

September 2, 2011

Mr. Chad Dibble  
Department of Fish and Game  
830 S Street  
Sacramento, CA 95811

Subject: Draft Conservation Strategy for Restoration of the Sacramento-San Joaquin Delta Ecological Management Zone and the Sacramento and San Joaquin Valley Regions  
– My Comments

Dear Mr. Dibble:

The draft offers “promising ecosystem management restoration opportunities” totally out of synchrony with concurrent developments on Central Valley water, export plumbing, environmental planning and social and political posturing. The draft’s material is quite elementary and conceptual and these strategies, and more, have been considered and discussed by many in the past decades. My general comment is to suggest that the report be greatly shortened, perhaps by 2/3 or more. Brevity will increase clarity.

The lengthy draft deserved an executive summary. The many publics and especially decision makers understanding and utility of the strategy in final form would benefit by an executive summary too.

While the scope of restoration of the Sacramento-San Joaquin Delta is undeniably complex and large, this Conservation Strategy must state that the strategies are conceptual and intentionally do not address scope.

The Conservation Strategy addresses only a part of the estuary - the delta, Suisun Bay and the east-most part of San Pablo Bay. Not addressed are the remainder of San Pablo Bay, Central Bay, South Bay and the area of estuarine influence westward of the Golden Gate. The western boundary of the Suisun Marsh and north San Francisco Bay management zone needs to be geographically defined beyond the vague lines of Figure 1. State why these ecological zones are omitted or need not be addressed. If no reason is given and the Department continues the strategy in this limited geographic scope in the estuary, clearly note the omitted ecological zones.

An important habitat monitoring approach/method that the Conservation Strategy should state and buy into is, in addition to conceptual models it proposes, an empirical comparison of physical and biological metrics for reference sites to match corresponding restoration sites, pre- and post-treatment. The baseline pre-restoration monitoring would provides for developing an understanding of the time required for restoration. The reference site monitoring represents an existing stable site that looks and behaves like the restored site that you want at some specified future time. The post-treatment condition is the habitat that you get. For example, if a marsh is sought, the reference site can be characterized with metrics like tidal range, stems per square meter, stem height, ratio of

un-vegetated tidal channels to vegetated flats, etc. When you get done you have some data to answer the all important questions: 1) Did we get what we wanted? 2) If yes, is it good/will we take it? and 3) If not, what happened and where do we go from here? Hopefully there are reference sites in this estuary for the habitats society seeks.

Of the 34 action items identified for the Sacramento-San Joaquin Delta EMZ, 27 are characterized as "studies", "determinations", "coordination", "research", etc. and only 7 identified are actual physical on-the-ground restoration actions. Under X2, Action 1, the action identified is "Continue to examine the mechanisms that demonstrate the importance of X2 (or outflow) for estuarine species and its relationship to species abundance." Nothing more is offered. This imbalance of talk versus identifying ecosystem management restoration opportunities is hardly a step that generates public confidence and support for your science.

History has demonstrated for decades that it is easier and more possible to spend restoration money upstream and downstream of the Delta than in the troublesome Delta as these upstream and downstream ecological zones have more shovel-ready projects and, most importantly, the social capital to allow restoration projects to be implemented. The Ecosystem Restoration Program by way of documents such as this Conservation Strategy needs to identify shovel-ready projects of substance and develop the needed social capital by way of increasing public confidence.

Public participation is a difficult thing to manage, especially in lengthy involvements. DFG says they want public input, but the processes they seek input on have been ongoing for decades and may well go on for decades more. The matters are so technical that only a few well-heeled parties can afford to participate fully, continually and effectively. Even the larger non-profit conservation organizations struggle at this. As a consequence you get comments reflecting an incomplete review like you are receiving herein from a frustrated citizen steward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Morat', with a long horizontal flourish extending to the right.

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