

Appendix F

Comment and Response Log

Appendix F

--Page initially blank--

1. Overview to Appendix F

Comments to the September 15, 2014 Administrative Draft RFMP provided input for preparation of the final 2014 RFMP. The following pages show original comments and a response by the author showing how each comment was handled in preparation of the final 2014 RFMP.

Any comments submitted after November 19, 2014 are filed following the comment/response log. Since these comments were not received in time for final preparation of the final 2014 RFMP, they will be considered in future updates of the RFMP.

Appendix F

--Page initially blank--

Comments on Lower San Joaquin and Delta South RFMP Released September 15, 2014									
No.	Reviewer Name	Agency	Item Description		Priority	Comment Category	Review Comment	Comment Response Code	Notes
			Page	Paragraph					
1	Steven Schoenberg	USFWS	ES-1 and throughout	All	3	G	There's a font spacing problem, letters are not equally spaced, making the document hard to read. Maybe it is some sort of font substitution issue. Correct.	N	Fixed
2	Steven Schoenberg	USFWS	ES-3	Number 3	3	G	(3. Identify....to leverage....funding sources) - the purpose of multiple benefits is not just to get money to build projects, it is to achieve those benefits. It's not only an economic exercise.	N	The Regions developed the "leverage ... funding sources" wording as part of their approach at the beginning of the study in 2013. The State is using funding as an incentive to achieve those multiple benefits. The Regions acknowledge that obtaining multiple benefits is not only an economic exercise, but that is the tool used by the Regions to explore the local interest in multiple benefits as they have limited funds even for flood management.
3	Steven Schoenberg	USFWS	ES-6	First	3	I	(...Regions were interested in showing implementation timing) - it wasn't the Regions' discretionary interest; we believe this is a required component of the RFMP.	C	Wording changed
4	Steven Schoenberg	USFWS	ES-7	Last	2	O	(bottom of page "These include improved...."). Rewrite, something like "Programs to address this residual risk include...."	A	Wording added
5	Steven Schoenberg	USFWS	ES-8	First after bullets	2	I	("estimates.....yielded \$112 million"). You must mean the estimates totalled \$112 million.	A	Wording changed
6	Steven Schoenberg	USFWS	ES-9	Thrid under Summary	3	G	("RFMP estimated cost is.....twice....the SSIA") Somewhere in the document, summarize why this difference in estimated cost.	N	Chapter 7 already has some explanation. Basically, the Regions included more specific projects than the SSIA, many not included in the SSIA.
7	Steven Schoenberg	USFWS	iv	First item	2	O	\$B means \$Billion, so correct please.	A	Corrected
8	Steven Schoenberg	USFWS	3	Last	2	E	("....a series of Small Group Meetings"): you mean "two series" of such meetings, correct?	A	Corrected
9	Steven Schoenberg	USFWS	15	Fourth	2	O	("including: Littlejohns Creek...", etc.): Please add French Camp Slough, lower Calaveras River, to this list of locations with riparian vegetation.	A	Wording added
10	Steven Schoenberg	USFWS	21	First	3	G	("eight western Delta islands...."): Which islands?	N	The point is that the original legislation that limited funding to eight western islands has been ammended to include all of the Delta. The names of the eight islands are not important for this RFMP since they are outside the Regions.
11	Steven Schoenberg	USFWS	21	Second	3	I	("LMAs are making.....smaller projects every year") What kinds of actions are in these small projects?	C	"Smaller" has been removed

12	Steven Schoenberg	USFWS	21	Second	2	I	(In general, more improvements could be completed if it weren't for permitting and funding limitations): This is law, a requirement, not a limitation, and this reads as one of several examples of editorial lamenting about such. Rewrite - avoid "if it weren't for" type language, please. If not possible to rewrite, then delete.	A	The sentence has been deleted since it wasn't necessary to the message.
13	Steven Schoenberg	USFWS	22	First	1	I	("regulatory constraints,....") What is a "regulatory constraint"? Please avoid calling a law or permit a "constraint", as if it were something to be circumvented or changed.	A	The "regulatory constraints" wording has been eliminated. However, we believe regulations can be constraints. That doesn't mean they need to be repealed or circumvented. For example, the requirement for a 218 vote is often listed as a constraint for funding a project.
14	Steven Schoenberg	USFWS	33	Second	3	O	should read "...not worth their effort to seek...."	A	Changed
15	Steven Schoenberg	USFWS	36	Last	2	E	("LCM approach protects and improves riparian habitat.....") we can see protect, but not "improve"; how does LCM improve this habitat?	C	The wording "and improves" has been removed.
16	Steven Schoenberg	USFWS	37	Last	2	G	("...regulatory challenges can make some maintenance activities impossible.") Regulations are law, not "challenges" to be avoided or vaguely criticized in a management document. Rewrite.	D	We believe that regulations and laws can be challenges. Sill, wording has been modified to remove the word "challenges."
17	Steven Schoenberg	USFWS	38	Fourth	2	O	should read "...rabbit was listed under the Federal ESA as endangered.....Snake listed as threatened...."	A	Text has been modified as suggested.
18	Steven Schoenberg	USFWS	38	Fourth	2	G	("vegetation....can no longer be controlled due to habitat concerns. Without adequate vegetation management, DWR...rates...levees as unacceptable."): Not true, however, unauthorized take is not allowed; <i>whomever wants to do maintenance should consult with FWS under Section 7 or 10 as appropriate. Reads as trying to blame endangered species act for levee problems; or implies that should be able to do anything as in past. Rewrite, or delete.</i>	D	Text modifications have been made.
19	Steven Schoenberg	USFWS	38	Last	1	I	And also p. 38, last paragraph: should read something like this: "...laws and policies prohibit unauthorized destruction and are aimed to protect endangered species and their habitat...."	A	Suggested text changes have been made.
20	Steven Schoenberg	USFWS	38	Last	1	I	Finally, on p. 38, "expensive mitigation requirements": its not "mitigation" - we do not use that term in the ESA, endangered species are specifically exempted from our Mitigation Policy, and you will not find it (the word "mitigation") in a term and condition in our BOs. The proper term for such actions is "compensation" or "offset."	A	Suggested text change has been made.
21	Steven Schoenberg	USFWS	39	Third	1	I	("...and therefore is not economically realistic in many cases"). Habitat restoration never generates money like a business. That is not its purpose nor a criterion for decision to do it. Delete phrase. Avoid appearance of editorial.	D	The reference to "economically realistic" has been removed.
22	Steven Schoenberg	USFWS	39	Last	1	I	("The best opportunities are along the mainstem....between Vernalis and Mossdale and along portions of....Paradise Cut and Old River") What is "best" about these locations compared to other locations downstream on the mainstem San Joaquin River? Seems to imply that whatever is in least conflict with urban development is "better" or "best"; perhaps best for developers - but not necessarily best or sufficient for listed species. Rewrite.	D	Since section 3.4 is about challenges, the text referring to opportunities has been removed.
23	Steven Schoenberg	USFWS	40	First	1	I	("...thus the species benefit will be limited by existing hydrology and reservoir operations.") Not entirely true. Setback benefits include not only inundation, but improved capacity allowance for low-flow bank edge vegetation (shaded riverine aquatic cover) that would provide benefits in all years. Also, terrestrial species, such as the brush rabbit, would benefit by setbacks in all years. Clarify.	D	Text has been modified.
24	Steven Schoenberg	USFWS	40	Third	1	I	("...essentially four ways to create....floodplain habitat") Too much of a sole emphasis on floodplains; it is important, but bank edge habitat, whether inundated or not - - is also very important. Bank edge woody vegetation could be enhanced by another means, such as with wider levees, or levees with short, waterside berms, that could provide wildlife/fishery values.	D	Since this section is about constraints, text for the lack of edge habitat has been added after the first paragraph.
25	Steven Schoenberg	USFWS	41	First	1	I	(Funding Constraints - "...are required to be applied toward a specific part....creates a complex accounting process"): FWS does not necessarily agree that this situation is pervasive or acts as a general constraint on funding, or about some onerous accounting process. Recommend delete it.	A	The paragraph has been deleted.

26	Steven Schoenberg	USFWS	43	First	2	O	edit- should say (2nd paragraph) "contemplate major development"	A	The text has been changed.
27	Steven Schoenberg	USFWS	43	Third bullet	1	O	("HMP configuration") - Please add a little more on what this is (more than the acronym definition); it was not explained prior in document.	D	More explanation on HMP and the PL 84-99 configurations has been included. In addition, the table in Section 3.4 shows an overview of geometric standards.
28	Steven Schoenberg	USFWS	46	First bullet	1	G	("Although the Regions support incorporating habitat enhancements and other multibenefits into future flood projects, they believe that the time to commit to those enhancements is during future project development planning.....committing is premature. More analysis...needed...costs and benefits"): FWS staff observed little local expression of interest in Regions' support of habitat enhancements during participation in the RFMP; but perhaps the contractor heard more support - if so, retain as written, but if it is merely a creative way to sound neutral without having any true local support - then it should be revised. By the way, the term "enhancements" isn't just about "future project development" - it should apply to all opportunities, including existing projects, in the Regions. At best - the expressed opinion to habitat enhancement was silence, but more broadly - it just isn't a significant component of what is proposed, and there is but one example of a firm project component (short setback in RD 684) in both regions. FWS wishes there was more appreciation of the need for habitat enhancement throughout the area. As currently proposed - the set of RFMP projects in these Regions perpetuate the status quo (traditional fix-in-place repairs, rock, no setbacks, no vegetation). In this regard, we agree only with the statement that (p 46) "a focused regional approach is illusive for all areas of the Regions." Some revision is needed to summarize the true extent of committed environmental enhancement, that is - substantially lacking.	N	Due to lack of information, now is not the time to commit to habitat enhancements. The Regions do understand the need for habitat enhancements. The problem is that there isn't enough money for even flood management, so adding significant habitat enhancements compounds the funding problem. No change in the text.
29	Steven Schoenberg	USFWS	46		1	G	(Regional Conservation Approach): Close inspection of Appendix C reveals that mention of study of setback potential is limited to a few RDs (1, 2, 2089), however, others areas have been identified along the mainstem San Joaquin in various other forums (Conservation Strategy/FROA/cost estimates - RDs 2064, 2075, 2094, 544, 524; by us in our October 2011 comments on the RD 17 phase III DEIS, etc.); some of this was discussed at small group meetings - although not currently part of a project nor locally supported. While it is understandable to exclude these from the detailed list of projects (they are not currently proposed), knowing the potential is there has value for future study and possible consideration. There appears to be widespread, chronic levee problems of several types (seepage, erosion concerns, slope stability, channel deposition, some recurrent breaches - e.g., RD 2075); many in areas with limited financial resources. Overall, this reviewer gets a sense that money spent on a patchwork of fixes into some areas, can all be washed it all away in the next large flood year which follows. This seems to argue for a more serious study of an optional approach in these Regions. Therefore, please consider summarizing all (not just select) physical opportunities for setbacks as a way of outlining the potential for a larger corridor in the mainstem. This should be a primary element of the Regional Conservation Approach.	D	The bullets within the Regional Conservation Approach have been revised to reinforce the possibility of setback levees. The original wording was not specific and was intended to include all habitat opportunities.
30	Steven Schoenberg	USFWS	47	First	3	G	("San Joaquin River corridor downstream from Paradise is constrained by the levee system and adjacent development.") Misleading as written. The levees do constrain the corridor, however, the land side is not highly developed throughout. Some of it is developed. The majority of the length is not yet developed and there is room for some more continuous habitat corridor to be incorporated into the design; it is acknowledged this is not - as in RD 17, phase III - what is currently proposed. Rewrite for accuracy.	D	Text has been modified.
31	Steven Schoenberg	USFWS	47	First	1	I	(re: setback adjacent to Old River; "local studies have shown this setback would have adverse hydraulic impacts" and "breach it [the old levee] in places is considered unrealistic because the existing levee would still need to be maintained, along with the new setback levee, to prevent the hydraulic impacts"). First, those "local studies" have never been made available....they are referenced in the DEIS for RD 17 phase III, but they were not included in the technical appendices, and never provided to FWS after our October 2011 comments (where we also commented that a hydraulic impact, if there was one, could be mitigated by interior levees, such as the old levee). Second, PBI (Peterson) briefly discussed this (an old river setback) at one of the RFMP's; in my recollection - he did state that there would need to be some maintenance; but did not specify that as "unrealistic." There was other discussion including by Eric Tsai of DWR expressing State interest. RD 17, however, has not proposed a setback at this location to date. We suggest editing "considered unrealistic" to something else - - - perhaps "not currently supported by RD 17" or whatever portrays the level and reasoning of local support or opposition.	A	Text changed as suggested.

32	Steven Schoenberg	USFWS	47		3	G	("...enhancement of in-channel islands.") Where are these islands?	N	General, wherever they may be located.
33	Steven Schoenberg	USFWS	47	Second	1	I	("...the approach does not support significant expansion of habitat and ecosystems functions along the San Joaquin River downstream from Paradise Cut since opportunities are generally small and site specific"). We disagree. The opportunity for enhancement is greatest where habitat is most degraded, and there is abundant such degraded habitat in the form of rocky barren levee faces on the San Joaquin River downstream of Paradise Cut, on both sides of the mainstem river. It is unclear how the writer came to the conclusion that opportunities are small and specific. The statement also conflicts with subsequent concept figures 10-11. Rewrite as substantial opportunity to enhance the river corridor exists throughout most of the mainstem San Joaquin River in the Regions, including downstream of Paradise Cut, but lacks local interest presently.	D	Text modifications have been made.
34	Steven Schoenberg	USFWS	47	third bullet	1	G	(Paradise Cut): please clarify and state whether an expanded Paradise Cut bypass could reduce water surface elevations (WSEL) upstream and by what amount (the RFMP does state the downstream effect as being on the order of ~20 inches), and if so, whether this reduced WSEL either upstream or downstream could provide for more vegetation allowance on the mainstem San Joaquin.	N	Text has been added to discuss the water surface upstream from Paradise Cut on the SJR. By "vegetation allowance" we assume you mean adding vegetation that would increase hydraulic roughness and raise the water surface. That may be possible with more detailed studies, but was not included in the RFMP. However, if vegetation addition completely cancels out the water surface drop, then Paradise Cut would be solely for habitat.
35	Steven Schoenberg	USFWS	47	Last	3	G	("...have option of linking with habitat improvements along the corridor"). What corridor is being talked about here? the mainstem SJR? Paradise Cut? either? What is meant by "linking with"? Clarify/revise.	D	"linking with" has been replaced with "participating in". The "corridor" is the corridor from the Vernalis gage along the San Joaquin through Paradise Cut in the above bullet. "the corridor" has been replaced with "this corridor"
36	Steven Schoenberg	USFWS	48		3	G	(continuation of "linking" options, with bullets): At first reading, this is a positive and logical approach. However, comparison with what is proposed reveals that the flood control projects are not doing this.	N	As noted in the first bullet under Section 4.5, the time for the Regions to commit to habitat enhancements is in future project development planning. That is why that the projects do not currently show specific enhancements.
37	Steven Schoenberg	USFWS	48	First bullet	3	G	First bullet (avoid and protect first): In the Regions, many projects have little remaining habitat, so the emphasis really needs to be on the second - that is opportunities to apply onsite best management practices into each project. Clarify extent that this applies, and that much habitat is very degraded, and in need of on-site enhancement.	N	One bullet is not intended to be emphasized over another. The second bullet should help guide actions regardless if there is existing habitat to avoid and protect or not in the first bullet.
38	Steven Schoenberg	USFWS	48	Second bullet	1	I	Second bullet: As written, this appears to provide some avenue to do nothing on-site ("In some cases, it may be more practical for the LMAs to contribute to the regional corridor concept in lieu of onsite habitat improvements.") What is meant by "more practical?" How many cases is "some?" What is a "regional corridor concept?" These could mean different things to different people. To be honest, our concern here is that this may be interpreted to do business as usual - rock, no on-site habitat, no improvement - so long as there is some contribution to the Paradise Cut corridor. On the one hand - FWS is indeed very interested in opportunities like Paradise Cut as one area of interest that could help the riparian brush rabbit (other populations outside of this area would also be necessary to provide resiliency and redundancy for the species). But, this would not function as aquatic habitat (temporary, not on the main migration route of salmonids, not inundated most years, adjacent to major diversions) and is not the mainstem San Joaquin River. Clarify what is a "regional corridor"; and in what circumstances, such off-site contribution would apply ("some cases").	D	"Business as usual" was not the intent of the second bullet and the reference contributing to the regional corridor. Have removed the last sentence of the second bullet. Have also tried to clarify by adding ",especially where there is little existing habitat" to the first sentence.

39	Steven Schoenberg	USFWS	48	Third bullet	1	G	Third bullet ("look for opportunities to enhance ecosystem benefits....in channel islands and river margins as part of adjacent flood projects along the San Joaquin River downstream of Paradise Cut"): This reads, by omission, that setbacks are not to be considered, nor some of the other specifics mentioned in the fourth bullet (waterside flood benches, protecting mature trees, levee setbacks).	D	It appears like the commentor is viewing each bullet as a stand alone concept where only one bullet is considered. The intent is for all the bullets to be considered. Set-back levees are shown in the fourth bullet and don't need to be listed in each bullet. We have added a clarification before the bullets to indicate that all bullets should be considered. The third bullet has been removed since the concepts are already included in the fourth bullet.
40	Steven Schoenberg	USFWS	48	Fourth bullet	1	I	Fourth bullet ("corridor from the Vernalis gage to Mossdale....look for opportunities to increase channel margin habitat"). FWS supports channel margin habitat, but does not support confining looking for opportunities to just a part of the mainstem San Joaquin. And, as written, it begs the question - What is proposed north of Mossdale (little guidance is provided)?. Drawing a boundary on enhancement at Mossdale simply sets the stage for further degradation on the lower section of the river, where habitat is more degraded, and where threats (from development, flood control actions) are greatest. One cannot "reduce the risk associated with new urban development...." (4th sub-bullet) if enhancement actions are excluded from those areas of such new development. We recommend deleting the "Vernalis gage to Mossdale" restriction, and instead say - "On the entire mainstem San Joaquin River throughout the Regions, look for opportunities to apply habitat conservation practices..... to increase channel margin habitat	A	Have removed "from the Vernalis gage to Mossdale"
41	Steven Schoenberg	USFWS	48	Fifth sub-bullet	1	I	The fifth sub-bullet ("Protecting mature trees on the levee cross section") is similarly exclusionary, depending on how it is interpreted. For example, there are significant mature trees at risk in the footprint of proposed seepage berms in RD 17 phase III, and likely elsewhere. Large trees often grow near, but not within, the (existing) levee cross-section. "Riparian" defined - means under the influence of an adjacent water body. The distance of influence varies, but can be and often is beyond the levee cross-section (100's of yards). We suggest revision, such as "Protect mature riparian trees throughout the Region.....".	A	Text changed as suggested.
42	Steven Schoenberg	USFWS	49	Last bullet	3	G	When a levee upgrade is needed to deal with seepage or slope stability issues, design of reconstruction will consider ways to incorporate new channel margin habitat....Figures 10 through 12....DWR). FWS supports these concepts, and they may be the only options for completely developed areas. However, they are all subordinate in our preference to a true levee setback which involves rebuilding the levee far enough away from the river edge so that armored water edge slopes are minimized. Understand that woody vegetation establishment needs room for soil and root growth. The dripline of a single mature tree - which roughly approximates the extent of root growth (it could be more) is on the order of 50-100 feet wide. And, while a narrow corridor is much better than none - more significant terrestrial wildlife benefits are achieved where these corridors are sufficiently wide to reduce edge effects (on the order of 300-600 feet wide minimum). Notably absent from the Regional Conservation Approach is any serious consideration of a true setback associated with permanent water - as in the mainstem San Joaquin River (Paradise Cut can be considered a type of setback/bypass; but it does not have frequent/permanent flow).	N	This bullet applies to upgrade of levees, not building new levees. The provision for setback levees is in another bullet.
43	Steven Schoenberg	USFWS	53	First	3	G	("San Joaquin Multi-Species Habitat Conservation and Open Space Plan is a master plan...purpose of balancing the need to conserve open space for wildlife and converting....space to accommodate a growing population"). That document is an HCP; vague terms like "balancing need" are not really the measure of intent; HCP's must ensure that the activities do not affect the existence or recovery of any listed species covered by the plan - but probably more than that - they should contribute to the recovery of those species. Put simply, the species should clearly be ahead of the game with that HCP than without it. Some better understanding/rewriting needs to be expressed here.	N	The reference to "ballancing" is directly from the HCP.

44	Steven Schoenberg	USFWS	55	Last	3	G	("The Regions had thought that Round 2 RFMP may be a way to further craft regional projects considering....climate change"). We are not aware that (climate change consideration) is the purpose of phase II of the RFMP); some other actions have been discussed - (governance/communication/institutional barriers/O&M), but to my knowledge not climate change. It could be. Or the focus of phase II may be subject to change, or climate change could be included in the scope. Please check/clarify.	D	The Regions originally proposed that climate change be included in Round 2. We agree that DWR has now proposed a narrower scope, the Regions would still like to acknowledge that they wanted to further investigate climate change and that an investigation will be needed in the future.
45	Steven Schoenberg	USFWS	62		1	I	(5.1.1, 5.1.2, 5.1.3) It isn't entirely clear what these sections are about; are they projects not covered in Appendix C, are they projects within Appendix C that are highlighted (the prior paragraph, says there is "more discussion of several of the less routine projects is warranted"). Is this that "more discussion"? Slight revision is needed, perhaps (first sentence) "Below, we highlight several of the projects in Appendix C because (state reasons). All appear to be in the Stockton area.	D	Agree that these sections are out of place and fit better in Appendix C. The text in Section 5.1 has been shortened for context.
46	Steven Schoenberg	USFWS	62		2	I	The last sentence before the table on p. 62 (ULDC evaluations....is shown below) is unclear; what is it that is supposed to be in that table? Rewrite text / revise table.	D	The sentence has been modified.
47	Steven Schoenberg	USFWS	62		3	G	Is there any relation between 5.1.2 and 5.1.3? If so, please state.	D	5.1.2 includes Smith Canal Gate. 5.1.3 provides more discussion of Smith Canal Gate since it is an initial project. Have provided some text clarification of this.
48	Steven Schoenberg	USFWS	69		2	G	Notably absent from 5.1 (or from the projects in Appendix C) is a description of RD 17 phase III (Appendix C, p. 41 says "Since....is funded and awaiting construction....not included in the potential projects for RD 17). Does this mean that projects that do not involve (or intend to request) any State funding, are to be excluded from this RFMP? It would seem logical that some (not all) of the projects in the RFMP are likely/eligible to receive funding. The exclusion of this one project - RD 17 phase III, seems improper. Some illustrations are nevertheless provided in Appendix C. As to "awaiting construction" - this implies the project has completed environmental documents and received all permits, which it has not.	D	State funding has already been arranged for Phase III. Since the RFMP is identifying future funding that is needed to help the State and locals plan, Phase III was not included in the future projects. More discussion has been provided in Appendix C.
49	Steven Schoenberg	USFWS	71		3	G	("....studies indicate expansion of Paradise has....potential to lower water level...20 inches along the San Joaquin River downstream.....") Would this bypass also reduce the upstream stage as well (I seem to recall some brief mention of this at one of the small group meetings)? Please review and state upstream stage reduction - where and how much.	D	The upstream water surface elevations would also be reduced, but the effect would gradually diminish as one moves upstream on from the Paradise weir along the San Joaquin River. For example, about three miles upstream from the weir, the water surface elevation would be about 12 inches less than without a Paradise Cut Expansion. The text has been modified to clarify this point.
50	Steven Schoenberg	USFWS	80	Section 6.1	2	G	(6.1"...supports additional planning and response....beyond current levels....components include: [various dollar amounts and components]"; 6.2 and 6.3 - similar dollar/component lists): Please clarify what these dollar amounts mean; are they the total amount needed, some additional amount beyond what is currently available? Are none of these actions currently funded? some of them? which ones?	D	Cost estimates are for activities beyond existing funding. Clarifying text has been added.

51	Steven Schoenberg	USFWS	83-87	Section 6.4	3	G	(Recommended Process and Policy changes): It is unclear how this section relates to the scope of an RFMP. FWS is hesitant to agree/disagree with (or comment on) any of it; other than to say that it reads more as a lobbying statement than as a component of flood management planning. Perhaps some additional preface language can be composed to better place this process/policy narrative in context of the RFMP.	N	Section 6.4 does relate to the RFMP because there are process and policy changes that are beyond the authority of the regions, but that are needed to improve regional flood management. Some additional context has been added at the beginning of Section 6.4
52	Steven Schoenberg	USFWS	93	First bullet	1	O	("The Appendix [C] also shows a summary.....without the RD designations") Where in Appendix C is this summary?; perhaps it is somewhere else in the RFMP?	C	Good catch. The summary tables were unintentionally left out of Appendix C. The tables have been added.
53	Steven Schoenberg	USFWS	101	third bullet	1	G	(7.2 Consistency with SSIA: "RD 17 Levees....The regions believe the intent that the intent of DWR's language for discouraging incompatible development was for rural/agricultural levees and not for a levee that is already protecting an urban population. The SSIA seems to agree with this opinion since it included urban levee improvements for RD 17") This statement appears to conflict with the SSIA, which states (p. 3-7, 2012 CVFPP): "...consider setbacks to the extent feasible, based on the level of existing development and the potential benefits." and "should also preserve or restore, at minimum shaded riparian habitat corridors along the waterside of levees." The level of existing development of RD 17 does not feasibly preclude setbacks beyond those already proposed (including short waterside berms); improving and maintaining those levees free of shaded riparian on their waterside - as would occur under a fix-in-place strategy, does not preserve/restore a riparian corridor - and does not achieve even the minimum stated in the SSIA. As to the potential to set aside land somewhere else, in reference to Section 4.6 (the regional HCP), that HCP specifically excludes Federal flood control projects (there is a provision to seek inclusion, requiring FWS approval), does not cover all species or waterside effects, and has take restrictions. It is true that CVFPP's Fig 3-12 does include a line for "urban levee improvements" in the vicinity of RD 17; but the other language in the SSIA encourages (not discourages) enhancement in the forms of setbacks and preservation and restoration of habitat in these areas. In the absence of these enhancements, the future result would be major habitat discontinuities. For these reasons, we do not concur with the Regions that there is consistency with the SSIA with respect to RD 17 levees. We recommend revising the language.	D	The RD 17 bullet was not intended to be about setback levees or other ecosystem restoration which is addressed in a separate bullet. The bullet is about future development, not setback levees. The RD 17 levees were eliminated from the Corps of Engineers' feasibility study because federal policy (Executive Order 11988) prevents federal participation in a project that can induce development. The State has also questioned future development within RD 17. The bullet intended to show that the SSIA showed urban development for RD 17. Some clarifying text has been provided.
54	Steven Schoenberg	USFWS	111	4	3	G	(State should support the region's efforts for flood insurance reform): Please succinctly state (or reference prior pp. in document) what the Regions want in terms of reform or support.	D	This was discussed in Section 6.4.2. A note to this has been added to Recommendation 2.
55	Steven Schoenberg	USFWS	51 of Appendix A	Last bullet	1	I	There are two separate authorities - the ESA, and FWCA (Fish and Wildlife Coordination Act), that seem comingled here. The FWCA authority (requirement to consult on Federal water resource development projects) is done whether or not there is any listed species; it is not an endangered species consultation. ESA authority comes into play when there is a listed species; that consultation is separate from the FWCA authority. Some slight revision is needed.	A	Text added.
56	Steven Schoenberg	USFWS	General comment on Appendix C		1	CI	The figures and text descriptions appear to clearly show and describe the project locations, and the feedback at the small group meetings. In view of the paucity of enhancement actions in these proposed projects, this RFMP process thus far appears to have been unsuccessful in incentivizing projects that incorporate even minimum habitat improvements; perhaps the revision (of the main report) can include some useful thoughts of ways to improve local participation/interest in environmental enhancements.	N	
57	Steven Schoenberg	USFWS	7 of Appendix C		3	G	(e.g. Table 2, DNM, M, MG) - define acronyms in table	N	These acronyms have already been defined on page one of the Appendix in Table 1 (apply for the entire Appendix)
58	Steven Schoenberg	USFWS	29 of Appendix C		2	G	(e.g., Table 11, Reach ID A-L, units, numbers in various tables throughout document.) - what do these reach ID's mean, and how can the reader find out about where they are?	D	These ID numbers, units, and segments are from DWR's ULE and NULE documents. A note has been added in the Appendix C Overview, Table 1.
59	Steven Schoenberg	USFWS	41 of Appendix C		1	CI	Probably should include a little more on the status of RD 17 phase III (not all permits/permissions obtained yet, no final EIS yet, etc.)	A	Added context for permits/EIS.

60	Steven Schoenberg	USFWS	119 of Appendix C		3	G	Some of the project work for RD 2058 might be lessened, or changed, depending on the configuration of a Paradise Cut setback. Summarize this option to the extent possible.	N	The suggested discussion is already contained in the paragraphs for the RD 2058 Projects. See "Seepage Repairs" and "Slope Stability Repairs"
61	Steven Schoenberg	USFWS	Summary statement		3	G	In view of the paucity of enhancement actions in the proposed projects, this RFMP process thus far appears to have been unsuccessful in incentivizing projects that incorporate even the minimum habitat improvement measures; perhaps the revision (main report) can include some thoughts of additional ways to improve participation/interest in environmental enhancements.	N	Same comment as No. 56 above.
62	John Kleinfelter	CDFW	See comments above, Nos. 1 - 61				Review and remarks provided by CDFW personnel corresponded with, and was effectually equivalent to, comments provided by USFWS.	N	Comments from governmental resource agencies (USFWS and CDFW) are combined under one set for the purpose of concise and efficient summary. See comments and responses above, Nos. 1 - 61.
63	Compilation of DWR Comments	DWR	ES-9	First bullet	1	I	Lower SJR Region estimated financing capability to start from \$7M?	D	The text has been changed to clarify the local funding capability.
64	Compilation of DWR Comments	DWR	ES-10	Table	2	I	In the table of SSIA and RFMP costs in the Executive Summary, what is referred to as "Regional Improvements" is categorized in the CVFPP as "System Improvements".	A	Footnote has been added
65	Compilation of DWR Comments	DWR	All		3	G	The Executive Summary and Introduction sections were good and concise, providing a reasonable level of common background materials, and carefully summarizing important information.	N	
66	Compilation of DWR Comments	DWR	iv	Top of Page	2	O	\$B should be \$Billion	C	\$Billion has been added
67	Compilation of DWR Comments	DWR	iv	Bottom of Page	2	O	Proposition 1E is not listed	B	Proposition 1E has been added
68	Compilation of DWR Comments	DWR	Various		3	G	Section 1-4 - The document captures and expresses the variety of flood protection issues facing the combined region, and sections 1 through 4 do a nice job of laying out the flood hazards and risks, and identifying the four target flood protection levels for the subareas within the region. The document makes a strong effort to highlight the variety of activities going on in the Regions, and works to weave them together into a comprehensive story for implementation within the region.	N	
69	Compilation of DWR Comments	DWR	20	Second & Third	1	I	Section 2.7 - Creation of SJAFCA - Last paragraph talks about WRDA 1996 and federal and State reimbursement, but the number do not add up to tell a complete story.	D	Text has been revised
70	Compilation of DWR Comments	DWR	33	Second	1	I	Section 3.2 - FEMA will still not provide post-disaster restoration funds, but they will participate in emergency response activities.	D	Clarification text has been added
71	Compilation of DWR Comments	DWR	37		1	G	Section 3.4.1 - The information in this section lacks detail considering the level of detail provided in Section 6.1.	D	Supplemental text has been added
72	Compilation of DWR Comments	DWR	38		2	G	Section 3.4.3 - What about the addition of flood development fee to continue improving flood protection as more people are put behind levees?	D	The fee has been added to the text as a possibility.
73	Compilation of DWR Comments	DWR	46	First	2	E	Section 4.3 - This section talks about USACE feasibility study RP, but there is not mention of NED, which is ultimately what is going to be recommended by USACE.	C	Corps terminology has evolved from TSP to RP as their study progress, but will ultimately be NED. Correction has been made.

74	Compilation of DWR Comments	DWR	47	First bullet	1	I	<p>Section 4.5 - There have been suggestions of setting back the levee at a meander on the east side of the San Joaquin River, adjacent to Old River. However, local studies have shown that this setback would have adverse hydraulic impacts along the San Joaquin River with the existing levee removed. Leaving the existing levee in place, but breaching it in places to provide new access to the floodplain is considered unrealistic because the existing levee would still need to be maintained, along with the new setback levee, to prevent the hydraulic impacts. At the current level of planning, the local LMA does not plan on pursuing this levee setback while investigating other ecosystem enhancement opportunities. Some of these opportunities may be enhancement of in-channel islands and other bench areas between or on the levees. Comment on above - Both the 0.7 mile south levee and 0.7 mile north levee in this area are currently being maintained. If a setback levee were implemented that keeps the south levee in place, the 0.7 mile south levee and a new 0.4 mile east setback levee would need to be maintained. It is unclear how this would increase maintenance requirements over existing practices.</p>	D	Text revisions have been made
75	Compilation of DWR Comments	DWR	59	First	1	I	<p>Section 5 - Structural Actions proposed loses some of the flow and cohesion the document laid out through Section 4. It is unclear how the Projects by individual LMAs within the two Sub-Regions tie together to achieve the overall vision for the Regions. Estimated costs are provided, but there is no coherent flow of timing or priority for proposed implementation (other than stating that due to the high cost of seepage/slope stability improvements for Delta South, these would be lower priority). It would be helpful to see the identification of those projects that are highest priority to achieve the target flood protection levels within the sub areas of the Regions. If all identified projects are necessary to achieve the target flood protection levels, then the timing for likely implementation and availability of the local cost share should be roughly identified.</p>	D	Section 5 lays out the projects identified within the Regions. The timing of these projects is presented in Section 7. Some clarifying text has been added on the first page of Section 5 to tie better with Chapter 7.
76	Compilation of DWR Comments	DWR					<p>Section 5.2 - 5.2 - There is a nice level of project detail for those projects that are identified as having LMA and Regional Significance, however, the listing of projects in Sections 5.1 and 5.2 is considerably more expensive than the SSIA estimate, and although this is pointed out clearly in the document, no prioritization for proposed implementation is provided in this section (although some prioritization is provided in Section 7, tables 12 through 17). The document really needs an identification of what "must be achieved" and CAN be achieved if sufficient funding (at the local, State, and federal levels) is not available to carry out all proposed work.</p>		Section 5 lays out the projects identified within the Regions. The timing of these projects is presented in Section 7. Some clarifying text has been added on the first page of Section 5 to tie better with Chapter 7.
77	Compilation of DWR Comments	DWR	69	Mid-page	2	I	<p>Section 5.2 - Potential projects included herein are categorized as projects with regional significance. These are projects such as the expansion of Paradise Cut and other projects that can affect multiple LMAs. These regional projects are the types of projects that DWR may consider in their BWFS.</p>	A	Sentence has been deleted
78	Compilation of DWR Comments	DWR	80				<p>Section 6.1 - Emergency Response discussion is well developed.</p>	N	
79	Compilation of DWR Comments	DWR	82		2	G	<p>Section 6.2 - The section covering O&M is quite limited and could be greatly expanded. At a minimum, discussions about the ongoing O&M, including challenges, obstacles, and successes in portions of the Region that might be applied elsewhere, needs, etc. should be laid out. Ways to potentially coordinate, consolidate, and improve O&M should be explored and implemented.</p>	D	More discussion has been added. However, Section 6 covers solutions where challenges, obstacles, etc. are described in Section 3.
80	Compilation of DWR Comments	DWR	82		2	G	<p>Section 6.3 - The bullets on 6.3 are helpful to understand the direction for the proposed Flood Risk Management, however, this section could also be expanded and more specificity added.</p>	D	Discussion has been added.
81	Compilation of DWR Comments	DWR	83-87		2	G	<p>Section 6.4 - There are some strong ideas laid out in Section 6.4 for Recommended Process and Policy changes, and further development on these seems appropriate. It may be useful to tie the proposed improvements in 6.4 back to issues that should be identified in 6.1, 6.2, and 6.3.</p>	D	Tie back to issues has been added, but to section 3, not 6 which covers solutions.
82	Compilation of DWR Comments	DWR	87	Item 4	2	G	<p>Section 6.4.5, #4 - The State's flood management concern is almost entirely centered focused on areas protected by the State Plan of Flood Control, and reducing State their own liability.</p>	A	
83	Compilation of DWR Comments	DWR	88		2	G	<p>Section 6.5 - Discussions apply to other sections (6.3, for example) where additional information could be added to identify issues in the preceding sections, and the proposed solutions.</p>	D	Clarifying text has been added .
84	Compilation of DWR Comments	DWR	100	Second	2	I	<p>Section 7.2 - "The SSIA is relevant to the RFMP because potential projects that are consistent with SSIA objectives may be more likely to receive State support and be incorporated in the BWFS and the 2017 CVFPP."</p>	A	

85	Compilation of DWR Comments	DWR	102	Fourth Bullet	1	I	The USACE's Recommended Plan for the urban areas includes climate change sea-level rise in their evaluations.	A	
86	Compilation of DWR Comments	DWR	111-112		3	G	Section 8.5 - Recommendations appear to heavily rely upon significant State funding and investment. A major concern is that State level funding sources may not materialize as proposed.	D	The recommendations were intended to focus on the State. The Regions are aware of the potential lack of funding from local, State, and federal sources.
87	Michael Sabbaghian	DWR			1	G	Verbal comment - The report discusses how the southern wing levee for RD 17 helps control development by excluding agricultural land to the south from RD 17, but what is being proposed to manage growth within RD 17?	D	It is too early in the process to have a definitive answer.
88	Michael Sabbaghian	DWR			3	G	Verbal comment - It is probably too late to do anything about it in this RFMP, but the Regions need to work on identifying multi-benefits.	D	As stated in Section 4.5, the regions support incorporating habitat enhancements and other multi-benefits into future flood projects where feasible, but believe that enhancements should be part of future project development planning.
89	Michael Sabbaghian	DWR			2	G	Verbal comment - take out the tone that the Regions can't do multibenefit projects.	A	Several text changes have been made
90	Matthew Ward	SJ County Flood Control & Water Conservation District	Several		3	E	The reviewer made editorial suggestions in 19 different location.	A	Suggestions for editorial changes have been incorporated.
91	Matthew Ward	SJ County Flood Control & Water Conservation District	27	Figure	3	O	This area doesn't look correct. Missing North Little Johns Creek and the North fork of South Little Johns Creek.	D	The map is intended to be broad coverage of where recent detailed studies provide flows. It is not intended to show every tributary where flows aren't shown. Made no changes in the figure.
92	Matthew Ward	SJ County Flood Control & Water Conservation District	31	Figure	3	O	This map is missing the 3/4-mile Duck Creek Left Bank Levee. The levee was built by USACE, is a project levee and protects urban area.	D	This map was produced by CVFED to show approximate flooding depth in urban areas. The focus is not on levees. No changes made on the figure.
93									
94									
95									
96									
97									
98									
99									
100									