

July 20, 2001

Ms. Jessica Martini-Lamb
Sonoma County Water Agency
Post Office Box 11628
Santa Rosa, California 95406

Dear Ms. Martini-Lamb:

Notice of Preparation (NOP) of Initial Study
Crocker Creek Dam Removal Project
Crocker Creek, Tributary to the Russian River
Near Cloverdale, Sonoma County

Department of Fish and Game personnel have reviewed the NOP of Initial Study for the Crocker Creek Dam Removal Project. The NOP identifies potential impacts to creeks, riparian areas, and species of concern. The Department is trustee agency for fish and wildlife resources of the State of California. The Department is also a responsible agency and issues permits for impacts to State-listed threatened or endangered species and impacts to creeks. Since your project will impact a waterway and listed species, continued close coordination with the Department will assist in developing adequate mitigation and issuance of final permits and approvals for the project.

The Department must comply with the requirements of the California Environmental Quality Act (CEQA) in issuing incidental take permits for State-listed threatened and endangered species. Consequently, the Department, as a responsible agency, will use the proposed CEQA document in issuance of needed permits in the event that State-listed species are adversely affected by the project. The proposed document should include an adequate description of any endangered species impacts and mitigation measures to allow the Department to use the document in issuance of an endangered species permit.

The Department will also act as responsible agency for any activities that require a Streambed Alteration Agreement. It is the policy of this Department that a project should cause no net loss of riparian habitat value. Unavoidable impacts within the riparian area should be identified and mitigation provided

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for in the proposed document. This includes not only long-term impacts but also short-term impacts due to construction. Specific details concerning the proposed stabilizing of the north dam abutment, demolishing the remaining concrete structure, biotechnical channel adjustments, bank recontouring, revegetation, and proposed interface between the restored channel grade and the sill of the dam should be included in the environmental document. Again, these details, and any alternatives to the proposed project, should be developed in your ongoing consultation with the Department to adequately discuss mitigation and project design requirements for Streambed Alteration Agreement issuance.

The environmental document must address which listed and sensitive species may use the area as habitat. Surveys should be conducted for any rare, threatened or endangered species which may exist on site. Federal candidate species, wildlife listed as species of special concern, and plants listed by the California Native Plant Society (CNPS) should be included. The Department's California Natural Diversity Database (CNDDDB) should be consulted for any known site-specific occurrences and for a list of species found in the general area. A report from the CNDDDB which lists no findings for the project site does not indicate these species do not exist there, only that no information is in the file. Consequently, a negative result from a CNDDDB search must not replace the requisite surveys.

Surveys for sensitive species, including plants, amphibians, fish, raptors, and nesting birds should be conducted at the proper time of year. Impacts to these species and their habitats should be avoided. Impacts which are unavoidable should be identified and appropriate mitigation provided.

Survey results and specific mitigation measures must be included in the document. Surveys to be conducted at a later time or mitigation measures to be identified at some future time are not acceptable. It has been determined by court ruling that such studies and mitigation measures would be improperly exempted from the process of public and governmental scrutiny which is required under the California Environmental Quality Act (CEQA). A document which requests future studies or future identification of mitigation will be considered inadequate.

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The Department appreciates the opportunity to coordinate and comment on this project. If you have any questions, please contact Ms. Linda Hanson, Environmental Specialist, at (707) 944-5562; or Mr. Scott Wilson, Habitat Conservation Supervisor, at (707) 944-5584.

Sincerely,

COPY Original signed by
John Emig



Robert W. Floerke
Regional Manager
Central Coast Region

cc: Department of Fish and Game

Mr. Bill Cox Central
Coast Region

Mr. George Heise
Native Anadromous Fish and Watershed Restoration Branch

bc: Hanson, Wilson

LH/pm