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Sacramento, CA 9825
(916) 414-6460
www.cvjv.org

CENTRAL VALLEY JOINT VENTURE

Conserving Bird Habitat in California's Central Valley

April 11, 2016

Audubon California

California Waterfowl
Association

Defenders of Wildlife

Ducks Unlimited, Inc.

Point Blue Conservation
Science

River Partners

The Nature Conservancy

The Trust for Public Land

Mr. Andrew M. Montaña
NEPA Document Manager
Western Area Power Administration, Headquarters
P.O. Box 281213
Lakewood, Colorado 80228-8213

SUBJECT: Comments on the Scope of the Draft EIS/EIR for the Proposed
Colusa-Sutter Transmission Line Project

Mr. Montaña:

On behalf of the Central Valley Joint Venture (CVJV) Management Board, we submit these comments in response to our review of the scope of the Draft EIS/EIR for the proposed Colusa-Sutter Transmission Line Project (Project).

The CVJV is a partnership of twenty public and private entities comprised of Federal and State agencies, science and conservation organizations, and one corporation. Our mission is to work collaboratively to protect, restore, and enhance habitats for birds, in accordance with conservation actions identified in the CVJV Implementation Plan (Plan). The Plan provides a cohesive vision for bird conservation in the Central Valley within the context of the entire Pacific Flyway in association with four international bird conservation initiatives. The Plan sets quantitative habitat objectives based on best available science to ensure sustainable populations of migrant and resident birds in California, a critical area which has lost over 90 percent of its wetlands. The Plan's objectives incorporate a baseline of habitat expected to be provided by federal and state refuges, private wetlands and wildlife friendly agriculture.

The proposed project has the potential to impact crucial habitat important to migratory birds within the Sacramento Valley portion of the Central Valley. The wetlands and rice fields of the Sacramento Valley are best known for their importance to waterfowl. They have historically provided a winter haven for ducks, geese, and swans. Waterfowl migrate to the Valley by the millions from as far away as the Arctic regions of Alaska, Canada, and

Siberia. Next to waterfowl, shorebirds are the most abundant wetland dependent bird group. The Western Hemisphere Shorebird Reserve Network has designated the rice fields and wetlands of the Sacramento Valley as a site of international importance to shorebirds.

While the CVJV is not opposed to new energy options, we believe that this should not come at the expense of migratory birds and their habitats. We have concerns that the proposed project would undo many of the habitat gains made by the CVJV over the years. The concerns to bird resources fall into two broad categories: impacts to birds due to direct mortality via collisions with lines and decreased quality of habitat along the transmission line corridors. Power line routes that bisect major waterfowl roost sites (i.e., National Wildlife Refuges and State Wildlife Areas) and major feeding areas (e.g., rice fields) would likely have the greatest impact to bird habitat. Waterfowl in the Sacramento Valley regularly fly in a spider-web pattern of movements to migrate between major feeding and roosting areas. Additionally roosting and feeding birds tend to avoid areas near large power lines. We therefore request that within the scope of your draft EIS/EIR that you assess the movement patterns of waterfowl within the project area and indicate how the proposed alternatives could affect bird use.

California rice agriculture provides habitat and nourishment for approximately seven million ducks and geese migrating along the Pacific Flyway each year. Studies have shown that California rice fields currently provide more than half of the nutritional requirements of wintering waterfowl in the Sacramento Valley. Locating the transmission line through rice fields may make it more difficult and expensive for rice farmers to keep growing rice and may also reduce income derived from leasing rice fields for hunting. We request that you include in your draft EIS/EIR an assessment of the economic impacts to rice farmers.

The CVJV overlaid the three proposed study routes onto a map that showed conservation easements, rice agriculture and federal, state and private wetlands. Based on that exercise we believe that other alternatives can and need to be developed that are more bird friendly. We request that you either modify existing alternatives or develop new alternatives that minimize corridors over wetlands, rice fields and conservation easements and that minimize areas within close proximity to state and federal wildlife management areas. We also request that for all of the alternatives developed, that you clearly estimate the effects on birds and their associated habitats and indicate how you propose to mitigate and compensate for any negative effects.

We appreciate your consideration of our comments and would welcome the opportunity for our partners to meet with your planners to discuss our concerns or any other issues. If you have questions about the positions presented here or about the CVJV, please contact our Coordinator, Mike Dunphy by email at michael_dunphy@fws.gov or by phone at (916) 414-6459.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff McCreary". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff McCreary
CVJV Board Chair

cc: Central Valley Joint Venture Board



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March 20, 2017

Audubon California
California Waterfowl
Association
Defenders of Wildlife
Ducks Unlimited, Inc.
Point Blue Conservation
Science
River Partners
The Nature Conservancy

Mr. Andrew M. Montaña
NEPA Document Manager
Western Area Power Administration, Headquarters
P.O. Box 281213
Lakewood, Colorado 80228-8213

SUBJECT: Comments on the Scope of Environmental Issues to be
considered in the Proposed CoSu Line Environmental Documents

Mr. Montaña:

On behalf of the Central Valley Joint Venture (CVJV) Management Board, we submit these comments on the revised scope of the draft EIS/EIR for the proposed Colusa-Sutter Transmission Line Project (Project).

The CVJV is a partnership of twenty public and private entities comprised of Federal and State agencies, science and conservation organizations, and one regulated utility provider. Our mission is to work collaboratively to protect, restore, and enhance habitats for birds, in accordance with conservation actions identified in the CVJV Implementation Plan (Plan). The Plan provides a cohesive vision for bird conservation in the Central Valley within the context of the entire Pacific Flyway in association with four international bird conservation initiatives. The Plan sets quantitative habitat objectives based on best available science to ensure sustainable populations of migrant and resident birds in the Central Valley of California, a critical area which has lost over 90 percent of its wetlands. The Plan's objectives incorporate a baseline of habitat expected to be provided by federal and state refuges, private wetlands and wildlife-friendly agriculture.

The proposed project has the potential to impact crucial habitat important to migratory birds within the Sacramento Valley portion of the Central Valley. The wetlands and rice fields of the Sacramento Valley are internationally recognized for their importance to waterfowl. They have historically provided a winter haven for ducks, geese, and swans. Waterfowl migrate to the Valley by the millions from as far away as the Arctic regions of Alaska, Canada, and Siberia. In addition to waterfowl, shorebirds and waterbirds (e.g., Sandhill Cranes) are also abundant and dependent on these habitats.

The Western Hemisphere Shorebird Reserve Network has designated the rice fields and wetlands of the Sacramento Valley as a site of international importance to shorebirds.

Based on correspondence between our Coordinator and Western Area Power Administration staff on March 9, 2017 it is our understanding that the comments that were submitted on April 1, 2016 (letter attached), will still be considered as you analyze the alternatives. Therefore this letter only provides comments on the new alternatives; please see our previous comments regarding the original alternatives.

As mentioned in our previous letter, California rice agriculture provides habitat and nourishment for approximately seven million ducks and geese migrating along the Pacific Flyway each year. Studies have shown that California rice fields currently provide more than half of the nutritional requirements of wintering waterfowl in the Sacramento Valley. Locating the transmission line through rice fields may make it more difficult and expensive for rice farmers to grow rice and may also reduce or eliminate income derived from leasing rice fields for hunting, potentially affecting the farmers' ability to provide important food and habitat for migratory birds. It is important that these potential impacts be specifically addressed in the draft EIS/EIR.

The CVJV overlaid the two new proposed study routes onto a map that showed conservation easements, rice agriculture and federal, state and private wetlands. The Segment Two Study Area impacts a number of important wetlands and annually farmed rice agricultural areas. The County Road 16 Corridor Study Area traverses less rice area and fewer protected areas than earlier proposals, but it passes through substantial grassland and upland habitat. We have concerns that there could be detrimental impacts to upland birds in the County Road 16 Corridor Study Area. Whether or not these differences reduce impacts relative to other alternatives (including the "no project" alternative) would need to be evaluated in the draft EIS/EIR. We request that within the scope of your draft EIS/EIR that you assess the impacts to resident and migratory grassland birds and raptors along the County Road 16 Corridor.

We appreciate your consideration of our second round of comments. If you have questions about our input, or about the CVJV, please contact our Coordinator, Mike Dunphy by email at michael_dunphy@fws.gov or by phone at (916) 414-6459.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff McCreary". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jeff McCreary
CVJV Board Chair

cc: Central Valley Joint Venture Management Board