

97-150

# MILL CREEK CONSERVANCY

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CALFED Program  
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May 1, 1997

**SUBJECT: ECOSYSTEM RESTORATION PROGRAM PLAN -  
Executive Summary 4-8-97**

Dear Mr. Daniels,

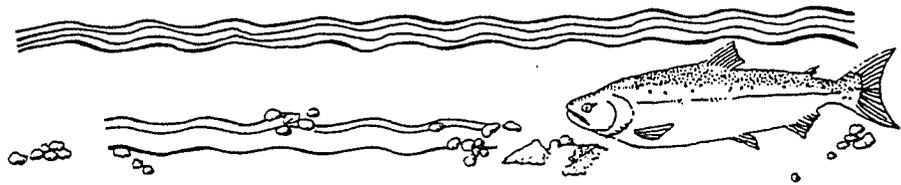
The Mill Creek Conservancy is interested in the CALFED program and any policies that may impact our watershed. Burt Bundy - MCC President, has attended many of the CALFED meetings in order to gain insight and provide input for your Program. In addition, I have had the opportunity to review the Ecosystem Restoration Program Plan on the behalf of the Mill Creek Conservancy Board of Directors.

The Mill Creek Conservancy has grave concerns about some material contained in the Executive Summary. Information for several "targets" for our stream are not accurate and do not reflect the current conditions within the Mill Creek watershed. One specific target is at cross purposes with current policy for fisheries management in Mill Creek. Hopefully your agency can respond to the items listed below and correct any future documents.

## CORRECTIONS, COMMENTS & QUESTIONS:

### 1. Table 5 Mill Creek Targets - Water Diversions (page 59)

The water diversions on Mill Creek have been screened since the 1920's. The screens have been improved by the Department of Fish & Game as new methods and materials have been developed over the years. Please correct your text to reflect the accurate status of the screened diversions on Mill Creek. You may verify the information regarding diversion screens with the Department of Fish & Game &/or the water master for Mill Creek - Jim Lowden of Los Molinos Mutual Water Company.



2. Table 5 Mill Creek Targets - Harvest of Fish & Wildlife (page 61)

There has been no take of salmon and steelhead in Mill Creek for many years. Please check the "harvest" rules for Mill Creek salmon and steelhead with the Department of Fish & Game. Harvesting wild salmon is not an option for a species in peril and being considered for listing as an endangered species. Please verify the Department of Fish and Game policy of NO ARTIFICIAL HATCHERY FISH TO BE ESTABLISHED IN MILL CREEK. The target regarding harvest of Mill Creek fish and wildlife needs to be eliminated from any future CALFED documents.

3. Table 5 Mill Creek Targets - all remaining categories (page 54 -58, & 60)

The Mill Creek Conservancy has spearheaded a cooperative approach to watershed management with special emphasis on protecting and enhancing salmon and steelhead habitat. In December 1994, the Conservancy developed a Memorandum of Understanding to create a Mill Creek Watershed Management Strategy. There are 17 partners to the MOU including the Forest Service, Department of Fish & Game, BLM, Department of Water Resources, The Nature Conservancy, Natural Resource Conservation Service, Los Molinos School District, etc. In 1995, we secured funding and developed the work program for a cooperative local approach to resource management. In 1996, a wide range of stakeholders participated in eight Scoping Study sessions to discuss goals and projects priorities. The result of the eight meetings was the development of the Mill Creek Watershed Management Strategy Report which was published in January 1997. The report contains 13 recommendations from the Watershed Advisory Committee (WAC) and are include in the Executive Summary which is attached to this letter.

The eight public meetings were conducted as "Scoping Study" format to determine the range of resource issues within the Mill Creek watershed. The topics listed in your Mill Creek targets were discussed at our meetings. The WAC recommendations reflect the emphasis for action and the appropriate areas for restoration work. This work is ongoing and we not certain how your program targets will be implemented.

Your targets does not appear to recognize the level of cooperative effort that has already produced results and benefits to the watershed. CALFED was sent notices of our meetings to encourage participation and awareness of our program. On February 11, 1997 a copy of the Mill Creek Watershed Management Strategy Report was sent to Kate Hansel of your staff. Mill Creek Conservancy completed the Report in January and has been working on specific implementation guidelines utilizing the 13 recommendations of the Report.

3. Table 5 Mill Creek Targets - all remaining categories (page 54 -58, & 60) - cont.

We would appreciate a correction of the target to reflect the level of effort for resource protection that has been made by the 50 contributors to the Mill Creek Watershed Management Strategy Report. After reviewing our Report, we are confident that you will have documentation that a cooperative approach has been developed that optimizes salmon and steelhead habitat in the Mill Creek watershed.

4. Table 1 Ecosystem Element - Chinook Salmon (page 12)

Please amended the statement "Contribute to the restoration of Sacramento Fall-Run, Spring-Run, Late-Fall Run and San Joaquin Fall-Run Chinook in order to support sport fisheries and viable commercial fisheries." to address the current status of the Spring-Run Chinook salmon as a candidate species which requires the same protection and consideration as a species listed as endangered species.

5. Table 1 Ecosystem Element - Steelhead (page 12)

Amended target to reflect status of inland steelhead populations as a candidate species. Should inland recreational fishing opportunities be the goal for steelhead?

6. Table 1 Ecosystem Element - Artificial Propagation of Fish (page 17)

The Mill Creek Conservancy does not support artificial propagation of spring run chinook salmon and steelhead that may endanger the natural wild population of Mill Creek anadromous fish. SEE COMMENT # 3.

7. Table 2 Ecosystem Element - Central Valley Streamflows (page 18)

Are outflows - through flows from Delta to the ocean? Are these outflows in addition to the 800,000 cfs that are provided for fish & wildlife under the Bay Delta agreement? We need NOV - FEB flows for out migrating spring run chinook salmon. What are the flow needs for steelhead - do you provide an adequate window?

8. Table 3 Ecosystem Element - Sacramento River Targets (page 32)

Are these outflows adequate to safely transport salmon & steelhead?

9. Table 1. Ecosystem Element - Vision Summary (page 9)

Bay - Delta Hydrologic -Why was the mid 60's chosen as a date to restore Bay Delta channel? Pre-pumping conditions need to be considered to determine full impacts to anadromous fish.

The Ecosystem Restoration Program Plan needs significant refinement to live up to its goal of creating a comprehensive plan to restore ecosystem health. Specific recommendations/targets require accurate information. The Conservancy has supplied these comments in order for the information regarding Mill Creek to be correct. Our group is most familiar with Mill Creek and the associate "targets", however lack of clarity brings the reliability of information regarding other targets into question.

The Ecosystem Restoration Program Plan is ambitious - however soundness of information and appropriate targets should be the threshold for the establishing priorities for critical resource issues. We would appreciate a response to this letter. Our organization would also appreciate copies of all volumes of the ERPP when they are available. Hopefully a meeting can be held up in this area to allow participation by several members of our group. Please feel free to contact me directly at 916 - 595 - 4493. Thank you for your attention to this matter.

Respectfully submitted,



Kerry L. Burke, Resource Coordinator

enclosure: Mill Creek Watershed Management Strategy Report - Executive Summary