

May 10, 2002

Patrick Wright, Executive Office
CALFED
1416 Ninth Street, 11th Floor
Sacramento, CA 95814

Subject: Comments on 2002 Ecosystem Restoration Grants Recommended for
Funding in the Delta Primary Zone

Dear Mr. Wright:

The Delta Protection Commission is the State-authorized land use planning agency for the Primary Zone of the Delta. The Commission has planning and limited regulatory authority over local government actions in the Primary Zone. The Commission does not have authority over State or federal actions, so these comments are advisory only. The full Commission has not had the opportunity to review the projects proposed for funding, however, these comments have been discussed and reviewed by the Commission's CALFED Committee and the Chairman of the Commission.

About 80 applications for funding of studies and projects in the Delta were reviewed by CALFED. The CALFED Committee had no comments on *studies* that are recommended for funding; deferred comments on those projects recommended for further

consideration by CALFED this fall ("**consider as a directed action**") until such time as the revised applications are submitted; and had no comments on projects ***not recommended for funding***.

The Committee has comments on the following projects proposed for funding:

Geomorphic and Geologic Mapping for Restoration Planning, Sacramento-San Joaquin Delta Region, William Lettis & Associates, Inc.: \$120,000

Project Description: Two year research study to map geomorphic landforms and geologic deposits in the North Delta for floodplain restoration, evaluation of selective levee breach and planning for setback levee construction on the lower river systems.

COMMENT: Data developed should be made available at no cost to agencies and interested parties working in the Delta, including the Delta Protection Commission.

Restoring Ecosystem Integrity in the Northwest Delta, Phase II, Solano Land Trust:
\$1,803,223

Project Description: This project has three sub-parts.
One task is development of a management plan for Wilcox Ranch, which is outside of and west of the Legal Delta.

The second task is study of restoring tidal action to the 1,000-acre site owned by Department of Fish and Game which includes portions of Calhoun Cut and is bounded to the north by Barker Slough. This site is in the Primary Zone, east of the Jepsen Prairie Preserve owned and managed by Solano Land Trust, and is in public ownership.

COMMENTS:

- ***Funding should include a complete inventory of all existing habitats and values on the Department of Fish and Game site; this task may require additional funding.***
- ***Analysis of restoration should describe how proposed restoration would meet CALFED Ecosystem Restoration Goals for the North Delta segment of the Sacramento-San Joaquin Delta Ecological Management Zone for Phase II (Years 1-7).***

The third task is acquisition of 775 acres of privately-owned land north of Barker Slough/Lindsey Slough (Pemco) and study of possible relocation of the existing levee in order to restore portions of the site to aquatic and riparian habitat.

COMMENTS:

- ***Applicant states acquisition is exempt from CEQA, but future restoration actions which would retire agricultural land should be evaluated under CEQA. Site is designated PRIME; Williamson Act data omitted from application.***
- ***CALFED should condition funds for acquisition so lands upland of any new setback levee will be sold to private landowner for permanent agricultural use with access to riparian water, and not sold or transferred to a State or federal agency. To further long-term protection of Delta agricultural land, an agricultural easement should be associated with the new remnant parcel. [Note: This option is included in the application].***
- ***Proposed levee setback project would require review and approval from Reclamation District 2060 and Solano County. Coordination and letters indicating positions of each should be required by CALFED prior to funding acquisition [PSP requires "consistent with County General Plan, or evidence of local government support"].***
- ***Applicant should coordinate with Reclamation District 2060 to ensure that appropriate studies that may be required for evaluation of a new setback levee are included in this study phase (geology, soils, flood control, seepage issues, etc). This task may require additional funding.***

- ***CALFED should require the project proponents to present the long-term plan for lands in the Primary Zone at a public meeting of the Delta Protection Commission.***

McCormack Williamson Tract Restoration: Wildlife-Friendly Levee Management. The Nature Conservancy: \$2,476,835

Project Description: Island is owned by The Nature Conservancy, funds from CALFED. Height of eastern levee is restricted by legal agreement, so Island designed to flood before other nearby islands. Island within study area of CALFED/DWR North Delta Improvements Project. Island may be floodway and/or tidal habitat restoration. Either future use requires reconstruction and reconfiguration of interior levees to eliminate erosion. Pilot project completed in 2001 to reslope at 5:1 and plant. This funding would allow additional levee reconstruction work and associated planting.

COMMENTS:

- ***Design and construction of reconfigured levees should not preclude full analysis of viable alternatives currently under evaluation as part of the North Delta Improvements Project. The entire North Delta Improvements Project will be reviewed by the Delta Protection Commission.***

Staten Island Wildlife-Friendly Farming Demonstration. Ducks Unlimited: \$1,507,459

Project Description: On Staten Island, owned by The Nature Conservancy, and purchased with CALFED ERP funds approved land year, Ducks unlimited will construct small internal levees to allow seasonal flooding of agricultural lands to serve as seasonal habitat. The project includes construction of a new four-unit pumping facility that will allow water to stay on the upper portions of the Island for a longer period of time, and yet be drained for planting. The pump station would release waters into South Fork of the Mokelumne. Finally, the project includes a three-year monitoring project of the discharge from the flooded areas. Island is within study area of CALFED/DWR North Delta Improvements Project. Island may be used as floodway and will be managed permanently for wildlife-friendly agriculture.

COMMENTS:

- ***Design and construction of the new levees and pump station should not preclude full analysis of viable alternatives currently under evaluation as part of the North Delta Improvements Project, such as use of Staten Island as a floodway or with setback levees. The entire North Delta Improvements Project will be reviewed by the Delta Protection Commission. This comment has also been submitted by Department of Water Resources staff.***
- ***Design and construction of reconfigured levees should support or be neutral for agriculture activities on Staten Island as well as seasonal wildlife habitat. A memo to that affect was sent to Delta Protection Commission by The Nature Conservancy staff.***

Sustainable Restoration Technologies for Bay/Delta Tidal Marsh and Riparian Habitat,
HART, Inc.: \$1,800,00

Project Description: The project builds upon experiences along Mokelumne River and Georgiana Slough protecting more than 11,000 linear feet of bank using wildlife-friendly biotechnical techniques and several miles of tidal marsh restoration using specialized planting methods. The methods are "low-tech" and cost-effective and serve to protect levees while at the same time restoring valuable riparian and tidal marsh habitat. Propose to continue along Georgiana Slough and new efforts on Sacramento River (Brannan-Andrus Island); below Rio Vista as the base of the Montezuma Hills; near Courtland; Steamboat Slough (Grand Island); Sutter Slough and Miner Slough (RD 999).

COMMENTS: Support.

Thank you for the opportunity to review and comment on the project proposed for funding by the CALFED program. We look forward to review an additional group of projects this fall. Please do not hesitate to call if you need additional information about these comments.

Sincerely,

Margit Aramburu
Executive Director

Cc: Delta Protection Commissioners
Dan Castleberry, CALFED ERP Program
Harry Englebright, Solano County Planning Department
Pam Muick, Solano Land Trust
Mike Eaton, The Nature Conservancy
Christopher Sasso, Ducks Unlimited
Gwen Knittweiss, Department of Water Resources