sacramento river
conservation area
forum
a voice for all interests

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March 23, 2005

Ken Roby,
Lassen National Forest
Re: CALFED Monitoring PSP

Dear Mr. Roby,

The Sacramento River Conservation Area Forum welcomes the opportunity to comment regarding your CALFED Monitoring PSP that recently came before our organization. The project involves Watershed Improvement monitoring activity on Deer, Mill, Antelope, and Battle Creeks, tributaries between Sacramento River Miles 220 and 270 in Shasta and Tehama Counties. This project is listed as Project #53 in the "Project Tracker" system on our website at: www.sacramentoriver.ca.gov. Please keep this project updated as it progresses.

On March 1st, 2005, you presented this project to our Technical Advisory Committee for review and comment. The project was determined to be consistent with the principles and guidelines of the SRCA Forum Handbook and was forwarded to the SRCAF Board of Directors with that recommendation.

On March 17, 2005, the project was presented to the SRCA Forum Board of Directors and was found to be consistent with the principles and guidelines of the SRCA Forum Handbook with no objections noted at this time.

We appreciate the effort your organization has made in bringing these projects to the Forum and your recognition of the value of the principles and guidelines of the Handbook. We look forward to your continued coordination with SRCAF and the local contacts on this project as well as any future project proposals.

Sincerely,

Burt Bundy, Manager
SRCA Forum

Cc: CALFED ERP Monitoring PSP

Monitoring Effectiveness of Watershed Improvement Measures in Deer, Mill, Antelope and Battle Creeks

Ken B Roby

Initial Selection Panel Review

Not Recommended

Amount Sought: **$**259,152

Fund This Amount: $**0**

Brief explanation of rating:

The restoration actions involved road treatments to reduce the sediment loading at stream crossings. The technical reviewers felt the project should provide important information regarding the restoration of road crossings and the regional reviews noted that this type of work was closely linked to activities being conducted by local watershed conservancies and the lessons learned here should be transferrable to similar restoration projects. The emphasis is to be on observations of rill and gully erosion coupled with upstream and downstream measurements. The reviewers were concerned with the transient nature of the erosion and the liklihood of pulses of sediment from other sources may not allow any connection from these road treatments to habitat restoration in the watershed outside the immediate areas of the road crossings. The Selection Panel does not recommend funding under the ERP as a major portion of the proposal is focused on non-point source type discharges that could also be monitored under other programs such as the those conducted under timber harvest plan monitoring and non-point source control programs of the Regional Water Quality Control Board and the U. S. Forest Service.

Technical Panel Review

Technical Review Panel's Overall Evaluation Rating:

Above Average

Explanation Of Summary Rating

The problem of sediment loading from roads is an important one and this project should provide important information on methods for dealing with it. The strength is that the control and treated reaches are essentially in the same spot and, therefore, both will be equally affected by other perturbations in the watershed.

Goals And Justification

The restoration actions involved upslope restoration activities, primarily road treatments. As clearly explained, the goals of the restoration actions were to reduce sediment loading from road crossings. The conceptual model for these actions is clear: reduction of sediment loads will improve fish habitat. A bit more background information regarding what the roadcrossings look like would have been helpful. The hypothesis to be tested is straightforward: do the treatments reduce the amount of sediment delivered from the roads to the streams. This project should provide important information regarding the restoration of road crossings. Road treatments are often done but little is known about what works and what does not. In this project, a several different treatments will be monitored, allowing some comparison between treatments.

Approach

The approach is not very clearly explained. The primary metric for measuring whether the treatments have been successful is through estimates of sediment delivery calculated on the basis of annual observations of rills and gullies. No detail is

given to how these measurements will be made nor to what precision. What size rills will be measured and at what resolution? How big are the gullies? I assume that this technique has been tested (one reviewer does note that these techniques are standard and fully-vetted), but we would have liked to see some more detail. In any case, annual surveys may not be enough (especially given the temporary nature of rills) and we recommend that surveys be carried out at least twice during the rainy season. Other monitoring indicators for this task are estimates of sediment delivery and measurements of sediment delivery. Why the difference? Will estimates be made in one case but measurements in another? This is not very clear. The PIs also propose to monitor the reduction in road-channel connections by making estimates of flow connectivity. It is not clear what this means or what they plan to measure. The project extends and improves previous monitoring efforts. Other response variables, however, will be monitored and include in-stream abiotic and biotic measures and these are appropriate and valuable. As proposed, this project will have a good level of replication and controls. The PI's make the strong point that monitoring programs must be continuous and as long as possible to increase the odds of capturing the rare, high-magnitude events. Some aspects of this proposal will provide useful and valuable information, particularly the measurements of channel habitat above and below channel crossings. The results from this will be straightforward enough that the information can be easily relayed to decision-makers with a minimum of interpretation.

Feasibility And Likelihood Of Success

As noted above, there are some gaps in the project documentation. All the tasks seem technically feasible but the panel was skeptical of the proposal to measure volumes of rills and gullies. The spatial scale of the project is ideal with the objectives and the PIs are fortunate that the restoration actions are so spatially delimited. This allows for a laser-like focus at precisely the right spot. As previously noted, the temporal scale will need to be adjusted to capture the transient nature of rills and gullies. One potential problem that was identified was the role of pulses

of sediment from fire-related erosion. If portions of the watersheds have been recently burned (as was believed by a member of the panel), will increased erosion from the fire drown out any differences between the treated and control reaches? No red flags from the regional panel nor environmental compliance.

Performance Measures

The data should allow evaluation of the restoration actions, especially the habitat monitoring (eg, pool depths, pebble counts, etc.). Specific performance measures will be compared between treated and untreated sites. The rationale for these measures is clear: they are looking for evidence of road erosion at the source (the road) and also at the sink (the channel). It was noted that discharge is not a good metric for measuring treatment effects. Waananen and Crippen have a better method for estimating discharge in catchments > 1 mi2 than that provided by the Rational Formula. Also, a better justification for 0.1 level for P is needed. Finally, it should be recognized that the PIs are addressing indirect measures of habitat improvement.

Products

The project should be helpful to decision-makers, etc. This is a timely and important issue – forest roads are the primary source of sediment to streams. Links with research institutions seem to be informal although the Lassen National Forest will help with some cost-sharing. Data handling and storage will be through the Almanor Ranger District. Results will be available online but no specifics about the data are given. Public outreach will include public meetings and one class at Feather River College. The habitat monitoring should provide high-quality data but no track record is given regarding the PIs' abilities to see this work through to peer-reviewed publication and no indication is given that this is a goal of theirs. We strongly urge the PI's to make every effort to publish this work in peer-reviewed journals.

Capabilities

The team has a solid mix of biologists, hydrologists, and geologists. The 2 senior PIs have a wealth of experience working on these types of issues.

Budget

The budget is reasonable and adequate.

Regional Review

High. The regional review notes that these are high-priority streams to the Sacramento River and that this project is tightly linked to activities being conducted by local watershed conservancies. Also, lessons learned here will be transferable to similar restoration projects.

Administrative Review

No red flags from the administrative review. Budget review notes many small issues that will need to resolved. For example, "grantee must provide detailed information for all work including subcontractor work for each specific task, services, and work to be performed."

Additional Comments

Sacramento Regional Review

Sacramento Regional Panel's Overall Ranking:
High

Summary:

The panel ranked this project HIGH. This project addresses a very important issue for species of concern: habitat degradation due to excessive sedimentation. The project results will be transferrable to other similar restoration projects to increase cumulative value of sediment reduction measures at channel crossings.

1. Applicability To ERP Goals And Regional Priorities.

This project is applicable to ERP goals and regional priorities. Proponents propose to monitor the efficacy of channel crossing treatments at reducing sedimentation in high priority tributaries to the Sacramento River. This project will provide information to improve future channel crossing restoration actions. Channel crossing restoration is common in the watershed and this information will be readily transferable to actions conducted by other entities. Project results can be used in increase protection and habitat improvement for Spring-run Chinook and Steelhead in the Deer, Mill, Antelope, and Battle Creek watersheds.

2. Links With Other Restoration Actions.

The proposed project is highly linked to activities being conducted by local watershed conservancies. Information collected under this project (on public lands) will be coordinated and analyzed in conjunction with that collected by local groups on private lands. The proposed monitoring will expand on existing monitoring to provide site specific information as well as additional baseline information for status and trends analysis.

3. Local Circumstances.

There do not seem to be any local circumstances that would preclude implementation of the proposed project. The project does not appear to rely on other actions prior to implementation.

4. Local Involvement.

The outreach plan described in the proposal appears to consider all potentially interested or affected parties. There are strong links between the project proponent and local groups conducting similar work on private lands. This project will build upon the already established partnerships in the area.

5. Local Value.

Results from this project will be analyzed in coordination with that collected by local groups. Data will be made available online and results should be able to be applied at various scales.

External Technical Review #1

Goals And Justification

This proposal follows the logical progression of CALFED−funded ecosystem restoration in the watersheds work will be completed in for this proposal. Lassen National Forest (LNF) received CALFED funding for planning and implementation and this proposal will undertake monitoring of some of these efforts and establish a fish habitat baseline. The goals and objectives of the restoration work completed have focused on reducing sediment delivery into the aquatic ecosystem to pre−management levels through implementation of multiple types of projects listed in Table 1. The conceptual model is very simplistic and based on linkages between the physical and biological aquatic system (basically ecological principles), although it does nicely incorporate adaptive management. It does not adequately describe the performance measures and does not explicitly connect the physical processes or the various types of road and landing improvement measure undertaken with fish habitat, although these linkages are better documented in Table 2. However, the proposed monitoring objectives, measures, and indicators in Table 2 will only be collected on crossings (1 of 7 types of restoration improvements made in the watershed and listed in Table1).

The key physical process based on watershed analysis and proposed for monitoring is “the sediment regime”. The goals and objectives of this proposal are clearly to determine if crossing improvements are meeting their objective of sediment reduction and protecting or improving fish habitat at the site, sub−watershed, and watershed scales. Since only 1 of 7 types of improvements are being monitored in the watersheds, it may be difficult to evaluate the stated hypotheses developed to provide information about the relationship between physical processes and restoration. The proposed hypotheses and complexity of only monitoring a single type of improvement and not having habitat data prior to improvement makes it near impossible to evaluate the hypotheses regarding the relationship between sediment production, fish habitat and road crossings at the sub−watershed and watershed scales.

However, data that are will be gathered will be valuable as a baseline for future work on incorporating fish habitat and sediment linkages into a conceptual model.

The hypotheses stated in the Approaches and Scope of Work section are simple and do not seem justified relative to the existing knowledge. The questions suggested in the Problem, Goals, Objective section have not been well documented in the peer reviewed literature and are suitable given existing knowledge and knowledge gaps, particularly related to trying to detect changes at a larger scale. Instead of the hypotheses' test criteria in Table 3 being .10 difference for significance, it may be more appropriate to develop null hypotheses and determine what kind of difference actually exists.

Approach

The approach to monitoring does not seem adequately designed to meet the project's objectives without further increased monitoring of the other 6 out of 7 types of improvements that occurred in the watersheds. However, if the site-specific methods were used at these other 6 of 7 improvement types, then the approach would be appropriate. The project's flexibility seems to build upon previous experience such that necessary changes can be made in sampling design and protocols if modifications are necessary, so perhaps this can be considered before work in started. Investigators believe the proposal addresses three key deficiencies which surfaced in previous monitoring efforts. Two of the deficiencies are clearly addressed, and one shortcoming (temporal scale of precipitation and flow events) is beyond the control of the investigators. The monitoring and evaluation activities most likely to make significant contributions to our knowledge-base will be about the scaling of the sediment regime and how it operates at the larger sub-watershed and watershed scales proposed. Rarely is this scale the focus of restorations, although conceptual models incorporating cumulative effect analysis may allow for some quantitative linkage between large scale sediment reduction and site-specific restoration actions. However, cumulative effects analysis is not part of

this proposal although it is my impression that this is part of many FS modeling efforts at larger scales. Unfortunately, it seems the data collected will consist of the fish habitat baseline for future evaluation ("…intended primarily to establish a solid baseline against which future conditions can be compared."), although monitoring in these key watershed should be initiated immediately. The information generated from these monitoring and evaluation efforts could benefit managers and decision makers in the watersheds where this work will be completed and in other regions with similar soils and weather patterns more so than inform decision-makers and managers outside these watersheds. However, changes are necessary and here are some that might be considered: increasing relationships among stressors and attributes in the conceptual model, developing the Approach further to evaluate all watershed improvements undertaken, and potentially using retrospective methods, like aerial photo interpretation, to collect more historical sediment and fish data.

Technical Feasibility

The project is fully documented as proposed, however I do not think the hypotheses are testable with the monitoring effort focused on only 1 or 7 improvements undertaken in the watersheds. The scale of the project is not consistent with the objectives of evaluating effectiveness as the larger sub-watershed and watershed scales (a study of tremendous value).

Performance Measures

The performance measures collected by the monitoring activity will allow for evaluation of the crossing sites being monitored. Explicit performance measures are proposed for monitoring being completed at all scales, although at larger scales (possibly reach, sub-watershed, and watershed) they will not necessarily be reflective of the site-specific evaluations being completed. One suggestion is to further develop the conceptual model and monitoring efforts to allow for integration of the performance measures at various scales towards answering the suggested hierarchical questions in the

Goals and Justifications. The rationale for the performance measures is clearly demonstrated at the more localized scales, but not well constructed at the larger scales. The data and performance measure will not allow for evaluation of the conceptual models underlying the previous restoration actions, in which 7 types of improvement were implemented in concert, since only a single improvement (crossings) will be monitored. The monitoring and evaluation plan is not explicit enough to assess the performance of the restoration actions.

Products

This project may yield information that is usable for future efforts by resource managers, other decision makers, and/or scientists to monitor fish habitat at larger scales. I do not believe monitoring efforts, as proposed, are sufficient to accept or reject hypotheses or address the questions of value that are proposed in the Goals and Justifications. If the conceptual model was further developed and monitoring increased to points where the hypotheses could be tested, information (results and discussion) would be useful for resource managers, other decision makers, and/or scientists. The project does not explicitly describe how others will be able to access the data produced by this monitoring effort. The final report will only include results and findings. The data handling, storage, and dissemination measures do not seem adequate to allow resource managers, other decision makers, and scientists access and use of the projects results. It does not seem the project was designed to produce high–quality results that would stand–up during peer review, for reasons discussed earlier in this review.

Capabilities

The project team’s qualifications are reasonable for the project. Overall however, it does not provide for a multidisciplinary approach to evaluating and analyzing the data. One suggestion would be the inclusion of a geologist (especially in attempts are made to use retrospective methods). The project team’s performance record indicates they have the ability to complete the project, although the

conceptual model does not seem to reflect all the linkages and relationship these proposers have likely evaluated, developed, and discussed through working on the LNF through Watershed Analysis and implementation.

Budget

The budget seems minimal, and not clearly adequate for the work proposed. Further review of the budget suggest it may be possible that not enough time is considered for data entry, data analysis, report writing, and/or data dissemination.

External Technical Review #2

Goals And Justification

yes. clear statement is made of watershed restoration activities that will be monitored. They have several conceptual models and a well described conceptual framework. Hypotheses could be better stated but are present for each scale, and obviously relate to erosion and sediment regime as controlled by road treatments, and the effects on fish habitat.

Approach

this project will continue already on-going monitoring to complete a long-term project of habitat improvement thru road treatments. They will continue existing monitoring, which has been satisfactory, and bring this project to completion.

Table 2 lays out the objectives nicely, and table 3 lays out the tasks nicely.

I thought there would be diagrams of the conceptual approach -- if so, didn't find them.

Technical Feasibility

yes. continuation of prior monitoring

Performance Measures

yes. standard methods, well vetted.

Products

description of products and justification of their usefulness were not very well developed

Capabilities

yes. experienced team will continue on-going monitoring

Budget

$260 k, with some match

yes.

Additional Comments

this looks like a soild, local-level project that has had prior funding and now needa a last round of funding to complete the monitoring. I am very sympathetic to "real" on-the-ground projects like this one. But there wasn't a whole lot of conceptual justification

External Technical Review #3

Goals And Justification

YES to all of the above. This proposal is a little unusual in that it is specifically designed to monitor the effectiveness of ongoing and past restoration work in forested watersheds. This is very important, if we are to find out what works, and what doesn't. Effectiveness monitoring is supposed to be built into restoration grants, but the time frame funded in the initial grants is seldom adequate to capture the impacts of low-frequency hydrologic events. This proposal will help fill the gap. The conceptual model and hypotheses are well thought-out, and reflect a good understanding of how watersheds "work".

Approach

YES to all of the above. The approach incorporates previous experience with monitoring. The replication of sites should be adequate to detect significant differences between treated and untreated sites, if they exist. The results should show what kinds of restoration activites are most effective in forested watersheds, and will have immediate application in planning and design.

Technical Feasibility

Yes, it is fully documented, technically feasible and its scale is consistent with the objectives.

Performance Measures

YES to all of the above. Of course there is no guarantee that the number of cases will be sufficient to detect an existing treatment effect, but 45-50 cases is a pretty good sample size (I gather that all treated crossings will be included, so the "sample" of treatments is 100%).

Some specific comments and suggestions:

1. It is not clear why the Rational Formula is proposed for estimating discharge (Q) at each site. Q would not be a useful metric for measuring treatment effects, but might be useful for stratifying sites. The regression equations of Waananen &Crippen would probably be more appropriate than the Rational Formula for estimating Q in catchments > 1 sq mi. in area (but don't use both methods and mix results).

2. I rather doubt that treatment effects will be detectable at the sub-watershed and watershed scales, due not only to the "landscape dilution" effect, but also the reduced number of cases. That wouldn't mean that the restoration treatments are not improving watershed conditions. If a big flood occurs during the study period, it is possible that habitat conditions at the watershed scale will show a decline, but the decline might be worse without the treatments. That's why the site scale work is so important.

3. I am not sure why a confidence level of 90% rather than 95% is chosen for statistical tests. I would be willing to continue watershed treatments that I am 90% sure are effective.

4. The statistical model(s) that will be used should be planned out in more detail. It sounds as if a t-test of means of treatement and control sites will be used; maybe an ANOVA would be more appropriate.

Products

YES to all of the above. I especially like the public outreach and educational aspects of the proposal.

Capabilities

Yes to all of the above. Ken Roby (lead investigator) is well-known for his work on buffer strip widths and macroinvertebrates. His leadership of the project gives me confidence that the results will be meaningful.

I like the idea of involving the PSW Experiment Station; in fact, I think the Station's involvement (in a consultation role) will be essential. A scientist from the station (with background in hydrology, geomorpholgy and statistics) should review the detailed study plan (especially the proposed statistical model), and meet with the team before the field work begins.

Budget

Yes, the budget seems reasonable. An overhead rate of 16% seems really low. You could not get such a deal on labor, OH and travel costs in the private sector.

Additional Comments

This is an excellent proposal, and I highly recommend it for funding. The recommendations above are not meant as reasons for rejection, but rather as suggestions for fine−tuning and improving the project.

Budget Review

1. Does the proposal include a detailed budget for each year of the requested support?
Yes.

If no, please explain:

COMMENTS: 1. Note Budget/Labor breakdown is mostly based on assumed numbers of hours required to perform tasks 2. Open to amendment request add'l $$ 3. 30% benefits applied to hourly rate 4. Average IDC rate is 16%

2. Does the proposal include a detailed budget for each task identified?
Yes.

If no, please explain:

COMMENTS: 1. Ensure that supplies &expendables are not duplicative charges of OH/IDC

The labor rate, benefits and indirect rate should be itemized in the format provided by the PSP to enable reviewers to better evaluate and ensure that proposed labor rates are comparable to state rates.

IF proposal is funded grantee MUST provide more specific info on $$, tasks, deliverables, etc. In its current format the proposal submitted does not seem to know what it is that the grantee really intends to do, deliver, etc.

FINANCIAL INFo must also be specific.

The Subcontracted work as well as grantees work should be identified with a rate and hours and attributed to each task and deliverable for each year. A performance evaluation is also recommended for subcontractors that receive more than 50% of the grant funds.

If the subcontractor has not been identified, a position description complete with education level, experience, and abilities be submitted and the rate and hour associated with

that position will be attributed to a task, and deliverable. The grantee must also comply with the State competitive bidding process as stated in the PSP.

3. Are project management expenses appropriately budgeted?
Yes.

If no, please explain

COMMENTS:

1. 27% is average amt budgeted for proj mgmt 2. Note: compared to industry standards of 10−15% for proj mgmt − applicants proposed % is high 3. Need to review budget before award − CAREFULLY

4. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs? Are indirect rates, if used, appropriately applied?
No.

If no, please explain

COMMENTS: 1. 16% OH is applied to IDC − but provides no detailed info 2. Need detailed info on what is included in OH/IDC rates

Budget Detail/Administrative Overhead Fees – Budget detail combines the labor rates with the direct overhead rate. The labor rate, benefits and indirect rate should be itemized in the format provided by the PSP to enable reviewers to better evaluate and ensure that proposed labor rates are comparable to state rates.

If proposal is funded, a detailed list of items included in the indirect cost rate should provided by the grantee. Grantee must provide itemized and detailed information included and charged as part of Indirect Rates (IDC) charges.

Note: No overhead or indirect rate charges on the equipment purchases should be allowed as part of the budget that shall be funded as a result of this PSP.

5. Does the budget justification adequately explain major expenses? Are the labor rates and other charges proposed reasonable in relation to current state rates?
Yes.

If no, please explain:

COMMENTS: 1. Applicant uses Fed rates 2. Review more carefully prior to award

Major Expenses – If the grant is awarded a detailed list of equipment purchases should be provided by the grantee so reviewers can better evaluate whether it is more cost effective for the state to purchase large dollar equipment items through the state procurement process. If the equipment list is available within the State inventory or stock, then purchase of some or all of the listed items may be provided, loaned or leased by the state to the grantee. In the event, that the equipment is purchased by the grantee, the grantee shall maintain an inventory of major equipment for auditing purposes and potential use for future projects. Grantee shall follow State Contracting Manual (SCM) Section 7.61 thru 7.62 rules pertinent to equipment purchase, lease, etc.

6. Are other agencies contributing or likely to contribute a share of the projects costs?
Yes.

If yes, when sufficient information is available, please sum the amount of matching funds likely to be provided:

COMMENTS: 1. Identifies possible cost share partners – Lasen, NF &DFG 2. Need add'l detail – no $$ associated w/ cost share

Cost Sharing – Grantee shall provide information regarding its financial capability and stability as well as it's level of commitment for any proposed cost share funds. A detailed budget of the project's proposed cost share funds should be provided prior to grant funds being awarded. A financial evaluation is recommended for grant agreements that state/claim over 30 % or $250,000 (which ever is less) of matching funds. The evaluation will avoid likelihood of the grantee requesting an amendment to increase project funding

due to lack of or miscalculation of matching funds to complete the project.

7. Does the applicant take exception to the standard grant agreement's terms and conditions? If yes, are the approaches the applicant proposes to address these issues a reasonable starting point for negotiating a grant agreement?
Yes.

If no, please explain:

Applicant agrees to T

8. Are there other budget issues that warrant consideration?
Yes.

If yes, please explain:

COMMENTS: 1. Budget applies escalation figures to its labor charges for each year 2. Need more careful review prior to award (possible award delay &changed rates)

Other comments:

SUPPLEMENTAL COMMENTS: 1. Subs not identified 2. 60% of proj cost allocated to subs 3. Narrative difficult to tie to task &deliverables chart 4. Proposal as is will need re-work to convert to SOW/agreement

Task and Deliverables – Grantee must provide detailed information for all work including subcontractor work for each specific task, services, and work to be performed with the appropriate and corresponding deliverable or end product for each task(s) and/or sub-task(s). Costs associated with each task and deliverable should be evaluated based on what is considered to be reasonable costs for performing similar services.

Subcontracting – Proposals for work to be performed by subcontractors or other entities in excess of the 25% of the total project dollars the grantee is required to provide a justification for subcontracting services. If subcontractors

are pre-selected and identified in the proposals as part of the project team, the grantee should provide a justification on how each subcontractor was selected. Grantee shall identify labor rates and indirect costs rates paid to each identified subcontractor to ensure that labor rates are comparable to State rates.

The Subcontracted work should be identified with a rate and hours and attributed to each task and deliverable for each year. A performance evaluation is also recommended for subcontractors that receive more than 50% of the grant funds. If the subcontractor has not been identified, a position description complete with education level, experience, and abilities be submitted and the rate and hour associated with that position will be attributed to a task, and deliverable. The grantee must also comply with the State competitive bidding process as stated in the PSP.

END OF REVIEW

Environmental Compliance Review

1. Is compliance with California Environmental Quality Act (CEQA) required for this project?
No.

2. Is compliance with National Environmental Policy Act (NEPA) required for this project?
No.

3. Does this project qualify for an Exemption or Exclusion under CEQA and NEPA, respectively?
Does not apply.

4. Did the applicant correctly identify if CEQA/NEPA compliance was required?
Yes.

5. Did the applicant correctly identify the correct CEQA/NEPA document required for the project?
Does not apply.

6. Has the CEQA/NEPA document been completed?
Does not apply.

7. If the document has not been completed, did the applicant allot enough time to complete the document before the project start date?
Does not apply.

8. If the document has not been completed, did the applicant allot enough funds to complete it?
Does not apply.

9. Did the applicant adequately identify other legal or regulatory compliance issues (Incidental Take permits, Scientific Collecting permits, etc,) that may affect the project?
Yes.

10. Does the proposal include written permission from the owners of any private property on which project activities are proposed or, if specific locations for project activities are not yet determined, is it likely that permission for access can be obtained?
Does not apply.

11. Do any of these issues affect the project's feasibility due to significant deficiencies in planning and/or budgeting for legal and regulatory compliance or access to property?
No.

Prior−Phase Funding Review

List the other CALFED or CVPIA grants received by this applicant for which your agency manages contracts:

Project Title	Lassen National Forest Watershed Stewardship: Butte, Deer and Mill Creeks
CALFED Contract Management Agency	National Fish and Wildlife Foundation
Amount Funded	849845
Date Awarded	2001/01/01
Project Number	ERP−01−N26

3. Have negotiations about contracts or contract amendments with this organization proceeded smoothly, without persistent difficulties related to standard contract terms and conditions?
Yes.

4. Are the status, progress, and accomplishments of the organization's current CALFED or CVPIA project(s) accurately stated in the proposal?
Yes.

5. Has this organization made adequate progress towards these project(s)' milestones and outcomes, without unreasonable divergences from project schedules or poor−quality deliverables?
Yes.

6. Is the applicant's reporting, record keeping, and financial management of these projects satisfactory?
No.

Significant delays in invoicing. Quarterly fiscal reporting is good.

7. If this application is for a next phase of a project whose contract your agency currently manages, will the project(s) be ready for next−phase funding to monitor and evaluate project outcomes in fiscal year 2005/6, based on its current progress and expenditure rates?
Yes.