

**FRIENDS OF THE RIVER
SACRAMENTO RIVER PRESERVATION TRUST
MOTHER LODE CHAPTER SIERRA CLUB
BUTTE ENVIRONMENTAL COUNCIL**

c/o Friends of the River - 128 J Street - 2nd Floor - Sacramento, CA 95814 - (916) 442-3155

August 11, 1998

Lester Snow
CALFED Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Draft Staging & Implementation Plan (8/5/98 version)

Dear Mr. Snow:

Thank you for soliciting public comments concerning the CALFED Bay Delta Program's draft staging and implementation plan (8/5/98 version). We are compelled to protest the August 11 deadline for submission of comments. The postmark on the notice of the plan's availability is August 7 and it was not generally received by most recipients until August 10. One day is not adequate to review and fully comment on the draft plan. Therefore, our comments at this time focus on just one aspect of the plan.

As conservation organizations based in the Sacramento Valley, with long histories of working to protect, conserve, and restore the Sacramento River's outstanding natural values, we are concerned about the draft plan's Ecosystem Restoration Stage I implementation actions concerning the river.

According to the draft plan (pg. 28), "The priorities for restoration activities will be first on existing public lands as appropriate, second on acquisition of easements, and third on acquisition of fee title as necessary to achieve program objectives." A specific action in the draft plan (also on pg. 28) is to "Complete the remaining 60% of the easements and/or acquisition for the Sacramento River meander corridor [approximately \$30 million required] (yr 1-7)."

There are currently insufficient public lands along the Sacramento River to complete the establishment of a riparian meander corridor as envisioned by state and federal programs (SB 1086, CVPIA, CALFED). The next priority in the draft plan is the acquisition of easements. However, we don't believe that easements along the Sacramento River will meet CALFED's Stage I or longer term restoration goals and objectives.

Past easements along the Sacramento River intended to protect riparian habitat have proven to be ineffective. A review by the U.S. Fish and Wildlife Service of riparian easements along the river associated with bank protection projects found that many so called "riparian easements" were under agricultural cultivation or completely cleared of native vegetation to facilitate levee and bank inspections. In addition, riparian revegetation efforts intended to mitigate bank protection projects on the Sacramento River have often failed because no investment was made in long term maintenance. Unless an agency is responsible for the proper protection, maintenance, and management of easements, it is unlikely tht the plan's emphasis on easements will meet CALFED objectives.

Further, acquisition of easements may not be a cost-effective investment of public money, since easements are nearly as expensive as fee title acquisition. Given the potential ineffectiveness of easements in actually protecting and restoring riparian habitat along the river, it would seem that fee title acquisition would have greater cost benefits, while better ensuring achievement of restoration objectives.

In addition, fee title to thousands of acres of riparian habitat along the Sacramento River has already been acquired from willing sellers by federal and state agencies. It makes no sense to switch from the existing program of fee title acquisition to an emphasis on easements. Depending on what entity becomes responsible for the management of CALFED easements, another layer of government bureaucracy could be injected into the existing state and federal management responsibilities along the river.

Finally, we are also concerned about the draft plan's emphasis (also on pg. 28) on developing and implementing "...an outreach, coordination, and partnering program with local landowners including individuals, Reclamation Districts, Resource Conservation Districts, Water Authorities, irrigation districts, Farm Bureaus, etc. to assure participation in planning design, implementation, and management of ERP projects."

This action apparently excludes a number of important stakeholders, including conservation organizations, sport and commercial fishing groups, recreation interests, professional organizations, academia, and the public in general -- many of whom were instrumental in establishing the Sacramento River meander corridor policies and riparian habitat acquisition programs. It certainly puts an unfair and legally questionable emphasis on "landowners" while virtually ignoring other stakeholders and interests that should be considered valuable CALFED partners.

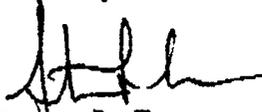
We urge that the draft staging and implementation plan be revised to:

1. Continue the fee title acquisition of the riparian meander corridor along the Sacramento River.
2. Establish a multi-agency coordinating entity responsible for managing the Sacramento River meander corridor, with representatives from federal, state, and local agencies; conservation interests; landowners; other interest groups; and the general public.
3. Emphasize CALFED ecosystem restoration partnerships with all stakeholders and public interests, not just landowners.

Our respective organizations may be submitting further comments on the draft staging and implementation plan, but we wanted to be sure to submit these comments by the unreasonable Aug. 11 deadline.

Thank you for your consideration.

Sincerely,



Steven L. Evans
Conservation Director
Friends of the River

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