

# Sacramento Valley Landowners Association

May 10, 2002

Patrick Wright, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street  
Sacramento, Ca 95814

Dear Mr. Wright:

The Sacramento Valley Landowners Association (SVLA) Board of Directors submits the following comments regarding the proposed funding recommendations for the 2002 CALFED Bay-Delta Program Ecosystem Restoration Program. SVLA members have actively participated in projects relating to the Sacramento River for a number of years. Public input provided by landowners and local government is an important aspect of the planning process.

We are very concerned that the new CALFED process -- to wait until recommendations are made before receiving local public notification -- will effectively circumvent any meaningful local input.

The Sacramento River Conservation Area Forum (Forum) has provided an excellent opportunity for landowners and agency representatives to come together to openly discuss important issues related to the Sacramento River. SVLA has participated in the process since its inception.

The Forum Memorandum of Agreement (MOA) describes public agency support for "improving coordination and cooperation between public agencies and identifying agreements and relationships among the signatory public agencies in implementing the 1989 Plan and Handbook." The Forum was also designed to bring a balance between restoration actions and farming and ranching along the Sacramento River. Moreover, the Forum signatory agencies are nearly identical to the CALFED Bay-Delta Program signatory agencies and include the Army Corps of Engineers, California Department of Fish and Game, the Resources Agency, U.S. Bureau of Reclamation and U.S. Fish and Wildlife Service.

The Forum uses the principles and guidelines set forth in the "SRCA Handbook" to guide the implementation of the 1989 Upper Sacramento River Fisheries and Riparian Habitat Management Plan (1989 Plan). The goal of the Forum is to preserve existing habitat and reestablishment of a continuous riparian ecosystem along the Sacramento River in a manner that requires:

- Maintain a limited meander where appropriate,
- Accurate and accessible information and education that is essential to sound resource management,
- Full consideration to landowner, public and local government
- An ecosystem approach that contributes to the recovery of threatened and endangered species and is sustainable by natural processes, and
- Ensures that local concerns are fully addressed.

By adhering to the program principles and guidelines, fostering communication and support of the fisheries portion of the 1989 Plan, most of the 20 plus fisheries actions outlined have been accomplished or are in progress. Those actions included the temperature device at Shasta Dam, restoration activities on the tributaries, screening major pumping plants and solutions for fish passage at Red Bluff Dam, which ironically, the ERP Selection Panel chose not to fund.

The CALFED Record of Decision (ROD) states a commitment to seek to implement the Program through "locally based, collaborative programs such as the Sacramento River Conservation Area/SB 1086" (ROD pg. 34). Furthermore, ERP 2002 proposal solicitation package priorities includes M & T Ranch/Llano Seco, Sutter Mutual Water Company, Pleasant Grove Verona Water Company, and support conceptual models to support restoration of river, stream and riparian habitat. SVLA strongly recommends funding for M & T Ranch/Llano Seco. This is an excellent example of local input and coordination.

We acknowledge the efforts of the CALFED ERP program team in assembling the various reviews for each proposal and appreciate the inclusion of representatives of the Forum Technical Advisory Committee as members of the Sacramento Regional Review Panel. SVLA fully endorses the following CALFED funding recommendations:

- Meridian Farms Water Company's Positive Fish Barrier Fish Screen Project,
- Sutter Mutual Water Company's Tisdale Positive Barrier Fish Screen and Pumping Plant,
- Reclamation District 108 Consolidated Pumping Facility and Screen, and
- The Nature Conservancy's Sub-reach Planning for the Sacramento River.

Additionally, we urge you to move swiftly in finalizing contracts for the additional six projects within the conservation area considered for directed action.

However, the SVLA Board respectfully requests that the comment period be extended to allow adequate review of proposed projects within the conservation area. The current May 10 deadline for submitting comments on finding

recommendations does not provide the SVLA Board adequate time to evaluate projects within the conservation area.

Finally, we thank you for your consideration of these comments and recommend that in the future that the principles and guidelines set forth in the Handbook be the primary document from which funding decisions related to the conservation area are based. Additionally, we look forward to working with you as you labor to integrate regional and locally lead implementation of the CALFED Record of Decision and look forward to your response.

Sincerely,

Brendon Flynn  
President

Cc: Mary Nichols, Secretary of Resources  
Bennett Raley, Assistant Secretary U.S. Department of Interior



*To promote the economic, social and environmental viability of Northern California  
by enhancing and preserving the water rights and supplies of our members.*

May 10, 2002

Mr. Patrick Wright  
Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

**RE: CALFED ERP 2002 PSP Selection Panel Recommendations**

Dear Patrick:

The Northern California Water Association (NCWA) is very concerned with the CALFED Ecosystem Restoration Program 2002 PSP Selection Panel Recommendations. We are particularly concerned with the apparent disregard for local input from the Sacramento Valley.

As you know, NCWA represents 68 water suppliers and individual farmers who collectively irrigate 860,000 acres of fertile Northern California farmland. Several of our members also deliver water to state and federal wildlife refuges and a large portion of this land serves as important seasonal wetlands for migrating waterfowl, shorebirds and other wildlife.

We were generally pleased with your utilization of regional panels as part of the Ecosystem Restoration Program (ERP) project selection process, although we believe the earlier CALFED process, including the ecosystem roundtable, was a more meaningful process to assure local and regional input. For regional strategies to succeed in the CALFED process, CALFED must be diligent to assure that projects, including projects to benefit the ecosystem, are locally generated from within the region and have broad local support.

To start, we strongly endorse the selection panel's determination to fund the Meridian Farms Water Company's Positive Barrier Fish Screen Project and the Yuba County Water Agency (YCWA) Narrows 2 Powerplant Flow Bypass System, and partially fund the Sutter Mutual Water Company Tisdale Positive Barrier Fish Screen and Pumping Plant and YCWA's Yuba Goldfields Fish Barrier Replacement Project. These are examples of CALFED support for regional priorities. The regional panel identified each of these projects as "high" priority.

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On the other hand, our concerns arise from the full or partial funding totaling \$2,216,447 for four projects ranked as "low" priorities by the Sacramento regional panel. Local interests determined that the projects would provide limited or no local value, did not reflect regional priorities, or were poorly written. But, this evaluation was overridden and the projects were nonetheless funded. The funding of these projects does not reflect the role local support should play in the CALFED process as directed in the Record of Decision (ROD).

Our frustration with the selection of these projects is compounded by the fact that there were 19 projects the regional panel determined to be "high" priorities that were not recommended for funding by the CALFED Selection Panel. There are six projects that were not recommended for funding that are of special concern to NCWA. These projects provide considerable regional benefits and, as a result, the Sacramento regional panel considered most of them "high" priorities. The projects include: Ducks Unlimited White Mallard Dam and Associated Diversions Phase III Construction, Orland Unit Water Users' Association Northside Diversion Dam Fish Passage Feasibility Study, Pleasant Grove-Verona Mutual Water Company Positive Barrier Fish Screen Design and Environmental Review, Reclamation District No. 108 Wilkins Slough Positive Barrier Fish Screen Sediment Removal Project, Tehama-Colusa Canal Authority Fish Passage Improvement Project at the Red Bluff Diversion Dam, Phase III, and YCWA Narrows 2 Powerplant Intake Extension.

The next step in the selection process—distributing the remaining ERP funding to "Considered as Directed Action" projects—provides CALFED with an opportunity to better incorporate regional panel recommendations in the decision-making process. NCWA is particularly interested in three projects that are "Considered as Directed Action," the M&T Chico Ranch/Llano Seco Fish Screen Facility Short-term/Long-term Protection Project, the Natomas Mutual Water Company American Basin Fish Screen and Habitat Improvement Project, and Reclamation District No. 108 Consolidated Pumping Facility and Fish Screen. Each of these projects received a "high" priority ranking by the Sacramento regional panel, and each is specifically designated as a priority in the Ecosystem Restoration Program Draft Stage 1 Implementation Plan (August 2001).

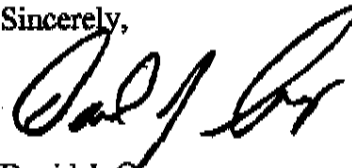
The "Consider as a Directed Action" category also includes three projects that received a "low" rating from the Sacramento regional panel. They are S.P. Cramer & Associated, Inc. Assessment of Life-History Characteristics and Genetic Composition of *Oncorhynchus mikiss* Throughout California, The Nature Conservancy's Implementing a Collaborative Approach to Quantifying Ecosystem Flow Regime Needs for the Sacramento River, and U.S. Geological Survey Assessing the hazards of mercury and selenium to the reproductive success of birds. As was the case with funded projects receiving a "low" priority rating from the Sacramento Regional Panel, these projects were determined to provide limited or no local value, did not

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reflect regional priorities, were poorly written, or were already being performed through another CALFED program.

As CALFED moves forward with the remaining funding selections for the 2002 PSP and into future funding cycles, we hope that it will reexamine the regional panels and other local input from the Sacramento Valley and, as a result, regional priorities in the CALFED EPR will receive the appropriate consideration as part of the selection process.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Guy". The signature is fluid and cursive, with the first name "David" being the most prominent.

David J. Guy  
Executive Director

cc: Dan Ray

**SACRAMENTO RIVER  
CONSERVATION AREA FORUM**

c/o California Department of Water Resources  
2440 Main Street, Red Bluff, Ca. 96080  
Web-Page [www.sacramento-river.ca.gov](http://www.sacramento-river.ca.gov)  
Ben Carter, Chairman - Jane Dolan, Vice Chairman- Don Anderson, Sec/Treas  
Burt Bundy, Manager - (530) 528-7411 Fax (530) 528-7422 bundy@water.ca.gov



May 8, 2002

Patrick Wright, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street  
Sacramento, Ca 95814

Dear Mr. Wright:

The Sacramento River Conservation Area Forum (Forum) Board of Directors (Board) welcomes the opportunity to comment regarding the proposed funding recommendations for the 2002 CALFED Bay-Delta Program Ecosystem Restoration Program (ERP). The public comment period is intended to provide counties and interested citizens a vehicle to provide input on proposed projects, especially those with land use consequences.

We acknowledge the efforts of the CALFED ERP program team in assembling the various reviews for each proposal and appreciate the inclusion of representatives of the Forum Technical Advisory Committee (TAC) as members of the Sacramento Regional Review Panel. However, because of the short notice and time frame allowed for public comment, neither the TAC or the Board were able to facilitate a normal review of the three CALFED proposals recommended for full or partial funding through the CALFED screening process.

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- Proposal # 92, Meridian Farms Water Company Positive Barrier Fish Screen
- Proposal # 162, Sutter Mutual Water Company Tisdale Weir Positive Fish Screen
- Proposal # 172, The Nature Conservancy Sub-reach Planning above Colusa (Even though the Forum Board supports this proposal in concept, and members of the SRCAF (myself included) participated in its development, it still requires a public review as part of our process)

We are expediting our public input process of these proposals and will respond to you as soon as the review is complete. To provide adequate public notification for comments and review at the SRCAF, we need at least a 60-day review period. Conducting open, public discussions of activities along the Sacramento River is a fundamental value of our organization. The Forum Board strongly feels that to cut this process short would not be in the best interest of CALFED or any Sacramento River stakeholder.

The SRCAF Board offers our services in helping provide further input as these projects develop. We also look forward to working with those proposals recommended for "Directed Action" to generate technical information and facilitate review through our Board and TAC.

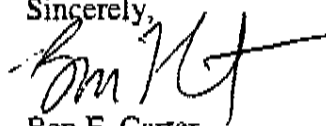
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- Uses an ecosystem approach that contributes to the recovery of threatened and endangered species and is sustainable by natural processes,
- Maintains a limited meander where appropriate,
- Works within the parameters of local, state and federal flood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

By adhering to the program principles and guidelines, fostering communication and support of the fisheries portion of the 1989 Plan, most of the 20 plus fisheries actions outlined have been accomplished or are underway. Those actions included the temperature device at Shasta Dam, restoration activities on the tributaries, screening major pumping plants and solutions for fish passage at Red Bluff Dam.

Finally, we thank you for your consideration of these comments and recommend that in the future that the principles and guidelines set forth in the Handbook be a primary document from which funding decisions related to the conservation area are based. We look forward to working with you as you integrate regional and locally lead implementation of the CALFED Record of Decision. If you have any questions, please don't hesitate to contact me directly at (530)458-7566 (email: [carter.b@colusanet.com](mailto:carter.b@colusanet.com)) or Burt Bundy, Manager of the SRCAF at (530)528-7411 (email: [bundy@water.ca.gov](mailto:bundy@water.ca.gov)).

Sincerely,



Ben F. Carter  
Chairman

cc: Mary Nichols, Secretary of Resources  
Bennett Raley, Assistant Secretary U.S. Department of Interior