

ORANGE COVE IRRIGATION DISTRICT

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May 6, 2002

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

Subject: 2002 PSP Proposal # 104, Mill Creek Adaptive Management
Fish Passage Project

Dear Mr. Ray:

I have reviewed the comments from the various reviewers for the subject proposal and find there is no basis for several of the comments that apparently led to the recommendation to not fund the proposal. It is difficult to understand the disparity among the reviewers for a proposal that is not highly hypothetical in nature, is well documented in several restoration recovery documents and has good local support necessary to fulfill the requirements of the proposal. Therefore, I submit the following for clarity and request that the proposal be reconsidered for funding.

Of major concern is the comment which is repeated several times, "lacks local support, specifically, agency biologist". This project is the result of a major collaborative effort with the local community. The project is formulated on the basis of getting stakeholders involved. In particular, it is a "farmer to farmer" project where long-term solutions are sought in a manner compatible with agriculture and the economic interest of the community. As such, the District has very deliberately formulated this proposal to address local concerns. The project will be managed in partnership with Los Molinos Mutual Water Company, the Watermaster for Mill Creek. **CDFG has stipulated that all flow schedules shall be developed and approved by their agency.** Further, the project is developed in coordination with the Mill Creek Conservancy, Tehama County, and local representative of California Departments of Fish and Game and Water Resources. Mill Creek Conservancy and Tehama County have provided letters of support for the project.

The comment that we don't have support from agency biologist is unfounded. California Department of Fish and Game biologists were very much involved in the conceptual development of the project. Several concepts presented by the proposal are the results of CDFG input. Some have had limited testing but had favorable results that warranted additional testing such as providing water for pulse flows to trigger up migration. CDFG further supports the studies to

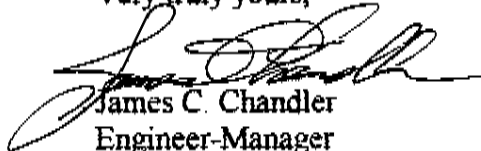
evaluate opportunities to conserve water diverted from the stream by improving water distribution and application efficiencies.

Further, this project was subjected to several levels of review while the full program was before US Fish and Wildlife Service and the US Bureau of Reclamation. The review culminated with a group review that included representative from US Fish and Wildlife Service, US Bureau of Reclamation, US National Marine Fisheries Service, California Department of Fish and Game, California Department of Water Resources, UC Berkeley, Los Molinos Mutual Water Company, Central Valley Project water Association and Orange Cove Irrigation District. The conclusion was that the project had merit for restoration and recovery. Due to funding constraints, USBR/USFWS requested that the project be broken into components wherein they would support a CALFED application, which has resulted in the subject application. This further causes confusion regarding agency biologist support unless it is a bias by certain reviewers.

The External Scientific reviewers do not present those concerns with reviewer # 3 clearly articulating the proposal's objectives and opportunities. It clearly makes sense to solve a known fish passage problem before undertaking other restoration efforts in a watershed that is documented as having good fisher habitat conditions in the upper watershed. The proposal also provides the opportunity to identify other stressors that may limit recovery efforts through its Technical Advisory Committee and scientific reviews.

Again, I respectfully request that this project be reconsidered for funding. It is a project that is addressed by the Anadromous Fish Restoration Program as having a high priority. It is the results of a major collaborative effort with the local community wherein the participants remain the stewards of the watershed and the resources within.

Very truly yours,



James C. Chandler
Engineer-Manager

cc: Mr. Kirk Rodgers, Regional Director, USBR
Mr. Steve Thompson, Regional Manager, USFWS
Mr. Patrick Wright, Executive Director, CALFED