

March 23, 2006

FWS Preliminary Comments on January 3, 2006 MSCP

1. Page 2-43, 3-19. Concerned with State leases as mitigation - not in perpetuity
2. Page 2-42 Permit area - sewer and flood control activities also occur inside the city boundaries - Need to resolve
3. Table 2.14 - we need the analysis of all species without the CLS filter
4. Page 2-56 - Table 2.11 consistency with Table 2.6
5. Page 2-61 - We need dates for when the various management plans will be completed
6. Page 2-66 - The yellow bat is also a riparian species. Consider covering
7. Page 3-2, Tables 3.1 and 3.2 - Where does the 4.8 mitigation ratio come from?
8. Page 3-6, 3-7 - Open space counted towards permit needs to be in common areas
9. Page 3-10 - what are the ramifications if the area is already graded?
10. Page 3-18 - Why was there only 82% compliance with CLS?
11. Page 3-32 - Doug will provide language to help clarify the recovery areas
12. Page 3-33 - We need an analysis of acres of habitat lost and conserved for each species now (habitat already acquired), annually, and at benchmarks
13. Page 3-34 - Need assured funding for mitigation and monitoring
14. Page 4-3 - what about other potential restoration projects on Cienega Creek and San Pedro River?
15. Page 4-15 - Compliance within 10% okay on annual basis, need full mitigation at benchmarks
16. Page 4-24 - like the concept of the tiered management for cost estimation
17. Page 4-26 - How are set asides conserved?
18. Page 4-26 - Also need biological management and monitoring on set aside and CE lands
19. Table 5.1 - grazed lands should be rested 2 growing seasons after a severe fire (changed circumstance response)
20. Table 5.1 - Use table as inclusive list of changed circumstances
21. Page 6-3 - This Provides a list of potential mechanisms to protect property. Which ones will be used?
22. Page 3-36 - Need to describe the ramifications of future projects affecting mitigation lands (need to replace and also mitigate)
23. Page 6-15 - Need a list of lands already conserved that will be contributed to MSCP
24. Page 6-15 - Need permit term (30 years?)
25. Page 6-18 - What are 50% set asides?
26. Page 6-19 - Need more information in annual reports.
27. We need to see the entire 2005-2010 Capital Improvement Plan
28. Attachment E - Standard Conservation Easement Template - need to review
29. Attachment F - Include a map of the HPPs in MSCP
30. Attachment H - Various comments on species table