[Comments were submitted as email content.]

Stacy, the Feather River Region has reviewed the draft Central Valley Flood System Conservation Strategy and offers the following comments for the Department's consideration:

1. Feather River levees for much of the area—and outside the reaches of the four recent setback levees—are set back thousands of feet from the channel. Unlike much of the Sacramento River Flood Control System, in which levees were strategically set close to the channel, the Feather River offers a unique opportunity within existing levee alignments to restore natural floodplain processes. The relatively sparse use of revetment in the region is a result of the original levee alignments and the newer setbacks that afford a comparatively uncommon amount of river meander and soft bank. In the Oroville Wildlife Area (OWA) alone, there are over 800 acres of publicly owned land that may benefit from the removal of hydraulic obstructions and other floodway restoration efforts, including 120 acres of new, permanent rearing habitat for salmonids (currently proposed). Collaborative workshop processes like the ones used for OWA and Lower Feather River Corridor benefit from a bottom-up, opportunistic approach that yields more realistic goals and projects than a top-down, objective approach. Consideration should be given to building on the accomplishments of the Lower Feather River Corridor Management Plan as we transition to the next level of planning that is being accomplished by the Sacramento Basin Feasibility Study and the 2017 update to the CVFPP.

2. Restoration efforts should include an evaluation of how to increase the habitat value of lands that are already under State and Federal ownership. This would include an evaluation of how to maximize the habitat benefits of the areas added to the floodway as part of the Bear River and Feather River setback levee projects.

3. The OWA and the floodway between the OWA and Thermalito Afterbay appear to be the source, or the significant contributor for Primrose that pervades the system downstream. Targeting eradication in this area may have significant, long-term benefits for flood O&M, flood control, habitat restoration and recreation.

4. The strong emphasis in the Conservation Strategy on multi-benefit projects that reconnect floodplain habitat through setbacks and other flood control improvements is in line with the objectives of the Oroville Wildlife Area Flood Stage Reduction Project (OWA FSR), which is currently in the design phase. In the paragraph that starts at the end of page 5-19 and continues on to page 5-20, some specific potential projects are called out as examples of multi-benefit projects. OWA FSR is not among these examples, but the Feather River Bypass is. The OWA FSR should replace the Feather River Bypass as the example in this paragraph because the Feather River Bypass was removed from the 2012 CVFPP by a CVFPB resolution passed on June 29, 2012 (item 23). Additionally, OWA FSR would be a better example of a major multi-benefit action to achieve Conservation Strategy goals for the Feather River CPA because the planning process for OWA FSR is already underway and the project has broad regional stakeholder support.

5. Proposals for Sutter Extension Canal lining and other improvements may also have flood maintenance and operational benefits, as this reach of levee has been a historic source of seepage and sloughing. In addition to water conservation benefits, the Sunset Weir could be modified or removed to improve fish passage.

6. The Conservation Strategy does a good job of documenting the status of the ecosystem and actions that have led to its degradation over time. The measurable objectives are reasonable. The identification of "Additional Need" (habitat creation) and "Potential Opportunity" is helpful to allow for public and agency engagement to decide how much habitat creation is supportable by the land use and flood control agencies as well as the agricultural community. However, the "Objective Amount" of habitat is not appropriate to include in the final document. The regions were not consulted in the development of these habitat creation goals, and there will need to be a land use and flood control agency engagement process to reach consensus on these before they can be established. The habitat creation objectives should be a vision for the total habitat that is practicable in a region. These objectives should be based on a cumulative understanding of the other large-scale habitat creation efforts, either through mitigation or restoration. Assurances from the State and Federal resource agencies will need to be provided to ensure that these habitat creation goals include the mitigation for projects identified in the Basinwide Feasibility Study, as well as mitigation for the ongoing operation and maintenance of the flood control system.

7. One of the goals of the Conservation Strategy identified on Page 3-3 is to "Improve dynamic and hydrologic (flow) and geomorphic processes in the SPFC." While restoring flows may be a worthy objective, it is outside the purview of the SPFC. This should either be removed or reworded to "coordinate and support" an action that would be evaluated and implemented by others.

8. LMAs are listed as one of the monitoring entities under the Adaptive Management Strategy but have no role in the evaluation or outcome of this large, top-down program. This point should be a focus of discussion with the Regions to ensure understanding of what monitoring is required, how it will be funded, and what support from the LMAs is needed to undertake this activity.

We commend the Department for their continued effort to craft a Conservation Strategy that can be supported by the Regions. The document does a good job describing the existing conditions and opportunities to integrate restoration into the Flood Control System. We look forward to working with the Department to revise the document to address our comments.

Submitted on behalf of the Feather River Region,

Ric Reinhardt