

# Shasta Tehama Bioregional Council

A Collaborative Council Working on Natural Resources, Biodiversity, Economics and Community

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## TECHNICAL ADVISORS:

UC Cooperative Extension Service

US Bureau of Land Management

US Bureau of Reclamation

National Park Service, Whiskeytown  
National Recreation Area

USFS, Shasta Trinity National Forest

California Department of  
Forestry & Fire Protection

California Department of Fish & Game

US Soil Conservation Service

US Fish & Wildlife Service

February 16, 2000

Mary D. Nichols  
Secretary for Resources  
The Resources Agency  
1416 Ninth Street, Room 1311  
Sacramento, CA 95814

Copies sent to: PW

Date: 2/22

Dear Mary D. Nichols:

RE: CALFED and Community-based Groups

The Shasta-Tehama Bioregional Council (STBC) was both surprised and disappointed in early December 1999 to learn that CALFED was conducting a study of the Clear Creek watershed, "Adding Rigor to the CALFED Concept of Adaptive Management: A Case Study Application to Tributary Restoration." We were surprised to be so late in learning of this study (developed in July 1999) because "Clear Creek (Shasta County) is one of three demonstration streams selected for full-scale implementation of restoration actions . . . and has an active watershed group composed of local landowners and local, state and federal agency personnel, which can help to catalyze restoration efforts." (Strategic Plan for Ecosystem Restoration, Chap. 6: Stage 1 Action Plan, Sacramento River Basin, Feb 1999). And disappointed because as that "active watershed group" we were not included in the development and implementation of this important study of adaptive management.

The manner in which this has played out raises many concerns regarding the importance CALFED places on the role of local watershed groups and communities in the adaptive management process. To what extent is local knowledge and expertise important to the successful, long-term effective and efficient implementation of the CALFED program on-the-ground and in the watersheds? To what extent is the voluntary participation and support of landowners in a watershed important to the success of the CALFED program? How should local watershed groups, communities, landowners, and citizens be involved in the adaptive management processes?

CALFED places great emphasis on the adaptive management approach "to restoring and managing the Bay-Delta ecosystem . . . acknowledg[ing] the uncertainty inherent in restoring and managing a natural system as large and complex as the Bay-Delta by designing and monitoring restoration actions so that they improve the understanding of the system while simultaneously restoring it." (CALFED Draft Programmatic EIS/EIR Revised Phase II Report, p. 152-153. June 1999).

The adaptive management study came to my attention at a CALFED Watershed WG meeting December 10, 1999, when reference was made to it. I was unaware of the study, though a CALFED staffer indicated CALFED had been working with local groups on it. He didn't say what "working with" or "local group" meant.

I contacted the Western Shasta Resource Conservation District (WSRCD) to see whether CALFED had consulted with them about this study. They indicated they first learned of the study when CALFED contacted them to conduct a field trip of the watershed for the contractors already conducting the study. WSRCD asked for a presentation on the study and this was done in early December 1999. The study proposal is dated July 29, 1999, but between that date and the December presentation, CALFED did not inform WSRCD, STBC, or anyone else up here

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about the study, let alone engage any of these groups in designing and implementing the study. This oversight is all the more egregious because the STBC had made a presentation to the Bay-Delta Advisory Council (BDAC) at their September 17, 1999 about our work in the Clear Creek watershed. If STBC was not seen by CALFED and this adaptive management study as an important local stakeholder and participant in the adaptive management process, what local group was? (Letter from CALFED BDAC chair is attached).

This study, and the manner in which it is being developed, implemented, and ultimately used, is an example of CALFED's White Papers and Technical Workshops process for addressing issues. The CALFED Watershed Work Group has commented on the closed, exclusive nature of this White Paper and Technical Workshop process, especially with regard to informing and engaging local and non-scientist/expert interests about the White Paper and Technical Workshop issues, processes, and outcomes. Long-term this will not succeed.

This study and the manner in which it is being implemented is indicative of CALFED's approach to and interaction with local watershed groups and local knowledge, and the role watershed groups will play in the CALFED solution. It is the scientist/expert coming up with the "objective" solution, and CALFED distributing a centralized plan for implementation by local watershed groups, with little or no participation from those groups in developing the plan or activities.

Most importantly, this approach will not come up with the best long-term sustainable solutions for the watershed itself. The STBC operates on the belief that the best solutions are developed when scientific knowledge is combined with local knowledge about site specific conditions and the history of a landscape. Such a collaborative decision-making process is even more important if a long-term sustainable solution requires a change in people and landowner attitudes and behavior rather than constant financial input or regulatory enforcement.

The CALFED Watershed Program Plan (June 1999) emphasizes the importance of locally based environmental protection and enhancement in attaining the objectives of CALFED. Desired Outcome 3.3.2 Development of monitoring protocols and application of adaptive management processes, is particularly apt with regard to the Clear Creek Adaptive Management Study. This study could still be an opportunity to explore the value and the limits of community-based, locally led efforts to achieve CALFED objectives, but again, to succeed it will take a reorganization of the process to include knowledgeable local stakeholders from the beginning.

Thank you for your consideration of our concerns.

Sincerely



Melinda Brown, Chair  
Shasta-Tehama Bioregional Council

cc: CALFED Watershed Work Group  
Shasta-Tehama Bioregional Council members  
Western Shasta RCD  
CALFED Bay-Delta Advisory Council  
CALFED Policy Group senior staff  
Bruce Babbitt, Secretary of the Interior  
Senator Dianne Feinstein  
Senator Barbara Boxer  
State Senator Maurice Johannessen  
State Assemblyman Dick Dickerson