



April 18, 2002

Mr. Dan Ray
CALFED Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Dear Mr. Ray,

I am writing to comment on initial recommendations for the 2002 Ecosystem Restoration Program concerning our proposal (#88) Lower Putah Creek Watershed Pilot Implementation Projects. Note that External Scientific Review #3 gave the proposal an overall evaluation of "Excellent" citing in many instances examples that were overlooked by the other reviewers. The proposal is currently not recommended due at least in part to some critical oversights, misinterpretations and unfairly pessimistic assumptions that are clarified in these comments. It is our hope that clarifying key points will lead to reevaluation of the proposal and upgrading to at least "directed action" status. For clarity, these comments are organized by type of review and respond directly to the comments of the reviewers.

Sacramento Regional Review: The reviewer missed three references in the proposal (pages 15, 23 and 28) to the hiring of a geomorphologist and unfairly downgraded the reliability of the project on the misunderstanding that a geomorphologist was not involved in the project. The reviewer also failed to consider that the Streamkeeper position is only partly funded by the L.PCCC and that it is possible for some Streamkeeper hours to be charged to the project and other hours used as matching funds. The discrepancy in web page design costs came about because we decided to request a third year of funding for design assistance but did not make consistent changes at various places in the application. (We would happily accept two years funding on this line item.)

External Scientific #1: The External Scientific #1 review unfairly downgraded the proposal out of concern that the benefits of removing invasive exotic vegetation might not outweigh the risks. Given that invasive weed control is an established CALFED objective with many projects already funded in other watersheds the reviewer appeared to place an undue burden of proof of the benefits of invasive weed control upon this proposal. The reviewer may be unaware that the four principle invasive species are trees and large shrubs that completely displace native plants and virtually all of the native species that are dependent on them. Eucalyptus towers over native cottonwoods and oaks, shading them out. Arundo forms dense thickets as big as houses that are impenetrable to wildlife. Tree of Heaven forms colonies of hundreds of plants that exclude native trees and shrubs. By their nature, these invasive species increase as a percentage of total riparian vegetation every year. Many riparian corridors have been completely dominated by Arundo. The reviewer appears to be unfamiliar with the nature of these plants and the widespread longstanding efforts to control them in the west.

508 Elmira Road, Vacaville, California 95687 ♦ Phone: (530) 574-1075 ♦ Fax: (707) 448-7347 ♦ <http://www.putahcreek.org>

*The Lower Putah Creek Coordinating Committee consists of:
Cities of Davis, Fairfield, Susan City, Vacaville, Vallejo and Winters, County of Yolo, Maine Prairie Water District,
Putah Creek Council, Solano County Water Agency, Solano Irrigation District and University of California, Davis*

The reviewer failed to consider the 20-year fish and wildlife monitoring commitment on the part of the LPCCC in concluding that there is little monitoring to detect negative impacts. The assumption that all monitoring work would be performed by the Streamkeeper is false and inconsistent with the description of monitoring as matching contributions beyond the Streamkeeper's time.

The assumption that monitoring would be unscientific is false and out of character for the LPCCC. The LPCCC reviews fish and wildlife monitoring programs in monthly board meetings and *ad hoc* technical advisory groups and hires qualified experts such as Dr. Peter Moyle of the University of California, Davis and Thomas Payne Associates for routine fish monitoring and Dr. Andrew Engilis of the University of California, Davis, and Strategic Environmental, a professional wildlife monitoring firm to perform routine wildlife assessments and special studies on Putah Creek. Reports are peer reviewed. Two members of the LPCCC are wildlife biologists, one is a fisheries biologist with an advanced degree in hydrology. The assumption that monitoring would be unscientific is not consistent with the budget for these services nor the nature of the LPCCC.

One of the main objectives of fish and wildlife monitoring is to inform decision making concerning overall management of the creek, especially restoration projects. Few if any watersheds have as much financial commitment and professional expertise applied to long term monitoring as Lower Putah Creek.

The reviewer questioned whether invasive weed control would lead to unstable banks. However standard control methods for the target plants, eucalyptus, tamarisk and tree-of-heaven, call for cut stump treatment methods that leave the soil-holding benefits of the root systems intact for years until they decompose. By then, in most places, native vegetation would recolonize these areas naturally, supplemented as needed by more active revegetation projects. Given our concern over bank stability elsewhere in the proposal it was unfairly pessimistic of the reviewer to assume that we would create unstable banks by removing invasive plant species.

The reviewer's concern that herbicide applications might lead to negative impacts on fish or that spot treatment of invasive species (especially cut stump treatments) constitutes "herbicide applications at a large scale" are exaggerated. Before I became the Streamkeeper, I had 13 years of experience reviewing fish and wildlife hazards of pesticides for the California Department of Pesticide Regulation including development of measures to protect federally listed species from pesticides. I also had 3 years of experience in conventional farming and 5 years of experience as a technical representative for an agricultural chemical manufacturer. The assumption that we would make ignorant or reckless applications of herbicides could not be more false.

External Scientific #2: This reviewer also failed to note the involvement of a geomorphologist (specified on pages 15, 23 and 28 of the proposal) and downgraded the project unfairly by assuming a lack of expertise for the proposed work. The reviewer also should have granted higher marks for feasibility for reducing sediment runoff from agricultural fields since the project would expressly implement standard resource conservation district (RCD) protocols for controlling sediment in farm runoff. Moreover, the proposal contained appropriate criteria for determining success (sediment captured in ponds and traps that would otherwise flow into the creek) that were not acknowledged by the reviewer. Since these are pilot projects affecting less than 1 percent of the adjacent lands, bedload sediment reductions is an inappropriate criteria.

Thank you for the opportunity to comment on the review of our proposal. When these clarifications are taken into account, we believe that the other reviewers will concur with conclusions of the External Scientific Review #3 that this is on the whole an excellent proposal worthy of support by the Ecosystem Review Program and upgrading of the proposal to at least "directed action" status.

Sincerely,



Rich Marovich,
Streamkeeper