



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

San Luis National Wildlife Refuge Complex  
Post Office Box 2176  
Los Banos, California 93635

10 December 2004

Mr. Joe Thompson  
U. S. Bureau of Reclamation  
South-Central California Area Office  
1243 N Street  
Fresno, CA 93721

**Re: Comments on Draft Environmental Assessment (EA) and the Draft Finding of No Significant Impact (FONSI) for the proposed long-term Central Valley Project (CVP) water service contracts between Reclamation and the 20 Delta-Mendota Canal (DMC) Unit Contractors**

Dear Mr. Thompson:

The San Luis National Wildlife Refuge Complex has reviewed this EA in relation to the wetlands of the refuges and conservation easements within this Complex. The EA is well-organized and provides a good summary and evaluation of the proposed action. *Chapter 1. Purpose and Need* provides a good background summary of the CVP history that helps establish the purpose and need for renewal of long-term water contracts with the 20 contractors of the DMC Unit. The EA acknowledges that a fundamental understanding of the CVPLA is necessary to review this EA. This introductory chapter refers to refuge/wetland water supplies as not relevant to the proposed action. As part of the extensive background discussion, major emphasis is placed on discussing efforts to protect fishery resources. This is expected due to use of CVP water supplies and the relationship to other CVP operations and activities.

*Chapter 2. Description of Alternatives* provides a good discussion of each water district and its water needs as well as a good comparison table of contract provisions considered in the alternatives. *Chapter 3. Affected Environment, Environmental Consequences, and Environmental Commitments* provides a thorough summary description of each water district. The Biological resources analysis summary contains a summary discussion of wetlands which includes "Significant Natural Areas" within or located near the EA study area. These include: Lower and Upper Cottonwood Creek Wildlife Management Areas (WMA), Mendota WMA, Los Banos WMA, Merced National Wildlife Refuge (NWR), North Grasslands WMA, San Luis NWR, San Joaquin River NWR, and Volta WMA. Clarification is needed in these discussion regarding water sources for management. It should be noted that all the areas discussed -- except Lower and Upper Cottonwood Creek WMA and San Joaquin River NWR -- are authorized and receive CVP water supplies to meet Level 2 requirements, in accordance with the CVPLA. An EA prepared by Reclamation for long-term water supply contracts/agreements for these refuges was completed in November 2000 and should have been reviewed and referenced by the preparers of this EA. Also the Grassland Water District -- the largest area of contiguous, privately-owned wetlands in California -- was not included in the wetlands discussion. The District is a significant natural area, as recognized by several international organizations; and is located within the area discussed in the EA.

The discussion of recreation resources was reviewed relative to the managed wetlands. As the water supplies to be provided under the long-term contract renewal do not change from historic deliveries of previous contracts, the impact to recreation activities on the wetlands/refuges is not expected to be impacted by the proposed action. This would be consistent with the overall FONSI. The summary discussion of the analysis conducted for the EA is sufficient to support a Finding of No Significant Impact (FONSI).

Thank you for the opportunity to comment on this EA and FONSI.

Sincerely,



Kim Forrest  
Refuge Manager

Cc: Dan Walsworth, Refuge Supervisor; California/Nevada Operations Office; FWS  
Don Marciochi, Manager; Grassland Water District  
Susan Jones, Branch Chief, San Joaquin Valley Branch; Endangered Species Division;  
Sacramento Fish and Wildlife Office; FWS  
Dale Garrison, Biologist, Implementation Branch; Project Implementation Division; Sacramento  
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Roger Guinee, Division Chief, Water Operations Division; Sacramento Fish and Wildlife Office;  
FWS

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