

No.	Date	Agency	Page	Line	Comment	Draft Response
1	6/27/2014	California Department of Fish and Wildlife (CDFW)	General		The draft MUSR RMFP has several well-developed discussions and encouraging components awaiting more detail. The project list is extensive, but general. As was discussed at the last stakeholder meeting, the next step is prioritizing projects. The Department is very interested in what the prioritization process will entail and suggests, with the release of the CVFPP Conservation Strategy, that one of the categories for prioritization will be how each project meets the goals and objectives of the Conservation Strategy for the region and the flood control system as a whole. Through that project prioritization, we hope many multi-benefit projects will be selected to move towards implementation. Multi-benefit projects may be either inherently multi-benefit in nature or may contain several projects grouped together to form a multi-benefit package that meets multiple objectives of the MUSR RFMP and the CVFPP. From the Department's perspective multi-benefit projects must have an ecosystem function preservation or restoration component to them, so we recommend inclusion of those components in the prioritization process development.	Comment noted. Given the number of projects suggested for inclusion in the RFMP, a ranked prioritization of all projects won't be pursued. Instead projects will be categorized according to type, benefits, and objectives met, etc. Also the RFMP does not define multi-benefit to as "must have an ecosystem component". Projects can have benefits such as recreation, water supply, etc.
2	6/27/2014	CDFW	3-34	21	Chapter 3.1.4 Line 21 Please specify what is meant by recent, when addressing the "recent drought". It would be better to say the 2013/14 drought, or something similar.	Text revised.
3	6/27/2014	CDFW	3-34	13, 14, 16, 25	Chapter 3.1.4 Lines 13, 14, 16, 25 Please replace Shasta Reservoir with the proper name, Shasta Lake.	Text revised.
4	6/27/2014	CDFW	3-47	33	Chapter 3.3.1 Line 33 Recommend change to "...the lengthy and costly project by project environmental review and permitting process is problematic."	Text revised.
5	6/27/2014	CDFW	3-47	22-23	Chapter 3.3.1 Lines 22-23 Please define what "changes in regulatory baselines" means.	Text added to clarify.
6	6/27/2014	CDFW	3-50	2-11	Chapter 3.3.2 Line 2-11 Recommend changes: "Habitat mitigation is often required to offset the biological impacts of development or, infrastructure construction or, repair/replacement projects and maintenance activities. Habitat mitigation is comprised of enhancement, protection, or restoration/rehabilitation of habitat in specific ways, for the betterment benefit of the impacted species. These actions may include planting of vegetation, grading and contouring of the land surface, removal of revetment, and adjusting the hydrologic regime of the area through irrigation or management of drainage. This may at times involve the conversion of agricultural lands back to habitat or placement of a conservation easement on all or a portion of lands. These mitigation areas are often frequently located away from the project's site of impact, and the land use changes associated with the habitat mitigation may have an influence on the properties adjacent to the mitigation site. The time and cost requirements associated with the project by project mitigation process are a challenge for many local agencies whom are already struggling with other fiscal and staffing constraints."	Text revised.

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7	6/27/2014	CDFW	3-55	8-19	Chapter 3.3.5 Lines 8-19 We encourage evaluating whether the development of a regional System Wide Improvement Framework (SWIF) is an option for the RFMP to transition existing levees to United States Army Corps of Engineers' (USACE) standards while maintaining Public Law 84-99 (PL 84-99) rehabilitation assistance and adhering to the federal Endangered Species Act (ESA) and other federal environmental laws. In addition to deferring the need to comply with the USACE's policy on vegetation on levees, it could establish a federal nexus for Section 7 consultation on species listed under the federal ESA.	Development of SWIFs is lists as proposed project.
8	6/27/2014	CDFW	3-59	30-37	Chapter 3.3.6 Lines 30-37 We encourage evaluating where there may be levees that could benefit from being removed from the federal program on multiple levels (flood management, maintenance, 408-permitting efficiency, and ecosystem function).	Comment noted.
9	6/27/2014	CDFW	3-59		Section 3.3.6 should be rewritten to reflect the new USACE policy on PL84-99 eligibility with respect to vegetation.	Text revised to address new interim guidelines.
10	6/27/2014	CDFW	3-62		Chapter 3.3.8 We appreciate the discussion of accommodating climate change and encourage you to retain it in the final document.	Comment noted.
11	6/27/2014	CDFW	3-63	1-2	Chapter 3.3.8 Line 1-2 This section states "This climate uncertainty requires flexibility in flood management planning. We encourage including opportunities in the RFMP to expand floodplain, provide transitory storage and setting back levees which can help provide this flexibility.	Comment noted.
12	6/27/2014	CDFW	3-63		Chapter 3.3.9 Recommend including something like "The development of multi-benefit flood management projects that incorporate water supply, ecosystem restoration/conservation, and recreation components could open up alternative funding sources."	Text added.
13	6/27/2014	CDFW	1-3	10	Chapter 1 Line 10 Recommend change to "promoting ecosystem function through protection and restoration"	Text revised.
14	6/27/2014	CDFW	1-10	19	Chapter 1.8 Line 19 Please provide a definition or description of "Sacramento River Flood Control Project"	Text added.
15	6/27/2014	CDFW	1-14	23	Chapter 1.8.2 Line 23 Please explain which criteria "those criteria" refers to.	Text added to clarify.
16	6/27/2014	CDFW	1-15	7	Chapter 1 Line 7 Recommend change to "protection of fish, wildlife, plant, and native habitat resources"	Text added.
17	6/27/2014	CDFW	1-15	9	Chapter 1 Line 9 Recommend change to "managing State wildlife areas and ecological reserves in the region."	Text revised.
18	6/27/2014	CDFW	1-15	20 and 21	chapter 1.8.2 Line 20 and 21 Please describe 404 and 401 permits; when/why are they needed, etc.	Text added.
19	6/27/2014	CDFW	1-16	4	chapter 1.8.3 line 4 Include issuing 404 permits	Text added.
20	6/27/2014	CDFW	2-1	12	chapter 2.1 line 12 This needs a more complete description including an explanation of how bypass system works because Fremont Weir also drains Sac River	Text added.

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21	6/27/2014	CDFW	2-1	25	chapter 2.1 line 25 Knights Landing is on map but not in text. If it is included in this plan, please include a description, population, etc. If it is not included, then make it clear on the map that it is outside the plan boundary.	Knights Landing is not within this RFMP area.
22	6/27/2014	CDFW	2-1		chapter 2 Recommend this chapter include a description of the historic setting (pre-agriculture and pre-flood control system) to complete the reader's understanding of the region.	Text added.
23	6/27/2014	CDFW	2-7	12	Add period after the word "structures"	Text revised.
24	6/27/2014	CDFW	2-7	13-18	This section "Native Vegetation and Grazing Land" includes low density rural development, mined land, grazing lands and open field areas that do not qualify for an agricultural category all of which could be non-native vegetation (or little to no vegetation). These should not be combined with "native vegetation" areas. The Department recommends separating this into two categories that capture: 1) Natural, Conserved, or Restored lands and 2) Grazing Lands (which may include non-native and regional fields) to give a more accurate representation of regional setting and land use.	Text revised to the extent information is available.
25	6/27/2014	CDFW	2-7	Table 2-2 and Fig. 2-5	Recommend separating "Native Vegetation and Grazing Land" into two categories that capture: 1. Natural/Conserved/Restored lands and 2. Grazing Lands (which may include non-native and regional fields)	Text revised to the extent information is available.
26	6/27/2014	CDFW	2-9	9	The Colusa and Tehama County figures seem to have misplaced commas or missing numbers	Text revised.
27	6/27/2014	CDFW	2-10	23	capitalize Great	Text revised.
28	6/27/2014	CDFW	2-12	26	Please add Sacramento River and Big Chico Creek to this list.	Text revised.
29	6/27/2014	CDFW	2-12	28	After this paragraph or in a table it would be helpful to give percentages of conserved/protected/managed for wildlife land that is riparian, wetland, grasslands and other habitats named in this section.	Text revised to the extent information is available.
30	6/27/2014	CDFW	2-12		The Natural Resources section should be consistent with the other sections of this chapter. Recommend changing name to "Environmental Setting" and describing the existing environmental conditions, resources and functions (river process, characteristics of the river in this reach, flood flows from an ecological perspective, fire regime, native and listed species habitat) and the extent of loss of and stressors on natural resources in the region.	Text revised to the extent information is available.
31	6/27/2014	CDFW	2-12	18	Recommend change to "Agricultural areas and private lands also provide valuable habitat for some species."	Text revised.
32	6/27/2014	CDFW	2-12	20	Recommend change to "Riparian vegetation is a habitat is characterized by trees, other vegetation..." as riparian vegetation in itself is not a habitat.	Text revised.
33	6/27/2014	CDFW	2-12	22-24	Please include that an additional important function of riparian systems is soil stabilization/conservation. These zones are important natural biofilters, protecting from polluted surface runoff	Text revised.
34	6/27/2014	CDFW	2-12	27-28	Please list waterways or areas with named habitats for the Mid-Sacramento River Region as was done above for the Upper Sacramento Region	Text added.
35	6/27/2014	CDFW	2-12	4-6	Recommend moving this paragraph further into section 2.5 or into the geologic setting section as it is an awkward way to begin this section.	Text revised.

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36	6/27/2014	CDFW	2-12	Table 2-4	The title "Managed Land Types" instead describes ownership. Land type should be riparian, grassland, etc. and should be captured in this table. We recommend including that information and defining whether private lands are only owned by Non-Governmental Organizations (NGOs) or if this includes private landowners with a conservation easement on their property. The Department also recommends adding a column showing the percentage each of these land types is of the total acreage in the Region (out of 640,000 acres).	Text revised to the extent information is available.
37	6/27/2014	CDFW	2-13	2	Some of these lands may not be truly "managed" especially the private ones. Recommend classifying these as wildlife habitat instead of managed habitat.	If information is readily available, table will be revised.
38	6/27/2014	CDFW	2-13	2	Add Big Chico Creek Ecological Reserve to this list- research and permitted use only	Text added.
39	6/27/2014	CDFW	2-13	3	chapter 2.5 Line 3 Butte Creek Canyon Ecological Reserve is managed by CDFW	Text revised.
40	6/27/2014	CDFW	2-13	16	Chapter 2.5 line 16 Remove hyphen in "pre-serving" so it reads "preserving"	Text revised.
41	6/27/2014	CDFW	2-13	22 and 27	Chapter 2.5 Line 22 and 27 Both of these areas say they occur "outside" the Region Boundary. Please specify to what direction "above" or "north" of the Region, etc.	Text revised.
42	6/27/2014	CDFW	2-14	17	Chapter 2.5 line 17 Recommend change to "...units of Upper Butte Basin Wildlife Area, including the state endangered western yellow-billed cuckoo."	Text revised.
43	6/27/2014	CDFW	2-14	29	Chapter 2.5 Line 29 horned lark misspelled	Text revised.
44	6/27/2014	CDFW	2-14	20-25	Chapter 2.5 line 20-25 CDFW managed, Acreage needed for Clear Lake WA (97 acres)	Text revised.
45	6/27/2014	CDFW	2-14	25-30	Chapter 2.5 line 25-30 CDFW managed, Acreage needed for Collin's Eddy (57 acres), Accessible only by boat	Text revised.
46	6/27/2014	CDFW	2-15	10	Chapter 2.5 Line 10 Recommend change to "The refuge supports several endangered special-status plants and animals..." since several of the ones listed do not have endangered status under ESA or CESA. Alternately to "special-status," "protected" or "sensitive" could be used.	Text revised.
47	6/27/2014	CDFW	2-15	17	Chapter 2.5 Line 17 Recommend remove "It consists of 1,461 acres of tall weedy vegetation, brush, valley oaks, willows, and cottonwood trees" and replace with annual grassland or non-native grassland or whatever is there.	Text revised.
48	6/27/2014	CDFW	2-17		Chapter 2.7 We recommend the RFMP consider intentional flooding in areas that do not threaten life and structures as a way to lessen the chance or extent of catastrophic flooding caused by a levee break.	Please see Section 10.2.9 regarding transitory storage.
49	6/27/2014	CDFW	2-19	13	Chapter 2.7 Line 13 It would be helpful to add any years that flooding has taken place in Colusa Basin Drain as have been illustrated in other areas.	If information is readily available, text will be added.
50	6/27/2014	CDFW	2-19	41	Chapter 2 Line 41 addition- railroad bridges and road crossings.	Text added
51	6/27/2014	CDFW	4-1	12	Chapter 4.1 Line 12 Change to "...must deal with to effectively operate and maintain..."	Text revised.
52	6/27/2014	CDFW	4-1		Chapter 4.1 It is important to note that the flood control system was built within the natural environment and within a natural river system, so although it is categorized as "developed as a single purpose system" it has always existed within a multi-purpose environment.	Comment noted.

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53	6/27/2014	CDFW	4-2	1-7, 17-22	Chapter 4.2 and 4.3.1 Lines 1-7, 17-22 Recommend changes: "Barriers to performing adequate maintenance include insufficient funding and resources, the time and costs associated with environmental and regulatory restrictions, insufficient funding and resources, and competing maintenance priorities, and the need to integrate mandates of both completing interests of federal and state regulatory and resource agencies, and flood system maintenance agencies."	Text revised.
54	6/27/2014	CDFW	4-3	9-12	Chapter 4.2 Lines 9-12 In addition to the funding needs identified here, the inclusion of funding for long-term maintenance, management and monitoring should be a required part of any flood management or restoration project or program.	Text added.
55	6/27/2014	CDFW	4-4	25-39	Lines 25-39 The Department applauds the solutions proposed, please retain them in the plan.	Comment noted.
56	6/27/2014	CDFW	4-5	10	Chapter 4.3.2 Line 10 Please provide an example how "mitigation requirements for activities impacting listed species are changing."	Examples to be added.
57	6/27/2014	CDFW	4-5	16	Chapter 4.3.2 Line 16 Please refer to the Department as CDFW, not DFW	Text revised.
58	6/27/2014	CDFW	4-5	18-20	Chapter 4.3.2 Lines 18-20 Please replace the word "river" with "stream" to reflect Fish and Game Code	Text revised.
59	6/27/2014	CDFW	4-5	20-21	Chapter 4.3.2 Lines 20-21 Please remove the sentence, "DFW contends that Section 1600 applies to areas from the waterside levee crown to and the water and wetted channel." This is not accurate. In the next line, please change "DFW" to "CDFW"	Text revised.
60	6/27/2014	CDFW	4-5	25-28	Chapter 4.3.2 Lines 25-28 Recommend changes to: "LMAs have adjusted their maintenance methodologies to accommodate these laws and the listings of species but as more analysis confirms possible impacts of common maintenance practices that in the past were not considered to affect listed species now are making it, it can make it difficult to meet obligations for levee maintenance without first obtaining proper permits."	Text revised.
61	6/27/2014	CDFW	4-5	30-40	Chapter 4.3.2 Lines 30-40 The Department applauds the solutions proposed, please retain them in the plan.	Comment noted
62	6/27/2014	CDFW	4-5	34-36	Chapter 4.3.2 Lines 34-36 "Incentives for using certain maintenance methodologies and avoidance and minimization measures...would reduce alleviate mitigation requirements."	Text added.
63	6/27/2014	CDFW	4-5	39-40	Chapter 4.3.2 Lines 39-40 Recommend change to: "Reaching agreement on standard avoidance and minimization measures (timing and/or phasing of maintenance activities) at a regional level to avoid "adverse impact" finding by resources agencies."	Text added.
64	6/27/2014	CDFW	4-5		Chapter 4.3.2 Please add language about other regulatory permits that may be needed depending on activity and location (Clean Water Act 404 from USACE, Clean Water Act 401 from the RWQCB)	Text added.
65	6/27/2014	CDFW	4-6	28	Chapter 4.3.3 Line 28 Recommend replacing "projects" with "habitat or species"	Text revised

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66	6/27/2014	CDFW	4-6	9	Chapter 4.3.3 Line 9 It is not the lack of "safe harbor" agreements, it is the lack of state and federal incidental take permits or take coverage under ESA and CESA that sometimes constrains LMAs. If they had permits for incidental take that covered routine maintenance and larger projects, they wouldn't need to get an individual permit every time they wanted to do work. They would have assessed their impacts, mitigated to the appropriate level once for the life of their permits and then been able to perform the work with more flexibility than they currently have under the law obtaining project-by-project permits.	Comment noted.
67	6/27/2014	CDFW	4-6	bullets	Chapter 4.3.3 Bullets Recommend adding bullet " Identify which species must be mitigated for within the floodway (fully or partially)	Text added
68	6/27/2014	CDFW	4-7	24-31	Chapter 4.3.4 Lines 24-31 Recommend stating in this paragraph that SWIFs also provide a federal nexus for a Section 7 consultation under the federal ESA which can streamline obtaining take coverage when a more comprehensive option (Habitat Conservation Plan) is not currently available or being developed in the region.	Text added.
69	6/27/2014	CDFW	4-7	36	Chapter 4.3.5 Line 36 Recommend change to: "It is imperative that every LMA has an aggressive rodent abatement, and damage repair, and prevention program."	Text revised.
70	6/27/2014	CDFW	4-8	31	Chapter 4.3.5 Line 31 Recommend change to: "Establish procedures and guidelines for removal of rodent habitat and food sources reducing the conditions that attract rodents." This may include establishing buffer zones between nut orchards and levees for ground squirrels and depredation permits for beaver. The Department issue a depredation permit to DWR for 5 counties and all the waterways DWR maintains. This could be a model for other maintainers.	Comment noted. Eliminating nut orchards from areas adjacent to levees is not considered to be practicable or likely.
71	6/27/2014	CDFW	4-8	34	Chapter 4.3.5 Line 34 Recommend change to: "...to minimize threats to levee integrity and crop destruction."	Text revised.
72	6/27/2014	CDFW	4-8	19-20	Chapter 4.3.5 Lines 19-20 Recommend change to: "Potential impacts to endangered species act listed under (both the CESA and or ESA) impacts during rodent burrow repair activities in some locations have been expressed as a concern by resource agencies."	Text revised.
73	6/27/2014	CDFW	4-8	22	Chapter 4.3.5 Line 22 Recommend change to "Facilitation through environmental compliance regulatory processes..."	Text revised.
74	6/27/2014	CDFW	4-8	28	Chapter 4.3.5 Line 28 Recommend change to "Establish guidelines for land uses habitat projects that could become a source of rodents." Many land uses besides restoration can be a food source for rodents. Nut orchards are a preferred food source for ground squirrels which excavate large burrow complexes into levees throughout the central valley.	Comment noted. Eliminating nut orchards from areas adjacent to levees is not considered to be practicable or likely.
75	6/27/2014	CDFW	4-8	3	Chapter 4.3.5 Line 3 Recommend change to: "Adequate rodent control is a two three part maintenance process of reducing the conditions that attract rodents, eradicating the rodents, and properly filling their burrows."	Text added.
76	6/27/2014	CDFW	4-8	7-9	Chapter 4.3.5 Lines 7-9 Recommend change to: "Interpretation of environmental laws and regulations by various resource agencies Differing methods, presence of listed species habitat, and other environmental factors can limit the periods during which poison bait can be utilized and other methods can be employed to control rodents."	Text revised.

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77	6/27/2014	CDFW	4-8	bullets	Chapter 4.3.5 Bullets Recommend adding bullet "Increase awareness of what conditions increase the likelihood of rodent abundance (including proximity to nut orchards, temporary shelter on/near levee (stationary farm/construction equipment)).	Comment noted. Eliminating nut orchards from areas adjacent to levees is not considered to be practicable or likely.
78	6/27/2014	CDFW	4-13	35	Chapter 4.3.9 Line 35 Any of this vegetation that was planted as mitigation for previous impacts should not only be "not removed" but should not be subject to LCM. Please confirm/deny in the CVFPP and clarify in this section.	Text added to clarify.
79	6/27/2014	CDFW	4-13	38	Chapter 4.3.9 Line 38 "implemented"	Text revised.
80	6/27/2014	CDFW	4-14	11	Chapter 4.3.10 Line 11 We applaud the concept of DWR developing and implementing a maintenance subventions cost share program and would like to see that developed further.	Comment noted.
81	6/27/2014	CDFW	4-14		Chapter 4.3.10 Recommend discussing the possibility of requiring a funding component for long-term maintenance be built into every project in the system through the regional plans or the CVFPP since there is never enough money to maintain the system in the long-term.	Comment noted.
82	6/27/2014	CDFW	6-1	24	Chapter 6.2 line 24 The MUSR RFMP largely underestimates the natural environment's ability to produce revenue, tourism, business, family interaction, etc. in the Region. The Sacramento River above the City of Colusa provides an example of this potential. The river meanders, has agriculture within its levees and is a highly utilized area for fishing, hunting, birding, boating, camping, etc. The river below the City of Colusa, a major population base, is not visited as frequently because the river lacks the character and resources that draw tourism and recreation to the area. Allowing the river to function as it does above the City of Colusa (i.e. increasing the width between the levees) does not exclude agriculture, helps improve flood capacity, and will draw people willing to spend time and money to the area.	Comment noted.
83	6/27/2014	CDFW	6-1	1	Chapter 6 Title appears to be missing a word. Recommend change to "Land Use and Environmental Resources" or something similar.	Text revised.
84	6/27/2014	CDFW	6-1	29-30	Chapter 6.2.1 Lines 29-30 To be more accurate, recommend changes to "The current flood system of levees, weirs and bypasses was largely overlaid on the natural river system but developed for the single purpose of flood damage reduction.	Text revised.
85	6/27/2014	CDFW	6-1	3, 4	Chapter 6.1 Lines 3, 4 The regions may not always have a "relatively-secure and abundant water supply", especially during years of severe drought. Recommend that this sentence is reworded to reflect that fact.	Comment noted.
86	6/27/2014	CDFW	6-1		Chapter 6 This chapter should begin with background information as the other topic chapters do. It should also provide a description of the species and habitats that occur in this region, their historic abundance and the loss of natural habitat and ecosystem function due to changes in land use (flood management, urban and rural development, agriculture, etc.). Without this baseline understanding of where the region is beginning it will be difficult to measure improvements to habitat and function through multi-benefit projects.	Text revised.

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87	6/27/2014	CDFW	6-1		Chapter 6.1 This first section "The Value and Importance of Preserving Agriculture" seems like an abrupt way to start this chapter. Recommend beginning chapter with the environmental setting/background as described in comment above and then including this and section 6.2 as subheadings under a section of "The Economic Value and Importance of Land Use in the Region"	Text revised.
88	6/27/2014	CDFW	6-2	4	Chapter 6.2.1 Line 4 Recommend change to "Mitigation projects are developed to offset impacts to or loss of habitat for address adverse effects on listed species and/or their habitats from project impacts, as required by state and federal law."	Text revised.
89	6/27/2014	CDFW	6-2	6	Chapter 6.2.1 Line 6 Recommend change to "Mitigation is generally comprises the protection, enhancement or rehabilitation of habitat..."	Text revised.
90	6/27/2014	CDFW	6-2	7	Chapter 6.2.1 Line 7 Recommend change to "Mitigation may include planting of vegetation, allowing or restoring natural river processes, grading and contouring of the land surface..."	Text revised.
91	6/27/2014	CDFW	6-2	17	Chapter 6.2.1 Line 17 Please expand on what criteria are considered for on-site vs. off-site mitigation. Not all projects can be mitigated off-site, for a variety of different reasons.	Text revised.
92	6/27/2014	CDFW	6-2	17	Chapter 6.2.1 Line 17 Recommend change to "...depending on the specific site attributes, species needs, and design considerations."	Text revised.
93	6/27/2014	CDFW	6-2	19	Chapter 6.2.1 Line 19 Recommend change to "...resulting in a net improvement for the affected species in question."	Text revised.
94	6/27/2014	CDFW	6-2	22	Chapter 6.2.1 Line 22 Recommend change to "...can reduce the overall cost and permitting efficiency of the project..."	Text revised.
95	6/27/2014	CDFW	6-2	33	Chapter 6.2.1 Line 33 Please explain what is meant by "an invisible land management directive."	Text revised to clarify.
96	6/27/2014	CDFW	6-2	37	Chapter 6.2.1 Line 37 After the description of the concerns from landowners of being adjacent to habitat projects, a sentence should present the benefits of being near native habitat, including reduced pesticide need, beneficial insects and pollinators, native habitat can support raptors which feed on burrowing mammals (a concern for landowners and levee maintainers).	Comment noted.
97	6/27/2014	CDFW	6-2	15, 16	Chapter 6.2.1 Lines 15, 16 Please expand on the statement "because a component of the project will influence a species and/or habitat" by describing how species and/or habitat will be influenced/impacted.	Text revised to clarify.
98	6/27/2014	CDFW	6-2	27-30	Chapter 6.2.1 Lines 27-30 Recommend change to "There are legal and regulatory requirements for mitigation (CEQA, permit requirements, etc.) whereas restoration projects are largely completed based on the aspirational goals of various agencies and organizations and legal mandates of resources agencies to recover listed species and improve habitat, which were set based on societal value of these natural resources."	Text revised.
99	6/27/2014	CDFW	6-3	14	Chapter 6.2.2 Line 14 Please define what is meant by "substantial habitat areas"	Text added.
100	6/27/2014	CDFW	6-3	17-18	Chapter 6.2.2 Lines 17-18 This states that three listed birds species use croplands, but then goes on to list two bird species and one bat species. Please revise to two bird species and one mammal species or if the bat was incorrect, please replace with the third bird species you were referencing. Also, please describe which types of agricultural areas these species use (i.e. alfalfa for Swainson's hawk) as they do not use all agricultural areas.	Text revised



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101	6/27/2014	CDFW	6-3	2,3	Chapter 6.2.2 Lines 2,3 The blanket statement that cultivated ag and rangeland help support endangered species should be refined. There are some crops that help like rice for waterfowl and giant garter snake and alfalfa for Swainson's hawk but other crop types (some row crops and orchards) have little to no habitat value for native wildlife. Most listed species in the MUSR (bank swallow, fish, pond turtle, VELB) only rely on natural environments. Statement is misleading.	Text revised.
102	6/27/2014	CDFW	6-3	5, 6, 7	Chapter 6.2.2 Lines 5-7 Please expand on the importance of riparian, freshwater emergent marsh and grassland habitat and include examples of species that benefit from these habitat types.	Text added.
103	6/27/2014	CDFW	6-3	Table 6-1	Chapter 6.2.2 Table 6-1 This table needs to be revised. The land cover types listed are not all "habitats" as presented in the title. This should be changed to "Existing Land cover/uses in the Region" if the current categories will remain. Recommend separating cropland into types (orchards, row crops, rice, alfalfa) since only a couple of these provide habitat to native and listed species. Most of these provide little to no habitat to native and listed species. It is also unclear what 100% refers to- of all land use in the MUSR Region?	Text added.
104	6/27/2014	CDFW	6-4	9	Chapter 6.2.2 Line 9 Recommend change to "CDFW lands wildlife oriented properties include..."	Text revised.
105	6/27/2014	CDFW	6-4	13	Chapter 6.2.3 Line 13 We applaud your statements about alternate funding sources for multi-benefit projects and restoration along with the added resiliency these projects add to the system as a whole. We encourage more development of this discussion.	Comment noted.
106	6/27/2014	CDFW	6-4	13	Chapter 6.2.3 Line 13 Need to explain the financial benefit of increased river process.	Text revised to clarify.
107	6/27/2014	CDFW	6-4	18	Chapter 6 Line 18 addition- projects that reduce flood risk while also protecting, enhancing and restoring habitat...	Text revised.
108	6/27/2014	CDFW	6-4	36, 37	Chapter 6.2.4 Lines 36, 37 Recommend change to "There are several agencies and non-governmental organizations that are known to undertake have been involved with conservation planning in the Regions,"	Text revised.
109	6/27/2014	CDFW	6-5	9	Chapter 6.2.4 Line 9 Recommend change to "Give the river more room to move." Also recommend adding setback levees as a vital component in allowing the river to move more.	Text added
110	6/27/2014	CDFW	6-5	29	Chapter 6.2.4 Line 29 Recommend change to "Conduct Complete property line surveys..."	Text added
111	6/27/2014	CDFW	6-5	33	Chapter 6.2.4 Line 33 Recommend change to "Encourage and participate in efforts to protect, improve, restore, and create..."	Text added
112	6/27/2014	CDFW	6-5	35	Chapter 6.2.4 Line 36 Recommend change to "...deer, bats, other native fish, birds, mammals and rare plants."	Text added
113	6/27/2014	CDFW	6-5	36	Chapter 6.2.4 Line 36 Please add giant garter snake to this list	Text added
114	6/27/2014	CDFW	6-5	15-16	Chapter 6.2.4 Lines 15-16 Incentives should include protection of property owners crops via fencing. If landowners are being encouraged to increase native riparian habitat that comes with an increase of deer which would have negative impacts to their crops.	Text added
115	6/27/2014	CDFW	6-6	35	Chapter 6.2.5 Line 35 Recommend change to "...proposes measures to monitor, avoid, minimize, and mitigate these impacts..."	Text revised

No.	Date	Agency	Page	Line	Comment	Draft Response
116	6/27/2014	CDFW	6-6	22-25	Chapter 6.2.5 Lines 22-25 Recommend change to "DWR's FESSRO has been charged with supporting developing the Central Valley Flood System Conservation Strategy, a mechanism by which mitigation or repairs and improvements to the SPFC can be (pre-) mitigated and the charge of SB 5 met a document that looks at the system as a whole and provides a strategy for meeting the conservation goals of the Central Valley Flood Protection Plan and the Central Valley Flood Protection Act of 2008."	Text revised
117	6/27/2014	CDFW	6-6	22-25	Chapter 6.2.5 Lines 22-25 Please change title to "Existing Habitat Conservation Plans/Natural Community Conservation Plans (HCPs/NCCPs), RAMP and other Plans"	Text revised
118	6/27/2014	CDFW	6-6	26-29	Chapter 6.2.5 Lines 26-29 Recommend change to "The USFWS and NOAA have species recovery plans for some of the federally threatened or endangered species and habitats in the Regions, supporting decision making, but are not legally binding requirements of projects. These species and habitats include the Chinook salmon, Central Valley steelhead, valley elderberry longhorn beetle, and the vernal pools. CDFW also has a recovery plan for the state-threatened bank swallow."	Text revised
119	6/27/2014	CDFW	6-7	1	Chapter 6.2.6 Line 1 Should include definition of "take". "Take", per Fish and Game Code, means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.	Text added.
120	6/27/2014	CDFW	6-7	8,9	Chapter 6.2.6 Line 8, 9 Please flip to read Habitat Conservation Plan/Natural Community Conservation Plan	Text revised
121	6/27/2014	CDFW	6-9	3	Chapter 6.3.1 Line 3 It should be described in text and shown in figure 6-1 (zoomed in version is needed) that there is a substantial amount of near-channel bank revetment that is far from levees or without levees in this region. That revetment may be easier and more important to remove in some cases.	Figure added.
122	6/27/2014	CDFW	6-9	15	Chapter 6.3 Line 15 Recommend change to "Physical considerations- these are generally related to the conflict between where species needs and human activities that influence these species and their habitats intersect."	Text revised
123	6/27/2014	CDFW	6-9		Chapter 6.3.1 This section on Revetment and Limited Channel Migration is very good and a critical part of the equation. Please retain.	Comment noted.
124	6/27/2014	CDFW	6-12	20	Chapter 6 line 20 These are not mutually exclusive. Lowering and reconnecting floodplain could reduce stage and provide other flood/water supply benefits (transitory storage, water quality, etc.).	Text revised.
125	6/27/2014	CDFW	6-12	24	Chapter 6 line 24 Recommend change to "...did not account for the dependence of species and habitats on a functioning river ecosystem, provide opportunities for future habitat restoration or prevent entrainment of aquatic species.	Text revised
126	6/27/2014	CDFW	6-12	29	Chapter 6.3.2 Line 29 Agriculture, river process, and flood control are not mutually exclusive. There are many examples where productive agriculture persists within the levee system.	Comment noted. See Section 6.4.
127	6/27/2014	CDFW	6-12	36	Chapter 6.3.2 Line 36 Recommend change to "...were designed to address the flood conveyance limitation of the natural leveed river system." The natural river system had meander and connected floodplain, which provided plenty of flood conveyance. Once the river was altered through dams and levees and land use changes on the flood plains not compatible with flooding were implemented, then conveyance became an issue.	Comment noted.

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128	6/27/2014	CDFW	6-13	2	Chapter 6.3.2 Line 2 More examples of small multi-benefit projects are needed. Especially if there are habitat projects that also provide flood benefits.	Comment noted.
129	6/27/2014	CDFW	6-13	5	Chapter 6.3.2 Line 5 Recommend change to "...flood system maintenance that influence may impact river habitats and associated species."	Text revised
130	6/27/2014	CDFW	6-13	13	Chapter 6.3.2 Line 13 The Department understands that the potential for increased environmental regulations is a common concern from private landowners. It would be helpful for the document to provide examples of when this has happened to understand how this actually affecting landowners on the ground. Understanding in what instances this has occurred would help us know how best we can work with landowners to help resolve issues that living next to habitat may create. We are sympathetic to their concerns and have resources and techniques to navigate regulations and to help avoid, minimize, or offset damage done by wildlife.	Comment noted.
131	6/27/2014	CDFW	6-13	25	Chapter 6.4.1 line 25 Excellent inclusion of many different options in this section "Strategies to Support River Process." Well developed with small and large examples. Please retain	Comment noted.
132	6/27/2014	CDFW	6-14	29	Chapter 6 line 29 Revetment removal should be considered high priority....Developing and streamlining the required permitting processes to allow for revetment removal should be discussed along with how to work through the potential liability of rock removal.	Comment noted.
133	6/27/2014	CDFW	6-15	1	Chapter 6.4.1 Line 1 Even though the flood management system is different in the southern portion of the region, a map showing the same information as in Figure 6-2 needs to be added for the part of the region below Colusa. This information is critical to understand the historic and current meander and infrastructure.	If information is available it will be added.
134	6/27/2014	CDFW	6-16	22	Chapter 6 Line 22 Recommend adding sentences: "The use of vegetation and wetlands can improve water quality. Riparian (Shaded Riverine Aquatic Habitat-SRA) vegetation is beneficial to aquatic species, providing shade and large woody debris."	Text added.
135	6/27/2014	CDFW	6-16	12-14	Chapter 6.4.1 Line 12-14 Recommend changes to "...for multi-benefit projects. Also, projects that incorporate ecosystem restoration and recreation components may be eligible for alternate sources of funding that is not available for single-purpose flood management projects. In addition to funding, a key value of a multi-benefit project that incorporates ecosystem restoration components is that it can be self-mitigating; speeding up the project process because mitigation is not required and the cost and potentially lengthy time to develop and implement that habitat project it would be are unnecessary. A multi-benefit project could only be potentially self-mitigating if the ecosystem improvements offset and were in-kind to the impacts. A self-mitigating project could only be multi-benefit if the ecosystem improvements were above and beyond mitigation since mitigation alone can not count as the ecosystem restoration portion of a multi-benefit project. "	Text added.
136	6/27/2014	CDFW	6-16	35-38	Chapter 6.4.1 Line 35-38 Please include a discussion of the benefits of fish screens and impacts caused by lack of screening and fish entrainment into flood conveyance systems.	Comment noted. Detailed evaluation of fish screens is beyond the scope of the RFMP.
137	6/27/2014	CDFW	6-18	17	Chapter 6.4.1 Line 17 Recommend change to ".....those that reduce flood risk along with providing one or more...."	Text revised.

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138	6/27/2014	CDFW	6-18	23	Chapter 6.4.1 Line 23 Recommend change to "An One example of a multi-benefit project exists at is the Princeton..."	Text revised.
139	6/27/2014	CDFW	6-18	40	Chapter 6.4.1 Line 40 Change to "NOAA and CDFW guidelines..."	Text revised.
140	6/27/2014	CDFW	6-19	6	Chapter 6.4.1 Line 6 issued	Text revised.
141	6/27/2014	CDFW	6-19	9	Chapter 6.4.1 Line 9 Comment- Currently, this project has stalled due to permitting issue with the rock removal (CFVPB, ACOE, & DWR). DWR Flood Maintenance continue to express that they are not comfortable with supporting project because there is risk. Again, liability needs to be addressed before rock removal is actually implemented.	Comment noted.
142	6/27/2014	CDFW	6-20	28	Chapter 6.4.3 Line 28 M&T Ranch Pumping Plant Improvements is a multi-benefit project, not a restoration project.	Text revised.
143	6/27/2014	CDFW	41813.00	26	Chapter 6.4.4 Line 26 Reducing costs of herbicides is not the only benefit. Less use of herbicides also reduces potential impacts to aquatic species.	Text added.
144	6/27/2014	CDFW	6-23	36, 37	Chapter 6.4.4 Line 36, 37 Agricultural easements should be evaluated with water availability and changing climates in mind to ensure any easements remain useful or feasible in the future. We encourage agricultural crops like alfalfa and rice easements as they provide the most wildlife habitat value from the crop and it's practices. We also encourage easements to allow erosion of riverbanks to increase river meander and which may provide nesting habitat to bank swallows.	Comment noted.
145	6/27/2014	CDFW	6-24	1	Chapter 6.4.4 Line 1 Reference should be "...(DWR , 2012)"	Text revised.
146	6/27/2014	CDFW	6-27	25-27	Chapter 6.4.5 Line 25-27 Please expand on how advanced mitigation provides a means of making flood maintenance less expensive and timelier. Should also include the benefits of creation of habitat. Please define what is meant by "specific" aquatic habitat or terrestrial habitat resource or give examples.	Text added to clarify.
147	6/27/2014	CDFW	6-28	41	Please spell out "ESA."	Text revised.
148	6/27/2014	CDFW	6-29	37-38	The acronym needs to be changed to "LSAA" throughout the section	Text revised.
149	6/27/2014	CDFW	10-1	32	Sites reservoir is a controversial project. It may offer some benefits to the system, but has many permanent impacts within it's footprint and on the Sacramento river to agriculture and rangeland, habitat, listed and native species, river function and processes, etc.	Comment noted.
150	6/27/2014	CDFW	10-2	3	The project at the Red Bluff Diversion Dam has already been completed. It should not be stated that "...replacing the Red Bluff Diversion Dam with state-of-the-art fish screens...." is part of a proposed project.	Text added to clarify.
151	6/27/2014	CDFW	10-2	4	Proper name is Shasta Lake, not Lake Shasta.	Text revised.
152	6/27/2014	CDFW	10-2	6	A new diversion at Moulton Weir would require a fish screen	Text added.
153	6/27/2014	CDFW	10-5	27	Proper name is Shasta Lake, not Shasta Reservoir.	Text revised.
154	6/27/2014	CDFW	10-5	28	Please insert (Shasta County) after "Dam".	Text revised.
155	6/27/2014	CDFW	10-5	33	The first sentence states that releases from Shasta Dam often are made for flood management; this implies that flood management is the primary purpose of the reservoir, which is not entirely true. Text needs to reflect the fact that Shasta Dam is operated in conjunction with other Central Valley Project facilities to provide for the control of flood water, storage of surplus winter runoff for irrigation in the Sacramento and San Joaquin valleys, municipal and industrial use, maintenance of navigation flows, protection and conservation of fish in the Sacramento River and Delta, and generation of hydroelectric energy.	Paragraph described the multiple purposes served by Shasta Lake.
156	6/27/2014	CDFW	10-6	7	Please change "Reservoir" to "Lake", to reflect the proper name of Shasta Lake.	Text revised.

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157	6/27/2014	CDFW	10-6	24	Please change "Reservoir" to "Lake", to reflect the proper name of Shasta Lake.	Text revised.
158	6/27/2014	CDFW	10-6	15-16	Please explain what the Lake Flood Control Diagram is and if possible add a figure.	Text added to clarify.
159	6/27/2014	CDFW	10-7	21	Can be a source of attracting and entraining salmonids from Butte Creek Improvements to the system should consider this potential issue	Text revised to clarify.
160	6/27/2014	CDFW	10-7	22	"Sacramento River Flood Control System" was also mentioned previously in the document, but not defined. Please describe the Sacramento River Flood Control System.	Sacramento River Flood Control System description added to Chapter 3.
161	6/27/2014	CDFW	10-8	13	Can be a source of attracting and entraining salmonids from the Sacramento River. Improvements to the system should consider this potential issue	Text revised to clarify.
162	6/27/2014	CDFW	10-10	28	Be sure to include consideration for preventing fish entrainment for all sites	Comment noted.
163	6/27/2014	CDFW	10-10		It would be helpful to include a summary of the improvements for flood control mentioned in the 2012 CVFPP to the Fremont Weir/Yolo Bypass Modifications. The area provides wildlife habitat and recreation (~2500 user day/year) and is a very important area for all areas captured under the multi-benefit project categories.	Text added to clarify.
164	6/27/2014	CDFW	10-12	12	Recommend change "prohibit" to "prohibiting"	Text revised.
165	6/27/2014	CDFW	10-13	12	USGS is not in the list of acronyms; please spell out the first time USGS is used.	Text added.
166	6/27/2014	CDFW	10-13	39-40	Recommend change to "Typical riparian species within the canal are cottonwoods, willows and alders. Increased riparian vegetation habitat makes it difficult and expensive to maintain channel capacity."	Text revised.
167	6/27/2014	CDFW	10-15	5	Include information on how removal of vegetation will be mitigated.	Impact analysis has not be undertaken, therefore potential mitigation requirements are unknown at this time.
168	6/27/2014	CDFW	10-17	35	The word "encompass" is confusing. Recommend change to "Incorporating a 1,000 foot wide bypass expansion.....is predicted to convert 2,459 acres of agricultural land to active floodplain." or something similar.	Text revised.
169	6/27/2014	CDFW	10-18	33	Include information on how removal of vegetation will be mitigated.	Impact analysis has not be undertaken, therefore potential mitigation requirements are unknown at this time.
170	6/27/2014	CDFW	10-18	41	Listed threatened and endangered fish species exist in the Bypass. Permitting requirements would remain the same.	Text added.
171	6/27/2014	CDFW	10-18	1-29	This section seems to highlight the negative issues relating to bypass expansion. Recommend also including the ecological benefits of bypass expansion.	DWR has not articulated the specific ecological benefits of this proposed bypass expansion. We understand that this information is currently being developed as part of the Conservation Strategy.
172	6/27/2014	CDFW	10-19	5	"Shasta Dam Raise" is not a location, as listed in the bullet. Should be rewritten to: Shasta Lake (dam raise)....	Text revised.
173	6/27/2014	CDFW	2-13 to 2-15		Chapter 2.5 Recommend changing "within" to "within or near" as some of these are in the MUSR Region and some are just outside. Should be noted clearly in the title which are outside the Region or consider separate lists. Additionally, several are described as "west of the region" or "just east" of the region. It should be clearly stated in the text that they are outside of the region.	Text revised.

No.	Date	Agency	Page	Line	Comment	Draft Response
174	6/27/2014	CDFW	2-13, 2-14	2 and 18	Chapter 2.5 line 2 and 18 Recommend changing "within" to "within or near" as some of these are in the MUSR Region and some are just outside. Should be noted clearly in the title which are outside the Region or consider separate lists. Additionally, several are described as "west of the region" or "just east" of the region. It should be clearly stated in the text that they are outside of the region.	Text revised.
175	6/27/2014	CDFW	4-2 and 4-5	10 and 3-4	Chapter 4.2 and 4.3.2 Lines 10 and 3-4 Recommend change to "and California's Fish and Game Code for lake and streambed alteration. law."	Text revised.
176	6/27/2014	CDFW	4-2 and 4-5	11 and 4	Chapter 4.2 and 4.3.2 Lines 11 and 4 Recommend change to "through a project by project permitting process..."	Text revised.
177	6/27/2014	CDFW	4-2 and 4-5	8 and 2	Chapter 4.2 and 4.3.2 Lines 8 and 2 It is incorrect to say "most maintenance activities are exempt from NEPA and CEQA" as it depends on the activity, timing and location. Recommend changing to "Some maintenance activities..."	Text revised.
178	6/27/2014	CDFW	4-2 and 4-6	18-22 and 5-10	Chapter 4.2 and 4.3.3 Lines 18-22 and 5-10 Recommend change to "Failure to properly plan, fund (including long-term funding), maintain, and manage mitigation and habitat enhancement projects is can resulting in adverse impacts to hydraulic capacity, conveyance, and ability to inspect, monitor, and flood fight. Further, plantings and migrating beyond their original project limits and the lack of 'safe harbor' agreements is creating financial and operational constraints for the LMAs." Please cite examples of unmanaged habitat enhancement or mitigation sites that have shown to cause these problems.	Example to be added.
179	6/27/2014	CDFW	6-19 and 6-20		Chapter 6.4.2 Please describe how each of these projects are multi-benefit.	Text added.
180	6/27/2014	CDFW	6-29 and 6-30	35-36	Please include "Lake and" before "Streambed" both in the header and first sentence.	Text revised.
181	6/27/2014	CDFW	6-29 and 6-30		CDFW does not issue "Programmatic" Lake and Streambed Alteration Agreements. Please change the title of this section to "Master Lake and Streambed Alteration Agreement" and Please remove the paragraph on page 6-30 lines 5-8 that begins with "There are also Programmatic...approval process." If you have any questions about the Lake and Streambed Alteration Agreement process or the Fish and Game Code covering these agreements, please contact the Department.	Text revised.
182	6/27/2014	CDFW	General		Chapter 6 We encourage the expansion of the ecological opportunities of the MUSR RFMP now that the Administrative Draft of the Conservation Strategy for the CVFPP has been released. There appear to be multiple opportunities to meet Conservation Strategy objectives through setback levees, floodplain lowering, and revetment removal in the MUSR region. The locations identified as opportunities in the Floodplain Restoration Opportunities Analysis (FROA) of the Conservation Strategy are a technical exercise that would benefit from MUSR stakeholder local knowledge to refine the analysis. The Department encourages the MUSR RFMP to explore these specific opportunities further. The Department and other Resource agencies, and the Department of Water Resources (DWR) Floodsafe Environmental Stewardship and Statewide Resources Office (FESSRO) staff welcome further coordination to discuss and assist with continued analysis to support the RFMP effort.	We understand that Admin Draft of the Conservation Strategy is under revision, therefore it is premature to include in the RFMP.

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183	6/27/2014	CDFW	General		The existing flood management system along the Sacramento River is known to entrain and strand migrating fish following high flow events. Tisdale Weir is a prominent example of one of these problem points where the Department has had to rescue listed fish species. In developing this plan, particular attention should be given to identifying ways to improve existing structures and finding ways to minimize standing potential.	Study of the bypass and weir system is beyond the scope of the RFMP. DWR will evaluate as part of their Basin Wide Feasibility Study and Conservation Strategy.
184	6/17/2014	DWR CVFPO	1-3	20	"At the urging of the CVFPB" seems like a poor phrase choice. Regional planning was part of the CVFPP (section 4.4.1) before Resolution 2012-25 was passed.	Text added to clarify.
185	6/17/2014	DWR CVFPO	7-2	3-15	I would like a little further discussion as to why a new definition of small community was needed. So the three areas that are now classified as "rural areas" will not be required to seek 100-year level of protection? Is no future growth expected in these communities? Just a little more clarification is needed.	Text added to clarify.
186	6/17/2014	DWR CVFPO	7-9	9-16	Hydraulic modeling is currently being done by DWR to further analyze potential levee breach and flood scenarios as part of the BWFS's. This information should be available by completion of the BWFS's if not sooner.	Comment noted.
187	6/17/2014	DWR CVFPO	8-12	2-16	The tone of the 200-year maps discussion seems accusational. I am not an expert on the entire sequence of events and issues regarding the 200-year maps, but I suggest the writer checks all the facts and considers re-writing the section if need be.	Discussion as written is factual and is not intended to be accusational.
188	6/17/2014	DWR CVFPO	8-12		As stated, this Issues section 8.5 needs to be populated. DWR looks forward to a review of this section when it is ready.	Comment noted.
189	6/17/2014	DWR CVFPO	10-15	all	The list of locally preferred alternatives to the Cherokee Canal issue is helpful. Only through collaboration at all levels will the State and locals come up with a solution set that improves the situation.	Comment noted.
190	6/17/2014	DWR CVFPO	10-17	25	Conversion of 2,098 acres of SNWR seems unlikely.	Comment noted.
191	6/17/2014	DWR CVFPO	11-1	all	Chapter 11 is a very important chapter and needs to be developed. DWR looks forward to a review of this chapter when it is ready.	Comment noted.
192	6/17/2014	DWR CVFPO	12-1	all	Chapter 12 is a very important chapter and needs to be developed. DWR looks forward to a review of this chapter when it is ready.	Comment noted.
193	6/17/2014	DWR Emergency Response	5-1	31	Just an editing comment.....is there an "is" versus "are" issue at the end of the line?	Text revised.
194	6/17/2014	DWR Emergency Response	5-6		PL-84-99 Rehabilitation – This section has been expanded since the initial draft and is valuable and important. But I wonder if it should be moved to somewhere other than the Emergency Response Chapter where it will get more visibility. It really has more to do with financing than actual emergency response. This is really an "after the fact" issue.	Comment noted.
195	6/17/2014	DWR Emergency Response	n/a		The section under Gaps and Overlaps is, as before, excellent. It notes that there are 5 general gaps. Numbering them might highlight better these issues, which are important.	Comment noted.

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196	7/3/2014	DWR FESSRO	1-3	1	<p>We believe a description of the Conservation Strategy should be included in the section of the document. We would like to see the Conservation Strategy included in Section 1.3, under Relationship to Other Planning Efforts along with the CVFPP, BWFS, and RFMP. Also, the Conservation Strategy (material pulled directly from the working draft) would be more accurately described as:</p> <p>The Conservation Strategy informs the development of the 2017 update of the Central Valley Flood Protection Plan (CVFPP) (California Department of Water Resources [DWR] 2012a) and associated basin-wide feasibility studies (BWFSs) and regional flood management plans (RFMPs) by providing the systemwide context, information, and tools that are needed to guide the improvement of riverine and floodplain ecosystems. The CVFPP is a long-term planning document that supports prioritization of investments in Central Valley flood risk reduction and ecosystem improvements to meet the objectives of SB5. The CVFPP was first developed by DWR and adopted by the Central Valley Flood Protection Board (CVFPB) in 2012. The Conservation Strategy, builds upon the Conservation Framework, which was included as Appendix 2 of the adopted 2012 CVFPP.</p>	Text added.
197	7/3/2014	DWR FESSRO	1-15	5	To maintain consistency, the CDFW species of concern in the MUSR should be listed here (similar to the USFWS and NOAA section. The California Endangered Species Act should be mentioned here.	Text added.
198	7/3/2014	DWR FESSRO	1-20	20	The Endangered Species Act should be mentioned here.	Text added.
199	7/3/2014	DWR FESSRO	1-20	31	The Endangered Species Act should be mentioned here.	Text added.
200	7/3/2014	DWR FESSRO	2-5	Figure 2-3	Source data on maps. Maybe refer to source info on page 2.7 for the land use source.	Text added.
201	7/3/2014	DWR FESSRO	2-6	Figure 2-4	Source data on maps. Maybe refer to source info on page 2.7 for the land use source.	Text added.
202	7/3/2014	DWR FESSRO	2-7	Figure 2-5	Source data on maps. Maybe refer to source info on page 2.7 for the land use source.	Text added.
203	7/3/2014	DWR FESSRO	2-8	Figure 2-6	Source data on maps. Maybe refer to source info on page 2.7 for the land use source.	Text added.
204	7/3/2014	DWR FESSRO	2-12	20	The section on riparian vegetation and forest would benefit from being expanded to discuss the reduction of riparian habitats statewide and the importance and value of the riparian habitat that remains in the MUSR.	Text revised to the extent information is available.
205	7/3/2014	DWR FESSRO	2-12	3	The section would be enhanced by describing the species that use the MUSR. The MUSR contains critical habitat to multiple special status species that should be described, or at least listed in a table.	Text added.
206	7/3/2014	DWR FESSRO	2-13	1	Table 2-4 title should be Summary of Managed Wildlife Lands for the Region.	Text Revised
207	7/3/2014	DWR FESSRO	2-18	1	Consider rewording the sentence. I believe the designated floodway is defined by flood recurrence, not where the levees are. There are no SPFC levees between Red Bluff and Chico Landing, over 50 river miles, the statement makes is sound like there are levees all the way to Red Bluff.	Designated floodway is regulatory construct, identifying areas subject to CVFPB authority. Text added to clarify
208	7/3/2014	DWR FESSRO	3-15	Figure 3-5	Not sure what is on the Y axis of the figure charts. A lot of good info on figure, maybe could combine the graphs to make more readable.	Figure revised.



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209	7/3/2014	DWR FESSRO	6-3	15	Consider moving some of this material (see comment 8 and 9) to Chapter 2. Again, there is a missed opportunity to list the special status species here.	Text added.
210	7/3/2014	DWR FESSRO	6-6	22	We would like to see the Conservation Strategy included in Section 1.3, under Relationship to Other Planning Efforts along with the CVFPP, BWFS, and RFMP.	Text added.
211	7/3/2014	DWR FESSRO	6-12	36	I am unclear what the two management strategies are. I do not think they are clearly explained.	Text added to clarify.
212	7/3/2014	DWR FESSRO	6-12	7	There are two modifications to Federal projects in the works now, both identified in this plan (Kopta Slough and Riparian Sanctuary) that are under the impression that will not require Congressional approval through the 408 process. They will likely require approval from USACE Division level.	Comment noted.
213	7/3/2014	DWR FESSRO	6-14	20	Additionally, revetment decommissioning might be interim strategy. Getting revetment maintenance responsibilities off the books of maintaining agencies could meet multiple objectives. If removing the revetment is cost prohibitive, deciding to longer maintain it could be a strategy.	Comment noted.
214	7/3/2014	DWR FESSRO	6-15	Figure 6-2	No revetment mapped south of Colusa. I have those data to provide if you would like.	Figure added.
215	7/3/2014	DWR FESSRO	6-16	3	Floodplain lowering would also increase the frequency and timing of floodplain inundation, potentially with depths most suitable to juvenile salmonids rearing.	Text added.
216	7/3/2014	DWR FESSRO	6-19	10	In general, all of these projects were already in process before the MUSR RFMP. It would be great to have some new multi-benefit projects identified, even just conceptually, by the MUSR RFMP.	Comment noted.
217	7/3/2014	DWR FESSRO	6-20	10	Two projects that can be added to the multi-benefit list are the Bullock Bend site, a mitigation bank on the Sacramento River with Westervelt Ecological Services as the project sponsor and 1000-acre ranch, a project partnership between TNC, DWR, and DFW on the Sacramento River, both will that will provide mitigation for SPFC SSIA improvements and are consistent with Conservation Strategy goals and objectives. I see 1000-acre ranch in the "Other" section.	Text added.
218	7/3/2014	DWR FESSRO	6-20	28	More information is needed to explain how the Butte Slough Outfall Gates Replacement Project is multi-benefit.	Text added to clarify.
219	7/3/2014	DWR FESSRO	6-21	28	You may consider M&T a multi-benefit project. I am not sure what all the components are of the project, but I think it may qualify or potentially qualify and multi-benefit.	Text added to clarify.
220	7/3/2014	DWR FESSRO	6-27	24	Advanced Regional Mitigation Banks offer potential ecological benefits too. By mitigating before the impact, it reduces the temporal loss of habitats. By pooling resources they can often provide mitigation that is more ecologically meaningful by site selection, size, or regional association with other habitats and landscapes.	Text added.
221	7/3/2014	DWR FESSRO	11-1	21	We definitely support a strategy that groups projects to develop multi-benefit projects and believe these projects are the most likely to be feasible and receive funding, both from the State and other sources. A suggestion would be to see if the projects (or maybe groups of projects, some on this list are very similar) meet any Conservation Strategy objectives and would be multi-benefit projects. FESSRO staff could assist in this process, however, the project proponents would likely have the most knowledge about the potential of their projects.	Comment noted.

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222		DWR FESSRO	General		<p>As described by the 2012 CVFPP, DWR envisions a flood system in the Central Valley that integrates and improves flood risk management, ecosystem functions, institutional support, and the operation and maintenance of facilities (DWR 2012a). The Conservation Strategy supports this vision in its entirety, but focuses on the envisioned integration and improvement of ecosystem functions. It builds on the Conservation Framework, which was an integral part of the SSIA presented in the 2012 CVFPP, and which provided a broad outline of this strategy.</p> <p>Therefore, the primary purpose of the Conservation Strategy is to inform the integration of ecosystem improvements with flood risk management improvements in the BWFSs, RFMPs, and ultimately in the 2017 update to the CVFPP and in 5-year intervals thereafter. Each update will provide support for subsequent policy, program, and project implementation.</p>	Comment noted.
223	6/17/2014	DWR FMO	4.7	31	There are no solutions presented in this section: 4.3.4. Are some ideas planned to be added or is the solution simply to prepare SWIFs?	Solutions will be developed during SWIF development.
224	6/17/2014	DWR FMO	4-1	3	Recently the term Operations, Maintenance, Repair, Replacement, and Rehabilitation (OMRR&R) is being used more commonly to refer to the obligations of a levee maintainer. I believe the term was introduced in WRDA 86, but recently the USACE is using this term for all new or revised O&M manuals. Since O&M is referred to in many places, I suggest adding a sentence or two to the introduction that explains that O&M may also be referred to as OMRR&R and includes Repair, Replacement, and Rehabilitation work tied to the work described in the second sentence.	Text added to clarify.
225	6/17/2014	DWR FMO	4-2	3	I'm not clear on how insufficient channel maintenance impacts the LMA's PL84-99 eligibility. LMA's are responsible for the levee, regardless of what is changing in the channel (known as natural geomorphic activity. DWR understands that changes within the channel can impact the levee, but that doesn't change levee maintenance responsibility). Suggest removing the impact to PL84-99 statement.	Channel migration can lead to levee erosion, impacting PL84-99 eligibility.
226	6/17/2014	DWR FMO	4-2	11	Are the LMA's comfortable with admitting they sometimes avoid the permitting process?	Text revised.
227	6/17/2014	DWR FMO	4-2	18	Federal inspections, requirements, and enforcements have become increasingly more stringent. In some cases, current requirements go beyond the original design and construction.	Comment noted.
228	6/17/2014	DWR FMO	4-2	19	Add "maintain" to the list	Text added.
229	6/17/2014	DWR FMO	4-3	19	For this section as a whole, refer to the rural LMA topic sheet comments DWR provided as they apply to this section.	Comment noted.
230	6/17/2014	DWR FMO	4-5	20	A typo in the sentence makes it difficult to understand. I believe DFW considers levee waterside top hinge to opposite side top hinge to be jurisdictional.	Text revised to clarify.
231	6/17/2014	DWR FMO	4-5	34	The maintenance activities listed for this bullet item are considered routine. DWR is resisting the idea of having to mitigate for routine maintenance activities. Repair, Replacement, and Rehabilitation work will have likely have a mitigation component. Suggest changing the examples to Repair, Replacement, and Rehabilitation work.	Text revised to clarify.
232	6/17/2014	DWR FMO	4-5	bulleted items	Could also provide training for LMAs on programmatic permitting and utilizing the new maintenance methodologies developed.	Comment noted.

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233	6/17/2014	DWR FMO	4-5		Section 4.3.2 Maybe mention current programmatic permitting such as the Small Erosion Repair Program which is used as a permitting mechanism for what would be the RR&R portion of OMRR&R. Also identify a vehicle for additional resources to study habitat issues slowing the permitting process and preventing maintenance. (GGS, veg, etc.)	Small Erosion Repair Program is discussed in the RFMP.
234	6/17/2014	DWR FMO	4-6	7	Add "maintain" to the list	Text added.
235	6/17/2014	DWR FMO	4-6	bulleted items	An additional solution is to include LMA's in the planning and design of mitigation areas, specifically plant spacing and species selection. Maintenance tends to be limited because mitigation plantings are placed too close together (in order to maximize use of the space and limit expenses to purchasing additional property) and this greatly affects accessibility for maintenance, and increases maintenance costs because standard machinery cannot be used. When species are selected which are toxic or can cause injury to maintenance personnel, the ability to maintain the area is also affected.	Comment noted.
236	6/17/2014	DWR FMO	4-7	24	In this paragraph, I think it is important to note the USACE policy regarding PL84-99 and an accepted LOI and SWIF. For example, if the entire levee segment is considered "unacceptable" due to rodent activity, a SWIF will not be of much help. Or, if an unacceptable item is the cause of damage (such as an illegal encroachment) then the USACE will not factor in the SWIF regarding eligibility to fund the repair. Text from a November 29, 2011 memo is pasted below. Memo can be found here: <a href="http://www.water.ca.gov/floodsafe/leveeveg/levee_documents/2011-1129_Memo_USACE-SWIF.pdf">http://www.water.ca.gov/floodsafe/leveeveg/levee_documents/2011-1129_Memo_USACE-SWIF.pdf</a> :	SWIFs can be used to restore eligibility while the unacceptable item is being addressed.
237	6/17/2014	DWR FMO	4-8	1	Add in "Control of these animals and repair of the damage they create must be pursued...."	Text added.
238	6/17/2014	DWR FMO	4-9	30	I don't see the need for this last sentence. If a pipe has holes corroded through it, regardless of a flap gate or slide gate, there is potential for serious damage within the levee.	Text revised.
239	6/17/2014	DWR FMO	4-9	38	Delete the first word in the sentence "many"	Text revised.
240	6/17/2014	DWR FMO	4-11	27	Who will require this, enforce this, and review the reports for compliance and safety? LMA or CVFPB - authority?	CVFPB and LMAs work-ins together.
241	6/17/2014	DWR FMO	4-11	34	Flood Structures are not listed or discussed in the following section. Maybe a better title for 4.3.8 is "Land Use Impacts". Otherwise include a discussion on structures impacts to weirs, dams, gates, etc... or define what is meant by "structures".	Text added to clarify.
242	6/17/2014	DWR FMO	4-11	10, bulleted items	Additional Type: Encroachments permitted by CVFPB with or without concurrence from USACE, in compliance with the permit, but that present a risk to levee integrity or prevent proper O&M/visibility/flood fight access.	Text added.
243	6/17/2014	DWR FMO	4-11	18	Suggest including an introductory statement to the bullets below it	Text added.
244	6/17/2014	DWR FMO	4-12		Section 4.3.8 Additional issue: Bypasses and channels are farmed and grazed which ultimately is vegetation/channel maintenance performed by entities other than the LMA. If this land is no longer farmed/grazed, this creates an increase in work and costs for LMAs. If LMAs aren't able to perform the increased work load, due to funding, equipment, or labor limitations, then channel capacity is affected.	Comment noted.
245	6/17/2014	DWR FMO	4-14	6	Typo in the word "of" before local.	Text revised.
246	6/17/2014	DWR FMO	General		Examine any unmaintained areas for maintenance needs if any exist.	Comment noted.

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247	6/17/2014	DWR FMO	General		Possibly discuss, on a regional level, any mechanisms to perform future geotechnical analysis of levees, hydraulic and hydrologic studies, sediment removal, and how to address legacy issues.	Comment noted.
248	6/17/2014	DWR Northern District	2-18	2	Add description to the current single sentence describing Deer and Elder Creek. Elder Creek SPFC levee and SR back levee provide protection to Gerber. Elder creek is dominated by Arundo - O&M Section. Deer Creek levee broke in 1997 - this along with the fishery prompted the Lower Deer Creek evaluation. System is severely deficient in capacity.	Text added.
249	6/17/2014	DWR Northern District	2-28	39	Big Chico Creek as four culverts. The culverts control the outflow to BCC, which is 1500 cfs at the design flow. If the water surface elevation in the Sycamore Pool is higher, the outflow will increase.	Text added.
250	6/17/2014	DWR Northern District	2-28	9	Outfalls in the Upper/Mid Sac - Butte Slough Outfall Gates and Colusa Basin Drain Outfall. Both don't pass water when the river elevation is higher than the slough/drain side. Need to correct or add discussion.  Flow from the Sacramento River cannot enter Butte Slough through the Butte Slough Outfall Gates. This structure allows flow in one direction only - to the Sacramento River. This condition is the same for the Colusa Basin Drain Outfall. Add CBDO to Section 2.8.1.	Text revised.
251	6/17/2014	DWR Northern District	3-3	Table 3-1	Deer Creek capacity ranges from 7000 to 21000 as per DWR NRO Channel Evaluation. Limit facilities covered to those in MUSR. The table includes Yolo Bypass and creates some confusion.	Text revised.
252	6/17/2014	DWR Northern District	6-20	15	The Lower Deer Creek project needs additional description as to why it is multi-objective and the feature/processes being enhanced. If the description is elsewhere, provide re-direction.	Text added.
253	6/17/2014	DWR Northern District	6-20	28	How does the Butte Slough Outfall Gates Replacement Project become a multi-objective project? The description needs additional details.	Text added.
254	6/17/2014	DWR Northern District	8-4	1	Should highlight Little Chico Diversion levees, structure, and channel clearing. These levees need to provide 100- year protection and would need to provide 200-year at some point? Is this correct? Should the Little Chico Creek flood control project provide 200-year event though it is a channel through the City of Chico? What are Chico's flood opportunities for the future?	Text added.
255	6/17/2014	DWR Northern District	8-4	5	Little Chico Creek below diversion was a channel clearing project with a USACE design capacity of 3000 cfs. What projects are needed to maintain or enhance flood management?	Text added.
256	6/17/2014	DWR Northern District	8-8	6	With regard to FEMA accreditation, are there levees still needing accreditation? If funding was available, would other levees be accredited and how much would it cost include levee repairs, etc.? Accreditation was not mention for Little Chico Creek Diversion? Is this an issue?	Text added.
257	6/17/2014	DWR Northern District	8-12	18	Clarification. DWR-NRO / Flood Maintenance Office channel evaluation does not analyze the 100- and 200-year recurrence. The USACE design capacity is between a 100- and 200-year recurrence. DWR will maintain the channel in such a way to pass the design capacity at or below the 1957 Profile or with 3 feet of freeboard as shown by hydraulic analysis.	Text added to clarify.

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258	6/17/2014	DWR Northern District	8-12	28	<p>The diversion weir is also referred to as the Sill, which differentiates it from the Sycamore Weir. The notch in the weir is for flashboards. We believe the Sill still exists; however, we are also trying to confirm the status. The Sill was built in 1965? The Chico and Mud Creeks and Sandy Gulch was built in 1963. Gravel deposits are a serious threat to both Big Chico Creek and Sycamore Pool. First, the deposit of material raises the water surface elevation in the pool adjacent to the structure. The increase elevation will change the flow spilt between Big Chico, Lindo, and Sycamore weir, which means more flow will go through the Big Chico Gates based on the USACE rating curve. This becomes a downstream problem. Second, the increased WSEL encroaches on the levee freeboard in the pool. Several observers have stated that the WSEL encroach the freeboard during the 1997 event. Furthermore, vegetation becoming entangle on the structure also affects the distribution and levee freeboard. The Diversion Pool is like a sediment catchment basin and needs to be maintained regularly. During the 2012 high water event, a levee ramp near the Big Chico Creek gates eroded. Also, because the sediment has not been clear, a significant amount of vegetation has grown and needs to be maintained. Some vegetation across from the Big Chico Creek gates is pushing flow against the west bank levee near the Big Chico Creek gates.</p>	Text added to clarify.
259	6/17/2014	DWR Northern District	8-13	6	<p>Lindo Channel is a natural feature. For the most part, no improvements were made downstream of the Lindo Channel gates. The design capacity is 6000 cfs within the banks of the channel. USACE originally proposed levees on the downstream end of the project where farm levees existed but were never built. The farm levees are still there and some channel areas may rely on those farm levees for capacity. Issues material being piled in the activity flow are above the bank are a problem. Maintaining vegetation through the project is difficult because the channel becomes incised. Some historical sediment removal has occurred and will need to occur again. The channel is in the backyard of many residences.</p> <p>Does this channel need to provide 200-year level of protection? What alternatives existing? What about urban drainage from the City of Chico impacting high flow events?</p> <p>Need to expand upon the problem statement and 100-year/200-year level of protection.</p>	Text added to clarify.

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260	6/17/2014	DWR Northern District	8-13	8	<p>Sycamore and Mud Creeks have multiple issues. Vegetation management is one. The City of Chico urban drainage during the summer causes excessive vegetation growth in Dry Creek and Sycamore Creek in certain locations. This becomes an annual maintenance issue. The vegetation contributes to sediment deposition through this reach because the slope flattens somewhat and vegetation restricts flow. Vegetation below the end of the right bank on Mud Creek is dense and causes a backwater effect. This area is difficult to analysis because of backwater effects from the Sacramento River.</p> <p>Sediment is another issue. DWR has removed sediment near Meridian Road and in Sycamore Creek near Cohasset Road Bridge. Sycamore Branch continues to erode during high water events as water is conveyed from the Sycamore diversion to Sycamore Creek.</p> <p>A combination of sediment and vegetation management is needed at various locations through the project to maintain the existing design capacity, not the 100- and 200-year events.</p>	Text added to clarify.
261	6/17/2014	DWR Northern District	8-13	8	<p>Sycamore and Mud Creeks have multiple issues. Vegetation management is one. The City of Chico urban drainage during the summer causes excessive vegetation growth in Dry Creek and Sycamore Creek in certain locations. This becomes an annual maintenance issue. The vegetation contributes to sediment deposition through this reach because the slope flattens somewhat and vegetation restricts flow. Vegetation below the end of the right bank on Mud Creek is dense and causes a backwater effect. This area is difficult to analysis because of backwater effects from the Sacramento River.</p> <p>Sediment is another issue. DWR has removed sediment near Meridian Road and in Sycamore Creek near Cohasset Road Bridge. Sycamore Branch continues to erode during high water events as water is conveyed from the Sycamore diversion to Sycamore Creek.</p> <p>A combination of sediment and vegetation management is needed at various locations through the project to maintain the existing design capacity, not the 100- and 200-year events.</p>	Text added to clarify.
262	6/17/2014	DWR Northern District	8-13	25	<p>Sycamore Branch has eroded into the historic mud flow layer and may continue to erode. This area had a peak flow of 300 cfs, now it is 8,800 cfs design capacity with the project. Any future alternatives to re-route flows to address the 200-year level of protection criteria may need to consider the stability of this channel form and need for some stabilization.</p>	Text added to clarify.
263	6/17/2014	DWR Northern District	8-13	3	<p>The topic heading is Capacity deficiencies. This should be included in the discussion for each stream or included as 8.5.6 as a summary for all streams in the section.</p>	Text added to clarify.
264	6/17/2014	DWR Northern District	8-14	8	<p>Need more input from locals on Sheep Hollow Off-Stream Storage Area. The proposal should evaluate interior drainage areas/basins that may be in this area.</p>	Comment noted.

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265	6/17/2014	DWR Northern District	8-14	10	Dry Creek is problematic due to vegetation. The prevalence of water year-round induces significant vegetative grow. Recent vegetation maintenance is already diminished in a season. This area is also problematic due to additional drainage from pave surface. How is storm water management being addressed?	Comment noted.
266	6/17/2014	DWR Northern District	8-14	12	Other potential issues:  Need gaging to understand capacity of project. Need early warning system on flood levels. Debris removal on structures.	Comment noted.
267	6/17/2014	DWR Northern District	9-4	3	There is a Unit 3 for Deer Creek, which consists mainly of bank paving. Is this a Tehama County responsibility?	The USACE Periodic Inspection notes that Deer Creek Unit No. 3 is the County's responsibility. However, this section is locked and the property owner does not allow access. The County brought this up at the PI report before the CVFPB in September. The County has not expended any staff or material resources on this section in years.
268	6/17/2014	DWR Northern District	9-4	3	Any thoughts on SRFCP Chico Landing to Red Bluff Project - Bank Protection? There are a series of bank protection project for Butte, Glenn and Tehama Counties (O&M SAC512). O&M issues. Are they not being maintained?	Text added to clarify.
269	6/17/2014	DWR Northern District	9-4	3	USACE cleared several channels in Tehama County (Salt Creek - O&M SAC513, McClure Creek - O&M SAC511). These are channel clearing only projects, but they do have an O&M Manual. Does the county maintain?	The County does not regularly maintain these creeks other than around bridge structures. According to a letter in the appendix of each O&M Manual, O&M responsibilities were accepted by the State Reclamation Board.
270	6/17/2014	DWR Northern District	2-29	9	Sycamore Diversion and LC Gates are located on the same alignment, not upstream.	Text revised.
271	6/17/2014	DWR Northern District	General	Table 11-1	A lot of projects. Grouping the projects by Name/Type is good, but there are a lot of levee repair projects. May want column heading to say Agency or LMA. To identify project area, may want to include unit number as a column heading. An LMA table with name and initials would be helpful. Do you plan to put these projects on a map?	Table revised.
272	6/30/2014	Family Water Alliance, Inc. (FWA)	General		Cottonwood Creek project description detail should be added.	Project description detail added.
273	4/28/2014	NOAA NMFS	6-31	2-3	(18) Page 6-31: Is this statement: "these plans are limited in their ability to cover flood-and habitat-project related activities" relative to Habitat Conservation Plans accurate?	Yes. Text will be added to clarify.
274	4/28/2014	NOAA NMFS	3-50		(2) Section 3.3.2 Habitat Mitigation Requirements: These include both on-site measures and off-site mitigation, or at least perhaps mention that there are on-site measures, too.	Tet added indicating that on-site mitigation also occurs.
275	4/28/2014	NOAA NMFS	3-50		(3) Page 3-50: Should mention that U.S. Army Corps of Engineers (USACE) standards regarding removal of vegetation is in conflict with objectives of providing habitat for listed anadromous fishes and other species, particularly when the levee is the stream bank.	Revise text to discuss new USACE interim guidelines for PL 84-99.

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276	4/28/2014	NOAA NMFS	3-50		(4) Section 3.3.3: USACE section should be updated to state that PL 84-99 eligibility may not be impacted by vegetation based insufficiencies. There should also be a discussion on the process of obtaining a levee vegetation variance that allows levees to remain eligible for PL 84-99 insurance. These comments also relate to Section 3.3.5. Regional variance is briefly mentioned in 3.3.5, but should have a more thorough discussion. It is also important to note that the use of a SWIF, or variance, or adhering to vegetation standards as dictated by USACE or DWR may not be suitable for environmental compliance with NMFS.	Text revised to discuss new USACE interim guidelines for PL 84-99. Also text added to note NMFS concerns with USACE vegetation policy compliance.
277	4/28/2014	NOAA NMFS	2-12	18-19	(l) Section 2.5: Convention is that giant garter snake is lowercase. For Swainson's hawk, 'hawk' is lowercase.	Text revised.
278	4/28/2014	NOAA NMFS	2-17	20	(2) Section 2.7 line 20: When in a series, the word "creeks" should be lowercase.	Text revised.
279	4/28/2014	NOAA NMFS	2-23	Table 2-5	(6) Pg2-23 (Table 2-5) some verbiage apparently missing from Dec 1979 Description.	Text revised.
280	4/28/2014	NOAA NMFS	3-1		(l) Section 3.1.1: It is important to note that the channelization of the waterways by the levees and associated agriculture infrastructure has reduced the ability of the system to handle flows. This should be discussed in section 3.1.1.	Comment noted. Development of the flood control system has reduced risk and damages associated with flood events.
281	4/28/2014	NOAA NMFS	4-5		(5) Section 4.3.2: The CVFPP process should help alleviate the permitting difficulties. NMFS recommends being involved early in the process when our species have the potential to be impacted. Working the engineering around the natural resource requirement should be the order of operations, not working out the engineering first and then determining what needs to be done to mitigate or offset impacts to listed species and habitat. This will save time and money.	Comment noted.
282	4/28/2014	NOAA NMFS	4-6		(3) Section 4.3.3: Other avenues to pursue should include the use of setback levees. This can reduce the overall length of maintenance. Also, setback levees can reduce O&M as they will not require vegetation maintenance and they could be denuded of vegetation. This could also help reduce issues with rodent holes and other encroachment issues.	Comment noted. Levee realignment is discussed in the RFMP.
283	4/28/2014	NOAA NMFS	4-12		(6) Section 4.3.9: The 2012 CVFPP levee vegetation strategy does not protect and enhance sensitive habitats. The 2012 levee vegetation strategy will lead the eventual elimination of vegetation. The strategy does not allow for adequate recruitment that will replace mature trees as they die. This vegetation strategy is not approved by NMFS and cannot be used as a method for ensuring adequate protection to designated critical habitat. Referring to line 28, this approach will not protect waterside vegetation. Additionally, removal of dead and dying trees impacts recruitment of large woody material into the waterway. It is important to note that the Resource Agencies are not signatories to the CVFPP.	Comment noted.
284	4/28/2014	NOAA NMFS	5-1	37	(4) Page 5-1, line 37, typo",,"	Text revised.
285	4/28/2014	NOAA NMFS	5-6		(7) Pg. 5-6 (sec 5.6.3) Editorial only, but why is levee rehabilitation included in a chapter on emergency response? Perhaps the chapter should be entitled something like "emergency response and rehabilitation".	Recovery after a flood is an integral component of developing a complete emergency response program.
286	4/28/2014	NOAA NMFS	5-8		(12) Page 5-8 (section 5.4.2): Another indicator of flood flight readiness would be review of past performance during flood events.	Comment noted. Review of past performance is included in written levee flood flight plans.



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287	4/28/2014	NOAA NMFS	5-11		(13) Page 5-11 (section 5.4.4): Similar to the above comment, an indicator of Public Safety Readiness would be past performance.	Comment noted. Review of past performance is included in written levee flood flight plans.
288	4/28/2014	NOAA NMFS	6-1		(19) Referring to the placement of the entire 6.2.1 section under section heading 6.2 (The value and importance of the natural environment), section 6.2.1 describes conflicts between restoration and mitigation activities and flood control objectives, and seems out of place.	Text revised.
289	4/28/2014	NOAA NMFS	6-2	16-17	(8) Page 6-2, line 16 and 17. Not all projects can be fully mitigated off-site. This should be discussed.	Text will be added.
290	4/28/2014	NOAA NMFS	6-4	1	(8) Page 6-4, line 1: There is a hanging "source".	Text revised.
291	4/28/2014	NOAA NMFS	6-5	10	(10) Page 6-5, line 10. An impact to infrastructure should not be a deterrent to a setback levee. In certain instances this may provide an opportunity to consolidate or modernize infrastructure. For example, a setback may allow for consolidation and modernization of agricultural diversions.	Text revised.
292	4/28/2014	NOAA NMFS	6-5	2-3	(9) Page 6-4 (section 6.2.4) last paragraph: End of this sentence is very awkward: "that are known to undertake conservation planning in the Regions"	Text revised.
293	4/28/2014	NOAA NMFS	6-5		(7) Page 6-5 first paragraph: Add the NMFS' Draft Recovery Plan for the Evolutionarily Significant Units of Sacramento River Winter-run Chinook Salmon and Central Valley Spring-Run Chinook Salmon and the Distinct Population Segment of California Central Valley Steelhead to the list.	Text added.
294	4/28/2014	NOAA NMFS	6-6	4	(II) Page 6-6, line 4. Fish passage at the weirs should also be addressed. Section 6.4.3: Fish passage and stranding and Tisdale and Fremont weirs should be addressed. Stranding in the bypasses should also be addressed.	Study of the bypass and weir system is beyond the scope of the RFMP. DWR will evaluate as part of their Basin Wide Feasibility Study.
295	4/28/2014	NOAA NMFS	6-7		(9) Section 6.2.6: "The Existing Natural Community Conservation Plans/Habitat Conservation 31 Plans (HCPs/NCCPs), RAMP and other Plans" seems out of place under the "The Value and Importance of the Natural Environment". The discussion is about an administrative and regulatory tool. Given this discussion, and the previous section about mitigation and restoration, perhaps the section introduction and description should be broadened, or another section added that deals with the administrative and regulatory information.	Opinion of the commenter noted. This discussion was included here because of its connection to protecting and enhancing the natural environment.
296	4/28/2014	NOAA NMFS	6-9		(12) Page 6.9 (section 6.3): The socio-economic condition challenge refers to "the local cultural heritage of farming and the strong sense of identity with the land and the agricultural lifestyle," but when these are discussed later (page 6-13) the issues are primarily environmental regulation and costs and time associated with them. Perhaps a third challenge "increased permitting and environmental regulation" should be included. The other issue discussed on page 6-13 is the difference of opinion on the value of flood control vs. habitat restoration, the pro-flood control position may stem from farming interests, but it is a reach to categorize the challenge as the strong sense of identify with the agricultural lifestyle.	While this is an administrative challenge, it is also associated with physical challenge (that levees must be maintained)

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297	4/28/2014	NOAA NMFS	6-11	2-7	(13) Page 6-11 lines 2-7: Note the following statement: "The flood control levees and revetment are also within state or federal jurisdiction (Project Levees and Sacramento Bank Protection Project [Sac Bank], respectively) and the majority of the lands within the Regions are protected by State Plan of Flood Control levees. This may restrict the possibility for channel migration because agencies are mandated to maintain these structures, and removal or modification of a federal project requires approvals at a Congressional level." This statement is located under the "physical limitations" section. Perhaps administrative challenges need to be added to the list of challenges.	Text will be added regarding administrative challenges.
298	4/28/2014	NOAA NMFS	6-12	36	(14) Page 6-12, line 36. Not sure if the natural system could not manage the flows or if it was more a matter of the natural system could not manage flows once humans altered the landscape and 'settled' in the floodplains.	Text added to clarify.
299	4/28/2014	NOAA NMFS	6-13	17	(5) Page 6-13, line 17. Uncertain how air and water pollution standards will change. They may be monitored more closely, but not sure how they will change.	Text revised.
300	4/28/2014	NOAA NMFS	6-16	35-39	(5) Page 6-16, lines 35-39: The impact of unscreened diversions and value of screening them is not described. In section 6.43 (Restoration Opportunities) there is no mention of opportunities for fish screens. Some language that may apply is under the "Fish Passage Improvement" section, but screening should be discussed more clearly.	Comment noted. Evaluation of water diversions is beyond the scope of the RFMP
301	4/28/2014	NOAA NMFS	6-18	16-18	(10) Page 6-18. Lines 16-18: "However, generally, multi-benefit projects are those that reduce flood risk along with one or more other benefits such as improving water supply reliability;" this sentence needs addition of "and provide".	Text revised.
302	4/28/2014	NOAA NMFS	6-19	11	(15) Page 6-19 (section 6.4.2) line 11: "There are several existing opportunities for multi-benefit flood control projects". "Opportunities" should be replaced with "plans" in this sentence, as there are doubtless many additional existing opportunities for such projects.	Text revised
303	4/28/2014	NOAA NMFS	6-21		(16) Page 6-21 (section 6.43): It would be informative to highlight which (if any) of the strategies and programs listed in section 6.44 would be applicable to the California Trout inundated rice field program.	Comment noted.
304	4/28/2014	NOAA NMFS	6-22	3-5	(II) Page 6-22 (section 6-4) first paragraph: "The following sections provide an overview of potential strategies to preserve agriculture production while enhancing habitat and to reduce conflicts with flood and conservation management." This should probably read "conflicts between flood and conservation management.	Text revised.
305	4/28/2014	NOAA NMFS	6-27	26-27	(17) Page 6-27 (lines 26-27): The description: "A mitigation bank is a specific aquatic habitat" needs revision.. The bank is an administrative construct, not a habitat.	Physical Implementation of mitigation banks result in habitat creation. Text added to clarify.
306	4/28/2014	NOAA NMFS	10-1	32	(20) Page 10-1 (section I 0.2.1). The first sentence reads as if Sites Reservoir already exists.	Text added to clarify.
307	4/28/2014	NOAA NMFS	10-18	33	(21) Page I 0-18, line 33: Removal of vegetation from the bypass may require compensation and permits. The MUSR RMFP should propose how this removal will be compensated.	Impact analysis has not be undertaken, therefore potential mitigation requirements are unknown at this time. Impact analysis would be included as part of the proposed Comprehensive Bypass Management Plan .

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308	4/28/2014	NOAA NMFS	1.3.3		Also, in section 1.3.3: to be consistent with the CVFPP, projects will need to have an environmental enhancement component, individually or at a regional scale. It should also be noted that while the draft does a decent job of discussing the concept of multi-objective projects, without the ability to increase river function via setback levees and alterations to the bypasses that promote listed fish species recovery, any permitting mechanism set up via this process will be difficult to move forward.	Comment noted.
309	4/28/2014	NOAA NMFS	6-3 and 6-4		(2) Section 6.2.2 includes discussion and quantification (Table 6.1) of some habitat types within the regions. It would be beneficial if habitat could be described using metrics important to fish (and other species). For example: acres of floodplain, miles of natural bank, miles of bank with adequate shaded riverine aquatic habitat, acres of potential river meander, and miles of revetment. In addition, it would be worthwhile to include estimates of these attributes in terms of historic condition. This approach would serve several purposes: a. It provides context of the current condition, valuable in describing the relative need for restoration of habitat elements here versus other regions in the Sacramento-San Joaquin watershed system. b. These attributes will likely be used to evaluate alternatives and track conditions (effectiveness of the Conservation Strategy) over time. c. Use of these attributes would assist in the evaluation of alternatives (of flood control, multi-benefit and restoration activities) and just as importantly, provide context for contributions of the planning area to support of the species system- wide. Note that some of this information is displayed in figure 6.2.	The Regions expect that this information will be included in the draft Conservation Strategy currently being developed by DWR. Once the Regions have an opportunity to review the draft Conservation Strategy, this information will be included either by reference or direct quotation.
310	4/28/2014	NOAA NMFS	General		(4) Page 2-24, lines 8-9: The description makes it sounds like the overflowing of river banks is unusual, rather than a natural process. "The Sacramento River and its tributaries experience short-lived but periodic peak flows that can strain or overwhelm their natural flow channels." Similar thought here 2.8.1 (page 2-27. lines 7-8) relative to main channel, which is probably not accurate: "These structural elements work together to contain high flows within the main river channel, and when necessary, divert water out of the main river channel." What they are really talking about is the channel and floodplain. Page 2-29, lines 38-39 "Restoration of flood plains where feasible, to provide additional flood channel storage and conveyance capacity, is often regarded as a non-structural element because it reduces, rather than increases, the confinement of floodwaters in existing channels."	Comment noted.

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311	4/28/2014	NOAA NMFS	General		A related comment, to natural processes comes from the discussion on page 6.1 (section 6.2.1). This section deals with habitat mitigation and restoration, and the description of reads as if the environmental laws are the difficulty. It would probably be more accurate to state that the "single purpose" developments largely ignored the impact of developments on natural processes and habitats, and that the result is greatly diminished amount and quality of habitat of species that evolved with natural river processes. This thought is articulated later (page 6-9, section 6.3.1 lines 31-33): "In either event, the channel migration process of alluvial rivers on their floodplains is an important component in creating and maintaining the habitat components that native species evolved with and require for continued survival." And also from page 6-21 (section 6.43 lines 14-16): "These "surrogate wetlands" mimic the floodplain rearing habitat formerly used by young salmon, which has been largely eliminated by the development of the Central Valley. A consistent message throughout the document is lacking.	Comment noted. Text added to Section 6.2.1 that recognizes that the original system improvements did not address impacts to natural processes and habitats.
312	4/28/2014	NOAA NMFS	General		(3) Section 2.5 provides no description or overview of the fisheries species for which restoration actions are needed (or planned). In fact, the word "fish" is not used. There is also no discussion of current or historic distribution and abundance of either the species or important habitat elements (floodplains, etc.). Note that section 6.2.2 is entitled "Existing Habitats and Threatened and Endangered Species", but it does not list or describe threatened, endangered, and special status species. Somewhere, a description of these species should be included. It would be helpful if some background information about condition (current fish numbers vs. historic) were provided, again, to provide context. Page 6-6 (section 6.2.5) line 28, California Central Valley steelhead should be included in this list. It is not clear why listed species and Recovery Plans are listed in this section. It would seem better located in section 6.2.2, but species are currently not listed or described in that section either.	Text added.
313	7/8/2014	RD 108	2-30	30	"eligible for (federal) assistance..."	Text revised.
314	7/8/2014	RD 108	2-30	40	"If any part of a (levee system) receives an..."	Text revised.
315	7/8/2014	RD 108	3-44	9	"vital role ('in' or 'to') the interconnectivity of the Regions."	Text revised.
316	7/8/2014	RD 108	3-48	3	"risks discussed, flood system..." take out "above"	Text revised.
317	7/8/2014	RD 108	3-52	35	"Flood Control Project, (most) do not meet..." take out "they" and add "most"	Text revised.
318	7/8/2014	RD 108	3-53	10-16	Take out all text. Now complete appendix?	Text revised.
319	7/8/2014	RD 108	3-55	25-26	Take out last sentence	Text revised.
320	7/8/2014	RD 108	3-56	1-5	We bullet 4 areas but only have 3 mapped?	Text revised.
321	7/8/2014	RD 108	3-60	33-40	Needs to be updated to reflect Corps temp position	Text revised.
322	7/8/2014	RD 108	3-62	26-37	update section?	Text revised.
323	7/8/2014	RD 108	3-62	9	"flood wave, channel roughness, shape, and capacity."	Text revised.
324	7/8/2014	RD 108	3-63	19	remove "remaining"	Text revised.
325	7/8/2014	RD 108	1-6	5-11	Provide list to IRWM	List was provided
326	7/8/2014	RD 108	1-7	6	Focus Area Workgroups were... (add the 's' on the end of workgroup)	Text revised.
327	7/8/2014	RD 108	1-9	10-13	"two smaller Administration Committees..." Really one committee?	Text revised.
328	7/8/2014	RD 108	1-10	9	Add a period to the end of the last sentence.	Text revised.
329	7/8/2014	RD 108	2-4	Table 2-1	Table 2-1 Who are these 729 for Yolo County?	Text revised.
330	7/8/2014	RD 108	2-9	Table 2-3	Table 2-3 Check the numbers for Colusa.	Text revised.

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331	7/8/2014	RD 108	2-10	Figure 2-6	Figure 2-6 "Gross (Annual) Value of Agricultural Production..." Add the word Annual	Text revised.
332	7/8/2014	RD 108	2-12	24-27	Sacramento River; seems like we should discuss Butte Sink?	Text added.
333	7/8/2014	RD 108	2-12	3	"As note(d) previously,..." change "note" to "noted"	Text revised.
334	7/8/2014	RD 108	2-17	27	"has been shown to be (more than) ten times..."	Text revised.
335	7/8/2014	RD 108	2-21	Table 2-5	Table 2-5 In second row, include 1906, 09, 15 Dolan Break	Text added.
336	7/8/2014	RD 108	2-28	28,33	Fremont Weir and Yolo Bypass are outside of MUSR region	Text revised.
337	7/8/2014	RD 108	3-1	10	"levee overtopping (or foundational failures)."	Text revised.
338	7/8/2014	RD 108	3-1	32	"including channel (clearing), to..."	Text revised.
339	7/8/2014	RD 108	3-6	Table 3-1	in the table, says "meridian Road" is that highway 20?	Text revised.
340	7/8/2014	RD 108	4-1	5-6	Is "through seepage and under-seepage" O&M?	Text revised.
341	7/8/2014	RD 108	4-3	33	The "1" after projects needs to be subscripted.	Text revised.
342	7/8/2014	RD 108	4-4	37-39	Our regions are CVP dominated and CVP rates are federally legislated. Maybe we don't include this sentence?	Text revised.
343	7/8/2014	RD 108	4-5	20	remove "and" at the end of the line	Text revised.
344	7/8/2014	RD 108	4-13		We have no recommendation for veg management, should we?	Text added
345	7/8/2014	RD 108	4-14	9	Add a period to the end of the sentence.	Text revised.
346	7/8/2014	RD 108	5-1	37	Remove the comma after "...department)"	
347	7/8/2014	RD 108	5-3	18	"concomitant" partner?	Text revised.
348	7/8/2014	RD 108	5-4		Col County SRWSLD	Text revised.
349	7/8/2014	RD 108	5-5	11	"Maintenance Area 1 (MA12) and (SRWSCD)..."	Text revised.
350	7/8/2014	RD 108	5-6	7	"operable at that time." remove "the"	Text revised.
351	7/8/2014	RD 108	6-9	36	Remove extra punctuation	Text revised.
352	7/8/2014	RD 108	6-18	24	Remove or fix "...Plant/Fish..."	Text revised.
353	7/8/2014	RD 108	6-21	17	"These (trials) documented..." remove experiments	Text revised.
354	7/8/2014	RD 108	6-21	26	"in the (Yolo Bypass and) Colusa..."	Text revised.
355	7/8/2014	RD 108	6-22	12-13	This sentence doesn't agree with the numbering 4 vs 3.	Text revised.
356	7/8/2014	RD 108	6-23	10-11	"historic overflow basins throughout the Regions..." is this runoff control or trans storage?	Text revised.
357	7/8/2014	RD 108	6-23	27-28	Defend this statement "Reduces long-term O&M costs." Also, reverse impacts too.	Text added to clarify.
358	7/8/2014	RD 108	6-25	38	Is this correct? "or is converted to agricultural or other uses." Plus good but lacks teeth and dollars.	Text added to clarify.
359	7/8/2014	RD 108	6-26	34-35	This needs substantial dialog not provided in flood planning by state.	Comment noted.
360	7/8/2014	RD 108	7-8	3	Remove "occasional"	Text revised.
361	6/25/2014	Reclamation District 1500	1-3	23	1.3.1 Line 23: Broaden the vision statement, it's too broad; say strategy. Need something more defined than "vision" and "roadmap"	Text revised.
362	6/25/2014	Reclamation District 1500	2-1	16-17	2.1 Line 16/17: delete "The Upper Sacramento River in this case..."	Text revised.
363	6/25/2014	Reclamation District 1500	2-24		Pg. 54 Page 2-24; Need RD 1660 Event in 1997	Text revised.
364	6/25/2014	Reclamation District 1500	2-28	20	pg. 58, page 2-28, line 20; change "east-west" to "west-east" more than 4 miles along; more like 5	4 miles is correct.
365	6/25/2014	Reclamation District 1500	5-4	Table 5-1	table 5-1; RD 1500; 68,000 Acres not 64,000	Text revised.
366	6/25/2014	Reclamation District 1500	10-16	18	10.4, line 18, Robbins spell check	Text revised.

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367	6/25/2014	Reclamation District 1500	10-17	3	Line 3, (10-17); Now includes west side under BWFS "General search and destroy"	Text revised.
368	6/25/2014	Reclamation District 1500	General		Table Projects; AB156 reports-RD 1500 wants USACE PIR; all inclusive of projects PIR Red Line items added.	Table updated.
369	6/25/2014	Reclamation District 1500	General		Levee breach's not a function of design. It is a function of O&M and lack of improvement capacity increases not an issue if you maintain the system. Look back through chapter 4 for stronger language. Get Letter from CVFCA to CVFPB on PIR's	Text revised.
370	7/10/2014	River Partners	3-49		<p>Section 3.3 Flood Management Challenges 3.3.10 Land Use Changes. "To ensure LMAs have an opportunity to review and comment on land-use activities which could impact their systems, improved communication and interaction between LMAs and land-use authorities is needed. Creation of "Flood Structure Protection Areas" directly adjacent to levees and other flood control structures would provide LMAs an opportunity for input on land-use decisions occurring in the vicinity of their facilities. These areas would be identified in county and city floodplain management ordinances and/or general plans as zones in which input is required from LMAs before land-use decisions are finalized".</p> <p>One avenue that is available to LMAs is the opportunity to review and comment on projects through the encroachment permit application process. Structures being built (domestic, agricultural or flood control in nature) or habitat restoration projects in the designated floodway would require going through this application process, where LMAs can weigh in. However, if you are a private landowner and want to change your crops (annual to perennial), then there is no encroachment permit requirement and there would be no review of these activities by LMAs. Also, would it be costly to communities to amend general plans to add these "Protection Areas"?</p>	<p>CVFPB Encroachment permit process does not apply to land uses changes on the land side, more than 10 feet from levee toe.</p> <p>This information would be added as General Plans are amended during normal course of local agency land use planning.</p>
371	7/10/2014	River Partners	2-13	Table 2-4	Page 2-13, Table 2-4: Please cite source for this data. Was it derived from the Upper-Mid Sac Atlas? How were the private lands defined as environmental managed lands (i.e.. duck clubs, private land with existing native vegetation)? How were these acreages calculated?	Text revised
372	7/10/2014	River Partners	2-14	14	Page 2-14, line 14: change from Howard Creek Unit to Howard Slough Unit	Text revised
373	7/10/2014	River Partners	2-17		Section 2.7 Flood Context and History of Flooding General comment: cite references, section comes off less factual and more opinion. Butte Basin Overflow Area: What about Goose Lake? The Plan of Flood Control (double check descriptive document) includes 3 flood relief structures not just the 2 provided in the text. Description of how flooding occurs should be cited. Isn't the Sac Bank Project designed to inundate portions of the Butte Basin? It was planned to ensure sufficient overbank flow into Butte Basin occurs so that that the flow between the downstream project levees does not exceed 150,000cfs.	Text added to clarify.

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374	7/10/2014	River Partners	2-27		Section 2.8.1 Structural Elements Butte Basin: has 3 areas where water flows into the Butte Basin Overflow Area. Need to include Goose Lake.	Text added.
375	7/10/2014	River Partners	3-1		Chapter 3. Assessment of Flood Hazards in the Region: Deficiencies, Risks and Challenges Channel capacity: Good overview of different factors that can affect channel capacity than just assuming vegetation is the culprit. How often does DWR Flood Maintenance assess channel conveyance with project specific modeling? How is that shared with LMAs? What is the recommendation for the reoccurrence interval for modeling?	DWR has recently initiated a program to access this issue. To date data has not been shared with LMAs.
376	7/10/2014	River Partners	4-2		Chapter 4. Operations and Maintenance Channel, Bank, and Bypass Maintenance (Page 4-2): To make it even more compelling, can you share the statistic of how many of the LMAs are ineligible for PL84-99?  It is important to give a full picture of what's going on. I think the planning team should disclose that LMAs have reached out to state and federal agencies for help in maintenance. Otherwise, it presents a skewed vision of what is occurring in some areas. It's important to present that state or federal agencies are on both sides of the LMAs arguments. USFWS SRNWR and Sutter NWR have spent money to maintain their properties and to help with adjoining LMAs. However, that's not highlighted at all in this document.	Text added
377	7/10/2014	River Partners	4-3		Section 4.3.1 Channel Bank and Bypass Maintenance Page 4-3, 1st paragraph: In the O&M Working group, insufficient funding was the #1 reason why maintenance is not performed regularly. Regulatory burdens are a big problem, but the real issue is that there is not enough money for DWR Flood Maintenance or local LMAs to complete everything that needs to be done. That is the CORE issue. And if being honest, then should describe agencies inability to communicate in a timely matter to allow the work to be completed within the work window. Good potential solutions.	Comment noted.
378	7/10/2014	River Partners	4-5	30	Section 4.3.2 Permitting and Maintenance Activities Page 4-5, 1st bullet, line 30: Which activities currently generate the most mitigation requirements? It would be good to identify these and go from there.	Example added.

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379	7/10/2014	River Partners	4-6		<p>Section 4.3.3 Maintenance of Mitigation and Habitat Enhancement Projects Page 4-6, 1st paragraph: This paragraph highlights the region's inability to understand the spirit of the regional planning effort. The tone of this description does not address what DWR is asking of regions, which is the need for multi-objective projects. This will need to include habitat enhancement. LMAs and the agricultural wants to depict the negatives, but there has been examples of 'habitat implementers' to properly plan, maintain and manage mitigation and habitat enhancement projects. It is not a balanced nor does it properly characterize these projects. If the region continues on this path, then this region will not receive FUNDING, and it will go to the regions that are willing to embrace the mandate of multi-objective projects.</p> <p>It also highlights the need for education on how these mitigation and habitat restoration projects are design and implemented.</p>	<p>Stakeholders within the Regions have spent considerable effort to try to develop multi-benefit projects. But for these projects to be successful, the issues outlined must be addressed.</p> <p>DWR requested that the Regions develop a plan to create "Floodsafe" regions. See Section 1.2 for MUSR RFMP purpose goals and objectives.</p>
380	7/10/2014	River Partners	6-2	37-40	<p>6.2.1 Habitat Mitigation and Restoration Page 6-2: "Agencies responsible for operation, maintenance, and management of the flood control system are also concerned that these changes to the landscape hinder the original purpose of the flood control system, and diminish the flood risk reduction benefits for which the system was initially designed to provide."</p> <p>If what was said earlier that DWR does site specific monitoring to determine the change in channel capacity, can they provide data that states this? Most restoration work is done on state and federal agencies that may be able to conduct maintenance, but would like to see this impact documented or quantified. Is this information shared with LMAs as well?</p>	<p>DWR has recently initiated a program to access this issue. To date data has not been shared with LMAs.</p>
381	7/10/2014	River Partners	6-3	Table 6-1	<p>Table 6-1 Existing Habitats in the Regions Page 6-3</p> <p>This demonstrates that habitat mitigation and restoration would only be possible on a small percentage of the region and floodway. Although restoration has occurred on lands previously in agriculture, the percentage of conversion is rather low.</p>	<p>Comment noted</p>
382	7/10/2014	River Partners	6-20	21	<p>Page 6-20: Please change 950-acre to 400-acre portion of the Riparian Sanctuary Unit. The Unit is 950 acres, but only 400 acres is being proposed under this project. There is no 3rd planning phase proposed. Project partners need to submit permit applications, secure permits and obtain funding. Instead of planning, it's more along the lines of permitting and implementation.</p>	<p>Text added.</p>
383	7/10/2014	River Partners	2-29		<p>Section 2.8.2 Non-structural Elements Conservation and flood easements are also available as non-structural elements that could also be highlighted.</p>	<p>Text added.</p>
384	7/10/2014	River Partners	General		<p>Specific comments on the USFWS/PCGID-PID Riparian Sanctuary Project:</p> <p>An important opportunity demonstrating both agricultural preservation and environmental stewardship. The project entails protecting a critical diversion that irrigates 30,000 acres of farmlands and wetlands.</p>	<p>Text added.</p>



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385	7/10/2014	River Partners	General		The project proposes a design that will improve water supply reliability, something that should be emphasized as well.	Text added.
386	7/10/2014	River Partners	General		When implemented, the project would reduce the state's liability by removing rock revetment that is currently not being maintained nor required to maintain flow splits into the Butte Basin.	Text added.
387	7/10/2014	River Partners	General		Reinitiating natural river process may be used to serve as a long-term solution to the operation of the pumping plant and fish screen facility. The project delivers a short-term and long-term solution to protecting PCGID-PID's investment. Rock placement prevents the downstream bank from erosion in an effort to maintain sweeping flows across the fish screens. When the river cuts off in the future, the new channel alignment will again maintain sweeping flows needed to operate the fish screens.	Text added.
388	7/10/2014	River Partners	General		Science based project design that has been vetted by the agricultural and environmental communities.	Text added.
389	7/10/2014	River Partners			Encroachments (Page 4-2): Good point. This is a big problem. Is it fair for the LMAs to foot this bill of dealing with the encroachments and bringing the flood control structure to compliance?	Comment noted.
390	7/10/2014	River Partners			Permitting and Maintenance Activities (Page 4-2): "Compliance with such laws is usually achieved through a permitting process that is often burdensome, lengthy and expensive." Is this reality or perception? If it's a reality, it's very important to describe why it's lengthy. It is the specifics that will help us understand the situation and develop solutions that work. Is it because regulatory agencies are unresponsive? Or is it both applicant (LMAs) and agencies? Is the problem in the type or amount of information that is being required for consultation?	Text added to clarify.
391	7/10/2014	River Partners			Maintenance of Mitigation and Habitat Enhancement Project (Page 4-2): There is no concrete proof that these projects are diminishing channel capacity and is contradictory to statements made earlier about factors contributing to reduced channel capacity (Section 3.1.1, page 3-1).	Example to be added.
392	7/10/2014	River Partners			Table 3-6 Summary of Select Major Projects within the MUSR Regions (Page 3-49): Under description for the Riparian Sanctuary Project, please add in water supply reliability.	Text added
393	7/10/2014	River Partners			Flood Structure Protection Area (Page 4-2): How would this program or process be structured? Is this a way to stall habitat restoration projects by LMAs who oppose them?	No. This is intended to address landside structures which typically fall outside the purview of CVFPB encroachment permit review.
394	6/30/2014	Sacramento Fish and Wildlife Service	General		The Service recommends that the MUSR RFMP include baseline habitat conditions within the region. This baseline will allow the region to measure gains created as a result of projects they implement for fish and wildlife species. For example, connectivity is very important for wildlife species. While different species have different requirements for connectivity, if the MUSR RFMP included a discussion of the habitat availability and location along the river then it would be possible to review various species needs and see where creating corridors would help the various wildlife species.	The Regions expect that this information will be included in the draft Conservation Strategy currently being developed by DWR.

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395	6/30/2014	Sacramento River Conservation Area Forum	General		We are focusing our comments on the plan's recommendations for potential solutions that are identified in the various sections and, in particular, those to which we believe the Forum can contribute. We believe that the background material accurately represents the issues for our region. In our comments on proposed solutions, we believe that the development of a corridor management plan (CMP) that includes completion of programmatic permitting can facilitate the implementation of many of the solutions that are proposed. The Mid and Upper Sacramento River Region has already completed a number of the steps for developing a CMP through the regional plan process. This process has convened stakeholders and identified maintenance issues and projects. We believe that a CMP for a reach covered by the regional plan can focus on the next steps that will lead projects to implementation. In particular, developing a CMP can include securing environmental permits and completing environmental review and packaging of flood management projects with habitat enhancements so that they can qualify for multi-benefit funding.	Comment noted. CMP is listed as a potential action under the RFMP.
396	6/30/2014	Sacramento River Conservation Area Forum			The Regional Plan proposes development of long term maintenance agreements that include maintenance measures and standards. We agree that this is an important step for flood management in the region. The draft Regional Plan identifies regional programmatic permits, identification of maintenance methods that can reduce impacts, identified mitigation areas or advance mitigation and regional timing and/or phasing to avoid findings of adverse impact. These are proactive solutions to the identified issues for flood system maintenance in our region. We believe that a CMP developed for a reach of the Sacramento River can integrate these recommendations with capital projects and habitat projects so that maintenance that is needed for public safety can proceed while maintaining the ecological values of the river corridor.	Comment noted.
397	6/30/2014	Sacramento River Conservation Area Forum			The plan recommends actions that address impacts from habitat projects on levee maintenance, including regional goals for habitat mitigation/enhancement, habitat project maintenance requirements and protection for neighboring landowners and local maintaining agencies from habitat that migrates from the original project boundaries. A regional permitting plan can be part of a CMP and could also set standards for habitat enhancement/mitigation projects for maintenance.	Comment noted.
398	6/30/2014	Sacramento River Conservation Area Forum			The Forum is also working on some projects that may be useful in implementing these solutions. We currently hold a Programmatic Safe Harbor Agreement for Giant Garter Snake and Valley Elderberry Longhorn Beetle that can provide protection to neighbors of habitat restoration projects. The agreement covers protection for agricultural activities and in some cases may address flood maintenance activities. We are currently mapping the restoration projects that have occurred within one mile along the Sacramento River corridor from 1988 to 2012. This effort will give stakeholders an understanding of what the region has contributed thus far to restoring the riparian habitat of the valley and can help frame a discussion about our region's goals for future contributions. We will have some initial results this fall, with more detailed results in 2015.	Comment noted.

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399	6/30/2014	Sacramento River Conservation Area Forum			System-Wide Improvement Frameworks (SWIFs) are recommended to address deficiencies in levees that are affecting PL 4-99 eligibility. We believe that the projects identifies in SWIFs could be included in a CMP, including needed environmental review and regional permitting, and that this action could benefit from such a regional approach.	Comment noted.
400	6/30/2014	Sacramento River Conservation Area Forum			Beginning on page 6-27, the plan describes corridor management plans and how they can address flood management on a regional and programmatic basis. We recommend this approach as an implementing strategy for the Regional Plan. Much of the early work has been completed, as your effort has convened stakeholders, identified management issues and is proposing flood management projects. We believe that the Forum can assist you in your next phase of regional flood planning by developing a programmatic permitting strategy and by identifying a procedure for developing multi-benefit projects.	Comment noted.
401	6/30/2014	Sacramento River Conservation Area Forum			The Forum would like to coordinate or efforts with the next phase of regional planning to help move regional planning into implementation. We can bring our resources to complement the funding for the regional planning effort, enhancing our region's ability to develop strategies that address permitting challenges and the development of multi-benefit projects. Working together to identify an appropriate reach, we would then collaborate with the regional flood effort and other stakeholders in that reach to develop a scope of work for the CMP. This scope of work would allow local communities to shape the effort, so that it minimizes high level planning and moves projects toward implementation.	Comment noted.
402	7/3/2014	The Nature Conservancy	3-47	26-29	Chapter 3.3.1 Lines 26-29 Federal funding for the construction of the Hamilton City Flood Damage Reduction and Ecosystem Restoration Project was awarded in March 2014.	Text revised
403	7/3/2014	The Nature Conservancy	4-6	5-8	Chapter 4.3.3 Lines 5-8 This is a broad generalization. If left as is, specific evidence is required to substantiate the statement. Projects developed and implemented by TNC are evaluated through hydraulic modeling to ensure they are flood neutral, go through CEQA/NEPA, and, when required, obtain a CVFPB permit. Please rewrite this paragraph to more fairly and accurately describe the potential impact of habitat enhancement projects citing specific examples where problems have occurred. There should also be a parallel discussion about issues arising from other land management actions in the floodway that may cause adverse hydraulic and maintenance issues (e.g., clearing habitat without permits, placing unpermitted revetment on banks, placing orchard debris on banks).  Section 4.3.3., lines 5-8 is counter to section 3.1.1, lines 18-20: "Consequently, it is often difficult to identify the specific causes of channel conveyance problems, and determining whether or not they are channel-related or levee-related often requires additional site-specific investigation."	Example added.
404	7/3/2014	The Nature Conservancy	6-1	25-27	Chapter 6.2 Lines 25-27 There is no overall statement regarding the Value and Importance of the Natural Environment such as the one for Agriculture in section 6.1.	Text added.

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405	7/3/2014	The Nature Conservancy	6-1	3-23	Chapter 6.1 Lines 3-23 The purpose of section 6.1 is not clear. This chapter discusses land use from a largely non-agricultural perspective so then why start the chapter with a statement about the importance of agriculture (which was already covered in Ch. 2)?	Text revised.
406	7/3/2014	The Nature Conservancy	6-12	35-37	Chapter 6.3.2 Lines 35-37 The natural system (assuming you mean pre-European settlement) was not "limited" in terms of flood conveyance. The natural system functioned naturally. The bypasses were created because the floodplains adjacent to the rivers were settled and developed and the natural flooding that occurred in these floodplains became a nuisance to the newly introduced human activities.	Text added to clarify.
407	7/3/2014	The Nature Conservancy	6-13		Chapter 6.4.1 Formal definition of a multi-benefit project. The environmental NGO community has created a multi-benefit website wherein you will find a definition for multi-benefit projects: <a href="http://www.multibenefitproject.org/">http://www.multibenefitproject.org/</a>	Text added.
408	7/3/2014	The Nature Conservancy	6-19		Chapter 6.4.2 The multi-benefit work group only met once for 1 hour during which time no new multi-benefit projects were discussed. This was a missed opportunity.	Additional multi-benefit workshops were held.
409	7/3/2014	The Nature Conservancy	6-21	28-32	Chapter 6.4.3 Lines 28-32 To our knowledge, the M&T Ranch Pumping Plant Improvements project is not a restoration project.	Text added to clarify.
410	7/3/2014	The Nature Conservancy	6-26		Chapter 6.4.5 There should be discussion about how a CMP is different/similar/complimentary to the RFMP. From the description given, the general goals of a CMP are similar to what this RFMP is trying to achieve and on the surface seems duplicative. A comparison of the two approaches would help clarify what each approach is trying to achieve.	Text added
411	7/3/2014	The Nature Conservancy	9-1		Chapter 9.1 This chapter should be an appendix since it is a list of maintenance needs.	Chapter contains important projects which benefit from inclusion in the main body of the plan rather than in an appendix.
412	7/3/2014	The Nature Conservancy	9-3		Chapter 9.20 The discussion on the Rock Creek Reclamation District is great. It illuminates a developing multi-benefit project and, as such, section 9.20 should be moved to section 6.4.2.	Comment noted.
413	7/3/2014	The Nature Conservancy	General		An alternative stakeholder process to the one currently in place needs to be implemented to develop additional multi-benefit projects in chapter 6 and to capture the needs of the current chapter 9. For example, 1 or 2 hour meetings are not sufficient, multiple half or whole day meetings will be needed to seriously develop multiple benefit projects. Additionally, a professional facilitator will be needed to manage these meetings.	Additional multi-benefit workshops with a professional facilitator were held.

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414	7/3/2014	The Nature Conservancy	General		It is our sincere hope that there will be a very serious and concerted effort to bundle the over 600 maintenance projects/activities and develop compelling and competitive multi-benefit projects. If not, this region will lose to other regions which have progressed much more quickly in terms of developing multi-benefit projects.	Comment noted.
415	4/28/2014	United States Dept. of Commerce National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service's (NMFS)	General		(I) To be consistent with CVFPP and CS environmental enhancement will be a necessary goal and objective of the MUSR RFMP. For example, in section 1.2, line 21: There is no mention of environmental enhancement as a goal. Environmental protection will not meet the objectives of the Conservation Strategy or the 2017 CVFPP update.	Projects included in the RFMP were evaluated as to whether they help promote ecosystem function.
416	6/30/2014	USFWS	3-47	33	Page 3-47 line 33: Projects can minimize some of these permitting issues by involving the resource agencies early in the planning process. Additionally, approaching permitting from a system-wide aspect would also minimize lengthy project by project permitting review.	Comment noted.
417	6/30/2014	USFWS	3-50	12	Page 3-50 line 12: It seems as though the plan is an opportunity to evaluate the region and create a cohesive flood protection plan for the rural area rather than the current system where areas were constructed and added in a piecemeal fashion.	Comment noted.
418	6/30/2014	USFWS	3-62	9	Page 3-62 line 9: It is worth mentioning that the system was not designed to accommodate changing conditions which this paragraph describes. This should justify the region and DWR thoroughly examining the flood control system and trying to create a system that is resilient enough to allow for future changes in climate, population, etc.	Comment noted.
419	6/30/2014	USFWS	1-6	Figure 1-2	Page 1-6 Figure 1-2: We recommend you include the Conservation Strategy and its relation to the other planning efforts in this figure.	Text added.
420	6/30/2014	USFWS	1-16	34	Page 1-16 line 34: Green sturgeon, Central Valley steelhead, and Central Valley Chinook salmon are all species listed by NMFS and should be addressed in their section. We recommend you add valley elderberry longhorn beetle, giant garter snake, and yellow-billed cuckoo as species of concern in this region.	Text added.
421	6/30/2014	USFWS	2-7		It would be helpful in this section to add a bullet which defines native vegetation, such as: Land which supports habitat for native fish and wildlife species.	Text added.
422	6/30/2014	USFWS	2-10	15	Page 2-10 line 15: Does the agricultural community support building large-scale/high value agricultural facilities within the floodplain? It seems as though these facilities would be built outside of the floodplain.	To ensure agriculture remains viable, it is necessary to construct agricultural facilities in close proximity to the agricultural operations. Maintaining agricultural viability of historical floodplains has a number of benefits including making urbanization less likely to occur in this areas.

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423	6/30/2014	USFWS	2-10	16	Page 2-10 line 16: It would really strengthen your point of the loss to agricultural production due to flooding if you could cite information from a previous event. For example, how long was land out of production during the 1997-1998 flood event. Also, wouldn't certain crops, such as orchards be more affected than other crops? This seems as though it would be a good discussion to include and would help when determining the costs to the local economy of a flood in agricultural areas.	Comment noted.
424	6/30/2014	USFWS	2-12	18	Page 2-12 line 18: Giant garter snake is not capitalized.	Text revised.
425	6/30/2014	USFWS	2-12	26	Page 2-12 line 26: Just a note that you haven't included the Sacramento River or other areas such as Tisdale Bypass or Sutter Bypass.	Text added.
426	6/30/2014	USFWS	2-13	27	Page 2-13 line 27: It seems as though some of the units of the Sacramento River National Wildlife Refuge should be within one of the regions. The way this section reads it sounds as though the Sacramento River National Wildlife Refuge is outside of either the Mid or Upper Sacramento River Regions.	Text added to clarify.
427	6/30/2014	USFWS	2-13	Table 2-4	Page 2-13 Table 2-4: It looks as though the vast majority of managed environmental lands (note: Can you retitle this table to Natural Lands or Habitat?) in both regions are in private hands. Can you provide a breakdown of how much of this land is protected through a conservation easement?	Text revised to the extent information is available.
428	6/30/2014	USFWS	2-17	31	Page 2-17 line 31: As mentioned previously, it appears the region has information on past effects to agriculture from major flooding. Putting all this information together and summarizing it in the plan would be very helpful.	Text revised to the extent information is available.
429	6/30/2014	USFWS	2-18	26	Page 2-18 line 26: You say that the Phelan Levee and the 3B's weir are private structures, so how do they fit into the flood control system and how reliant is the flood control system on these structures?	text added to clarify.
430	6/30/2014	USFWS	4-2	19	Page 4-2 line 19: We think it would be helpful if you could provide a specific example of where adverse impacts to hydraulic capacity or conveyance occurred as a result of mitigation projects.	Example to be added.
431	6/30/2014	USFWS	4-2		Page 4-2 Channel, Bank, and Bypass Maintenance: It would be useful to know how much money it would take to be able to complete the maintenance that is necessary for the flood control system on a yearly basis. This could then be used to design the system to minimize maintenance (therefore costs) and still have habitat for fish and wildlife species (minimize permitting).	Comment noted.
432	6/30/2014	USFWS	4-2		Page 4-2 Permitting and Maintenance Activities: It would seem that this is something that DWR could help you with.	Comment noted.
433	6/30/2014	USFWS	6-2	25	Page 6-2 line 25: It is important to really look at the funding source for some of the restoration projects. The CVPIA Habitat Restoration Program has funded many projects in the upper Sacramento River with the purpose of offsetting past, present, and ongoing effects of the Central Valley Project. We do not agree that there is a big difference between mitigation and restoration projects/ sites. Ultimately, future effects to any of these areas would only negatively affect species that have had a huge loss of habitat due to the construction of the flood control project.	Comment noted.
434	6/30/2014	USFWS	6-3	18	Page 6-3 line 18: You've lumped bats in with the birds.	Text revised
435	6/30/2014	USFWS	6-6	28	Page 6-6 line 28: You should add giant garter snake and add ecosystem after vernal pools.	Text revised

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436	6/30/2014	USFWS	6-12	7	Page 6-12 line 7: We believe the Corps has indicated that rock removal or modification could be done through the 408 permission process.	Comment noted.
437	6/30/2014	USFWS	6-12	18	Page 6-12 line 18: We do not agree and perhaps do not understand how flood management and floodplain inundation conflict. If you want to convey flood flows at the lowest stage possible one way of doing this is to widen the floodplain. We believe it is true that many of the local landowners oppose widening the floodplain, but that seems to be a different issue than the flood manager's issue.	Flood management involved reducing risk and damages for current and future land uses. Widening floodplain has in some cases the potential to increase flood risk for existing land uses.
438	6/30/2014	USFWS	6-12	24	Page 6-12 line 24: We suggest replacing habitat restoration with ecosystem or river function.	Text revised
439	6/30/2014	USFWS	6-12	36	Page 6-12 line 36: It seems as though the bypasses were designed to address the lack of floodplain (reduce flood risk to reclaimed lands) and currently serve as surrogate floodplain habitat though it is disconnected from the river. Given this is in the section under land use stewardship philosophies, it is worth pointing out the benefits the bypasses have to fish and wildlife species given how much the river's floodplain has been reduced.	Text added to clarify.
440	6/30/2014	USFWS	6-14	20	Page 6-14 line 20: Just to add to the discussion of revetment removal, it is very likely that in order to offset future rock placement that might be needed, the RFMP would need to remove rock to mitigate effects to bank swallows. That being the case, it would be good for the RFMP to have a list of sites which meets the criteria which are discussed in this paragraph in order to move forward with future projects.	Comment noted.
441	6/30/2014	USFWS	6-16	11	Page 6-16 line 11: Levee relocation also provides the flood benefit of lower stage at that location in high flow events and may change stage up- or downstream of the setback depending on the size of the setback.	Comment noted.
442	6/30/2014	USFWS	6-20	28	Page 6-20 line 28: It is unclear to the Service how the Butte Slough Outfall Gates Replacement Project is a multi-benefit project. What are the benefits other than flood control?	Text revised.
443	6/30/2014	USFWS	10-17	17	Page 10-17 line 17: Isn't sediment accumulation in the bypasses going to be an ongoing problem given the design of the bypasses? Is the region developing ideas to deal with this issue, since it would seem that the maintenance of continual sediment removal would be a costly burden for DWR?	Projected added for sediment removal with Sutter Bypass.
444	6/30/2014	USFWS	10-17	25-32	Page 10-17 lines 25-32: The Service recommends that you are careful how you portray the modeling that was done in the Sutter Bypass. It appears that the only alternatives were removal of vegetation on refuge lands. First, the Sutter National Wildlife Refuge (NWR) has worked collaboratively with DWR maintenance staff on strategic vegetation removal and suppression for the benefit of the flood control system. Mass removal of vegetation and conversion to agriculture as suggested in the plan would negatively affect the wildlife species which depend on that vegetation for habitat and would be very costly to compensate for. Additionally, what effect would the mass removal of vegetation have on the bypass itself? Woody riparian vegetation exists along the toe drains of the bypass and serves as a wave wash buffer for the levees. The 2D hydraulic model indicates that sediment removal near the mouth of the Feather River and at the Sutter NWR would improve Bypass conveyance capacity, but this is not mentioned or discussed.	Text added to clarify.

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445	6/30/2014	USFWS	10-18	29	Page 10-18 line 29: The region should consider ways in which the impacts to the agricultural community affected by some of the system-wide improvements under consideration by DWR could be minimized or mitigated and include these ideas in the plan.	A number of alternatives to the system expansion have been suggested within the RFMP for study under the BWFS.
446	6/30/2014	USFWS	10-18	32	Page 10-18 line 32: Who would pay for this maintenance and who would compensate for the loss of habitat? Also, the region should demonstrate how this would lead to system resiliency and incorporate future changes in precipitation patterns due to climate change.	Text added
447	6/30/2014	USFWS	10-20	1	Page 10-20 line 1: At one of the Steering Committee meetings staff from DWR discussed the issues with Cherokee Canal. The plan wants to improve Cherokee Canal to its design capacity, but we understood DWR to say that Cherokee Canal may not have been built as it was designed. It would be helpful if the region could summarize the study that DWR had done on Cherokee Canal and address the likelihood of the original design capacity being adequate for current and future flows down Cherokee Canal.	Text added to clarify.
448	6/30/2014	USFWS	General	Table 11-1	Table 11-1 General Comment: It would be helpful if the activities could have been grouped together into similar project types by lead agency. It would also be helpful to have a column that defines the project type as it is described in the document, so the reader can look at the table and easily find the discussion in the text.	Table revised.
449	5/20/2014	USFWS	General		Does the RFMP intend to review the region to better analyze what maintenance activities need to occur in what sections of the flood control system? For example, some reaches of the river may need to slow down the flows at certain events and those would have different maintenance needs than areas where water needs to move through. Additionally, some maintenance is occurring due to the design of the system, levees that were placed close together to facilitate sediment transport now are eroding the banks and levees. Trying to create a more permanent and regional repair would be more beneficial than fixing sites singly. In reading the Description of Topic, it was unclear as to whether or not the region feels the O&M manuals are useful for the changing nature of the river system as well as the changing nature of the flood system. Do they feel it is necessary to have the Corps rewrite the manuals to reflect what it is they do as well as what it is that needs to be done to provide public safety as well as habitat for fish and wildlife species.	At this time levee maintaining agencies have not expressed a desire to revise the system O&M manuals.



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450	5/20/2014	USFWS	General		<p>The current coordination efforts employed by State Flood Control Managers with the Sutter NWR on vegetation management actions have resulted in a positive cooperative working relationship between state and federal agencies resulting in tangible/measurable benefits that can be used as an example/model for taking substantive positive actions related to the flood control system. A few examples include the following:</p> <ul style="list-style-type: none"> <li>• Sutter NWR-Tree reduction Operations Plan,</li> <li>• Cooperative financial assistance from FWS in funding of DWR 2D model,</li> <li>• Annual vegetation management agreement with DWR- Sutter Maintenance yard.</li> </ul> <p>Coordinated activities between the Sacramento NWRC and the DWR Sutter Maintenance yard between 2006 and 2010 resulted in significant reduction in water surface elevations throughout the Refuge (DWR RMA-2 Model Results).</p> <p>In 2008 Sutter NWR Tree Reduction Operation Plan was developed and is included in the Comprehensive Conservation Plan finalized in 2009 (Attachment 1). Between 2008-2013 the Sutter NWR has removed 90% of the trees identified in the plan. Maps depicting where tree removal has occurred are attached (Attachment II). Most recently over 80 piles of removed trees and other vegetation were burned over 2012-2013 under this flood conveyance improvement project. The Refuge works cooperatively with DWR on tree removal and tule control and conducts annual maintenance using herbicide, disking, dozer, and mastication to control re- sprouts of shrubs and trees to maintain previous management.</p>	Comment noted
451	5/20/2014	USFWS	General		<p>Both the resource agencies and the flood maintainers need to recognize the multiple uses of the river: as habitat for fish and wildlife with the necessary corridors and river functioning; a flood control system; recreation; and a water conveyance system. With that recognition all parties need to also have the understanding that you can't do single purpose projects in the river system, they have to consider and work with the other uses of the river. The regional plan is an opportunity for the people of the region to make suggestions on where projects could occur which would minimize effects to other uses. From what DWR has been saying lately in meetings, it also appears that the multi-benefit projects are more likely to be funded or funded at a higher state cost share. The Sacramento River NWR is responsible for land management activities on over 10,000 acres of riparian habitat along the Sacramento River between RM 240 and RM 161. Since 1993, working with several NGO's, state and federal conservation agencies, approximately 6,000 acres of high quality riparian habitat has been restored on the SRNWR. Several research and monitoring efforts have shown significant improvements in habitat conditions, wildlife population response, and consideration of delisting species covered under ESA (Golet, et. al. 2008, 2013).</p>	Comment noted.

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452	5/20/2014	USFWS	General		<p>This document points out that the locals are doing maintenance under a federally issued Operations and Maintenance Manual. Because the manual was given to the State and locals prior to many environmental laws, the Corps did not do NEPA or consult under the ESA. This leaves the State and locals with the duty of complying with environmental laws. The region may want to consider requesting that the Corps initiate section 7 consultation to cover operations and maintenance of the federal flood control system. This could be done programmatically and effects and offsetting those effects would be analyzed upfront and everyone would be clear of the expectations. It seems as though it would be helpful if a handbook could be created for LMAs which described the various permits that may be necessary, how to go about getting them, and best management practices for avoiding and/or minimizing effects to fish, wildlife, and their habitats. This would ensure that everyone is using the same reference for BMPs leading to consistency across the region as well as benefit smaller LMAs that typically do not have the resources to develop this sort of handbook on their own.</p>	<p>Comment noted. Programmatic permitting is listed a potential project to be pursued.</p>
453	5/20/2014	USFWS	General		<p>A lot of good research on burrowing animals came out of the 2012 Vegetation Symposium. would recommend that the region review the following link to a paper regarding ground squirrels and habitat associations. As well as other research related to burrowing mammals and their control.  <a href="http://www.safca.org/documents/leveevgsymposium2012/clvrp_studies_now_available/BurrowingmammalHabitatAssociations.pdf">http://www.safca.org/documents/leveevgsymposium2012/clvrp_studies_now_available/BurrowingmammalHabitatAssociations.pdf</a></p> <p>Animal control and damage repair, similarly to other maintenance activities would benefit greatly from a programmatic permit. As stated above this would allow activities to have their effects analyzed and come up with conservation measures that are understood and used by everyone. It relieves the maintainers of the uncertainty which they currently have regarding what and how they can conduct maintenance.</p>	<p>Comment noted.</p>
454	6/30/2014	USFWS			<p>Along with habitat restoration efforts, the SNWRC has focused a great deal of effort in the management of these lands over the last 20 years including but not limited to working with stakeholders for the design and management of these habitats related to flood control efforts (2-D modeling, planting setbacks, levee maintenance, vegetation removal, infrastructure, flow through designs including topography and vegetation, etc. (See Attachments III, IV, &amp; V) invasive weed control, firebreaks in a wildland urban interface and hazardous fuel reduction activities, cooperative rural fire assistance coordinated law enforcement to reduce trespass on adjacent lands, developing cooperative range land management grazing activities, cooperative agreements with county agriculture offices for ground water management and targeted noxious weed control, feral invasive species control, management actions to reduce crop depredation on adjacent lands and reduce impacts associated with ESA regulations. In 2013 on the SRNWR alone, over 4,000 acres were treated with prescribed burning, managed grazing, firebreaks, and invasive weed control efforts.</p>	<p>Comment noted. Text will be added to describe SRNW maintenance efforts.</p>

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455	6/30/2014	USFWS			In addition, since the SRNWR was opened to public use in 2007, a steady increase in visitation has been documented with a high of over 55,000 visitor use days in 2013. Activities include hunting, fishing, wildlife observation, photography, environmental education, and interpretation. This increased visitation on the SRNWR and other Refuges of the complex brings in a significant economic benefit to local communities. The Sutter NWR provides over 2,200 visitor use days annually including pheasant and waterfowl hunting, a junior hunt weekend, and wildlife observation.	Comment noted. Text will be added to describe SRNWR recreational benefits.
456	6/30/2014	USFWS			The Complex manages its lands for multi-benefit goals and objectives. These activities and projects are developed annually using an annual habitat management planning effort as a step down from the Refuges Comprehensive Conservation Plans. This concept was developed years ago and uses the expertise of Refuge managers, biologists, fire program management, and maintenance/equipment personnel, law enforcement and visitor service professionals. Projects are prioritized during the process based on annual base funding, site assessments, public safety, sensitive resources, and condition of infrastructure. This process could also be used as a model for coordinating activities state and federal habitat enhancement projects and maintenance with Rural LMA's and other state and federal Flood Control Managers.	Comment noted.
457	6/30/2014	USFWS			The Service is supportive of the region combining flood management and ecosystem restoration into multi-benefit projects to address past, present, and future problems. The river and flood system are naturally dynamic and constantly changing. In order to deal with future unknown changes to the flood system and the ecosystem in the form of precipitation and climate change, the Service agrees with the California Department of Water Resources (DWR) that the system needs to be adjusted to allow for flexibility and resiliency.	Comment noted.
458	6/30/2014	USFWS			To create an ecologically functioning river system, natural river process such as erosion and deposition need to be allowed to occur. To accomplish this, some areas may need to be setback or have rock removed. It would seem that rock removal is a likely alternative in certain areas upstream of Colusa where the levees are already somewhat setback from the river.	Comment noted. Revetment removal is discussed in the RFMP.
459	6/30/2014	USFWS			Downstream of Colusa, the Sacramento River is fairly constrained with levees and the natural river processes are not occurring, so this is an area to investigate for setback levees.	Comment noted. Levee realignment is discussed in the RFMP.
460	6/30/2014	USFWS			The Service understands the need to weigh all the effects of revetment removal and levee setbacks to local land use. The MUSR RFMP has the experience and the ties to local landowners to be able to develop site selection criteria that maximize benefits to fish and wildlife while minimizing effects to land use within the region.	Comment noted.

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461	6/30/2014	USFWS			Flood management benefits such as reduction in maintenance due to less revetment within the system, safer levees, and lower flood stage would also factor into the best locations for selection. It is our understanding that DWR has examined the Sacramento River and located areas where setback levees, floodplain lowering, and revetment removal could occur and produce a benefit to natural river processes and ultimately fish and wildlife. This would be a good starting point for the site selection process.	The Regions expect that this information will be included in the draft Conservation Strategy currently being developed by DWR. Once the Regions have an opportunity to review the draft Conservation Strategy, this information will be reviewed.