring and management” is not a “stressor”. Besides, this statement is not accurate (see comment 66 above)	Text will be revised as appropriate.
74.	A.7-13, 14	A.7.5		DFG	Somewhere in this topic of “Exposure to toxics”, there should be a discussion of the San Joaquin River’s inputs to the Delta.	This will be considered as appropriate
75.	A.7-16	A.7.6	27-34	TNC	The information provided in this section should be cross checked with the DRERIP species model for WR, and the paragraph should indicate that the DRERIP model was used in the development of the text. (This comment applies to similar sections in the other Covered Species Accounts).	When publically available, information provided in DRERIP conceptual models will be reviewed and incorporated into the species accounts as appropriate.

No.	Page	Section	Line	Commenter	Comment	Disposition
76.	A.7-16	A.7.6	39-41	TNC	This sentence references 9,543 acres of shallow water habitat to be restored under ERP. The paragraph should elaborate on the specific projects and their various stages of planning.	The intent of this section is to describe the goals of existing and planned conservation efforts.
77.	A.8-1	A.8.2	39	DFG	Adult fish do not rear. Change "rear" to "occur".	Text will be revised as suggested.
78.	A.8-2	A.8.2	42	Karla Nemeth/ Zone 7	Replace Delta planning area with Planning Area	Text will be revised as suggested.
79.	A.8-3	A.8.2	5	Karla Nemeth/ Zone 7	Figure A.8.2 is not easily decipherable when printed in black & white; can it be improved?	Figure will be revised as practicable.
80.	A.8-4	A.8.2	Fig	DFG	Figure indicates that indices are for longfin smelt, not Delta smelt.	Typo will be corrected.
81.	A.8-5	A.8.4	8-43	Justin Fredrickson/ Kari Fisher/ CFBF	Flow and temperature requirements of delta smelt, freshwater outflow and saltwater inflow, as discussed here, have potentially important implications for the low salinity zone and any conveyance option that would significantly reduce outflow from the Sacramento River.	Comment noted.
82.	A.8-5	A.8.3	43	DFG	Add information on the correlation between turbidity and abundance/spawning migration.	Text will be revised to address this comment.
83.	A.8-7	A.8.4	18	DFG	Do distributions change in other water year types? If so, how?	This question will be addressed as appropriate
84.	A.8-8	A.8.4	1	Karla Nemeth/ Zone 7	Figures A.8.4 and A.8.5 are not easily decipherable when printed in black & white; can they be improved?	Figures will be revised as practicable.
85.	A.8-10	A.8.4	4	DFG	Remove comma after 'although'.	Typo will be corrected.
86.	A.8-10	A.8.4	10-12	DFG	This paragraph does not belong in the life history section. Move to stressors section (A.8.5) under predation.	Text will be revised to address this comment.
87.	A.8-10	A.8.5	28	DFG	Replace 'filtering' with 'filter'.	Typo will be corrected.
88.	A.8-10	A.8.5	30	DFG	Replace 'late 1980s' with 'mid 1980s'.	Text will be revised as suggested.
89.	A.8-10	A.8.5	35-41	DFG	Loss of tidal marshes from the Delta has had at least as large an effect on productivity as loss of floodplain inundation. Suggest inserting an additional mechanism paragraph.	Text will be revised to address the comment to the extent supported by literature.
90.	A.8-11	A.8.5	18	DFG	Add an additional mechanism: Increases in ammonium in Suisun Bay may be inhibiting phytoplankton production (Dugdale et al. 2007).	Text will be revised based on review of the cited reference.

No.	Page	Section	Line	Commenter	Comment	Disposition
91.	A.8-11	A.8.5	22-36	Justin Fredrickson/ Kari Fisher/ CFBF	Once again, conveyance options that significantly reduce freshwater flows from the Sacramento River could adversely impact X2 and delta smelt by causing upstream movement of the low salinity zone.	Comment noted.
92.	A.8-12	A.8.5	27-41	Justin Fredrickson/ Kari Fisher/ CFBF	Again, regarding temperature requirements of delta smelt in late spring, summer, and fall, there may be significant implications here, in terms of conveyance and operational options that would significantly reduce freshwater flows into the Delta.	Comment noted.
93.	A.8-13	A.8.5	1-16	Justin Fredrickson/ Kari Fisher/ CFBF	Turbidity as desirable factor that influences feeding and predation in delta smelt seems to conflict with statements earlier in the chapter concerning light, as opposed to nutrients, as the limiting factor on primary productivity. (See Section 2.3.2, p. 2-12, lines 7-14.) Is there any important interaction between these conflicting parameters and does this conflict need resolution?	Correct - both parameters appear to be important to delta smelt and do appear to conflict. Historically, the Delta was more turbid, suggesting that these fish may have evolved to deal with predation in a more turbid system despite the potential reduced phytoplankton from light limitation
94.	A.8-14	A.8.5	28-36	DFG	Add incidences of striped bass, white catfish, and black crappie predation from above (page A.8-10).	This information will be added as appropriate
95.	A.8-16	A.8.5	1-17	Greg Gartrell/ CCWD	Guerin et al (2008, in review) have found significant correlations between SWP winter salvage of adult smelt and subsequent FMWT index of delta smelt with 1 and 2 year lags over the past 12 years. More recent work shows that SWP winter salvage of adult delta smelt normalized to the prior FMWT correlates strongly with subsequent FMWT for delta smelt over a longer record. Similar relationships are found between winter exports and subsequent FMWT, but the salvage would more likely be causal. These relationships do not establish causality, but they are an indicator that winter salvage at the SWP may be a factor to be considered. No statistically significant relationships have been found with entrainment of larval and juvenile delta smelt.	If this document is available to us, we will add these relationships as appropriate Comment noted.

No.	Page	Section	Line	Commenter	Comment	Disposition
96.	A.8-16	A.8.5	1-17	TNC	<p>The intro to this paragraph states that there are no peer review studies, only unpublished studies, that indicate correlative relationships suggesting entrainment may negatively impact Delta smelt abundance. However, the remainder of the paragraph includes both published and unpublished work.</p> <p>The reference of Brown and Kimmerer 2001 is not included in the Literature Cited section.</p>	<p>Text will be revised for clarity.</p> <p>Reference will be added</p>
97.	A.8-16	A.8.5	29-30	Greg Gartrell/ CCWD	<p>Sereno et al (2007, unpublished) have shown relationships similar to those developed by Smith and Johns can be found by directly relating winter salvage of delta smelt to exports and San Joaquin River flow: the relationship with exports and San Joaquin flow is a statistically better relationship than with OMR net flows. OMR net flow (a mathematically and physically <i>dependent</i> variable) is determined nearly entirely by exports and San Joaquin flow in the winter (which are the mathematical and physical <i>independent</i> variables). Exports (adjusted for San Joaquin flow which generally has no delta smelt) determine both salvage and OMR flows. Consequently, a focus on OMR flows is misplaced; its statistical relationship to salvage is only reflecting its relationship to the independent variables, exports and San Joaquin flows, not a causal relationship (exports of course is causal to both salvage at the export pumps and to OMR flows).</p>	<p>Text will be revised based on review of reference and other relevant literature.</p>
98.	A.8-17	A.8.5	13-22	Greg Gartrell/ CCWD	<p>I believe the studies cited were for delta smelt juveniles (swimmers in the summer) not larvae. Substantial numbers of larval smelt can be entrained in the spring by these intakes which can have large approach velocities. Channel measurements of larval densities would suggest these may not be insignificant in those locations where smelt are present for those intakes being used (note that many are unused in the winter and spring).</p>	<p>Text will be revised to identify the applicable life stage.</p>
99.	A.8-18	A.8.6	40-42	DFG	<p>Additional actions other than those proposed in the ERP are also being considered.</p>	<p>Comment noted. Specific examples would be appreciated.</p>
100.	A.8-19	A.8.6	1	DFG	<p>“Many” projects? Only 3 are listed here.</p>	<p>Text will be revised for clarity.</p>
101.	A.8-19	A.8.6	1-3	DFG	<p>How will this land acquisition increase food production? Although this is a valuable acquisition, it is not a conservation effort until something is done with the land.</p>	<p>Text will be revised for clarity.</p>
102.	A.8-19	A.8.6	3-5	DFG	<p>Address the effectiveness of the Kimball island restoration site at eliminating impacts to Delta smelt. Delta smelt are rare on the island but have occurred adjacent to the island on the SJR side.</p>	<p>The intent of this section is to describe the goals of existing and planned conservation efforts.</p>

No.	Page	Section	Line	Commenter	Comment	Disposition
103.	A.8-19	A.8.6	12	DFG	Consider adding the actions imposed by Wanger and the expected benefit to the species. These seem to qualify as relevant conservation efforts, even if court imposed.	A brief description of Wanger decision requirements and anticipated species benefits will be added to text.
104.	A.8-19	A.8.7	39	DFG	Numbers or total catch? Which one?	This will be clarified
105.	A.8-19	A.8.7	39	DFG	Is 239 an index or a number? From which survey?	This will be clarified
106.	A.8-20	A.8.7	1	DFG	Is 84 an index or a number? From which survey?	This will be clarified
107.	A.9-3	A.9.2	2	DFG	Add 'and Bay Study surveys' to the first sentence.	Text will be revised to address this comment.
108.	A.9-3	A.9.2	16	Karla Nemeth/ Zone 7	Figure A.9.2 is not easily decipherable when printed in black & white; can it be improved?	Figure will be revised as practicable.
109.	A.9-3	A.9.2	17	DFG	After explaining the historical relationship between outflow and abundance, add a statement explaining that indices have been low in recent years despite relatively wet water years from 2003-2006. What was outflow during this time period? Did high levels of exports reduce outflow during these years? On line 30, failure of the population to respond to wetter conditions in 2003 is mentioned; this pattern continued after 2003 (2005 was above normal, 2006 was wet; indices remained low).	Text will be revised to address this comment.
110.	A.9-3	A.9.2	36-37	DFG	Explain how distribution changes from year to year with changes in freshwater outflow.	This will be addressed as appropriate
111.	A.9-6	A.9.2	16	DFG	What portion of the Delta?	This text will be clarified.
112.	A.9-7	A.9.3	1	Karla Nemeth/ Zone 7	Figure A.9.5 is not easily decipherable when printed in black & white; can it be improved?	Figures will be revised as practicable.
113.	A.9-8	A.9.5	36-38	DFG	Add exports from the Delta as a cause of reduction of outflows (in addition to reservoir storage and upstream diversions).	Text will be revised to address this comment.
114.	A.9-9	A.9.5	26	DFG	Replace 'late 1980s' with 'mid 1980s'.	Text will be revised to address this comment.
115.	A.9-9	A.9.5	31-37	DFG	Loss of tidal marshes from the Delta has had at least as large an effect on productivity as loss of floodplain inundation. Suggest inserting an additional mechanism paragraph.	Text will be revised to address the comment to the extent supported by literature.
116.	A.9-10	A.9.5	13	DFG	Add an additional mechanism: Increases in ammonium in Suisun Bay may be inhibiting phytoplankton production (Dugdale et al. 2007).	Text will be revised based on review of the cited reference.

No.	Page	Section	Line	Commenter	Comment	Disposition
117.	A.9-11	A.9.5	33-42	Greg Gartrell/ CCWD	See comment 45 (95 in this collated version). Preliminary analyses suggest similar relationships with longfin smelt (winter exports and salvage with subsequent FMWT).	If this document is available to us, we will add these relationships as appropriate
118.	A.9-12	A.9.5	3-4	Greg Gartrell/ CCWD	Not all of these diversions take water near the bottom; this should be checked. Many siphons and pumps in the Central and South delta entrain air at low tide.	This will be investigated and updated as appropriate
119.	A.9-12	A.9.5	19	DFG	Change "Delta" to "Bay-Delta".	This will be corrected
120.	A.9-13	A.9.6	17-19	DFG	Additional actions other than those proposed in the ERP are also being considered.	Comment noted. Specific examples would be appreciated.
121.	A.9-13	A.9.6	26-28	DFG	Add statement on the effectiveness of the EWA in protecting longfin smelt and other native fishes. Analyses have failed to show that EWA has given significant protection to fish populations.	The intent of this section is to describe the goals of existing and planned conservation efforts.

DRAFT