sacramento river preservation trust

November 1, 2002

Dan Ray
CALFED Bay-Delta Program
1416 9th Street, Suite 630
Sacramento, CA 95814

Re: Proposal 170DA: Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks, The Nature Conservancy (TNC)

Dear Dan,

The Sacramento River Preservation Trust (Trust) would like to submit comments on TNC's Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks Proposal 170DA:

1. The Trust is in complete support of the acquisition of the Nock and Nicholas properties.
2. The only concern the Trust has with the proposal has to do with the section entitled "Testing Hypotheses and Reducing Uncertainty" (page 5 of the Project Description). In that section it is stated that, " The short (3 year) time frame of this grant will not be sufficient to test the hypothesis we have posed, however, it will present us with an opportunity to assess baseline conditions at the site." The section ends with the following statement, "Although we are not currently seeking funds to conduct the long-term response monitoring that will be required to test our hypothesis, it is our intention to do so in the future."
   Our concern has two elements:
   a. The first element is the stated justification for not being able to test the hypothesis but feeling comfortable with assessing baseline conditions. This appears to the Trust to be unacceptable from the standpoint of meeting a key grant application provision.
   b. The second element has to do with the description of Phase IV of this project, which is briefly described as follows: "Phase IV (Ecosystem Response Monitoring & Research) is an initiated program and the subject of continued fund raising efforts." (page 6 of the Project Description). This latter reference appears to be in direct contradiction with the last sentence of the "Testing Hypotheses and Reducing Uncertainty" section. In addition, the definition of "an initiated program" is not provided but leaves one with the impression that Phase IV has already begun. At a minimum, the Trust would recommend that a more comprehensive description of Phase IV be provided before funding is granted for this portion of TNC's request.

The Trust appreciates having had the opportunity to comment and would appreciate being informed of any and all subsequent actions taken by CALFED concerning this grant request.

Sincerely,

John Merz
Chair, Board of Directors

P.O. Box 5366, Chico, CA 95927

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NICOLAUS NUT COMPANY

October 29, 2002

Mr. Dan Ray
CALFED Bay Delta Program
1416 9th Street Suite 630
Sacramento, CA 95814

Dear Mr. Ray:

As a property owner in the meander zone of the Sacramento River near Chico, I am writing in support of your Bay Delta / Ecosystem Restoration Program.

With many diverse interests to address in the state, I believe you are pursuing a thoughtful and responsible course of action. Our orchard is in the confluence area of the Sacramento River, Big Chico Creek and Mud Creek. From 1988 through 1994, we re-established the orchard and were well on our way to an economic farm. With multiple flood events from 1995 through 1998 (El Nino), we have suffered considerable loss.

Over time, I believe the highest and best use for this area is to be returned to riparian habitat. I have spoken on several occasions with The Nature Conservancy and feel that they can play a valuable role in this restoration process. You have my vote of confidence for the Program.

Respectfully yours,

George

George R. Nicolaus

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PHONE: 530 / 894-6171 • FAX: 530 / 894-0708

John J. Nock
4033 Ord Ferry Road
Chico, California 95928

October 28, 2002

Mr. Dan Ray
CALFED Bay-Delta Program
1416 9th Street, Suite 630
Sacramento, California 95814

RE: Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks

Dear Mr. Ray,

I am writing to express my family's support for a project proposal from The Nature Conservancy to acquire property for habitat restoration at the confluence of Big Chico Creek and Mud Creek.

My parents have owned the parcel of ground at the confluence of these two creeks since 1974. In the mid-1970's flooding occurred mainly from the backwater effect of the Sacramento River rising above flood stage. Over the years significant new flooding pressure has been generated as the City of Chico has grown. Chico uses the natural creeks running through the city to carry away storm water runoff. I have spoken with city staff who have explained that their storm water drainage system has been designed to evacuate as much water from the city as fast as possible. This drainage design brings our property more floodwater more frequently and with much more destructive force and speed.

When we purchased the property in the mid-1970's it was one of two along Big Chico Creek that were being farmed and were unprotected from flood flows by a levee. The Peterson property immediately below ours to the South was abandoned as a farm property in the late 1970's due to repeated flood damage and was sold for habitat restoration in the late 1990's. Ours is the only remaining property contiguous to Big Chico Creek that is still being farmed without the protection of a levee.

Our family is in the farming business and we have worked harder on this property than anywhere else to try to develop a productive and profitable orchard. After years of fighting nature at this site we have come to the conclusion that this property, while currently profitable to farm, is not a good place to remain. Nature attempts to reclaim this site through annual significant flooding pressure. Considering all the land acquisitions in our neighborhood and adjacent to our parcel, we felt that riparian habitat restoration may be the best option for the future.

Thank you for your time and attention to the proposal from The Nature Conservancy. I know that your decision is a difficult one. If there is any additional information that I could provide, please feel free to ask.

Sincerely,

John Nock

State of California • The Resources Agency
Gray Davis, *Governor*
DEPARTMENT OF PARKS AND RECREATION
Ruth G. Coleman, *Acting Director*
Northern Buttes District
400 Glen Drive
Oroville, California 95966-9222

Dan Ray
CALFED Bay-Delta Program
1416 9th Street, Suite 630
Sacramento CA 95814

October 28, 2002

Dear Mr. Ray:

CALFED DIRECTED ACTION: "Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks" by The Nature Conservancy

The California Department of Parks and Recreation (DPR) fully supports the subject proposal for acquisition and restoration plans on properties in the subject confluence area. This project will augment the protection of habitat begun by Annie Bidwell in 1908 when she donated the lands of Bidwell-Sacramento River State Park and continued with the addition of the adjacent 58 acre Peterson Property in 1998 funded by Anadromous Fish Restoration Program of the Central Valley Improvement Program.

Habitat restoration on these lands will expand the riparian corridor to link disjunct portions of riparian habitat along and between the Sacramento River and Big Chico Creek. This habitat for yellow-billed cuckoo, giant garter snake, and valley elderberry longhorn beetle is likely to become extensive enough to increase or support viable populations of these sensitive species in the area. Shaded riverine aquatic habitat for sensitive anadromous fish will also be developed and protected by this project.

Protection and management of such lands is embodied in DPR's Mission Statement. Should this project acquire these lands, facilitate their habitat restoration and transfer to State Parks, then an ecologically functional management unit within the Sacramento River Conservation Area will be preserved within Bidwell-Sacramento River State Park.

Sincerely,

Kathryn V. Foley

Kathryn V. Foley,
District Superintendent

Cc: Cathy Morris, TNC

sacramento river
conservation area
forum
a voice for all interests

October 28, 2002

Patrick Wright, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, 11th Floor
Sacramento, CA 95814

Dear Mr. Wright:

The Sacramento River Conservation Area Forum (SRCAF) Board respectively submits the following comments concerning "Directed Action" proposals located within the SRCAF area of influence.

At the October 17th meeting the SRCAF Technical Advisory Committee (TAC) reviewed "Directed Action" proposals for conformity with the principles and management guidelines set forth in the SRCAF Handbook. The principles provide the foundation for all restoration work to be done in a manner that:

- Uses an ecosystem approach that contributes to the recovery of threatened and endangered species and is sustainable by natural processes,
- Maintains a limited meander where appropriate,
- Works within the parameters of local, state and federal flood control and bank protection,
- Advocates voluntary landowner participation,
- Fully address landowner, public and local government concerns, and
- Provides accurate and accessible information and education that is essential to sound resource management.

The TAC presented the findings to the SRCAF Board of Directors Executive Committee for review and final comments.

Specific Comments:

CALFED Proposal number: 170
Project Proponent: The Nature Conservancy
Title: Restoration of the Confluence Area of the Sacramento River, Big Chico and Mud Creeks

The SRCAF did not see significant changes to this proposal as previously reviewed and presented to the SRCAF Board and TAC. The project was determined to meet the guidelines and principles of the Handbook. However, the SRCAF strongly urges the project proponents to coordinate with Butte County officials concerning ongoing upstream flood issues. Additional coordination should also focus on efforts to find a long-term solution of the M & T Chico

pumping facility (see comments below) and public trespass issues of adjacent landowners. Additional issues include the long-term ownership of the proposed acquisition and coordination of data with ongoing projects in the area.

CALFED Proposal number: 89
Project Proponent: M & T Chico
Title: M & T/Llano Seco Fish Screen Facility

The SRCAF determined that no significant change to the proposal has been made since its original submittal to CALFED for funding. The SRCAF Board supports achieving a long-term solution to the variety of water needs currently served by the pumping facility and has a record of working with the project proponents for some time. However, the Board notes that CALFED has recommended the formation of a Steering Committee to provide input to resolve this matter and strongly urges that these efforts involve the SRCAF. Additionally, the Board also recommends that the SRCAF be a part of any required public outreach component.

CALFED Proposal number: 116
Project Proponent: Reclamation District 108
Title: Reclamation District 108 Consolidated Pumping Facility and Fish Screen

The SRCAF Board determined that the project continues to meet the guidelines and principles of the Handbook as originally submitted to CALFED for funding. The Board is also looking forward to participating in the project proponents planned outreach strategy that includes a session on planning and design of the facility.

CALFED Proposal number: 167/ 171
Project Proponent: The Nature Conservancy
Title: Implementing a Collaborative Approach to Quantifying Ecosystem Flow Regime Needs for the Sacramento Valley and Sacramento River Restoration, Chico Landing Sub-Reach

At the time of the SRCAF review, project proponents relayed that the proposed projects had been granted an extension for re-submittal by CALFED. The SRCAF understands these projects, once re-submitted, will be followed by a 30-day comment period.

Overall Comments and Suggestions:

The SRCAF Board and TAC offers the following suggestions to improve CALFED's objective of local and regional coordination by incorporating the following suggestions in future CALFED ERP Proposal Solicitations and project implementation and design; 1) Increased agency/stakeholder coordination on regional data gathering and sharing, 2) Increased agency communication, 3) Changes to "resubmitted" projects through the Directed Action process be clearly identified, and 4) Increase allotted time for project proponents to develop resubmitted proposals and increase public comment period associated with Directed Actions as well future CALFED program grant solicitations.

1) CALFED should facilitate increased agency/stakeholder coordination on regional data gathering and sharing in a format that promotes the easy exchange of data among interested parties. This would decrease the cost of duplicate studies while promoting a comprehensive approach to resource management on a local or regional basis. This could be accomplished in part by establishing a program similar to the "Interagency Ecology Program for the San Francisco Estuary" for the Sacramento Valley region.

2) Clear identification of changes to original project submittals that allow interested parties to review the proposals more easily.

3) Increase allotted time for project proponents to develop resubmitted proposals and increase public comment period associated with Directed Actions as well future CALFED program grant solicitations.

As previously noted by the SRCAF Board in the original CALFED ERP 2002 PSP process, there was not adequate time allotted to project proponents to allow interested stakeholders to provide comments on project submittals. A normal 30-day comment period does not take into consideration that many stakeholder groups and other organizations meet once a month. Additionally, many project proponents expressed their frustrations with the Directed Action proposal process; in some cases the assignment of an appropriate CALFED liaison to help in addressing selection panel concerns came late in the 30-day period. This late assignment impeded the ability of project proponents to do a sufficient job of addressing CALFED concerns in their original submittal. With some other proposals, we understand project proponents have been given more time to resubmit. While we appreciate the value of flexibility in addressing applicant needs and difficulty of addressing revisions, we are concerned with fairness to all applicants.

Finally, the SRCAF Board appreciates the efforts contributed by your staff in this complex process of grant solicitation, selection and implementation. We offer our comments in a way that enhances your local coordination efforts. We look forward to working with you as the various CALFED programs are implemented now and in the future.

Sincerely,

Jane Dolan
Chairperson

cc: SRCAF Board of Directors
Mary Nichols, Secretary of Resources