

ATTACHMENT C

U.S. FISH AND WILDLIFE SERVICE RECOMMENDATIONS

The recommendations on the proposed All-American Canal Lining Project by the U.S. Fish and Wildlife Service (FWS) are presented below, together with the responses by the Bureau of Reclamation (Reclamation). The recommendations cover, in respective order, selection of the FWS preferred alternative, the Drop 3 Alternative, the Parallel Canal Alternative, and the Well Field Alternative.

It is important to note that while most of FWS's recommendations require certain activities to be conducted by Reclamation, any or all of the Project activities may be implemented by others rather than by Reclamation personnel. Public Law 100-675 authorizes the project with 100 percent of the funding to be provided by California contractors with Colorado River water delivery contracts (California Contractors). In accordance with Public Law 100-675, the project will be implemented by a California Contractor under a construction and funding contract with the Secretary of the Interior. Reclamation will ensure adherence to the following responses to FWS's recommendations.

FWS Recommendation. The Well Field alternative would have the least impact on the fish and wildlife resources of the Canal and vicinity. Therefore, it is the Service's preferred alternative among the action alternatives. In-place lining from Pilot Knob to Drop 3 would result in less disturbance of the fish and wildlife resources of the project area than construction of a Parallel canal. Therefore, it is the Service's preferred action among the lining alternatives. Construction of a Parallel Canal would result in greater disturbance of terrestrial resources than either the Well Field or In-place Lining to Drop 3 alternatives. In-place Lining to Drop 4 is the Service's least preferred alternative due to adverse effects to the wetland between Drops 3 and 4.

The direct effects to terrestrial habitats in any of the alternatives can be reduced through careful site selection of work areas. Impacts to fishery resources could be mitigated through enhancement of the in-Canal fishery.

Response. Reclamation agrees that the Well Field Alternative would have the least impact on fish and wildlife resources. However, the Well Field Alternative was not selected as the preferred alternative for international reasons, as discussed in chapter II, "Scope of Alternatives." Among the canal lining alternatives, Reclamation agrees that the Drop 3 Alternative would cause the least disturbance to the fish and wildlife resources in the project area. However, the Parallel Canal Alternative offers advantages in the area of cost and timeliness of construction, which makes it Reclamation's preferred alternative. The impacts can be mitigated, as discussed below under the Parallel Canal Alternative.

PARALLEL CONCRETE-LINED CANAL TO DROP 3

FWS Recommendation a. For the loss of shoreline game fish, 197 reefs, consisting of discarded automobile tires, shall be constructed and placed in the Canal. The reefs shall be evenly distributed over the 23-mile project area from Pilot Knob to Drop 3 and shall be alternately placed on both sides of the Canal.

Response. The use of artificial reefs has been adopted as the preferred method of mitigation for the effects on the canal fishery (chapter III under "Canal Fishery").

FWS Recommendation b. For the loss of 24 acres of common reed along the existing Canal banks, Reclamation shall plant 24 acres of cottonwood-willow and/or honey mesquite woodland with a mature habitat value of 21 points per acre adjacent to or within the wetland between Drops 3 and 4.

Response. The recommendation for replacement of common reed has been adopted (chapter III under "Wetlands Habitat").

FWS Recommendation c. For the loss of the 98.5 acres of riparian vegetation east of Drop 3, Reclamation shall plant 19 acres of cottonwood-willow and/or honey mesquite woodland with a mature habitat value of 21 points per acre adjacent to or within the existing wetland between Drops 3 and 4.

Response. The recommendation for replacement of riparian vegetation has been adopted (chapter III under "Wetlands Habitat").

FWS Recommendation d. Specific implementation plans for riparian revegetation shall be prepared by Reclamation following determination of specific site characteristics. Ratios of cottonwood, willow, and honey mesquite planted shall correspond to the suitability of potential revegetation sites for these species. The planting of honey mesquite/quailbush associations may be appropriate in areas of high soil salinity. These plans shall be approved by the Work Group prior to the commencement of project construction. Clearing of existing vegetation to plant seedlings shall be minimized and limited to saltcedar and arrowweed. Seedlings shall be planted at a density of 100 per acre and irrigated with water of sufficient quality and quantity to allow establishment.

Response. The recommendation has been adopted (chapter III under "Wetlands Habitat Along the All-American Canal").

FWS Recommendation e. For the loss of the 0.9 acre marsh located east of Drop 3, Reclamation shall recreate an 0.9 acre of marsh adjacent to the existing marsh between Drops 3 and 4, or remove pampas grass from 0.9 acre of existing wetland between Drops 3 and 4 and replace it with native marsh vegetation.

Response. This recommendation for replacement of marsh lost has been adopted (chapter III under "Wetlands Habitat").

FWS Recommendation f. Reclamation shall fund backwater restoration, development, and/or enhancement on the Colorado River between Parker Dam and Imperial Dam in the amount of \$100,000. The location, purposes, and design of the project shall be coordinated through the Work Group and the Colorado River Backwaters Committee.

Response. To ensure that the project does not cause an adverse change to wetlands along the Colorado River, this recommendation has been adopted. Funding for the work is a project responsibility and has been included in the cost estimates (chapter III under "Wetlands Habitat Along the Colorado River").

FWS Recommendation g. To the extent possible, construction activities, including access roads, staging areas, and batch plants, shall avoid flat-tailed horned lizard, Colorado desert fringe-toed lizard, and candidate and proposed plant habitat and shall be located within previously disturbed areas. Construction zones shall be flagged and all

activities shall be confined to these designated work areas. After construction is completed, Reclamation shall conduct an evaluation and quantification of the disturbance which occurred in creosote scrub and the Algodones Dunes.

Response. The recommended approach to selecting construction areas and quantifying construction disturbance to the creosotebush scrub and the Algodones dunes has been adopted (chapter III under "Special Status Species").

FWS Recommendation h. Prior to construction, abundance and habitat characterization shall be quantified for *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, and *Pholisma sonora*e to be destroyed by the project. Collections of plants and morphological data, including measurements and rooting characteristics, shall be made for a representative sample of plants (10 of each species). The host plant of any collected *Pholisma sonora*e shall be identified. Data collected on these species shall be delivered to the Service within 90 days of completion of pre-construction activities.

Response. The recommended approach to preconstruction surveys of dunes plants has been adopted (chapter III under "Special Status Species").

FWS Recommendation i. No new access to the dunes across either the All American Canal or the Coachella Canal, unless gated to prevent public use, shall be created for the life of the project.

Response. Access to the dunes is controlled and managed by the Bureau of Land Management (BLM). Any new access to the dunes area will be managed under BLM guidelines.

FWS Recommendation j. Reclamation or the project sponsors shall acquire and transfer to the Bureau of Land Management 188 acres of sand dune habitat. Acquired lands must support, at a minimum, the following species: *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, *Pholisma sonora*e, and Colorado Desert fringe-toed lizard. If sand dune habitat of sufficient acreage to achieve 1:1 compensation is not available for acquisition, Reclamation or the project sponsors shall implement the following actions in addition to acquiring available habitat for the above species.

1. Reclamation or the project sponsors shall fund a Multi-Species Conservation Plan for the sand dune species. This plan would address habitat conservation and recovery of *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, *Pholisma sonora*e, the Colorado Desert fringe-toed lizard, and Andrew's scarab beetle. The plan would include the following sections:

- a. a review of the biological literature for each species including a listing of all known localities,
- b. a discussion of all factors which threaten the continued existence of populations of species,
- c. and the development of actions needed to protect the species from these threats.

2. Reclamation or the project sponsors shall, in coordination with the Service and the Bureau of Land Management, implement a portion of the Conservation Plan. Implementation funding shall be equal to the estimated cost of acquiring 188 acres of sand dune habitat minus the cost of developing the Conservation Plan and the cost of lands actually acquired and transferred to the Bureau of Land Management.

Response. The recommended approach has been adopted. Reclamation agrees that an acre-for-acre compensation approach is required to address project impacts to the sand dune habitats and the special status species which inhabit them (chapter III under "Special Status Species"). Actual amount of habitat disturbed will be determined when final designs are completed comparing areas to be disturbed with habitats identified in FWS, 1993a.

FWS Recommendation k. In areas disturbed by construction, vegetation shall be crushed rather than bladed, whenever possible. In vegetated areas requiring blading, topsoil shall be stripped prior to disturbance and stockpiled. Prior to abandonment, construction sites shall be recontoured to approximate original topography and the surface soil materials replaced over the ground surface to facilitate natural revegetation.

Response. The recommended approach to construction guidelines has been adopted (chapter III under "Terrestrial Habitat").

FWS Recommendation l. Compensation, pursuant to the Bureau of Land Management compensation formula, shall be provided by Reclamation or the project sponsors to the Bureau of Land Management for the permanent or long-term loss of 1,203 acres of flat-tailed horned lizard habitat.

Response. The recommended approach to compensation for loss of flat-tailed horned lizard habitat has been adopted (chapter III under "Special Status Species"). Actual amount of habitat disturbed will be determined when final designs are completed comparing areas to be disturbed with habitats identified in FWS, 1993a.

FWS Recommendation m. To prevent the drowning of burro deer and other wildlife and to permit the Canal to continue to function as a source of water, Reclamation or the project sponsors shall construct the escape ledges described in section E.1.b of this Report along the entire length of the project. If further testing of the ledges in steep-sided canals shows they are not effective at allowing escape of deer, then escape ramps shall be constructed on both sides of the Canal at intervals of no more than 1 mile and just upstream of all siphons.

Response. The recommended approach to assuring the safety of large mammals has been adopted (chapter III under "Large Mammal Escape"). Should the ledges prove ineffective, Reclamation in cooperation with FWS would develop remedial measures.

FWS Recommendation n. Deflector systems, such as cables with visible buoys, shall be installed and maintained on the upstream side of all siphons to direct large mammals to escape ridges. If escape ramps are constructed instead of escape ridges, deflector systems shall be constructed just upstream of all escape ramps.

Response. The recommendation for deflector system has been adopted (chapter III under "Large Mammal Escape").

FWS Recommendation o. Reclamation or a management entity shall develop and implement a monitoring program to document the development of the riparian and marsh mitigation areas. Evaluation criteria shall be established by the Work Group that will address both physical (e.g., water quality, soil chemistry) and biological (e.g., vegetation growth and vigor) parameters. Riparian revegetation sites and marsh mitigation areas shall be monitored monthly during the first and second year growing seasons, twice during the growing seasons of years 3 through 5, and annually for years 6 through 10. The sites shall then be monitored in post-planting years 15, 20, and 25. The monitoring plan shall be reviewed by the Work Group prior to the first monitoring efforts and upon the completion of each survey year to determine if modifications to the plan or corrective actions would be required.

Response. The recommended monitoring program has been adopted (chapter III under "Monitoring Plan"). Monitoring will focus on the physical and biological parameters which support and indicate the viability of the vegetation planted or enhanced.

FWS Recommendation p. If, on any 10-acre site, mortality of planted riparian trees or shrubs exceeds 20 percent over and above natural mortality in adjacent and similar native riparian stands within 25 years after planting, reasonable corrective action shall be taken, including replacing dead plants, or other actions as agreed to by the Work Group.

Response. Reclamation agrees that provisions for remediating less than adequate revegetation efforts is an essential part of riparian mitigation. The project sponsor(s) or their consultants, in cooperation with Reclamation and other appropriate agencies would develop criteria for success, review monitoring results, and determine if remediation is required.

FWS Recommendation q. Groundwater elevation shall be monitored within the wetland between Drops 3 and 4. If groundwater elevation decreases as a result of the project, Reclamation or the project sponsors shall initiate discussions with the sponsors and the Work Group to identify and implement reasonable measures to ensure maintenance of existing values within the wetland. Special attention shall be given to maintenance of Yuma clapper rail and black rail habitat.

Response. This recommendation has been adopted (chapter III under "Wetlands Along the All-American Canal").

FWS Recommendation r. All fish and wildlife mitigation recommendations specified herein shall be implemented by Reclamation or the sponsors concurrently with project construction.

Response. The mitigation measures would be implemented prior to or during construction.

FWS Recommendation s. All operations and maintenance activities and fees associated with these fish and wildlife mitigation recommendations shall be the responsibility of Reclamation or the project sponsors.

Response. Operation and maintenance of the mitigation measures would be a project responsibility and has been included in project cost estimates. Reclamation would ensure that mitigation effectiveness is monitored as long as the canal is in Reclamation ownership. If the canal reverts to Imperial Irrigation District (IID) ownership, IID would assume responsibility for this activity under the mitigation agreement for this project (chapter II under "Parallel Canal Alternative, Project Operation").

IN-PLACE LINING TO DROP 3

FWS Recommendation. Implementation of this alternative would affect biological resources in a manner similar to that of the Parallel Canal alternative, except in the extent of terrestrial impacts and adverse effects to the Canal fishery. The adverse effects on the Canal fishery would be increased slightly. In-place Lining to Drop 3 would result in reduced impacts to the creosote scrub and sand dune communities and their associated rare plants and animals. As a result, compensation acreages and/or funds transferred to the Bureau of Land Management would be reduced under this alternative.

To account for slightly decreased adverse effects to the Canal fishery, recommendation a. from the Parallel Canal alternative should be modified as follows:

- a. For the loss of shoreline gamefish, 211 reefs, consisting of discarded automobile tires, shall be constructed and placed in the Canal. The reefs shall be evenly distributed over the 24.6-mile project area from Pilot Knob to Drop 4.

To account for decreased adverse effects to habitat of the flat-tailed horned lizard, candidate and proposed plants, and the Colorado desert fringe-toed lizard, recommendations j. and l. from the Parallel Canal Alternative shall be modified as follows:

- j. Reclamation or the project sponsors shall acquire and transfer to the Bureau of Land Management 41 acres of sand dune habitat. Acquired lands must support, at a minimum, the following species: *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, *Pholisma sonora*, and Colorado Desert fringed-toed lizard. If sand dune habitat of sufficient acreage to achieve 1:1 compensation is not available for acquisition, Reclamation or the project sponsors shall implement the following actions in addition to acquiring available habitat for the above species.

1. Reclamation or the project sponsors shall fund a Multi-Species Conservation Plan for the sand dune species. This plan would address habitat conservation and recovery of *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* spp. *tephrodes*, *Pholisma sonora*, the Colorado Desert fringed-toed lizard, and Andrew's scarab beetle. The plan would include the following sections:

- a. a review of the biological literature for each species including a listing of all known localities,

- b. a discussion of all factors which threaten the continued existence of populations of species,
- c. and the development of actions needed to protect the species from these threats.

2. Reclamation or the project sponsors shall, in coordination with the Service and the Bureau of Land Management, implement a portion of the Conservation Plan. Implementation funding shall be equal to the estimated cost of acquiring 41 acres of sand dune habitat minus the cost of developing the Conservation Plan and the cost of lands actually acquired and transferred to the Bureau of Land Management.

- 1. Compensation, pursuant to the Bureau of Land Management compensation formula, shall be provided by Reclamation to the Bureau of Land Management for the permanent or long-term loss of 200 acres of flat-tailed horned lizard habitat.

Response: The recommendations as cited above would be adopted for the in-place lining to the Drop 3 Alternative.

- a. Response. This modification to the number of artificial reefs has been adopted (see chapter III under "Canal Fishery").
- j. Response. The recommended approach has been adopted. Reclamation agrees that an acre-for-acre compensation approach is required to address project impacts to the sand dune habitats and the special status species which inhabit them (chapter III under "Special Status Species"). Actual amount of habitat disturbed will be determined when final designs are completed comparing areas to be disturbed with habitats identified in FWS, 1993a.
- l. Response. The recommended approach to compensation for loss of flat-tailed horned lizard habitat has been adopted (chapter III under "Special Status Species"). Actual amount of habitat disturbed will be determined when final designs are completed comparing areas to be disturbed with habitats identified in FWS, 1993a.

IN-PLACE LINING TO DROP 4

FWS Recommendation. Recommendations for this alternative would be the same as under the In-place lining to Drop 3 alternative, except that modifications are needed to account for greater adverse effects to the Canal fishery, much greater adverse effects to marsh and riparian communities, and slightly greater adverse effects to flat-tailed horned lizard habitat.

Recommendation a., b., c., d., e., and l. would be modified as follows:

a. For the loss of shoreline game fish, 258 reefs, consisting of discarded automobile tires, shall be constructed and placed in the Canal. The reefs shall be evenly distributed over the 29.9-mile project area from Pilot Knob to Drop 4 and shall be alternately placed on both sides of the Canal.

b. For the loss of 30 acres of common reed along the existing Canal banks, Reclamation or the project sponsors shall plant 30 acres of cottonwood-willow and/or honey mesquite adjacent to or within the wetland between Drops 3 and 4.

c. For the loss of 1,376 acres of riparian vegetation, Reclamation shall plant 359 acres of cottonwood-willow and honey mesquite woodland with a mature habitat value of 21 units per acre. The plantation shall be located at the existing wetland site between Drops 3 and 4. If site conditions or other factors preclude locating the revegetation site between Drops 3 and 4, the revegetation shall be accomplished at one of the following locations after evaluating their suitability for revegetation:

1. East Highline Site - This site is about 2 miles west of Drop 4 in an area of high groundwater where the Canal would not be lined.

2. Drop 3 Site - Located immediately south of Drop 3, this area consists of fallow agricultural lands.

d. Specific implementation plans for riparian revegetation shall be prepared by Reclamation following determination of specific site characteristics. Ratios of cottonwood, willow, and honey mesquite planted shall correspond to the suitability of potential revegetation sites for these species. Planting of honey mesquite/quailbush associations may be appropriate in areas of high soil salinity. These plans shall be approved by the Work Group prior to the commencement of project construction. Clearing of existing vegetation to plant seedlings shall be minimized and limited to saltcedar and arrowweed. Tree seedlings shall be planted at a density of 100 per acre and irrigated with water of sufficient quality and quantity to allow establishment.

e. For the loss of 112 acres of marsh, Reclamation or the project sponsors shall create 112 acres of marsh adjacent to the riparian revegetation site. Specific marsh types shall be replaced in-kind to the degree possible; however, less desirable marsh types could be replaced with higher value types.

l. Compensation, pursuant to the Bureau of Land Management compensation formula, shall be provided by Reclamation or the project sponsors to the Bureau of Land Management for the permanent or long-term loss of 274 acres of flat-tailed horned lizard habitat.

Response. The recommendations as cited above would be adopted for the in-place lining to the Drop 4 Alternative.

- a. Response. This modification to the number of artificial reefs has been adopted (see chapter III under "Canal Fishery").
- b. Response. This modification to the number replacement acres for the loss of common reed has been adopted (see chapter III under "Canal Fishery").
- c. Response. This modification to the riparian vegetation mitigation has been adopted with the following reservation. Additional revegetation sites may be considered if the location between Drops 3 and 4 proves to be unsuitable (see chapter III under "Wetlands Habitat Along the All-American Canal").
- d. Response. This modification to the recommendation has been adopted (see chapter III under "Wetlands Habitat Along the All-American Canal").
- e. Response. This modification to the marsh replacement has been adopted (see chapter III under "Wetlands Habitat Along the All-American Canal").

FWS Recommendation. To ensure the long-term maintenance of the riparian and marsh mitigation areas, the following additional recommendations would be added:

FWS Recommendation 1. A water distribution system shall be constructed as needed to maintain the marsh and riparian mitigation areas in perpetuity. This distribution system shall be designed to allow flexibility in the amount and location of delivered water. Sufficient water, currently estimated at 4,000 acre-feet of water per year, shall be delivered from the Canal through the distribution system to maintain the mitigation areas in perpetuity.

Response. This recommendation has been adopted (see chapter III under "Wetlands Habitat Along the All-American Canal").

FWS Recommendation 2. All marsh and riparian mitigation areas shall be managed by a management entity(s) to be identified by the Work Group. Reclamation or the project sponsors shall provide sufficient funds to the management entity(s) for long-term management of these areas.

Response. The marsh and riparian mitigation areas would be managed by a management entity acceptable to the work group. Long-term funding is a project responsibility and is included in project cost.

WELL FIELD BETWEEN PILOT KNOB AND DROP 2

The effects of the Well Field alternative would be fundamentally different from the other alternatives. The Canal fishery would not be affected, and terrestrial impacts would be greatly reduced relative [to the other alternatives].

FWS Recommendation a. In areas disturbed by construction, vegetation shall be crushed rather than bladed, whenever possible. In vegetated areas requiring blading, topsoil shall be stripped prior to disturbance and stockpiled. Prior to abandonment, construction sites shall be recontoured to approximate original topography and the surface soil materials replaced over the ground surface to facilitate natural revegetation.

Response. The recommended approach to construction guidelines has been adopted (chapter III under "Terrestrial Habitat").

FWS Recommendation b. Sites for wells, access roads, and ancillary facilities shall be selected to minimize adverse effects to sensitive plant species, the Colorado desert fringe-toed lizard, and the flat-tailed horned lizard. Preconstruction surveys of potential construction sites shall be conducted by qualified biologists to identify important habitats for sensitive species. Construction of drill pads at the well sites should occur during times of the year when candidate lizards are active and able to move from the path of construction activities.

Response. The recommended approach to construction guidelines and minimizing impacts to special status species has been adopted (chapter III under "Terrestrial Habitat").

FWS Recommendation c. Compensation, pursuant to the Bureau of Land Management formula, shall be provided by Reclamation or the project sponsors for any permanent or long-term loss of flat-tailed horned lizard habitat.

Response. The recommended approach to compensation for loss of flat-tailed horned lizard habitat has been adopted (chapter III under "Special Status Species").

FWS Recommendation d. No new access to the dunes across either the All American Canal or the Coachella Canal, unless gated to prevent public use, shall be created for the life of the project.

Response. Access to the dunes is controlled and managed by BLM. Any new access to the dunes area will be managed under BLM guidelines.

FWS Recommendation e. Prior to construction, abundance and habitat characterization shall be quantified for *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, and *Pholisma sonora* to be destroyed by the project. Collections and morphological data, including measurements and rooting characteristics, shall be made for a representative sample of plants (10 of each species). The host plant of any collected *Pholisma sonora* shall be identified. Data collected on these species shall be delivered to the Service within 90 days of construction completion.

Response. The recommended approach to preconstruction surveys of dunes plants has been adopted (chapter III under "Special Status Species").

FWS Recommendation f. Reclamation or the project sponsors shall acquire and transfer to the Bureau of Land Management an acreage of sand dune habitat equal to the acreage of candidate and proposed plant and Colorado desert fringe-toed lizard habitat lost as a

result of the project (1:1 compensation). Acquired lands should support, at a minimum, the following species: *Astragalus magdalenae* var. *peirsonii*, *Helianthus niveus* ssp. *tephrodes*, *Pholisma sonorae*, and Colorado desert fringe-toed lizard.

Response. The recommended approach to compensation for loss of flat-tailed horned lizard habitat has been adopted (chapter III under "Special Status Species"). Actual amount of habitat disturbed will be determined when final designs are completed comparing areas to be disturbed with habitats identified in FWS, 1993a.

FWS Recommendation g. Reclamation or the project sponsors shall conduct periodic water quality tests to ensure that the well field water remains of such chemical composition that the aquatic resources of the Canal will not be adversely affected. If the water quality of the wells deteriorates to a level detrimental to the Canal's aquatic life, pumping shall be suspended until the water quality problem is corrected.

Response. The recommendation for water quality testing has been adopted (chapter III under "Water Quality"). If the water quality of the wells deteriorates to a detrimental level, project operation would be changed as needed to minimize or avoid the problem.

FWS Recommendation h. Groundwater elevation shall be monitored in marsh and riparian areas between Drops 2 and 4. If groundwater elevation decreases as a result of the project, Reclamation shall initiate discussions with the sponsors and the Work Group to identify and implement reasonable corrective measures to ensure the maintenance of existing values within the wetlands. Special attention shall be given to maintenance of existing Yuma clapper rail and black rail habitat.

Response. Reclamation agrees that provisions for remediating less than adequate revegetation efforts is an essential part of riparian mitigation. The recommendation has been adopted (chapter III under "Wetlands Along the All-American Canal").

FWS Recommendation i. Reclamation or the project sponsors shall fund backwater restoration, development, and/or enhancement on the Colorado River between Parker Dam and Imperial Dam in the amount of \$100,000. The location, purposes, and design of the project shall be coordinated through the Work Group and the Colorado River Backwaters Committee.

Response. To ensure that the project does not cause an adverse change to wetlands along the Colorado River, this recommendation has been adopted. Funding for the work is a project responsibility and has been included in the cost estimates (chapter III under "Wetlands Habitat Along the Colorado River").

FWS Recommendation j. All operational and maintenance activities and fees associated with the fish and wildlife mitigation recommendations (a through i) shall be the responsibility of Reclamation or the project sponsors.

Response. Operation and maintenance of the mitigation measures would be a project responsibility and has been included in project cost estimates. Reclamation would ensure that mitigation effectiveness is monitored as long as the canal is in Reclamation

ownership. If the canal reverts to Imperial Irrigation District (IID) ownership, IID would assume responsibility for this activity under the mitigation agreement for this project (chapter II under "Parallel Canal Alternative, Project Operation").

FWS Recommendation k. All fish and wildlife mitigation recommendations specified above shall be implemented by Reclamation or the project sponsors concurrently with project construction.

Response. The mitigation measures would be implemented prior to or during construction (chapter III under "Mitigation Plan").