

Comments on select performance measures in the Delta Plan Performance Measures document dated December 17, 2015

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Ref. #	Strategy #	Policy or Rec.	Short Title	Comment
4.27	2	ER R2	Acres of habitat restored	<p>It is appropriate to track habitat restored in the Priority Restoration Habitat Areas (PRHAs). However, excluding restoration outside those areas, and excluding habitats other than floodplain and tidal wetlands will create an incomplete picture. The different methods of reporting habitat in the Delta amongst the programs (i.e. Delta Plan and Eco Restore) will cause confusion. Can habitat reporting be combined for this PM and DP R5 (which tracks carbon sequestration projects)?</p> <p>Also, keep in mind that creation of non-tidal freshwater marsh on Sherman Island, which you are proposing to exclude from your calculations, is likely to provide ecosystem benefits, and improve habitat available for a suite of wildlife species, particularly breeding and migratory birds.</p> <p>ER R2 says: <i>The elevation map attached as Appendix 4 should be used as a guide for determining appropriate habitat restoration actions based on an area's elevation.</i></p> <p>Carbon sequestration and elevation building are an appropriate restoration action for subsided areas. It was the intention to discourage tidal habitat restoration in areas that are highly subsided, unless the project proponent could demonstrate adequate elevation building would take place. It will take many years to build the elevation, but until then they will have created valuable wildlife habitat that could be tracked.</p> <p>Suggestion: Report multiple values for the Delta, one for tidal marsh and floodplain in the PRHA's and one for all kinds of habitat in the entire Legal Delta including areas outside the PRHA's; report both FRP and EcoRestore</p>

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				program progress. This would be most meaningful when reported in association with a map, e.g. with EcoAtlas data, and indicating which areas are excluded.
4.32	2	ER R2	Progress toward occurrence and use of protected and restored habitat by native species.	<ul style="list-style-type: none"> • Consider adding invertebrate community data from the IEP monitoring programs for Zooplankton and Benthic Invertebrates. • RE: Waterfowl counts in the Delta. <ul style="list-style-type: none"> – It's not clear whether you are proposing reporting on wintering waterfowl or breeding waterfowl data. Both are problematic for this Delta Plan performance measure for a number of reasons. The annual population estimates are for the entire Delta, and do not report on use of protected and restored habitats in particular. Delta and Suisun waterfowl use protected and restored habitat but they primarily use non-protected agricultural areas in the Delta. As the restoration described in the Delta Plan is implemented, it is highly possible that waterfowl populations will change, and even be reduced in those areas, but the surveys will not reflect changes in use of these specific restored habitats. – If you are concentrating on reporting tidal wetland and floodplain habitat, you should concentrate on the terrestrial species that would be appropriate indicators of restoration success, and which are found primarily in those habitats. – Recommendations for tidal wetlands: California black rail; General Waterbird and terrestrial bird trends. Consistent standardized surveys are not being conducted for black rail and other birds in the Delta, and as of yet, no consistent monitoring mandate for terrestrial species in Delta / Suisun restoration projects has been identified, except for projects managed by CDFW (e.g. Lindsey Slough).

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				<ul style="list-style-type: none"> For floodplain: More thought would need to be put into this. Possibly general Waterbird surveys during floodplain activation periods. Floodplains are made up of a variety of habitat types including riparian and freshwater wetlands, agricultural lands, and nonnative grasslands. When floodplains are active, they create ephemeral habitat for waterbirds. Specific surveys would need to be created for this; it could be that DRW's existing bird surveys would be appropriate.
4.37	2	ER R2	Landscape metrics to assess ecological functions.	<ul style="list-style-type: none"> These landscape metrics are valuable but only provide part of the picture. They don't get at critical on-the-ground habitat quality criteria, in particular the presence/absence of native and non-native plant species. These are important for both fish and terrestrial wildlife. Thus, it would be useful to report CRAM scores which include vegetation criteria in addition to landscape criteria. If all historical habitat types are going to be reported as baseline, then all modern habitat types should also be included; see comments associated with # 4.27.
4.35	4	ER P5	Progress towards decreasing trends in new/existing nonnative invasive spp., and abundance /distribution of existing nonnative invasive spp.	<ul style="list-style-type: none"> We recommend adding invertebrates to this PM. Data are collected by IEP's monitoring programs for Zooplankton and Benthic Invertebrates. Data from these programs were used to develop indicators for the 2015 State of the Estuary Report (SOTER). The benthic invertebrate indicator as reported in the SOTER is directly applicable to this Delta Plan performance measure. Identify who is collecting terrestrial invasive plant data on a regular basis. Is there a long term dataset?
5.28	3	DP R9	Include recreation facilities in ecosystem projects	Note that restoration projects in particularly sensitive areas should not be opened to recreation activities. A target of 100% may not be realistic or appropriate for achieving ecosystem function goals.