

EXHIBIT A

FISH AND GAME CORRESPONDENCE

Memorandum

To : Kim Tschantz
County of Santa Cruz
701 Ocean Street
Santa Cruz, CA 95060

Date : February 27, 1997

From : Department of Fish and Game

Subject : Jeannine M. DeWald

Buena Vista Landfill Soil Management Mitigation

This is a follow-up to our site visit on January 15, and amends the Department's previous comments regarding this project.

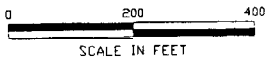
1. The project consultant has clarified the methodology which was used in the tarplant survey. Based on our discussion, it appears that the surveys were satisfactory and that tarplant does not occur on the site. This is supported by my observations during the January 15 site visit. Consultant will expand the discussion of this issue in the EIR.
2. The use of the, County's normal 50-year flood protection standard is acceptable provided that the County monitors turbidity changes downstream of the site after major storm events, with remedial action to follow if turbidity exceeds the standards set by AMBAG for this area.
3. ⊗ It is clear from the site visit that the habitat quality of the onsite drainages, other than the area to be used for mitigation&s extremely low. I also understand that the area needed for the stockpile is less than originally described in the EIR, resulting in a reduction of riparian impacts, and that the County intends to expand the mitigation area to form a larger area of contiguous habitat. These changes will result in a mitigation ratio of approximately 2: 1 and increased habitat quality. This will be acceptable to the Department.

In summary, the concerns raised in our initial response to the Draft EIR have been adequately addressed, and we would concur with its certification. Thank you for your willingness to work with us in protecting sensitive biological resources.

Sincerely,







Jeannine M. DeWald
Assoc. Wildlife Biologist

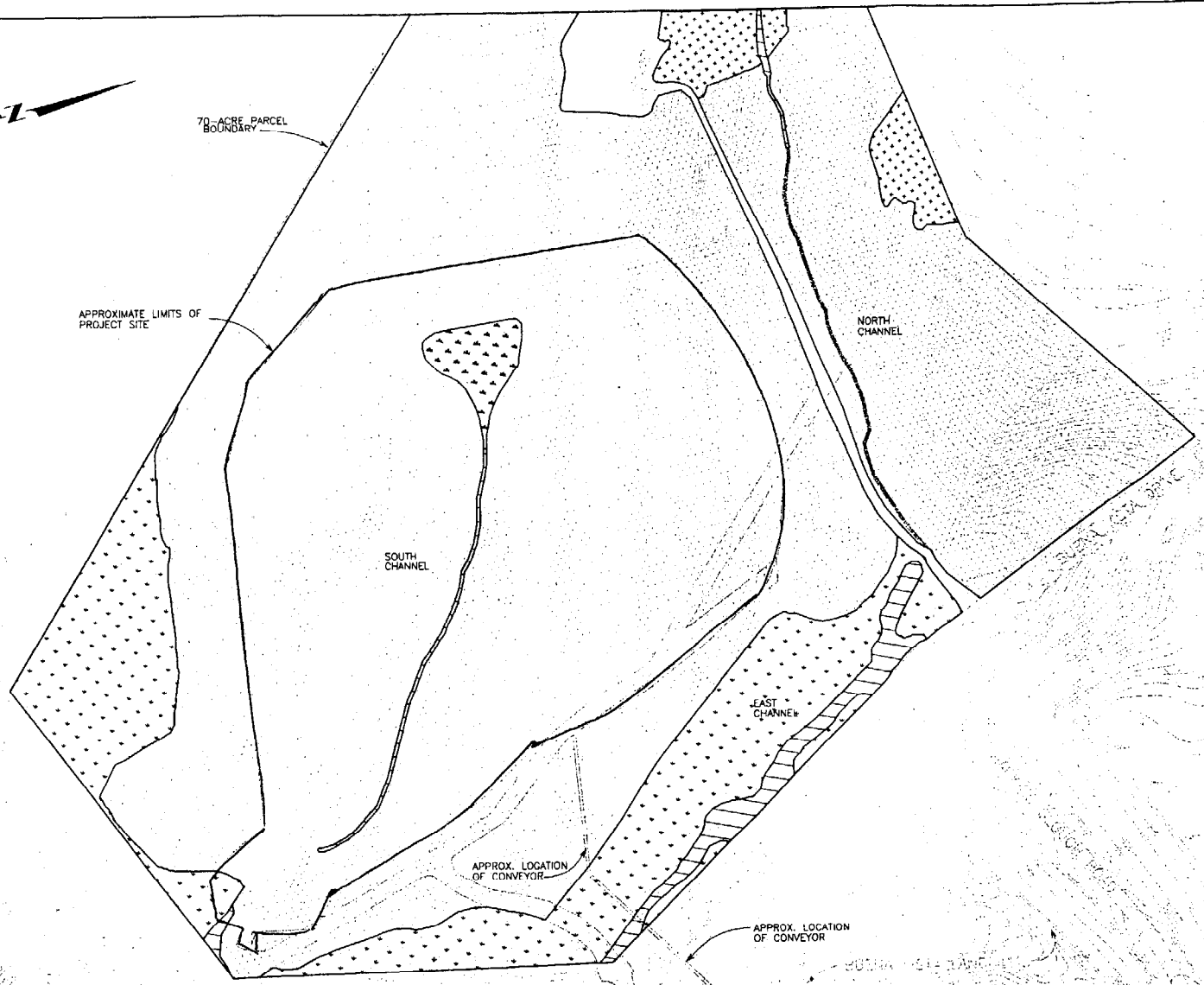


70-ACRE PARCEL BOUNDARY

APPROXIMATE LIMITS OF PROJECT SITE


EXPLANATION

-  RUERAL/AGRICULTURE
-  NON-NATIVE GRASSLAND
-  CENTRAL COAST RIPARIAN SCRUB
-  EMERGENT WETLAND
-  FRESHWATER SEEP
-  EUCALYPTUS GROVE
-  DEVELOPED/ACCESS ROADS



34720184.DWG 2000
1997.11.15

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 **Harding Lawson Associates**
Engineering and Environmental Services

DRAWN: CEG JOB NUMBER: 34720 018

Vegetation Map
Buena Vista Landfill
Soil Management Plan
Santa Cruz County, California

APPROVED: _____ DATE: 11/97

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PLATE 2

REVISED DATE: _____

Memorandum

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To : 1. ~~Projects/Coordinator~~
~~Resources Agency~~

2. Bud Lortz
Planning Department
City of Watsonville
250 Main Street
Watsonville, California 95076

From : Department of Fish and Game

Date: May 28, 1985

Telephone: ATSS ()
(916) 445-3531

Subject: City of Watsonville Class III Sanitary Landfill Expansion,
SCH 83011103, Santa Cruz County

Department of Fish and Game personnel have reviewed the DEIR for the City of Watsonville Class III Sanitary Landfill Expansion, SCH 83011103, and we have the following comments.

The entire 53.1 acre expansion site provides excellent habitat for many species of birds and animals. Most of those species found in the draft report's long list of birds, mammals, reptiles, and amphibians can be found on the proposed fill site on either a permanent or seasonal basis.

(*) The three identified habitat types - riparian, northern coastal scrub, and grassland combine to form an ecological unit of high value to wildlife. The area forms an important part of the watershed at the headwaters of Gallighan Slough. Much of the area is designated as critical wildlife habitat by the County of Santa Cruz.

The project riparian areas are of exceptional quality and appear to be in pristine condition. These areas are composed of dense stands of mature oak, willow and elderberry trees with a lush tunderstory of riparian shrubs. The riparian areas on the proposed landfill property are environmentally sensitive habitats.

The proposed project will eliminate eight of the total thirteen acres of riparian habitat. The removal of this critical wildlife habitat is an unacceptable adverse impact. Since the riparian habitat occurs at the boundaries of the project area, a redesign could eliminate the loss of this resource. We further recommend a minimum 100 foot natural buffer area be established adjacent to the riparian to ensure its protection. The buffer would be measured from the outer edge of the riparian extending to the toe of the fill slope. The 100 foot buffer area would also preserve a small part of the grass-scrub habitat and provide a more gradual transition from landfill to riparian for remaining wildlife species.

1. Projects Coordinator
2. Bud Lortz

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The Draft EIR states that "removal and temporary loss of grassland, northern coastal scrub, and riparian habitat would result from site preparation and landfill operations.* We believe the re-establishment of grass and possibly scrub habitat may be possible if the filled area is managed for that purpose. However, the covering of riparian habitat results in a permanent loss. The Draft EIR also States "the finished landfill would be revegetated to return the project to agricultural uses." The Final EIR should make clear the final vegetative management plans and projected use for the completed landfill. Land managed for agriculture is not always compatible with those managed for wildlife.

Preservation of five acres of riparian habitat with a buffer zone is suggested under the mitigated impact section of the Draft EIR. The preservation of a portion of the proposed project area is not mitigation for the loss of other portions of the project.

We do not agree with the temporary displacement of wildlife statement in the Draft EIR. The loss of wildlife habitat is synonymous with the loss of wildlife. Wildlife cannot merely move into adjacent habitat, if present, when their own home ground is destroyed. Habitat carrying capacities are limited because of various territorial requirements such as food, cover and nesting. Wildlife cannot be stockpiled while waiting for suitable habitat to be developed. Full mitigation measures for the loss of wildlife and wildlife habitat are needed in the Final EIR.

Mitigation measures must be coordinated with the Department of Fish and Game in the event the Santa Cruz long-toed salamander or Santa Cruz tarplant are found on or near the proposed project area.

All measures necessary to protect the natural waterways from project-related siltation and leachate contamination should become conditions of project approval.

The Department has direct jurisdiction under Fish and Game Code Section 1601-03 in regard to any proposed activities that would substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any stream. Operators will be required to submit notification of proposed channel modifications pursuant to Fish and Game Code Section 1603. Work cannot be initiated until streambed alteration agreements are executed.

1. Projects Coordinator 3
2. Bud Lortz

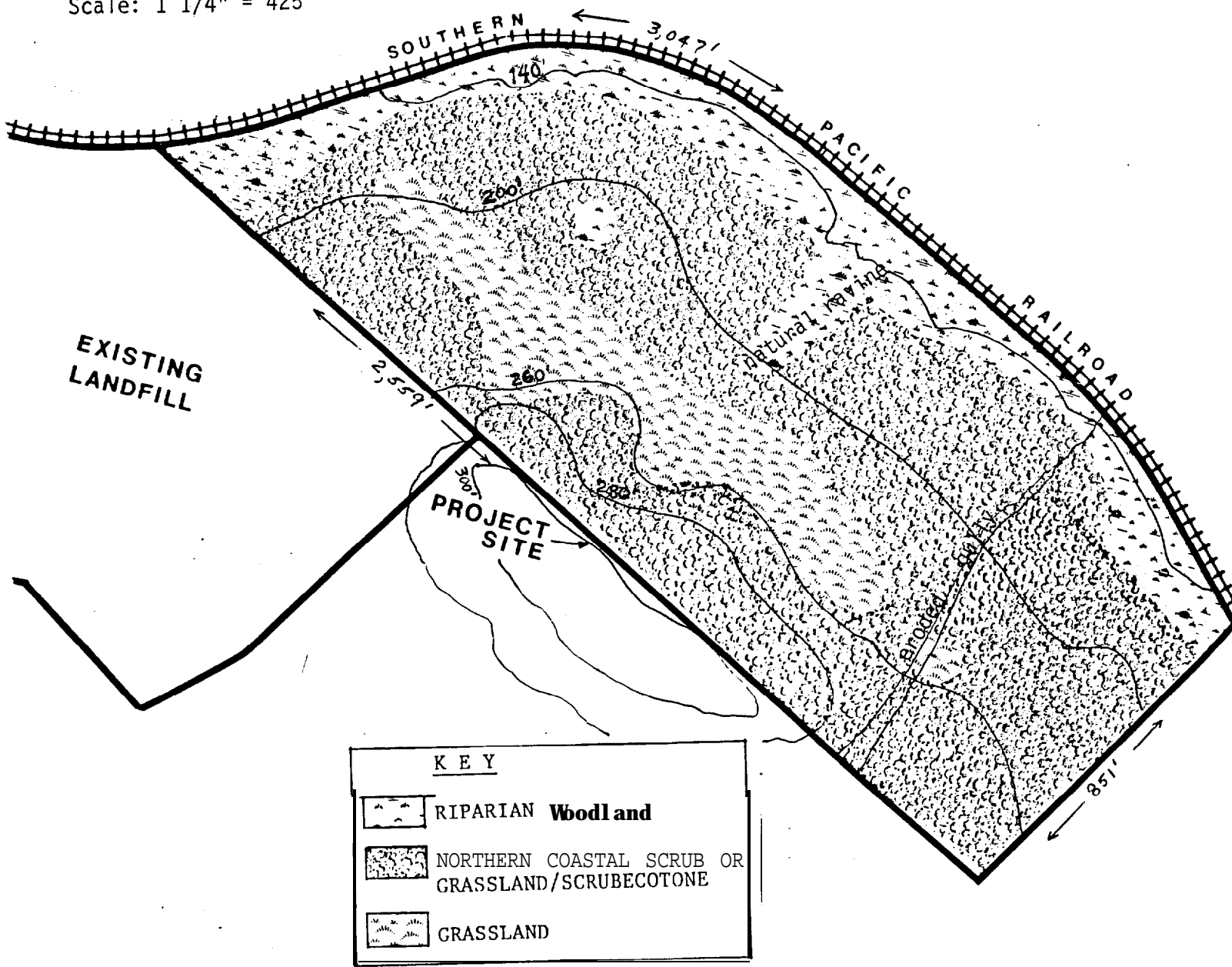
Department of Fish and Game personnel are available to discuss our concerns in more detail. To arrange a meeting, the project sponsor or applicant should **contact** Calvin Hamby, Wildlife Biologist, telephone (408) 462-6871; or Mr. **Theodore** Wooster, Environmental Services Supervisor, Department of Fish and Game, Post Office Box 47, Yountville, California 94599, telephone (707) 944-2011.

for *Pete Santadelli*
Jack C. Parnell
Director

MAP OF THE PROJECT SITE SHOWING TOPOGRAPHY AND VEGETATION TYPES

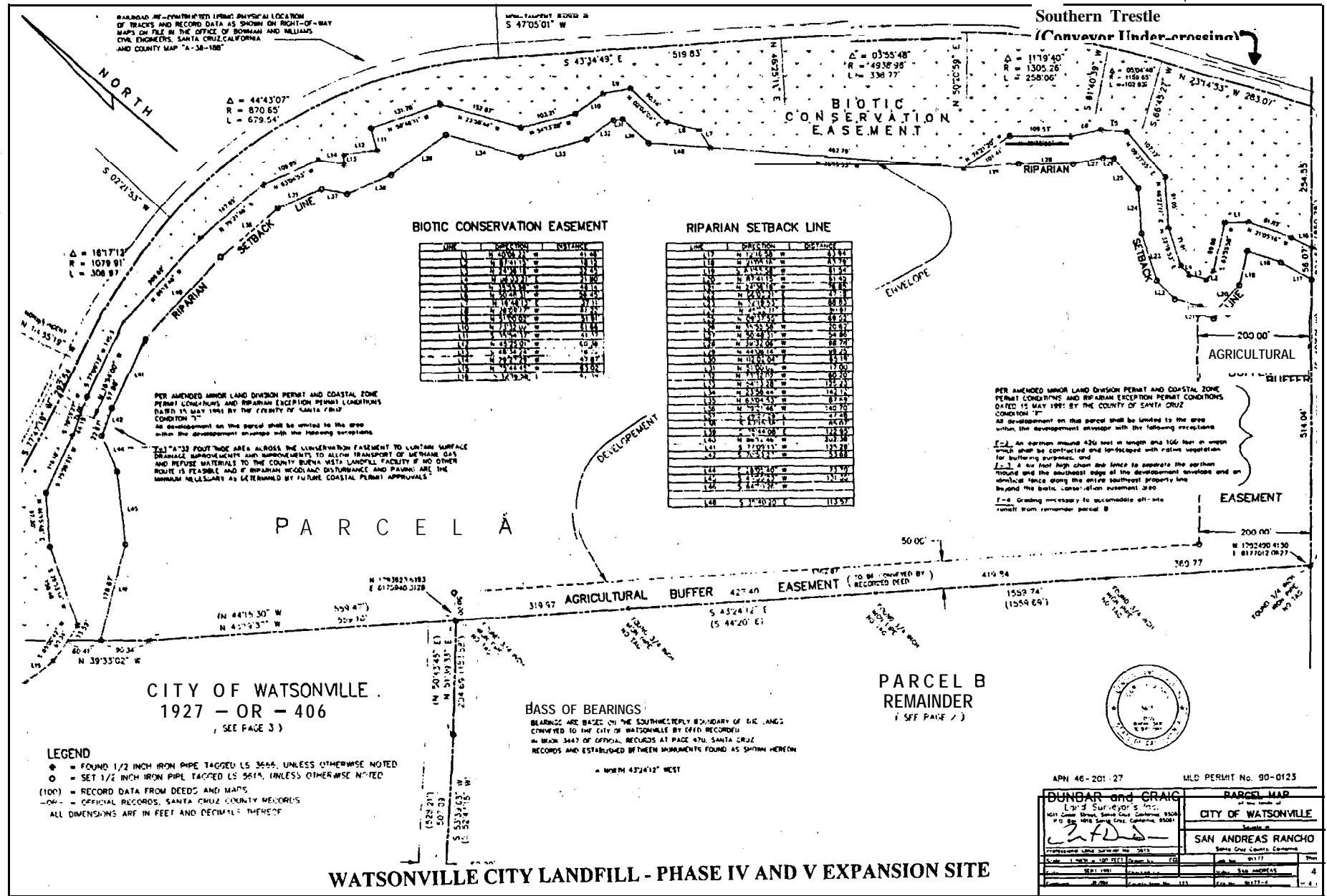


Scale: 1 1/4" = 425'



Note: Gallighan Slough is located adjacent to the north and northeast edge of the railroad.

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