

Responses to Comments Received on the October 4, 2013 Draft of the Feather River Regional Flood Management Plan

Date	Agency	Comment #	Page	Comment	Response
11/8/13	River Partners	RP-01		There is a good summary of the region's flood history and hazards and it describes well that the agriculture is at the heart of the communities within the region. It does set up the stage what is at risk locally, which is the core of this regional planning process.	Comment Noted.
11/8/13	River Partners	RP-02		The document fails to adequately describe the dramatic effects that development of flood management system and agricultural land uses has had on river-dependent wildlife, which is the cause of the largest regulatory conflicts for flood projects in the region. Suggest adding a section to describe the loss of habitat, flow (especially on seasonal floodplains), and wildlife populations dependent upon periodic flooding.	An ecological setting section was added that includes historical changes to the environment.
11/8/13	River Partners	RP-03		The document does not have a balanced representation of the different objectives that are important for this planning effort, in particular this document fails to address the incredible toll that flood management and agricultural land conversion has had on native wildlife. There is a statement, "the primary goal of the RFMP is to collaboratively improve flood risk management within the region, while improving operations and maintenance, promoting ecosystem functions, improving institutional support, and promoting multi-benefit projects. By aligning as closely as feasible with CVFPP goals the region seeks to maximize State and federal cost sharing and to execute high priority projects, consistent with the Regional Plan, as rapidly as feasible", that implies it will try to meet the integrative approach that DWR is seeking. However, at times throughout the plan, there is a serious lack of promotion for ecosystem function, and no basis for supporting multi-benefit projects where appropriate. See specific comments below.	The new section 2.3 describing the ecological setting includes narrative describing the impact of land use changes have had on the natural environment since 1850. The Plan recognizes that it is not feasible to restore the pre-1850 wildlife habitat conditions, but seeks to implement multi-objective projects which are reasonable and feasible.
11/8/13	River Partners	RP-04		Make sure that sources are cited on tables and figures. It's pretty inconsistent throughout the entire document.	GEI will double check.
11/8/13	River Partners	RP-05		Good synopsis and characterization of the different segments of the channels and floodplains in the regional planning area. It would benefit from a little better organization, so the characterizations are somewhat consistently described for all categories (ie. hydraulics, vegetation, erosion, sedimentation, fisheries and wildlife habitat and maintenance). Maybe if it could be formatted into a table.	This section of the report has been augmented with additional characterization for Honcut Creek, the Yuba River, the Bear River, and an expanded section for Cherokee Canal.

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11/8/13	River Partners	RP-06		The October 2013 Draft relates to the 2012 CVFPP but there is no reference to the 2012 Conservation Framework or the impending 2017 Conservation Strategy; especially if DWR is aiming to support environmental stewardship activities related to improving integrated flood management in Central Valley.	GEI has added a language under the CVFPP Goals and Objectives to address this comment. the aded language is "DWR also prepared the Conservation Framework which is an integral part of the SSIA identified in the 2012 CVFPP and describes how Environmental Stewardship is integrated to make progress towards meeting the environmental objectives of the Central Valley Flood Protection Act of 2008 throughout the flood management system."

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11/8/13	River Partners	RP-07		How do the proposed actions resolve to restore ecosystem function?	Text added to Executive Summary, Regional Goals and Objectives and to Section 1.7, page 1-7: "Nevertheless, the Plan recognizes that restoration of ecosystem function will occur incrementally over time, where compatible with flood management projects, with appropriate funding, and where locally supported. Flood management projects alone will not be sufficient to restore ecosystem function in the region--it will take a diverse range of programs, funding sources, and volunteer efforts sustained over time to accomplish this goal. "
11/8/13	River Partners	RP-08		How do proposed actions meet targeted wildlife needs for the planning area? Plan discusses Swainson's hawk and salmonid to some degree, but what about VELB? Bank swallow? Yellow-billed cuckoo? And other state and federally listed species?	An ecological setting section was added that describes the most important special-status species and their habitats in the region. The cuckoo has recently not been observed in the region.
11/8/13	River Partners	RP-09		The plan doesn't appear to have a fully integrated perspective. DWR has indicated many times that projects that will compete for funding will have an integrated approach, benefiting regional and systemwide flood management while also enhancing ecosystem function and improving institutional capacity (look at TRLIA as an example). Suggest that text be added to explicitly identify the importance of regional projects taking an integrated approach and providing multiple benefits.	Text page 1-7 has been modified as follows: " The region recognizes the importance of planning and implementing multi-objective projects. In fact, the Feather River corridor along much of its length already supports a number of habitat restoration and augmentation projects, including the TRLIA setback levees along the Feather and Bear rivers. Additional restoration projects, integrated corridor management plans, and improved management practices are being implemented. These efforts should be included in the overall evaluation of regional consistency with the CVFPP multi-objective goals."
11/8/13	River Partners	RP-10		Why aren't there proposed actions that highlight either reduced maintenance costs or reduced environmental disturbance (ie. use of native plants in areas prone to erosion or native grasses on levees to reduce spread of invasive species)? Provide incentives or arguments that will also have the flood management community embrace multi-objective projects the same way you address agricultural stewardship.	Paragraph, page 5-4 modified as follows: "Provide waterside berms and erosion protection on the water side: Where levees are subject to the erosive effects of river currents and wave wash, erosion protection by various means will improve levee reliability. Management actions include planting appropriate native erosion-resistant vegetation such as willow, placing rip-rap layers or berms on the water side, or using combinations of vegetation, soil, and rip-rap to create a highly erosion resistant, but habitat friendly, layer along the stream bank. Erosion can also be addressed using biotechnical techniques such as brush boxes, brush mattresses, and large woody debris, or through levee setbacks as described below." A new paragraph has been added to this section on page 5-4 as follows: "Incorporate habitat restoration in levee repair or new section: Native grasses can be planted over levee repairs or new levee sections. Native grasses are deeply rooted, perennial plants which may reduce long-term maintenance costs and provide raptor foraging habitat. For example, between 2008 and 2010 SAFCA incorporated native grass establishment over approximately 18 miles of new setback levees as part of the Natomas Levee Improvement Program, pioneering soil conditioning, seeding, and establishment

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11/8/13	River Partners	RP-11		<p>Highlight other benefits to the communities in the region and build them in where appropriate (ie. recreational opportunities). These projects use a lot of public dollars and the communities should be able to get amenities that they may value (ie. improved parks, boat ramps, hiking trails). Without year-round public benefits, it is unlikely that voters will approve another large water bond.</p>	<p>A new Chapter 7, Recreational Opportunities, has been added to report.</p>
11/8/13	River Partners	RP-12	Ch 1, Page 4, last paragraph	<p>"Agriculture provides the foundation for the regional economy. Loss of highly productive agricultural lands to accommodate larger flood conveyances, transient floodplain storage, and wildlife habitat could affect the long-term viability of the regional economy, including the many secondary and tertiary businesses which support agriculture". Most of the proposed habitat restoration project is on publicly owned lands in which they were acquired for habitat from willing landowners and/or landowners who were compensated fair market value for their properties. The Feather River Setback Area continues to accommodate agricultural operations, LMAs and the State will benefit from habitat restoration that will serve as future mitigation credit for their maintenance activities that will impact natural resources. The plan should serve to highlight the integrative nature of all the aforementioned objectives and supporting objectives. This region has the best opportunity in the Central Valley to demonstrate integration of flood management, agricultural production, recreation and wildlife habitat management already underway, and the tone of this chapter paints a much more one-sided and disappointing perspective focused on just one stakeholder interest group.</p>	<p>A new paragraph has been added to page 1-7, reflecting the region's concurrent interest in protecting agricultural land and improving ecosystem function: "There are also great opportunities for further environmental enhancement and restoration of ecological processes within the floodways of the Feather, Yuba, and Bear rivers, which can be implemented as part of multi-objective projects which also improve flood conveyance. For example, removing and regrading terraced hydraulic mining sediments can concurrently facilitate more frequent floodplain inundation, foster the growth of riparian vegetation, and improve flood conveyance. These floodway enhancement opportunities should be fully leveraged in preference to expanding the floodways at the expense of highly productive agricultural land. When such excavated material is beneficially re-used for other purposes such restoration activities become much more financially feasible."</p>

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11/8/13	River Partners	RP-13	Ch 1, Page 6, 2nd Paragraph	<p>“Despite the risk of flooding, the regional agricultural industry has thrived in the area due to rich soils, plentiful water, and excellent climatic conditions for a wide variety of highly marketable crops. In fact, agriculture makes productive use of lands which would otherwise pose excessive flood risks for residential, commercial, and industrial development. It is therefore of great regional importance to formulate a regional flood management plan which will reduce the risk of flooding while allowing agriculture to thrive.” Some flood prone areas are expensive to maintain (i.e. \$300m+ levee improvement project) and would instead make great recreational areas that will help attract more visitors and thereby diversify the local economy. River recreation/open spaces have been highlighted in other communities and have boosted their economy (ie. Redding). Suggest editing the paragraph to read:</p> <p>“Despite frequent and costly flooding, the regional agricultural industry has thrived in the area due to rich soils, plentiful water, excellent climatic conditions for a wide variety of highly marketable crops, and large public investment in flood protection infrastructure. Flood compatible agriculture, recreation areas, and wildlife management areas make</p>	<p>The paragraph on page 2-2 has been modified to address this comment. the new paragraph is "Despite the risk of flooding, the regional agricultural industry has thrived in the area due to rich soils, plentiful water, and excellent climatic conditions for a wide variety of highly marketable crops and large public investment in flood protection infrastructure. Compatible use of agricultural, recreational, and wildlife areas makes productive use of lands which would otherwise pose excessive flood risks for residential, commercial, and industrial development. It is therefore of great regional importance to formulate a regional flood management plan to promote flood-compatible land uses in the floodplain while reducing the risk of flooding and allowing economic prosperity in the region."</p>
11/8/13	River Partners	RP-14	Ch 1, Pg 1-1, Planning Process	<p>The planning process described gives the illusion that the process is fairly open and inclusive; however, if one is to visit your website, you cannot get meeting summaries from the only public meeting and there are no meeting summaries from any of the stakeholder meetings. Is there a stakeholder engagement plan? Who have you reached out or will be reaching out that represents the environmental groups/NGOs? What about recreation groups [fishermen, kayakers, Audubon Society (also a landowner in your project area) etc.]?</p> <p>Does the Feather River RFMP team acknowledge Audubon as another public lands owner? They should be a stakeholder in this planning process.</p>	<p>Documentation of the outreach process is posted on the project website.</p>
11/8/13	River Partners	RP-15	Ch 1, Pg 1-1, first 2 paragraphs	<p>The purpose of the RFMP is to develop a vision for a floodsafe region. The purpose section of this chapter seems to explain that the 4 grantees and DWR are developing the plan. I suggest a language revision to express that the 4 grantees and DWR are facilitating the development of a broadly supported floodSAFE vision.</p>	<p>The 2nd paragraph on page 1-1 has been modified to address this comment. the added language is: "Although funded by DWR, the intent of all five agencies (YCWA, TRLIA, MLC, SBFCA, and DWR) is to facilitate the development of a broadly supported Plan and embrace the floodSAFE vision."</p>

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11/8/13	River Partners	RP-16	Ch 1, Pg 1-2, first paragraph	Why weren't any meetings aligned with conservation initiatives in the region either with agency participation or environmental groups, or both? Suggest working with regional environmental interests to plan a coordinated meeting or workshop.	Documentation of the outreach process is posted on the project website. Subsequent to receipt of River Partners comments the team conducted additional joint meetings of resources agencies, NGOs, and agricultural interests to facilitate the further development of a broadly supported plan.
11/8/13	River Partners	RP-17	Ch 1, Sec 1.3, 4th paragraph	The 2017 CVFPP update will also be informed by the Conservation Strategy currently being prepared by FESSRO	The paragraph has been rewritten as follows: "In order to bring that process to fruition with the necessary level of detail and opportunity for full local participation in the planning process, the 2017 update to the CVFPP will be informed by regional flood management plans, such as this one, two basin-wide feasibility studies, and the Conservation Strategy. The Conservation Strategy expands upon the Conservation Framework that was included in the 2012 CVFPP."
11/8/13	River Partners	RP-18	Ch 1, Sec 1.3, last paragraph	Not certain that all stakeholders agree with these comments. New and expanded reservoirs would require substantial review and would likely hit difficult regulatory hurdles that would make them infeasible. Suggest providing source or reason for the claim that the "Region remains concerned..."	The last paragraph on page 1-3 has been revised to address this comment. the modified language is: "Consistent with the input provided to the CVFPB during the CVFPP adoption process, the political leadership and flood control agencies in the region remain concerned about the potential loss of agricultural lands, redirected hydraulic impacts, and public expense associated with the implementation of the Sutter Bypass expansion and the creation of a new Feather River Bypass ."
11/8/13	River Partners	RP-19	Ch 1, Sec 1.4	Suggest adding the following as sources of existing information: Conservation Framework State Wildlife Action Plan Lower Feather River Corridor Management Plan Regional IRWMPS Central Valley Joint Venture 2006 Implementation Plan Riparian Bird Conservation Plan – Partners in Flight Recovery Plans for State and Federally-listed wildlife and plants Refuge and Wildlife Area Management Plans Etc.	Changes have been made to Sec 1.4 as follow: Existing State documents of particular importance in this process include: <ul style="list-style-type: none"> • Central Valley Flood Protection Plan (2012), including attachments and CVFPB Resolution 2012-25 • 2012 CVFPP Conservation Framework • Flood Control System Status Report (FCSSR) (20102011) • State Plan of Flood Control Descriptive Document (2010) • Feather River Region Flood Atlas—Draft (July 2013) • Regional Flood Management Planning Initiative, Guidelines for Directed Funding to Prepare Regional Flood Management Plans (2012) • Lower Feather River Corridor Management Plan (only if it is released before the RFMP is published) • Central Valley Joint Venture 2006 Implementation Plan • Riparian Bird Conservation Plan – Partners in Flight • Refuge and Wildlife Area Management Plans

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11/8/13	River Partners	RP-20	Ch 1, Pg 1-7	<p>Specific Objectives listed on Page 1-7 do not support the goals and objectives of the CVFPP: Suggest revising the list to read as follows:</p> <ul style="list-style-type: none"> • Rural Agricultural Areas - Improve flood resiliency for the rural agricultural areas within the region. • Flood System Sustainability - Improve the flexibility and sustainability of the regional flood management system in light of climate change and regulatory constraints. • Agricultural Sustainability -Support and strengthen the regional economy, primarily founded on highly productive farmland; and modify State and federal floodplain regulations to help sustain agricultural uses of regional floodplain. • Ecosystem Restoration – Reduce future regulatory conflict and diversify the local economy through promotion of wildlife habitat management that supports and strengthens the regional riverine ecosystem for listed species as well as game species; modify State and federal floodplain regulations to help sustain resilient wildlife populations reliant upon the river and connected floodplains. • Multiple Objectives - Incorporate multiple objectives such as environmental restoration, agricultural enhancement, improved water 	<p>The proposed revised text represents considerable thought and effort and is appreciated. The concept of promoting environmental restoration is incorporated into the objectives by modifying text as follows:• "Multiple Objectives – Promote and incorporate multiple objectives such as environmental restoration, agricultural enhancement, improved water quality, open space, energy production, and recreation, to the extent compatible with existing land uses."</p>
11/8/13	River Partners	RP-21	Chapter 2	<p>Population demographics would be stronger if presented in comparison to other regions or larger geographies. How does the ag economy of this region compare to that of the Upper San Joaquin for example? What <u>about population?</u></p>	<p>Section 2.2 has been expanded to discuss population growth, but not to compare to other regions, as it is not clear what value such comparisons would add to the report.</p>
11/8/13	River Partners	RP-22	Chapter 2	<p>How much public investment in flood infrastructure has been made in the region since the gold rush?</p>	<p>The information is not readily available. Compiling such a public investment record for the past 160 years would be a significant undertaking, beyond the <u>scope of this Plan.</u></p>
11/8/13	River Partners	RP-23	Chapter 2	<p>There are several mentions of population growth in the document. What are the growth projections and what are they based on?</p>	<p>Section 2.2 has been expanded to discuss population growth, but not to compare to other regions, as it is not clear what value such comparisons would add to the <u>report.</u></p>
11/8/13	River Partners	RP-24	Chapter 2	<p>The chapter fails to recognize recreational resources in the region. The dams provide some recreational resources, and the river and levees also provide some. How does this sector of the local economy interact with flood management?</p>	<p>A new Chapter 7, Recreational Opportunities has been added to report.</p>
11/8/13	River Partners	RP-25	Chapter 2	<p>Please report flood damages in present dollars to facilitate comparison <u>across timescales.</u></p>	<p>The conversion has been done.</p>
11/8/13	River Partners	RP-26	Ch 2 Pg 2-16	<p>In addition to regulations regarding fish and wildlife, CDFW also administers Fish and Game Code 1600 protecting all lakes, streambeds and riparian habitat from unpermitted destruction. This code is usually at odds with flood maintenance requirements and thus should not be ignored in this RFMP.</p>	<p>Changes in the report have been made to reflect the comment. the new paragraph say: "The California Department of Fish and Wildlife (CDFW) administers State laws and regulations regarding the protection of fish and wildlife resources, as well as the Fish and Game Code 1600 protecting all lakes, streambeds and riparian habitat and as such exerts permitting authority over flood control project construction, operation, and maintenance activities, as well as managing State wildlife areas in the region."</p>

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11/8/13	River Partners	RP-27	Ch 2 Pg 2-16	The language in the RFMP regarding the purpose of the Williamson Act is not accurate and includes irrelevant information. Suggest replacing Williamson Act sentences with the following: "DOC also administers the Williamson Act, enacted in 1965, which enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value (DOC website accessed Nov 4 2013). Butte County, Sutter County, and Placer County participate in the Williamson Act program."	Changes in the report have been made to reflect the comment. the new paragraph say: "DOC also administers the Williamson Act, enacted in 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or open space use. In return, landowners receive property tax assessment which are much lower than normal because they are based upon farming and open space use as opposed to full market value."
11/8/13	River Partners	RP-28	Page 2-18: US Fish and Wildlife Service	Swainson's Hawk is not a federally protected species – the USFWS does not regulate its conservation excepting their role in enforcement of the Migratory Bird Treaty Act of 1918 which prohibits the disturbance of ANY nesting bird.	Changes in the report have been made to reflect the comment., reference to Swainson Hawk has been deleted.
11/8/13	River Partners	RP-29	Section 3.1	"Simply put, a levee is intended to confine channel flows from spreading out over former floodplains, which can then be put to a variety of beneficial uses." This statement confers a land use judgement that is not universally accepted. Suggest the following edit: Simply put, a levee is intended to confine channel flows from spreading out over former floodplains, causing a variety of positive and negative effects for people and the environment.	Changes in the report have been made to reflect the comment. it says "Simply put, a levee is intended to confine channel flows from spreading out over former floodplains, causing variety of effects on people and the environment. To accomplish this simple function, a levee must remain structurally intact throughout the duration of high water. "
11/8/13	River Partners	RP-30	Section 3.1	Is there any evidence of falling trees causing levee failure in the region? If so, please cite.	The reference to falling trees damaging levee integrity has been deleted.
11/8/13	River Partners	RP-31	Section 3.2	Is there any evidence of vegetation increasing channel roughness and reducing flood conveyance capacity in this region? If so, please cite.	Yes. Extensive engineering studies have been conducted in laboratory experiments, experiments on artificial channels, on natural rivers, and floodplains. An excellent discussion is provided in section 5-7 through 5-10 of <i>Open Channel Hydraulics</i> , by Ven Te Chow, 1959, published by McGraw Hill. It includes a detailed discussion of the factors influencing Manning's n, including vegetation. It also includes a table of values and photographs of channels with varying characteristics. Hydraulic models in current use are consistent with this discussion, (with reasonable simplifications for practical application). The models have been used to simulate flow in the region's flood channels, with reliable and accurate results. An excellent example of the application in this region is provided by <i>Cherokee Canal: Conveyance Assessment of As-Designed and Existing Conditions to Support Preliminary Design Concepts for Channel Maintenance and Long-Term Corridor Management</i> , prepared by ESA PWA, May 21, 2011.

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11/8/13	River Partners	RP-32	Page 3-4	It is not realistic to imagine that the ESA and CESA are going to be altered to accommodate flood maintenance needs. Instead there needs to be open dialogue and productive relationships between LMAs and regulators, perhaps even structures put in place to facilitate good relationships – i.e. have DFW hire a flood management specialist to assist in permitting, have quarterly workshops amongst regulators and LMAs, develop technical working groups to address the issues as they evolve, etc...	There is a long national and State history of laws and regulations being refined over time to improve their effectiveness. While it is unrealistic to imagine that environmental protection laws will be weakened in the future, it is realistic to imagine and work for opportunities to accomplish the desired protection more efficiently, as the report states. Concur with the call for open dialogue and productive relationships.
11/8/13	River Partners	RP-33	Pages 3-11 to 3-12	<p>“Impacts of modifications to facilities and environmental restoration on adjacent properties must also be carefully considered and mitigated, where feasible. For example, where wildlife habitat is proposed in proximity to existing agricultural lands, the impacts of plowing, spraying, and harvesting of agricultural lands on nearby wildlife habitat and, conversely, the impacts of protected species on agricultural lands, must both be carefully addressed to successfully implement flood risk reduction projects with environmental enhancement components. A major goal of the RFMP will be to develop projects that provide mutual benefits to agriculture and ecosystem functions.”</p> <p>Is there an example of plowing, spraying or harvesting being found in conflict with wildlife habitat management in the region? If so, please cite.</p> <p>Is there an example of protected species causing problems on agricultural lands in the region? If so, please cite.</p>	Please see Comment YSFB-7 and response, including changes in text
11/8/13	River Partners	RP-34	Figure 3-2	Figure 3-2 is difficult to read.	The figure, provided by SBFCA, adequately depicts the dynamic floodplain re-mapping process. If additional concerns are raised about the figure during the final review period the figure will be altered.
11/8/13	River Partners	RP-35	Chapter 5	It’s a good summary of multiple solutions. However, the idea behind the multi-objective approach isn’t necessarily focused on just mitigation for impacts to natural resources. The integrative approach also aims to restore and aid in recovery; restore ecological functions and possibly reintroduce natural processes, which doesn’t only imply compensatory mitigation equating to the amount of project impacts. This needs to be clearly distinguished in this plan.	A new paragraph has been added at the end of Section 5.1 reiterating the region's commitment to multi-objective planning, but integrating actions at project implementation to achieve that goal. The new text, inserted on page 5-2 is as follows: "The types of system improvements are described in general terms in the following sections. Specific actions are described in chapter 6, 7, and 8. It is the intent of the Plan that these specific actions be combined during implementation as multi-objective projects which achieve the primary goal of improving flood risk management and advance the supporting goals as well. The actions are described separately in this Plan because it is premature to define fully integrated projects prior to the formulation of detailed project design features, identification of funding sources (including incentives and constraints), and development of implementation plans. "

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11/8/13	River Partners	RP-36	Chapter 6	Need to organize this section. It has some good points, but at times it's hard to follow because you just pitch a whole bunch of actions for the reader to sift through. Perhaps a table may help as a quick reference to the proposed actions based on the objectives (Flood Management, Agriculture Preservation, and Environmental Stewardship).	Chapter 6 has been revised.
11/8/13	River Partners	RP-37	Chapter 6/whole document	The "Summary of Proposed Actions" described in Section 6.2 may serve well as criterion that should be used to guide what should be developed as proposed actions. When I think of proposed action, I'm envisioning a specific project with some details.	Please see Comment RP-35 and response
11/8/13	River Partners	RP-38	Chapter 6	There is a logical desire to keep land in production agriculture in the floodway. Similar to how habitat restoration should be limited to areas where it will not impact flood conveyance or potentially increase flood risk, the same goes for agriculture. Ensure that agriculture in the floodway is compatible with flood conveyance and adjacent land uses.	Agreed. Language in Section 6.2 acknowledges that it may not be possible to allow all agricultural land to remain in production as the flood risk management infrastructure is improved and/or expanded into neighboring farms.
11/8/13	River Partners	RP-39	Chapter 6	Good description of developing a program that compensates farmers for restoration on private lands. There is concern of "acknowledging the habitat enhancements and values already provided through farming" unless there is strict guidelines on what that entails. Perhaps also a sliding scale if you actually improve habitat for targeted wildlife species identified for the region (ie. Swainson's hawk habitat and yellow-billed cuckoo habitat vs. waterfowl or upland game species habitat).	The phrase "acknowledging the habitat enhancements and values already provided through farming" has been removed.
11/8/13	River Partners	RP-40	Entire document	Section 6.2 seems to have a more balanced perspective of agriculture and habitat restoration (Page 6-3). This is the kind of tone that should be repeated throughout the document consistently.	Comment noted.
11/8/13	River Partners	RP-41	Page 6-4	Page 6-4: Is the definition of "wildlife-friendly agriculture" in the Feather River RFMP consistent with the Conservation Framework and/or Strategy and by regulatory agencies? For example, is planting native grasses in orchards considered wildlife friendly ag? Does it increase habitat value of ag lands? Does it reduce potential for wildlife mortality? Does this example "fit" with the targeted wildlife life cycle?	The CVFPP Conservation Framework does not offer a definition of "wildlife-friendly agriculture." However, most of the wildlife-friendly farming strategies presented in the chapter were discussed and agreed upon by representatives of DFW, NMFS, and FWS on July 9, 2013. Notes from this meeting are available upon request.
11/8/13	River Partners	RP-42	Chapter 6	How will landowner incentive programs associated with compensation for ecosystem services be evaluated on the benefits being created?	The landowner incentive programs will be evaluated for consistency with the Conservation Strategy and with the HCPs under development. They may also be evaluated for additional criteria depending on the funding entity.

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11/8/13	River Partners	RP-43	Chapter 6	There is an excellent description and justification for habitat restoration at the Oroville Wildlife Area, which could also support flood protection and risk reduction objectives.	The Oroville Wildlife Area restoration opportunities are described at the same level of detail as other opportunities (See Section 6.3.3.2)
11/8/13	River Partners	RP-44	Section 6.3.3.4	<p>In Section 6.3.3.4 Feather River Wildlife Area - Abbott Lake Unit, the habitat restoration project being proposed by CDFW and River Partners is misrepresented in your public document.</p> <p>"A variety of ecosystem restoration actions have been planned for the Abbot Lake Unit (e.g., River Partners 2010). These actions include strategically lowering the banks of the Feather River and creating side channels within the Abbot Lake Unit that would become inundated during frequent high-flow events, providing spawning habitat and high-water refugia for anadromous fish. These side channels would also improve floodwater conveyance. Along with the side channels, strategic grading could create benches and shelves that would provide additional frequently inundated floodplain habitat. Aside from these grading and excavation activities, ecosystem restoration actions for the Abbot Lake Unit could include the expansion of Abbot Lake to create additional marsh habitats."</p> <p>River Partners does not include actions that would lower the banks of the Feather River and creating side channel within the Abbott Lake Unit. There is no topographical modification recommended in a restoration plan, CEQA document or permit applications. I don't believe it is an idea</p>	Text for Abbott Lake Unit restoration opportunities was modified based on the 2013 proposal to the Wildlife Conservation Board provided by River Partners.
11/8/13	River Partners	RP-45	Section 6.3.3.4	Another preliminary idea for the Abbott Lake Unit is potentially developing a borrow area for the FRWLIP and lowering the topography. Has this been modeled to address feasibility? Will there be adequate egress of floodwaters? Would this feature be too close to the levee? The northern area is fairly narrow. Will the feature serve only as backwater habitat? If so, would this be really contributing any benefits to salmonid habitat?	These things would be investigated in time; the text only refers to preliminary explorations. No change made.
11/8/13	River Partners	RP-46	Section 6.3.3.12	O'Connor Lakes Unit: Only partial history is given. LD1 used the site as a borrow area for the Star Bend Setback Levee, that's why there is a large swale constructed in the center of the unit. It will be described in the draft Lower Feather River Corridor Management Plan. Also, River Partners completed a habitat restoration project. What this plan is recommending is doing more enhancements. Lay the foundation that you are building upon past projects, which have already aided flood conveyance and increased wildlife habitat. This also serves as a good multi-objective model. The prior projects also reduced the frequency of DWR's maintenance activities and improved recreation because the habitat became better for hunting upland game.	Text was updated to include restoration and enhancement that was already conducted by River Partners.

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12/3/13	National Marine Fisheries Service (NMFS)	NMFS-01		It is clear in this document that environmental stewardship needs to be integrated into the flood management improvements. The Conservation Strategy will establish environmental objectives throughout the flood management system.	Please see response to RP-35
12/3/13	NMFS	NMFS-02		As written, the draft Plan does not adhere to the CVFPP goals and will not comply with the objectives as part of the Conservation Strategy or any ongoing or future programmatic permitting efforts. Moving forward, NMFS encourages DWR to take a more prominent role in the regional flood management process to ensure that the CVFPP goals and objectives are clearly understood.	The draft Plan advances the primary goal and supporting goals of the CVFPP. The emphasis of this regional plan is on advance these goals in a way that also promotes agricultural sustainability and economic stability, and takes advantage of extensive restoration opportunities within existing floodways.
12/3/13	NMFS	NMFS-03		General 1: It is of high importance that the proposed Plan incorporates components for habitat enhancement and restoration actions into every proposed flood improvement project.	Please see response to RP-35
12/3/13	NMFS	NMFS-04		General 1: The Plan should include multi-beneficial flood plans that are consistent with the goals of DWR's Environmental Stewardship Policy.	Please see response to RP-35
12/3/13	NMFS	NMFS-05		General 1 (continued): They [multi-beneficial flood plans] should also contribute to either the restoration of natural riverine processes through construction of setback levees or removal of levee armoring that has a non-functional purpose.	Please see response to RP-35
12/3/13	NMFS	NMFS-06		General 2: Flood management plans should increase unmanaged floodplain habitat and increase the amount of organically grown agriculture. This will make these flood improvement projects more competitive for receiving cost-share funding from the state and increase the likelihood to be permitted as covered activities under the permitting mechanism for the CVFPP.	Please see Comment RP-12 and response.
12/3/13	NMFS	NMFS-07		General 3: In order for the Plan's activities to be permitted and covered under the proposed permitting mechanism, the Plan will need to include projects that incorporate ecological restoration. The Plan as currently drafted is deficient of such restoration activities and projects.	Please see response to RP-35

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12/3/13	NMFS	NMFS-08		General 4: Chapter 2 (Regional Setting) includes no description or overview of the fisheries species for which restoration actions are needed. As a result, the importance of the Feather River Region (area as defined in the plan) relative to recovery and conservation of the species is not clear. Likewise, there is no discussion of the historic distribution or abundance of the species, which would help to further illustrate the precarious nature of the current condition of these species.	An ecological setting section was added that includes historical changes to the environment.
12/3/13	NMFS	NMFS-09		General 5: In addition to a lack of information about target (federally listed) fish species, there is also no information (in Chapter 2 or elsewhere) about the existing habitat conditions for the species in the Feather River region. This is important, because without an understanding of the existing condition (especially as compared to historic condition) it is difficult to evaluate the contribution of restoration activities, or set priorities for contemplated actions. In several cases, the report says that the contribution of recently completed and currently proposed restoration activities should be considered. If system wide habitat conditions were described quantitatively, using indicators of habitat important to the species and responsive to the activities planned, the historic, current and affected condition would be better illustrated and understood, including the contribution of individual or groups of actions.	An ecological setting section was added that includes historical changes to the environment.
12/3/13	NMFS	NMFS-10		General 6: In regard to the Conservation Strategy, it is unclear as to why this is not mentioned until Section 6.3, rather than being discussed earlier when the relationship with the CVFPP is covered. The point being that the CVFPP (through the Conservation Strategy) proposes a system wide approach to species recovery as well as flood control.	Section 1.4 Bullet has been revised to read: "• 2012 CVFPP Conservation Framework and 2014 draft Conservation Strategy(unpublished)". Section 1.7 page 1-6, bottom paragraph has been revised to read: "These goals provide guidance for the formulation of its specific policies and physical elements. The goals also capture guidance and objectives provided in the authorizing legislation (California Water Code Section 9616) (DWR 2012). DWR also prepared the Conservation Framework which is an integral part of the SSIA identified in the 2012 CVFPP and describes how Environmental Stewardship is integrated to make progress towards meeting the environmental objectives of the Central Valley Flood Protection Act of 2008 throughout the flood management system. In April 2014 DWR completed an administrative review draft of the 2017 Conservation Strategy, which although unpublished, has been helpful in advancing the region's effort of aligning proposed actions with DWR's goals and objectives. GEI has added language under the CVFPP Goals and Objectives to address this comment. Additionally, GEI believes the reference to 2012 or 2017 CVFPP is a reference to all the attachments including the Conservation Strategy."

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12/3/13	NMFS	NMFS-11		General 7: The brief introduction to Chapter 7 reads "This section will provide a list of management actions and projects for the region..." This is accurate, but falls within the Chapter termed "Structural and Operational Alternatives Formulation." As the introductory sentence describes, what follows are not alternatives, but a list of possible actions. Chapter 9 contains a means of comparing the potential actions, and it is assumed that the actions that rate the highest would then become priority. This appears to be another level of project screening, but is not the same as comparing alternative means of meeting objectives, whatever those are, for the Feather River Basin. Ideally, region-wide objectives for the plan addressing the different issues (flood control, agricultural lands, fish species recovery) would be developed, and then various combinations of actions developed to meet the objectives compared.	Please see Comment RP-35 and response
12/3/13	NMFS	NMFS-12		General 8: Under Purpose of the Report it is stated that the CVFPP will be followed to the 'extent feasible.' Why? What is not feasible? Is it a feasibility issue or a willingness issue?	The feasibility of an action a measure of the capability of getting something done, taking into account all of the steps needed to carry out the action, legal and regulatory constraints, financing, and acceptability. While the Plan is aligned with the CVFPP goals and objectives, not all of the actions which might be proposed under the CVFPP to advance those goals are necessarily reasonable or feasible from a regional perspective.
12/3/13	NMFS	NMFS-13		Specific 1: The Feather River Regional Flood Management Plan is defined as the "Plan." This is fine, but it goes from upper to lower case throughout the document, needs to be consistent as it can get confusing which plan is being referenced.	Minor editorial changes have been completed.
12/3/13	NMFS	NMFS-14		Specific 2: Under the 'Relationship with the CVFPP' section, new or expanded reservoirs are mentioned as alternatives to be considered. These discussions are likely non-starters as reservoir expansion or new reservoirs will not be a part of the programmatic permitting and will likely not be a part of the Conservation Strategy.	The opinion of the commentor is noted. However, new and expanded storage, as well as improved use of existing storage through F-CO, F-BO, and facilities modifications continue to be important multi-objective management actions which are being actively studied and implemented by water management agencies where feasible. Examples include DWR's multi-year evaluation of Sites Reservoir, USBR's evaluation of an expanded Shasta Lake, YCWA's evaluation of a new low-level outlet for New Bullard's Bar Dam, the Folsom Joint Federal Project to construct a new low-level spillway for Folsom Dam, and USACE plans to raise Folsom Dam, to name a few.
12/3/13	NMFS	NMFS-15		Specific 2 (continued): Bypass expansion projects are part of the CVFPP and a part of the Conservation Strategy and will likely be included in the permitting strategy. These activities should be considered as part of the Plan as they will provide for multi-beneficial projects.	Comment noted. The Plan does not include bypass expansion projects as noted on Page 1-3, paragraph 3. Please see Comment RP-12 and response.

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Date	Agency	Comment #	Page	Comment	Response
12/3/13	NMFS	NMFS-16		Specific 3: In the 'Regional Goals and Objectives' section, the Plan defines multi-benefit projects. While the definition does describe multiple benefits, it does not equate with how this is defined as part of the CVFPP. As part of this process, multi-benefit projects need to incorporate ecological restoration and long-term maintenance considerations.	Please see response to RP-35
12/3/13	NMFS	NMFS-17		Specific 4: Under 'Multiple Objectives' there is mention of energy production. Unsure how this fits in with the goals of the CVFPP.	The Plan is not constrained to advancing only the multi-objective goals of the CVFPP. Improving energy production as part of flood management projects where feasible is an important goal of regional, statewide, and national importance, particularly where existing facilities can yield greater benefits.
12/3/13	NMFS	NMFS-18		Specific 5: The Plan states the following: "While the regional goals and objectives are consistent with the CVFPP goals" NMFS disagrees. The Plan's goals are not consistent with the CVFPP. There is no discussion on bypass expansion, and there is limited discussion on ecological restoration absent of those activities already committed due to flood management projects in the area.	The opinion of the commentor is noted. Please see comments and responses to RP-12 and RP-35.
12/3/13	NMFS	NMFS-19		Specific 6: Page 1-3 states that the Plan formulation process is an integral part of the CVFPP process for planning, design, construction, and operation and maintenance. It should also be considered integral for species recovery.	Please see response to RP-7
12/3/13	NMFS	NMFS-20	Page 5	Specific 7: Page 5 of the Plan states the following: "minimizing future land use conversion to wildlife and fisheries habitat." With this as a goal, how will the Plan incorporate species benefit priorities into the proposed activities?	Please see response to RP-12.

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Date	Agency	Comment #	Page	Comment	Response
12/3/13	NMFS	NMFS-21		Specific 8: The restoration activities that are a part of the TRLIA setback and the Bear River setbacks are already committed to previous actions and are not applicable to this process aside from serving as guides for future projects. The Plan does not give detail on what land may still be available for use on additional projects.	The opinion of the commentor is noted. However, it is important to recognize that the regional flood management agencies, in partnership with State and federal agencies, have been advancing multi-objective projects consistent with CVFPP goals and objectives since the passage of Proposition 13 Bond Act in March 2000. Major levee setback projects, floodplain ecosystem restoration, improved reservoir operations, improved river corridor management planning, and other projects which have been implemented or are soon to be implemented. Given that major civil works projects take many years to implement, it is important to evaluate their benefits and impacts in toto, rather than view proposed future actions in isolation. Taken together, the region has an exemplary record in this regard. It is important for resources and permitting agencies to acknowledge the region's proactive approach and accomplishments, as they should provide context for review of permitting future projects and maintenance activities. See also responses to RP-12 and RP-35.
12/3/13	NMFS	NMFS-22	Page 6	Specific 9: On page 6, there is a typo, "in from the or southwest" ...	Minor editorial changes have been completed.
12/3/13	NMFS	NMFS-23	Page 6	Specific 10: Page 6: what is being referred to as the 'flood control channels?' If this is in reference to the Feather River, while they do provide flood control, to refer to a river as a flood control channel is inappropriate.	Changes in the report on page 7 have been made to reflect the comment. The new paragraph says "The flood management system which currently provides protection to the Feather River Region includes upstream reservoirs with active flood control space, levees along the major watercourses acting as flood control channels during high water events, and drainage facilities which pump interior runoff and seepage from levee protected areas back into the flood control channels."
12/3/13	NMFS	NMFS-24	Page 8	Specific 11: Page 8 discusses how vegetative growth impedes floodwater. This is not necessarily true; willows have been shown to have no impact on flood capacity. Also, vegetation can assist in preventing erosion damage, thereby providing a net benefit to flood management.	See Comment and response RP-31
12/3/13	NMFS	NMFS-25	Page 1-2	Specific 12: Page 1-2 states the following: "DWR has indicated that it will prioritize State cost-share funding for elements of the regional flood management plans to the extent that these elements are compatible with the vision, guiding principles, and elements of the CVFPP." NMFS is uncertain that this is understood as part of the Plan? The direction of this draft document would seem to indicate otherwise.	The regional flood management agencies, working closely with DWR, USACE, and resources agencies, have been leaders in implementing multi-objective flood risk reduction projects, as summarized in the report, and anticipate continuing in this direction, consistent with funding guidelines and project opportunities in the future. Please also see Comment and response RP-12 and RP-35

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12/3/13	NMFS	NMFS-26	Page 1-3	Specific 13: Page 1-3 discusses how the Feather River Bypass impacts and costs do not appear to justify further consideration. Is this analyzed somewhere? Were implications to species recovery considered in this evaluation?	Detailed habitat surveys and analyses have been conducted in the context of management of the existing facility. These surveys indicate that the existing Cherokee Canal and surrounding farmland provide important wildlife habitat, especially for GGS. We are unaware of any wildlife impacts study related to the proposed Feather River Bypass, but it is likely that issues related to salmonid survival, including both outmigrant survival and adult upstream migrant fish passage would need careful study.
12/3/13	NMFS	NMFS-27	Page 1-3	Specific 14: Page 1-3- (and elsewhere) refers to "the region" as concerned about several issues, including the potential loss of agricultural lands. This would be more accurate if concerns were attributed to people or entities within the region, or local flood management agencies within the Feather River Basin.	"The region" in this context is shorthand for the four regional partnering agencies (SBFCA, TRLIA, YCWA, MLC) responsible for conducting the RFMP and for contributing the local cost share of past, present, and future flood management projects. It is recognized that there will be a wide range of opinions and perspectives on the important, and often complex issues facing the Feather River Region. The regional partnering agencies seek to understand and accommodate this wide range of opinions and perspectives, to the extent consistent with good science, practical experience, and the well being of the people in the region. A paragraph has been added to the end of Section 1.1 as follows: "A diverse range of stakeholders, often with divergent interests and opinions, participated in this process. While all of these interests and opinions were carefully considered, it is ultimately the responsibility of the four local partnering agencies to formulate the perspective and recommendations of the region as documented in this report. For simplicity, these are attributed to "the region" throughout this report."
12/3/13	NMFS	NMFS-28	Page 1-7	Specific 15: Page 1-7 discusses Agricultural Sustainability. While this is good in principle, it does not adhere to the conservation strategy thus will not fall under the regional permitting nor qualify for State funding under the CVFPP. Some agricultural areas will need to be converted into natural floodplain to offset project impacts. Additional floodplain cannot be converted into agricultural land as part of this process without appropriate compensation.	The commentor has construed the Conservation Strategy as narrowly focused on fluvial processes and habitats. The Conservation Strategy contributes to the attainment of CVFPP Goals, including promoting multi benefit projects with "integrated planning, agricultural stewardship, and outreach and engagement" (draft Conservation Strategy, April 2014, unpublished). This certainly includes projects that concurrently achieve both sustained agricultural productivity and improved wildlife habitat.

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12/3/13	NMFS	NMFS-29	Page 1-7	Specific 16: In reference our general comments above, on page 1-7 the plan reads "The Feather River corridor already supports a number of habitat restoration and augmentation projects along much of its length, including the TRLIA setback levees along the Feather and Bear rivers. Additional restoration projects, integrated corridor management plans, and improved management practices are being implemented. These efforts should be included in the overall evaluation of regional consistency with the CVFPP multiobjective goals." An evaluation that quantified habitat condition could include these projects in the description of existing condition.	The intent of the Plan is not to seek credit for the work already been accounted for. The statements throughout the report are simply informational. The comment does not reference any specific statement; therefore, no changes have been made. An accounting of land may be useful for further clarifications.
12/3/13	NMFS	NMFS-30		Specific 17: Throughout the document there is some name inconsistency with Lake Oroville. In places it is referred to as Oroville Lake. Also, while the name is Lake Oroville, in discussion it should be referred to as a reservoir as it is not a lake by definition.	Minor editorial changes have been completed.
12/3/13	NMFS	NMFS-31	Page 2-7	Specific 18: Page 2-7 references a \$300 million figure, is this in 1997 dollars or current?	Changes have been made reflecting 1997 dollars.
12/3/13	NMFS	NMFS-32	Page 2-13	Specific 19: On page 2-13 the Central Valley Flood Protection Board is referred to as 'the Board' and 'CVFPB.' Pick one and be consistent in the entire document.	Minor editorial changes have been completed.
12/3/13	NMFS	NMFS-33	Page 2-18	Specific 20: Page 2-18: should be NOAA Fisheries, not NOAA fisheries. Giant garter snake, hawk, and valley elderberry longhorn beetle should be in lowercase.	Minor editorial change has been completed.
12/3/13	NMFS	NMFS-34	Page 3-1	Specific 21: On page 3-1 there is reference to threats during high water. It is important to note that threats also occur during 'normal' flows, such as under seepage. For example, the Jones Tract levee failed during the summer.	In general, the threat of levee failure is strongly influenced by the hydraulic pressure and erosive forces which come into play during high water events, although structural levee flaws can be revealed and cause failure over a range of flows. The Jones Tract levee failure in June, 2004 reflects the fact that much of the Delta, including Jones Tract, is below sea level, and thus Delta levees have high hydrostatic loadings all year round.
12/3/13	NMFS	NMFS-35	Page 3-1	Specific 22: On page 3-1 there is reference to 'sufficiently clear of vegetation.' What does this mean?	Changes in the report on page 3-2 have been made to reflect the comment. it is "They must be free of rodent holes, be accessible for patrols, and be sufficiently clear of vegetation to facilitate visual inspection and flood fighting."
12/3/13	NMFS	NMFS-36	Page 3-1	Specific 23: On page 3-1, there should be a discussion on setback levees as they can alleviate flood risk during multiple flow regimes.	GEI - the discussion in section 3.1 is a general discussion and speaks to the levee system in the region. Discussion of setback levee is offered in chapter 5 under 5.2-Levees.

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12/3/13	NMFS	NMFS-37	Page 3-2	Specific 24: Page 3-2 references how local agencies are concerned about cumulative impacts of vegetation. Instead of relying on misguided information, NMFS recommends that local agencies be educated regarding the benefits of vegetation. As examples, vegetation can reduce erosion and scouring and provide stability to the soils.	Changes in the report on page 3-2 have been made to reflect the comment; the following sentence has been added, "Erosion protection can be achieved by placing riprap, biotechnical erosion protection, such as brush boxes, or planting erosion resistant vegetation, such as willows, on the waterside of the levees. . "
12/3/13	NMFS	NMFS-38	Section 3.4	Specific 25: Section 3 .4 states the following: "the latter half of the twentieth century " As we are now in 2013, this statement should also include the 21st century.	Changes in the report on page 3-3 have been made to reflect the comment. It now says "From the latter half of the twentieth century to present has been marked by a growing awareness"
12/3/13	NMFS	NMFS-39	Section 3.5	Specific 26: Section 3.5 on page 3-4 incorrectly defines the US Army Corps of Engineers (USACE) vegetation policy. A vegetation variance can be obtained as part of a project and still be compliant with the USACE vegetation policy. Additionally, vegetation removal as part of the USACE vegetation policy will likely violate State and Federal laws. Page 3-6 again references the need to remove most woody vegetation. NMFS recommends a detailed reading of the USACE policy and a familiarization with the Systemwide Improvement Framework Policy.	Changes in the report on page 3-4 have been made to reflect the comment. Second paragraph of Section 3.5, page 3-4 has been rewritten as follows: "Beginning in 2006, a change in USACE's approach towards woody levee vegetation also poses new challenges for those who operate and maintain the existing system of levees. Since the levee system failures along the Gulf Coast caused by Hurricane Katrina in 2005, USACE has taken the position that no woody vegetation should be tolerated on or near federal project levees and, through a series of administrative actions, has moved to promulgate and enforce this approach. USACE allows for variances from this national policy. It requires that applicants develop detailed analyses which demonstrate that woody vegetation does not impair levee integrity and performance. The variance process is resource-intensive and involves extensive USACE review, up to and including approval by the Assistant Secretary of the Army for Civil Works (ASA-CW). Woody vegetation is of great ecological and aesthetic value and due to permitting constraints, is now very costly for local agencies to manage. "
12/3/13	NMFS	NMFS-40		Specific 27: As the Plan is supposed to work in cohesion with the CVFPP process, NMFS recommends following the vegetation framework described in the 2012 CVFPP and in the subsequent releases as opposed to the USACE vegetation policies.	The Plan as written is consistent with the vegetation management policy described in the 2012 CVFPP.
12/3/13	NMFS	NMFS-41	Figure 4-1	Specific 28: Figure 4-1 is labeled as draft from November 2012. Is this still a draft?	Yes. This draft is used for illustrative purposes only.
12/3/13	NMFS	NMFS-42	Page 4-22	Specific 29: Page 4-22, the word 'below' should be replaced by 'downstream.' Likewise, throughout the document replace 'above' and 'below' dams with 'upstream' and 'downstream' of dams.	Minor editorial changes have been completed.
12/3/13	NMFS	NMFS-43	Page 4-22	Specific 30: On page 4-22 there is mention of a proposed agreement to manage in-stream flows in the Yuba River. It would be useful to know the members of this proposed agreement.	Addition text and a table has been added to Section 4.2.3 to describe the Lower Yuba River Accord and to identify the 17 participating and signatory agencies and NGOs.

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12/3/13	NMFS	NMFS-44	Page 4-39	Specific 31: Page 4-39, under the Erosion section a potential restoration project opportunity that could utilize existing materials available would be to remove cobble left from gold dredging activities that are in piles or that line the bank in areas where it serves no functional flood control purpose or is protecting an area which could be converted back to floodplain habitat. This cleaned cobble could be reintroduced into the Feather River in reaches that have been depleted of the substrate. The ecological benefits created from the rock removal would be restored river meander potential and improve in-stream spawning substrate. The rock removal would also open up the area for vegetation restoration opportunities.	Section 4.4.1.1 -4.4.1.3 discussions modified in reach by reach descriptions of erosion to include: "One of the potential actions may be to remove cobbles left over from gold dredging and reintroduce it as slope protection where appropriate. In addition, where gravel deposits of the appropriate range of sizes needed by spawning salmon are available, the gravel can be cleaned and re-introduced to the channel to create high-quality spawning habitat."
12/3/13	NMFS	NMFS-45	Section 4.4.1.4	Specific 32: Section 4.4.1.4 discusses the Cherokee Canal. A potential multi-beneficial flood improvement and restoration project exists. The Cherokee hydraulic mine continues to release sediments during high flows and most likely releases mercury and other contaminants into the system and results in sedimentation buildup, decreasing flood conveyance capacity. Removal of the sediment source or isolating the mine from Cherokee Canal should be explored. This would not only decrease the ongoing Operations and Maintenance costs but would also increase flood conveyance capacity while improving water quality for fish and wildlife.	Cherokee Canal issues and concerns, restoration opportunities, and proposed plans have been rewritten and are described in Sections 4.4.1.4, 6.3.3.8, and 8.1.2. Studies conducted on the management issues and opportunities surrounding Cherokee Canal suggest that the primary source of sediment is no longer Cherokee Mine itself, but the alluvial debris deposits downstream in Sawmill Ravine and Dry Creek. Thus the plan does not propose actions to isolate the mine. A systematic assessment of the extent and source of potential mercury contamination in the Cherokee Canal system was not found. The report authors welcome additional information in this regard, and will consider it in future report updates.
12/3/13	NMFS	NMFS-46	Section 4.4.1.5	Specific 33: Section 4.4.1.5 discussion of the Sutter Bypass; structural modification to the Fremont Weir has been a high priority of NMFS and the US Fish and Wildlife Service. As is, it currently does not facilitate adult fish passage, delaying and killing fish on an annual basis. Costly and difficult fish rescue efforts are conducted on an almost annual basis. Modifications to the weir could eliminate the need and cost of these rescues and also improve flood conveyance and flood capacity within the Sutter Bypass. Additionally, modifying the Fremont Weir could also alleviate the backwatering effect of the Sacramento River at Fremont Weir that occurs.	A new Section 4.4.1.7 has been added to the report to address this issue: "Fremont Weir and the Yolo Bypass lie within the North Delta\Lower Sacramento River Regional Planning Area, and thus lie outside of the Feather River Regional Planning Area. These facilities currently convey about 80 percent of the flood flows from the Sacramento River system to the Delta, and thus play a critically important role in the overall performance of the SPFC for the Sacramento Valley. The Feather River Region partner agencies are aware that the ND\LS plan formulation effort includes the consideration of improving fish and wildlife habitat, fish passage, and flood conveyance capacity of Yolo Bypass and Fremont Weir. Because any expansion of Fremont Weir and the Yolo Bypass conveyance capacity would have beneficial effects on flood stages in the lower Sutter Bypass and the Lower Feather River, the Feather River RFMP partnering agencies will be supportive of such improvements if the ND\LS region recommends them and local impact concerns are addressed."
12/3/13	NMFS	NMFS-47	Section 5-2	Specific 34: The list of restoration projects in Section 5-2 includes fish habitat improvements on Deer Creek. If this Deer Creek is the Sacramento Tributary which flows through Vina, it is outside the planning area.	The reference is to Deer Creek which joins the main stem Yuba River about one mile downstream of Englebright Dam.

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12/3/13	NMFS	NMFS-48	pages 5-3 to 5-4	Specific 35: Pages 5-3 and 5-4 discuss benefits of setback levees. Additional benefits are the potential for reduced long-term maintenance and cost and the ability to retain all vegetation on the existing levee due to the setback levee in place. Recreational opportunities could be an additional benefit.	Changes in the report on page 5-4 have been made to reflect the comment. the modified section is "Reconstruct deficient levees in place or construct levee setbacks: With a limited footprint available, reconstruction in place with competent materials under current engineering practices can greatly improve levee reliability. While it is expensive to rebuild a levee in place with new materials, it may offer a solution where other options prove difficult to implement. Constructing a setback levee in its stead can provide additional channel storage and conveyance capacity, reduce the risk of levee overtopping and erosion failures, benefit habitats, and create recreational opportunities. However, a setback levee will fundamentally alter the potential uses of the land which transitions from levee-protected to floodplain. Given the potential local and regional impacts of such levee setbacks upon established land use, this approach is only recommended where supported by affected landowners, LMAs, and where consistent with county land use plans. Levee setbacks can be difficult and expensive undertakings, due to the need for large quantities of materials and the impacts on land use and agriculture in the vicinity. As an intermediate alternative between rebuilding a levee in place and constructing a new setback
12/3/13	NMFS	NMFS-49	Page 5-4	Specific 36: Page 5-4 discusses the opportunity to "provide off-stream transitory storage" by providing means for controlled inundation of adjacent uninhabited agricultural lands for increased flood storage and wildlife benefits. While NMFS agrees that this is a possible opportunity for increasing the amount of potential agricultural floodplain habitat, incentives should also be given to farmers for crop conversions to more flood tolerant agriculture in existing operational agriculture fields and allow for seasonal flooding to occur.	Please see responses to YSFB-1- and CAFB-50
12/3/13	NMFS	NMFS-50	Pages 5-5 to 5-6	Specific 37: Pages 5-5 and 5-6 states that the Plan considers all opportunities to improve ecosystem benefits for the purpose of offsetting "minor" impacts of flood control improvements. Not all flood control impacts to fish and wildlife are "minor" as some proposed flood improvement projects could and have had major impacts to fish and wildlife to the point of threatening their future existence. Using the adjective "minor" to describe flood project impacts should be removed.	Changes in the report on page 5-6 have been made to reflect the comment. The word "minor" has been deleted.
12/3/13	NMFS	NMFS-51	Page 6-1	Specific 38: Page 6-1 states the following: "restoration opportunities where feasible." This indicates that this priority is of lesser importance or considered as an afterthought. For flood management projects to work as part of the CVFPP, ecological restoration must be given equal emphasis.	"Feasibility" is a constraint on all actions in the plan. Improving flood risk management is the primary goal of this plan. Promote ecosystem functions and promote multi-benefit projects are among the supporting goals. These are not co-equal goals. However, the region is committed to integrating actions which advance the supporting goals wherever feasible. Please see Comment and response NMFS-12 for further discussion of "feasible".

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12/3/13	NMFS	NMFS-52	Page 6-1	Specific 39: Page 6-1 discusses how agricultural stewardship is an essential component of ecological stewardship. While NMFS will likely agree in certain situations, this will not be universally true. Flexibility will be required if projects as part of the CVFPP will be permitted.	Agreed. Language in Section 6.2 states that "utilization of agricultural lands as habitat by threatened and endangered species varies by crop type and agricultural lands do not always meet the full life-cycle habitat needs of some threatened and endangered species. Thus, habitat restoration must also be an integral part of the RFMP."
12/3/13	NMFS	NMFS-53	Page 6-1	Specific 39 (continued): Note also that this section (and elsewhere) speak to benefits to flood safety and wildlife, but do not include fisheries.	Text was changed from "wildlife" to state "fish and wildlife". Fish resources are also included in new ecological setting section of the Plan.
12/3/13	NMFS	NMFS-54	Page 6-2	Specific 40: Page 6-2 discusses how agricultural lands provide habitat value. This needs to be explained in detail. Is this referring to rice fields and their use by giant garter snake?	In the first paragraph of Section 6.2, the text notes that agricultural lands in the Feather River region provide foraging habitat for raptor species and sandhill cranes.
12/3/13	NMFS	NMFS-55	Page 6-6	Specific 41: Page 6-6 states the following: "Ensure that enhancements to the wildlife value of agricultural land do not reduce agricultural productivity." This position will not work as part of this process.	This bullet has been removed from the text.
12/3/13	NMFS	NMFS-56	Page 6-6	Specific 42: Page 6-6 states that farming within the floodway will be "encouraged" to follow organic farming practices. Although this is good in theory, "encouragement" alone will most likely not work. Monetary incentive programs which promote and offset increases in cost for organic farming should be established. These types of incentive programs should be thoroughly explored with DWR and other funding mechanisms.	Text has been added: "Monetary incentive programs would be offered to offset the costs associated with these types of BMPs and organic farming, or, for those lands brought under easements, the price of the easements will take into account the those costs."

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12/3/13	NMFS	NMFS-57	Page 6-6	Specific 43: Page 6-6 states in the summary of proposed actions that projects will "ensure that enhancements to the wildlife value of agricultural land do not reduce agricultural productivity." If the intent is to incorporate wildlife benefits into current farming practices or into particular agricultural plots of land, changes will need to be made. Additionally, any agriculture that is expected to receive regular flood inundation will need to be graded in a matter that prevents fish entrapment in pools and will need to be graded so that as water recedes it will flow back into the main waterway. These changes may or may not result in changes to crop yields. Any anticipated changes to crop yield production should be offset through monetary incentives or cost-sharing with the state should be sought.	The bullet stating "ensure that enhancements to the wildlife value of agricultural land do not reduce agricultural productivity" has been removed. The following language has been added (to Section 6.2.1): "These practices typically reduce yield or otherwise increase cost of farming and therefore, when implemented as part of the Plan, farmers must be compensated for the associated financial losses. Farmers may be compensated by the sale of an easement that requires particular farming practices for an agreed-upon duration of time, and provides financial compensation for implementation of these practices. Funding for voluntary wildlife-friendly farming programs could be directed through and administered by organizations with existing capacity, such as local Resource Conservation Districts (RCDs)." Language has also been added in Section 6.2, under the "Flowage Easement" bullet, stating that "a flowage easement could be purchased from the landowner allowing the lands to be flooded during high river flows, and compensating the landowner for any necessary flood-related modifications to the land or operations."
12/3/13	NMFS	NMFS-58	Page 6-6	Specific 44: Page 6-6 states in the summary, "pending favorable hydraulic modeling results, allow some orchards, row and truck crops, dry land and irrigated pasture, and rice fields to be placed in the modified/expanded floodways." The word "favorable" needs to be defined.	"Favorable" has been defined in the text as "no changes to stage during critical flows, and no change in near-bank velocities that would negatively influence erosion or sedimentation patterns."
12/3/13	NMFS	NMFS-59	Page 6-8	Specific 45: Page 6-8 discusses existing programs, plans, and similar efforts that have focused ecological targets. While NMFS agrees that this is true, these efforts are committed as part of other processes and cannot be used for CVFPP activities. For example, restoration as part of the Oroville relicensing effort cannot be used to offset regional plans or CVFPP project activities. Likewise, page 6-9 highlights the Feather River West Levee project. The mitigation as part of this project cannot be used for other project impacts.	Recent restoration actions contribute to the compliance of the area with the Statewide Investment Strategy for flood management. These actions are not meant to be mitigation for future impacts of flood management projects - the text does not state that. To be abundantly clear [actions that] "support" was replaced with "are consistent with" [the Conservation Strategy.]
12/3/13	NMFS	NMFS-60	Section 6.3.2	Specific 46: In Section 6.3.2, it is stated as a potential enhancement measure that covering rock slopes or rip-rap areas with soil and planting native grasses could be implemented. It should be noted that planting native grasses alone on levee banks will not provide for habitat enhancements for salmonids. Willows or other woody vegetation planted at or near the levee toe will provide a substantially greater amount of ecological benefits for a larger variety of wildlife including restoring shaded riverine aquatic habitat conditions for fish species.	Willow plantings and other riparian habitat restoration has been recommended for specific areas in Section 6.3.3. Native grassland on levee slopes can provide foraging habitat for Swainson's hawk, while not increasing hydraulic roughness (as was done for the Natomas Levee Improvement Project).

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12/3/13	NMFS	NMFS-61	Section 6.3.3	Section 6.3.3 continues the theme of the comment above. These restoration efforts are already tied to existing projects. What restoration opportunities are being proposed uniquely for the Plan? These will need to be identified prior to any project qualifying for State funds or issuance of a permit from NMFS. The Laurel Avenue Levee Setback discussion is an example of newly proposed habitat restoration project.	Text in Section 6.3.3 has been updated to describe actions that were already taken (e.g, Sections 6.3.3.4 and 6.3.3.12). Existing habitat enhancement and restoration is described in several projects in 6.3.3 to indicate that additional restoration could build on these projects. Generally, Section 6.3.3 describes future opportunities for enhancement and restoration.
12/3/13	NMFS	NMFS-62	Section 6.3.3.5	Specific 48: In Section 6.3.3.5 there is discussion on the potential Laurel Avenue Levee Setback. Some information is missing in the following quoted text from the document: "a setback levee along the of the Feather River could be constructed ... " Please add missing information to this sentence as well as fixing other edits within the last sentence of this paragraph.	Text has been modified to clarify this is on the right bank.
12/3/13	NMFS	NMFS-63	Section 6.3.3.9	Specific 49: Section 6.3.3.9 discussion of increasing the amount of brood ponds could pose a risk for fish entrapment if new brood ponds are constructed close in proximity to active waterways.	Text was modified to state that new brood ponds would be designed so as not to pose a risk for fish entrapment.
12/3/13	NMFS	NMFS-64	Page 7-1	Specific 50: Page 7-1 discusses the Sutter Butte Flood Control Agency 44 mile levee project. Is this being proposed as part of the Plan? NMFS has completed its consultation on this project.	Correct; consultation is complete on 40 miles of the FRWLP. Section 7.1.1 describes "ongoing, planned, and potential actions," and the FRWLP is an ongoing action.
12/3/13	NMFS	NMFS-65	Entire document	Specific 51: Page 9-2, section 9.1.6 correctly mentions the goals of the CVFPP. NMFS recommends redoing the draft Plan with these goals as the template.	The RFMP has been drafted in alignment with the CVFPP goals and objectives. As reflected in the extensive responses to comments, the revised plan reflects careful consideration of all feedback from stakeholders, including resources and <u>permitting agencies</u> .
12/3/13	NMFS	NMFS-66	Entire document	Specific 52: Similar to the comment above, page 9-3 correctly identifies how the CVFPP defines multi-objective projects. NMFS recommends the draft Plan be rewritten with this as the definition.	The RFMP has been drafted in alignment with the CVFPP goals and objectives. As reflected in the extensive responses to comments, the revised plan reflects careful consideration of all feedback from stakeholders, including resources and <u>permitting agencies</u> .
12/17/13	US Fish and Wildlife Service (FWS)	FWS-01	Pg 5	Its not clear what multi-objective benefits of productive agricultural lands there are. It would be helpful to define this.	Changes in the report on page 5 have been made to reflect the comment. The modified language is "There are many opportunities for improving the multi-objective benefits of productive agricultural land, (an example is benefit to wildlife habitats) which can concurrently strengthen the economic viability of agriculture in the region. The region seeks to take maximum advantage of these evolving opportunities while minimizing future land use conversion to wildlife and fisheries habitat."
12/17/13	FWS	FWS-02	Pg 1-7	We would recommend you include an objective of integrating ecosystem restoration oppertunities with flood risk reduction projects.	Please see Comment and response RP-12 and RP-35

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12/17/13	FWS	FWS-03	Pg 1-7	This last sentence (paragraph 4) seems to imply that the region does not want to improve the wildlife and fish habitat. This would seem to indicate that you had done some sort of analysis and found that additional wildlife and fish habitat is not needed. However since you have not done this, and it is not likely the case you should look at documenting the problems related to fish and wildlife and their habitat and come up with a plan to address the problems.	Please see Comment and response RP-12 and RP-35
12/17/13	FWS	FWS-04	Pg 2-2	It would be worth mentioning that the rich soils that sustain the agricultural lands were created over time from natural river processes. There are benefits to agriculture from restoring natural river processes.	Paragraph 2, page 2-2 has been modified as shown in bold: "Despite the risk of flooding, the regional agricultural industry has thrived in the area due to the rich alluvial and floodplain soils deposited over thousands of years , plentiful water, and excellent climatic conditions for a wide variety of highly marketable crops and large public investment in flood protection infrastructure. "
12/17/13	FWS	FWS-05	Pg 2-18	Valley elderberry longhorn beetle should not capitalized	Minor editorial changes have been completed.
12/17/13	FWS	FWS-06	Pg 3-1	Regarding "Simply put, a levee is intended to confine channel flows from spreading out over former floodplains, which can then be put to a variety of beneficial uses." Though this has been at the cost of lost habitat and a decline in some species.	Changes in the report have been made to reflect the comment. it now says "Simply put, a levee is intended to confine channel flows from spreading out over former floodplains, causing variety of effects on people and the environment. "
12/17/13	FWS	FWS-07	Pg 3-3	Refrence to 4% loss of habitat, paragraph 5 - It would be helpful to try and put this in perspective to the Feather River area. These kind of numbers should give context of what has been lost so it is clear this loss of habitat has affected fish and wildlife species.	Section 2.4 has been added to report to provide this context.
12/17/13	FWS	FWS-08	Pg 4-39	Wildlife Habitat (paragraph 6) - It would be helpful to provide more information on the types of habitat within each area and where connectivity is an issue.	A new paragraph has been inserted at the end of Section 4.4.1, page 4-32 in response to this comment as follows: "The lower Feather River corridor has been extensively studied for the purpose of improving flood protection, fisheries and wildlife habitat, water supply, and other benefits. A great deal of information is available. It is not the intent of this report to summarize this vast body of information, but to provide adequate context for proposed management actions. The interested reader is urged to review reference information for more detail. Of particular relevance is the Lower Feather River Corridor Management Plan (DWR 2014), which provides a wealth of tabular and graphic information regarding channel geometry, floodplain characteristics, land use and habitat values, recreational facilities, and opportunities."

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12/17/13	FWS	FWS-09	Pg 4-39	Wildlife Habitat (last paragraph) - Are there habitat connectivity issues in this river reach? This should be discussed somewhere in the document and be a factor in determining whether or not restoration activities are necessary.	See Comment and response FWS-8.
12/17/13	FWS	FWS-10	Pg 4-40	First paragraph - Are you saying there are opportunities for ecosystem restoration in these areas? Please clarify this.	The last sentence of the paragraph has been replaced as follows to eliminate the ambiguity: "Portions of the floodway adjoining the low flow channel between Marysville and Yuba City on either side of the State Route 20 bridge crossing are not farmed and may offer significant restoration opportunities. The east bank area extending one half mile upstream of the bridge is occupied by the River Front MX Park, consisting of frequently tilled and graded trails for motorcycle and four wheeler racing."
12/17/13	FWS	FWS-11	Pg 4-41	Paragraph 4 - Are you referring to floodplain lowering?	A sentence has been added to the first paragraph on page 4-42 to clarify: "This program includes a combination of planting riparian forest and oak woodland, planting perennial grassland and oak savannah, and excavating sediment combined with planting to create SRA."
12/17/13	FWS	FWS-12	Pg 4-41	paragraph 7 - Who makes the determination that it is overgrown? Since it is not serving the same function as a flood protection levee wouldn't the vegetation on serve to harm public safety? Is the vegetation serving as any type of biotechnical protection against erosion?	Current aerial imagery shows that the right bank Feather River along this reach is heavily wooded along most of its length, including remnants of a levee system. The plan does not include an analysis of the effectiveness of this woody vegetation in holding soil or affecting public safety. The main point is that RD 1001 is not actively managing the right bank vegetation. It falls within the scope of responsibility of DWR as part of its channel maintenance responsibilities under Water Code Section 8361(f).
12/17/13	FWS	FWS-13	Pg 4-42	Honcut Creek - What is the habitat like on Honcut Creek? Seems as though this is missing a section.	Honcut Creek, text has been added to Section 4.4
12/17/13	FWS	FWS-14	Pg 4-42	Yuba River - Similar comment to above. Please describe the habitat and fish and wildlife of the Yuba River.	Yuba River and Bear River, text has been added to Section 4.4
12/17/13	FWS	FWS-15	Pg 4-44	First paragraph - We don't disagree that the habitat within Cherokee Canal is valuable, but you don't explain why and to what species it is valuable. Please add this to the section.	Please see comments and responses to NMFS-45. In addition, references provide detailed information about the current habitat values of Cherokee Canal. See especially ESA PWA 2011.

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12/17/13	FWS	FWS-16	Pg 4-44	Last paragraph - Does this woody vegetation provide habitat for riparian species that is lacking in the area? It would be helpful to discuss the habitat in the area particularly if you are discussing removing this habitat.	New text has been added at the end of this section: "Wildlife Habitat: The 20-mile long Sutter Bypass provides important fisheries and wildlife habitat. The two borrow ditches along the east and west levees of the Bypass are important links in the migration routes of salmonids and steelhead. The ditches are lined with high-quality riparian habitat, including SRA. Much of the bypass is in rice production, which provides valuable resting, feeding, and foraging habitat for wintering waterfowl, shorebirds, and raptors. The Bypass includes two wildlife refuges: The 2600 acre Sutter National Wildlife Refuge consists primarily of wetlands, with some riparian and grassland habitats. The refuge typically supports 175,000 37 ducks and 50,000 geese. The refuge is located within the Sutter Bypass southeast of Meridian. The Sutter Bypass Wildlife Area is managed by California Department of Fish and Wildlife for fishing, hunting, and wildlife viewing. It consists of the Tisdale Bypass channel and two long, narrow parcels on either side of the Sutter Bypass, for a total of 3,204 acres."
12/17/13	FWS	FWS-17	Pg 5-4	Second paragraph - It would be helpful if you briefly described the benefits that could be created by transitory storage.	The 2600 acre Sutter National Wildlife Refuge consists primarily of wetlands, with some riparian and grassland habitats. The refuge typically supports 175,000 37 ducks and 50,000 geese. The refuge is located within the Sutter Bypass southeast of Meridian.
12/17/13	FWS	FWS-18	Pg 5-6	First paragraph - Since you have not done an effects analysis on the plan it seems a bit early to determine that your impacts to habitat would be minor.	Deleted word "minor." Same as comment NMFS-50.
12/17/13	FWS	FWS-19	Pg 6-5	Section on rice - Just a note that rice fields in the floodplain can serve as ggs habitat however depending on the frequency and duration of inundation it could negatively affect overwintering ggs by flooding their overwintering habitat.	Comment noted. Section 6.2.1.4 acknowledges that current farming practices do not provide the four-season habitat needs of GGS throughout its life cycle.
12/17/13	FWS	FWS-20	Pg 6-5	However, it (support) cannot be the sole means of offsetting impacts to riparian habitat.	Comment noted. Wildlife-friendly farming practices are not intended to be the sole means of offsetting impacts to riparian (or other types of) habitat under the RFMP. Language in Section 6.2 states that "utilization of agricultural lands as habitat by threatened and endangered species varies by crop type and agricultural lands do not always meet the full life-cycle habitat needs of some threatened and endangered species. Thus, habitat restoration must also be an integral part of the RFMP."

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12/17/13	FWS	FWS-21	Pg 6-6	3rd bullet - This seems to imply that you will be measuring the productivity of the agricultural lands. Not all species will benefit from wildlife enhancements of agricultural land and we don't feel you should make such a strong statement that agricultural lands would not be affected either by habitat restoration or flood projects.	This bullet has been removed from the text.
12/17/13	FWS	FWS-22	Pg 6-7	First bullet - This will not benefit all the target species in the conservation strategy. You need to include actions which would restore natural river processes.	It is well understood that wildlife friendly agriculture can not meet the needs of all wildlife species: the region needs to sustain a mosaic of habitat types and processes. The regional perspective, as articulated in this plan, is that agriculture provides an important part of the overall wildlife habitat mosaic, and its value should be recognized and enhanced where it is feasible to do so. The draft Conservation Strategy recognizes that agricultural lands can provide important habitat for many wildlife species, particularly on periodically inundated floodplains. It notes that rice fields and pasture are particularly valuable, and that agricultural land is often close to natural land cover and can provide functions that complement and increase the habitat value of natural land cover (see page 4-6, April 2014 Administrative Draft, Conservation Strategy, DWR).
12/17/13	FWS	FWS-23	Pg 6-16	Laurel Avenue Levee Setback - Would only tree crops be affected with a setback in this location?	The area consists mostly of tree crops, and an analysis of the effect on this crop would be necessary. No text change is necessary.
12/17/13	FWS	FWS-24	Pg 6-23	Paragraph 4 - Are the local landowners willing to take on the responsibility of following the long-term management plan and the remedial actions which may be necessary should the habitat not meet success criteria?	The language has been removed.
12/30/13	CA Department of Fish and Wildlife (DFW)	DFW-01		The FRRFMP should incorporate ecosystem restoration features into all proposed flood improvement projects in order to: maintain consistency with the CVFPP, Conservation Strategy and the Central Valley Flood Protection Act of 2008; increase permitting efficiency; and have the greatest chance of acquiring State funding for proposed projects.	Please see Comments and responses RP-12 and RP-35.
12/30/13	DFW	DFW-02		When possible, the restoration of natural riverine processes through construction of setback levees, removal of revetment not protecting infrastructure, and reconnection of floodplain should be incorporated into projects.	LD1 implemented the Star Bend levee setback along the lower Feather River in 2009. TRLIA implemented extensive levee setbacks along the lower Feather River east levee and the Bear River north levee. The plan also includes consideration of a new levee setback on the Bear river just downstream of Wheatland. Site-specific features, cost sharing arrangements, and local benefits and impacts are important considerations for any levee setback or revetment removal project. The region supports such management actions where feasible and reasonable.

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12/30/13	DFW	DFW-03		Even small improvement and maintenance projects should incorporate feasible ecosystem benefits such as, restoration plantings, invasive species removal, native vegetation buffers and hedgerows, and conservation easements.	Please see Comments and responses RP-12 and RP-35.
12/30/13	DFW	DFW-04		The FRRFMP appears to focus on agricultural land protection as the main environmental enhancement and proposes on page 4 (Agricultural Sustainability regional objective) to "achieve wildlife habitat objectives through preservation and/or modification of current agricultural practices to the extent feasible." The Department encourages wildlife-friendly agriculture and incorporating habitat enhancements within agricultural lands. However, these enhanced agricultural lands cannot provide for all native habitat ecosystem restoration needs... Only some native species and a few listed species have essential habitat on agricultural land and may directly benefit from enhancements. Agricultural lands provide little to no habitat value for many important species in the Plan Area.	It is well understood that wildlife friendly agriculture can not meet the needs of all wildlife species: the region needs to sustain a mosaic of habitat types and processes. The regional perspective, as articulated in this plan, is that agriculture provides an important part of the overall wildlife habitat mosaic, and its value should be recognized and enhanced where it is feasible to do so. The draft Conservation Strategy recognizes that agricultural lands can provide important habitat for many wildlife species, particularly on periodically inundated floodplains. It notes that rice fields and pasture are particularly valuable, and that agricultural land is often close to natural land cover and can provide functions that complement and increase the habitat value of natural land cover (see page 4-6, April 2014 Administrative Draft Conservation Strategy, DWR).
12/30/13	DFW	DFW-05		In addition, the enhanced agricultural lands may not be appropriate mitigation for impacts to native habitats.	Agreed. Mitigation will be tailored to address species-specific impacts.

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12/30/13	DFW	DFW-06		The FRRFMP relies heavily on past and current ecosystem restoration and multi-benefit projects (such as setback levees) instead of proposing and exploring future opportunities. Page 5 states: "The region seeks to take maximum advantage of these evolving opportunities while minimizing future land use conversion to wildlife and fisheries habitat." The Department applauds the setback levees and ecosystem restoration and enhancements that have been made in the Plan Area or that are currently underway, but also encourages incorporation of large and/or small ecosystem features into all future maintenance and flood management projects.	Please see Comments and responses RP-12 and RP-35
12/30/13	DFW	DFW-07		The Department desires to coordinate with the regional leads on the FRRFMP to compile and prioritize a list of ecological features that could be incorporated into future maintenance and flood management projects.	The region welcomes the opportunity to coordinate with CDFW, other agencies, and NGOs in formulating ecological features that could be incorporated. The region will continue to support river corridor planning, HCP planning, and site specific restoration efforts to the extent practical and feasible with available funding sources.
12/30/13	DFW	DFW-08		Many projects that will provide or have provided restoration plantings as mitigation have been characterized as multi-benefit projects in the FRRFMP. There is a difference between restoration to benefit the system and plantings done for mitigation to offset impacts from a flood management project. While mitigation plantings for a project do provide funding to get sites restored, they do not contribute to an increase (net gain) in habitat in the Plan Area since they are offsetting impacts elsewhere. Mitigation can be a component of a multi-benefit project, but there needs to be a net gain in habitat, river process or another component needed by targeted species to qualify as a multi-benefit project in the ecosystem restoration category.	The distinction between mitigation and enhancement is understood.
12/30/13	DFW	DFW-09		In the Feather River and in all the regions of the Statewide Planning Area, the Department seeks to increase the complexity and diversity of riparian habitats. Habitat that comprises only mature riparian jungle is not desirable or sustainable. Many species need different age classes of riparian forests, grasslands, oak woodlands and other habitats. The area between the levees should be managed for multiple species and the different life stages of those species, as they rely on different successional stages of vegetation.	The need for dynamic, complex, evolving riverine habitats is recognized. The region supports restoration of natural river processes where feasible. In addition, the need to achieve vegetative succession can also be met in part through active vegetation channel management--a process that can also help maintain appropriate channel flood conveyance characteristics.
12/30/13	DFW	DFW-10		This is another reason why restoring natural river processes, when feasible, will benefit multiple species by allowing the river to naturally regenerate the essential habitats.	GEI - Comment noted.

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12/30/13	DFW	DFW-11		The FRRFMP provides details, some data analysis and cost estimates for flood management projects, but not for environmental opportunities that could be incorporated into the system in the future as part of multi-benefit projects. Please provide more details and estimates for the ecosystem restoration components of this plan.	Available cost estimates were added to Table 10-1. The table will be updated in the future as additional information becomes available.
12/30/13	DFW	DFW-12		<p>To further promote the concept of integrated flood management and consistency with the CVFPP, Chapter 2, Regional Setting, should describe the environmental setting of the Plan Area, similar to the description provided for the other elements of the flood management system. This should include the historic condition, existing conditions, and the distribution and abundance of sensitive species and habitats that occur in the Plan Area. This Plan Area provides critical areas for many species and habitats important to the Statewide Planning Area and California as a whole and this information must be included to further evaluate what conditions can be improved and species benefited by ecosystem restoration features incorporated into maintenance and flood improvement projects.</p> <p>The discussion in Chapter 6 on integration with the Conservation Strategy's ecological goals and objectives is encouraging. However, as described above, without an environmental setting discussion on the existing conditions, these measureable objectives may not be easily implemented and tracked.</p>	An ecological setting section was added to the document.
12/30/13	DFW	DFW-13		Some of the restoration activities that are part of the Three Rivers Levee Improvement Authority (TRLIA) Feather River levee setback and the Bear River setback will serve as mitigation for previously planned projects or are committed to other programs. If the FRRFMP proposes to use area within these setbacks, the document needs to provide more detail on the acres to be used by each entity to ensure it is tracked correctly and not overcommitted.	The requirements for project mitigation are understood. The FRFPM provides an overview of regional projects and priorities. Project-specific mitigation accounting will be addressed in individual project documentation. See also Comment and response NMFS-21.
12/30/13	DFW	DFW-14		The Plan Area has some incredible ecological opportunities and is important habitat for many native terrestrial and aquatic species offish, wildlife and plants. Many sensitive species habitats could benefit from restoring natural river processes. Bank swallow and Western yellow-billed cuckoo are among several sensitive terrestrial species that are dependent on natural river processes and would benefit from restoration focused on their essential habitat requirements. The Department welcomes collaboration with those preparing the FRRFMP to identify and prioritize areas that would benefit the bank swallow and the other sensitive, native species in the Plan Area.	Please see Comment and response DFW-07.

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12/30/13	DFW	DFW-15		Multi-benefit habitat restoration actions required as part of the Oroville Federal Energy Regulatory Commission (FERC) Agreement cannot be counted towards meeting ecological objectives for this Plan Area, but the Department encourages coordination with the Oroville FERC process to maximize the ecological benefits that can be gained by that partnership.	GEI - The intent of the Plan is not to seek credit for the work already been accounted for. The statements throughout the report are simply informational. The comment does not reference any specific statement; therefore, no changes have been made.
12/30/13	DFW	DFW-16		The FRRFMP overlaps with several developing Habitat Conservation Plans (HCP's) and Natural Community Conservation Plans (NCCP's). The Department encourages coordination with these planning efforts to avoid conflicts and increase the overall benefit in the overlap areas by planning mitigation areas and conservation easements adjacent to existing and proposed conserved areas in the HCP/NCCP's to maximize connectivity and meet ecological goals and objectives for each plan.	The regional partners will work closely with DWR and other proponents of local HCPs and NCCPs as they develop the upcoming floodway HCP/NCCP.
12/30/13	DFW	DFW-17		The Department of Water Resources (DWR) has begun development of an HCP for the Feather River Conservation Planning Area, which includes the FRRFMP area. The Department encourages all local maintaining agencies in the Plan Area to join DWR in this effort to gain federal Endangered Species Act coverage (and other regulatory coverage) for impacts from their maintenance and flood management projects.	The region will participate in the HCP process.
12/30/13	DFW	DFW-18		As introduced on page 7, the Department encourages inclusion of non-structural flood risk management elements into projects. These elements can be combined for multibenefit to the ecosystem, recreation, reduced operations and maintenance, conveyance and other goals. They are also a good way of meeting some ecological objectives through conservation easements and lessening the confinement of floodwaters.	Comment noted. See also Comment and response RP-12 and RP-35. Section 6.2 describes the use of easements in the context of agricultural land preservation. Section 9.3.3 discusses agricultural conservation easements in the context of non-structural risk management.
12/30/13	DFW	DFW-19	Section 3.2	Section 3.2: Channels. States, "Where meandering channels begin to erode levee slope, erosion protection is required to protect the integrity of the system". While erosion protection is one option, if the levees must remain in their current configuration, it is not always required. The Department encourages an integrated flood management approach which would offer many alternatives to standard erosion protection for protecting or improving the integrity of the system.	See response to RP-10.

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12/30/13	DFW	DFW-20	Section 4.4	Pages 4-39: Wildlife habitat for Feather River between Honcut Creek and Yuba River. This section lists the possible limited options for restoration activities. Conservation easements of existing private land (including orchards on the river) should be included as a multi-benefit enhancement in this section and in other sections, where that possibility exists.	Text revised as follows: "Wildlife Habitat: There is limited potential for restoration activities in this river reach between Honcut Creek and the mouth of the Yuba River. The majority of the floodway between the levees in this reach is privately owned and intensively farmed, primarily devoted to permanent orchards. There may be limited options in this reach for non-crop buffers or understory plantings in the orchards to provide beneficial raptor habitat, shaded riverine aquatic habitat, and nutrients for fish species. Obtaining conservation easements may be possible as a multi-benefit measure if there are willing sellers in the region. See discussions in Section 7. Portions of the floodway adjoining the low flow channel between Marysville and Yuba City on either side of the State Route 20 bridge crossing are not farmed and may offer significant restoration opportunities. The east bank area extending one half mile upstream of the bridge is occupied by the River Front MX Park, consisting of frequently tilled and graded trails for motorcycle and four wheeler racing. "
12/30/13	DFW	DFW-21	Section 4.4	Section 4.4 only has Wildlife Habitat described in five of the nine specific areas. The Department recommends including a brief description of wildlife habitat for all of the specific areas.	New text has been added to briefly describe Honcut Creek, the Yuba River, and the Bear River, and Sutter Bypass.
12/30/13	DFW	DFW-22	Section 5.4	Section 5.4: Reservoirs. The Department recommends adding a water quality header to the reservoirs section and adding a discussion about managing reservoirs and invasive species.	New text has been added to Section 5.4, page 5-5 as follows: "Numerous reservoirs have been constructed on the rivers and streams tributary to the Lower Feather River System. They serve a multitude of purposes, including flood control, water supply, power, recreation, fisheries and wildlife habitat, water quality management, and hydraulic mining debris retention. There are four on the Bear River system, including Camp Far West Reservoir, which is the largest and furthest downstream. There are 20 on the Yuba River, including New Bullards Bar Reservoir on the Middle Fork Yuba River, which is the largest and most important for flood control, power, and water supply purposes. Daguerre Point Dam, constructed to retain hydraulic mining debris is the furthest downstream. Englebright Dam, which is about 20 miles upstream of the mouth, was constructed primarily to retain hydraulic mining debris, but also provides power, recreational, and wildlife habitat benefits. There are 18 dams on the Feather River system, including the Oroville-Thermalito complex which is the largest in the region. These 42 reservoirs are an important part of the landscape of the Feather River region and have a profound effect on public safety,
12/30/13	DFW	DFW-23	Section 5.4	The reservoir improvements section should include new habitat enhancements, and temperature and water quality monitoring and management for invasive species.	See Comment and response DFW-22.

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12/30/13	DFW	DFW-24	Section 5.5	Section 5.5: Fisheries and Wildlife Habitat. This section does not provide sufficient detail expected for a chapter titled "Solution Strategies and Management Actions". This section relies on regional and corridor plans and habitat conservation plans being developed, which are not guaranteed. The Department recommends the FRRFMP be actively involved with those processes and contribute specific actions and resources to accomplish enhancement, protection and restoration of habitat in the Plan Area. The discussion in this section should be fully developed with analysis and cost estimates as done for other types of improvements in the floodway.	This section has been rewritten as follows: "Consistent with the supporting goals of the CVFPP and this plan, the region is committed to promoting ecosystem functions and multi-benefit projects. Regional stakeholders, including public agencies, NGOs, and interested individuals have collaborated with State and federal agencies to plan and execute many improvements. Notable among them are securing wild river status for the South Yuba River, constructing major levee setbacks on the Feather River and Bear River, completion of the Lower Yuba River Accord, establishment of extensive conservation easements on land in the region, and improved vegetation and wildlife habitat management in the river corridors. The region has also participated in broad based multi-objective planning efforts such as the Lower Feather River Corridor Management Plan, now in draft form. The Regional Habitat Conservation Plan process now getting underway offers new opportunities to facilitate the long-term viability of agriculture in the region, improved wildlife habitat, corridor maintenance efficiency, and streamlined permitting. The RFMP considers all opportunities to improve ecosystem benefits, as feasible, to improve overall quality of habitat for all species in the region with the ultimate goal being increased habitat in the
12/30/13	DFW	DFW-25	Section 6.2	Section 6.2: second paragraph directs the reader to Section 7.3, but should be directed to Section 6.3.	Minor editorial change has been completed.
12/30/13	DFW	DFW-26	Sections 6.2.1.2 and 6.2.1.3	Sections 6.2.1.2 and 6.2.1.3: Of all agricultural cover types, alfalfa provides the greatest foraging benefit, by far, to Swainson's hawk. The benefits of row crops, truck crops, dry land and irrigated pasture to Swainson's hawk should be further discussed with the Department. Each crop type provides a varying level of suitable foraging habitat for Swainson's hawk, including unsuitable, suitable for a short period of their growing cycle, and moderately suitable throughout the nesting season (Estep, 2009).	Additional language regarding foraging suitability for Swainson's hawk has been added to sections 6.2.1.2 and 6.2.1.3 as per Estep Environmental Consulting 2009. The wildlife-friendly farming practices covered in the Plan focus on crops that are compatible with occasional or regular inundation and incorporation into the floodway. Alfalfa is not compatible with prolonged flooding, so it is not discussed in the Plan.
12/30/13	DFW	DFW-27	Section 6.2.1.4	Section 6.2.1.4: Rice fields. Recommend inserting the italicized text into the FRRFMP: "An option to be considered for effects to giant garter snake is the winter management of some rice fields and attendant water control structures located outside of the floodway to ensure rice fields or portion thereof are kept dry and have the necessary features to offer upland habitat during the snake's inactive period."	The proposed text has been inserted.

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12/30/13	DFW	DFW-28	Section 6.2.1.5	Section 6.2.1.5: General Agricultural Practices.: "Federal and state resource agencies...have expressed support for integrating more wildlife-friendly concepts into farming practices in and near the floodway in the Feather River region." This must be in addition to, not in lieu of, ecosystem restoration of natural habitats and processes.	Comment noted. Wildlife-friendly farming practices are not intended to be the sole means of offsetting impacts to riparian (or other types of) habitat under the RFMP. Language in Section 6.2 states that "utilization of agricultural lands as habitat by threatened and endangered species varies by crop type and agricultural lands do not always meet the full life-cycle habitat needs of some threatened and endangered species. Thus, habitat restoration must also be an integral part of the RFMP."
12/30/13	DFW	DFW-29	Section 6.2.2	Section 6.2.2: tenth bullet, recommend inserting the italicized text: "Manage some rice crops outside of the floodway in a dry condition for giant garter snake habitat as long as they contain necessary overwintering habitat features."	The proposed text has been inserted.
12/30/13	DFW	DFW-30	Section 6.3.1	Section 6.3.1: first bullet, recommend setting a target for floodplain habitat in native grassland, not just compatible agriculture.	"Native grassland" added to text as requested.
12/30/13	DFW	DFW-31	Section 6.3.3	Section 6.3.3: Restoration Opportunities, 2nd paragraph starts with "Rather than attempting to identify new, previously un-described restoration opportunities for the Feather River Region," and is contrary to the intent of this section. Past projects do not contribute to the ecological and multi-benefit goals and objectives of the CVFPP Conservation Strategy or the FRRFMP, so new opportunities for future projects need to be identified.	These are new projects, although they have been previously identified as opportunities. Text in Section 6.3.3 has been clarified.
12/30/13	DFW	DFW-32	Section 6.3.3.9	Section 6.3.3.9: Brood ponds must be constructed in a manner that does not pose a risk of fish entrapment if they are in close proximity to the active waterways.	Text was modified to state that new brood ponds would be designed so as not to pose a risk for fish entrapment.
12/30/13	DFW	DFW-33	Section 6.4.5	Section 6.4.5: third paragraph, there are no Programmatic Streambed Alteration Agreements (SAA's) in Fish and Game Code and the Department does not issue Programmatic SAA's. Please remove all document references to this term.	All references to programmatic SAAs have been removed from the Plan.
12/30/13	DFW	DFW-34	Section 6.3.3.13	Modification to the Fremont Weir to facilitate adult fish passage is a priority to the Department and should be included in the discussion of Sutter Bypass improvements.	Please see Comment and response NMFS-46

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12/30/13	DFW	DFW-35	Section 8.1.5	Section 8.1.5: Emergency Preparedness Options for Improvement. The FRRFMP should include emergency response drills and coordinating with the Department's Office of Spill Prevention and Response (OSPR) and local response agencies. For those agencies obligated with flood management, emergency preparedness should be a large and serious element of their plan. We recommend putting together the Emergency response (ER) meetings, setting up drills and coordinating with the Department (and other Resource Agencies), local Environmental Health and ER agencies. Flooding often creates hazardous spills and water quality degradation.	Section 8.1.3 Coordination has been revised as follows: "Coordinated flood operations among local maintaining agencies, cities and counties in the region, the Governor's Office of Emergency Services, the State-Federal Flood Operation Center, USACE, the CDFW Office of Spill Prevention and Response (OSPR) are critically important in managing and fighting floods, saving lives and properties, and limiting the spread and impact of toxic materials in floodwaters. "
12/30/13	DFW	DFW-36	After Section 8.3.3	After Section 8.3.3: The Department recommends adding a section on Environmental Conservation Easements which could be a good way for private landowners to help contribute to the ecological goals and objectives while receiving additional financial support. The Department encourages the exploration and development of landowner incentives to make environmental conservation easements a viable option for landowners.	Section 8.3.3, page 8-7 has been rewritten, with a new title, as follows: "Agricultural and Environmental Conservation Easements: Agricultural and environmental conservation easements that preserve agriculture, prevent urban development in current agricultural areas, or achieve specific environmental conservation goals can advance regional goals of improving the sustainability of agriculture, limiting future flood damages, and improving environmental quality. They serve as a useful tool for attracting State and Non-Governmental Organization (NGO) funding to support permanent agricultural use and environmental enhancement. When consistent with local land use plans, and supported by local land owners, such programs can be a source of additional financial support for property owners while advancing regional and State goals and objectives. Incorporation of easement programs in the suite of floodplain management and flood risk management tools is also likely to improve the chances of State support for levee improvement projects. Easement programs are discussed in greater detail in Chapter 6."
12/30/13	DFW	DFW-37		Department wildlife area staff highlighted the difficulty in not knowing where property boundaries are when our Department owns and manages many non-contiguous parcels in the area. The Department suggests an update for property line surveys as part of project planning.	New text has been added to Section 8.2, page 8-5 as follows: "Updating and clearly delineating the boundaries of reclamation districts, State-owned and managed lands, and lands with various easement restrictions can help improve efficiency and coordination."
12/30/13	DFW	DFW-38		Invasive plant species migration and dispersal as part of construction activities can contribute to the spread of these noxious weeds. The Department spends valuable time and resources trying to control noxious weeds. The Department suggests an implementation of stricter measures to minimize dispersal and movement of these invasive plants.	New text has been added to Section 8.2, page 8-5 as follows: "Maintenance activities involve moving earthmoving, mowing, and spraying equipment from place to place. Such activities can help spread invasive species, which are difficult and expensive to eradicate and cause great environmental harm. Such equipment can also cause inadvertent harm to floodplain habitats. It is therefore important to plan staging of equipment and execution of the work with such potential impacts in mind."

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12/30/13	DFW	DFW-39		There is concern that maintenance occurring on Department wildlife areas in the Lower Feather River may include more vegetative removal work than anticipated. The Department and DWR have a nearly final Memorandum of Understanding (MOU) stating that all vegetation maintenance activities will allow habitat to persist as much as practical. The Department recommends including language in the FRRFMP to address coordination with landowners, including the Department's wildlife areas, with the potential to be affected by proposed projects or maintenance activities.	New text has been added to Section 8.2, page 8-5 as follows: "Voluntary collaboration is also important in flood corridor management, where DWR has primary maintenance responsibility, CDFW and other resources agencies have permitting and oversight responsibilities, and underlying property ownerships may involve private parties. It is important that the interests of all affected parties be communicated and understood such that management activities can be as effective as possible while minimizing impacts and conflicts."
12/30/13	DFW	DFW-40		Hunting and Levee Access: Historically hunters were able to access various wildlife area units from the levee roads. The Department encourages the protection and enhancement of hunting opportunities by securing existing access points and reopening stretches of closed levee that may have been restricted to hunters in the recent past. In particular, allowing levee access during the November-January turkey, pheasant, and waterfowl hunting season would provide recreational improvements needed by hunters in this Plan Area. The Department has a special hunt every November at the Nelson Slough Unit and the flood management projects near that area should not jeopardize this hunt.	The special hunt at the Nelson Slough Unit has been added to the Feather River Wildlife Area discussion under Sutter County in the "Recreation Setting" section of the document. Hunting and fishing facilities to the Nelson Slough Unit has been added as a potential recreation measure in the document table.
12/30/13	DFW	DFW-41		The Department would like to see new boating access near highway 99 and the Nelson Slough Unit of the Feather River Wildlife Area. This may provide a means to offset impacts to recreation, reduced levee access and closures at other project locations. Department staff desire to coordinate and provide specific ideas on how best to accomplish this goal. We encourage you to further explore this option with us and other involved agencies (Cal Boating and Waterways, Caltrans, Sutter County Board of Supervisors, and the Fish and Game Commission) for incorporation into multi-benefit projects in the FRRFMP.	River access to the Nelson Slough Unit has been added as a potential recreation measure in the document table.
12/30/13	DFW	DFW-42		Staging of construction equipment and material must not occur in the floodplain and may not be placed on Department land without prior authorization and any necessary mitigation in place prior to the impact.	See Comment and response DFW-28.
12/30/13	DFW	DFW-43		Every effort should be made to avoid impacts to important habitats, including, but not limited to Mature Riparian Forest and Shaded Riverine Aquatic habitats.	See Comment and response DFW-28

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1/22/14	Yuba-Sutter Farm Bureau (YSFB)	YSFB-01	General	The public outreach and planning process implemented by the FRRFMP partnered agencies has been a productive and positive one. We have found the outreach coordinators working on the plan, like those from MBK Engineers, Westervelt, and Sutter Butte Flood Control Agency, to be engaging with agricultural stakeholders and the wider community . We find this spirit of collaboration refreshing, and believe this is precisely the kind of grassroots planning that can garner wide support for a regional flood plan and achieve the goals put forth in the Central Valley Flood Protection Plan.	Comment noted.
1/22/14	YSFB	YSFB-02	General	We are pleased to see a general theme in the plan which highlights the importance of preserving productive agricultural lands while working with landowners to enhance wildlife and habitat benefits on a voluntary basis.	Comment noted.
1/22/14	YSFB	YSFB-03	General	Recognition within the Plan that productive agriculture and wildlife habitat do not have to be mutually exclusive, and that agriculture already provides habitat benefits, is positive and on-point.	Comment noted.
1/22/14	YSFB	YSFB-04	General	The local economy is largely dependent on a vibrant and productive agricultural community. Projects such as expansion of Sutter Bypass, Cherokee Canal or the Laurel Avenue area would be significantly detrimental to agriculture and the region's economy, and should not be included in the plan.	The Plan reflects the concerns noted in this comment. See especially Executive Summary, page 2, second paragraph, page 3, second paragraph, page 1-2, fourth paragraph, page 1-3, last paragraph, page 5-2, 3rd paragraph, and page 6-21, 3rd paragraph.
1/22/14	YSFB	YSFB-05	General	It is imperative that rural levees receive improvements and 100-year flood protection when possible, in order to protect legacy communities such as Nicolaus and Robbins. Language in the Plan outlining goals to repair rural levees, especially those in the southern Sutter Basin, is well stated.	Comment noted.
1/22/14	YSFB	YSFB-06	General	We encourage the FRRFMP group to reach out to other agricultural organizations in the area that have a broad background in environmental stewardship and agriculture, such as the Northern California Water Association, California Rice Commission and Family Water Alliance.	Agreed. Please see the response to comment CAFB-31, which includes some new language relevant to this request. Additionally, the Northern California Water Alliance, the California Rice Commission, and the Family Water Alliance will be notified when the next public review draft of the Plan is released, and will be invited to the next public workshop.

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1/22/14	YSFB	YSFB-07	Section 3.11, Page 3-11, Last Paragraph	<p>Recognition in this section that protected species can impact agricultural operations and that these impacts must be addressed, is a positive step toward ensuring agriculture can remain productive in the floodplain. The California Endangered Species Act already recognizes the interference of endangered species in farming practices and allows for the accidental take of candidate, threatened, or endangered species in the course of agricultural activities (Wolk, 1). The following are just a few specific examples of instances where wildlife have proven detrimental to adjacent farming and ranching operations:</p> <ul style="list-style-type: none"> • Black vultures prey on newly-born livestock and, along with turkey vultures, form roosts that create nuisance, health, and safety problems. In recent years, livestock depredation and property damage caused by vultures have increased steadily (Avery, 1). • U.S. sheep producers attributed 39,800 sheep and 126,000 lamb deaths (valued at \$9.6 million) to coyotes in 1999; this was 61% of their total losses (NASS). • Fruit loss to birds is a long-standing and costly problem for many producers of tree crops. A survey of honeycrisp apple, blueberry, cherry, and wine grape growers in California, Michigan, New York, Oregon, and Washington estimates that current bird damage costs per hectare ranges from \$104 to \$7,267 (Anderson, 1). 	<p>Comment noted. In addition, new paragraph inserted in Section 3.11 as follows: "For example the Sutter-Yuba Farm Bureau noted several examples of wildlife impacts on farm operations in its comment letter on the October 4, 2013 draft of this plan:</p> <ul style="list-style-type: none"> • Black vultures prey on newly-born livestock and, along with turkey vultures, form roosts that create nuisance, health, and safety problems. In recent years, livestock depredation and property damage caused by vultures have increased steadily (Avery, 1). • U.S. sheep producers attributed 39,800 sheep and 126,000 lamb deaths (valued at \$9.6 million) to coyotes in 1999; this was 61% of their total losses (NASS). • Fruit loss to birds is a long-standing and costly problem for many producers of tree crops. A survey of honeycrisp apple, blueberry, cherry, and wine grape growers in California, Michigan, New York, Oregon, and Washington estimates that current bird damage costs per hectare ranges from \$104 to \$7,267 (Anderson, 1). • Deer can be very destructive to gardens, orchards, and landscaped areas (Salmon, 1)."
1/22/14	YSFB	YSFB-08	Section 5.1, Page 5-2, bullets	<p>Mentioned in this section is a component of the State System-wide Investment Approach, to create "Fish passage improvements for the Sutter Bypass and Fish Passage east of Butte Basin." As a way to further enhance fish passage improvements, it is possible that agricultural landowners could assist in working toward this goal, by collaborating with local agencies on a <u>voluntary</u> basis to erect fish screens on irrigation ditches. This would protect salmonids travelling upstream from entering irrigation ditches from main irrigation canals and work could be done at a relatively low cost.</p>	<p>New sentence added to Section 5.1, page 5-2: "Local stakeholders have expressed an interest in working with the State to further enhance fish passage improvements; the agricultural landowners could assist in working toward this goal by collaborating with local agencies on a voluntary basis to erect fish screens on irrigation ditches to protect salmonids travelling upstream from entering irrigation ditches from main irrigation canals."</p>
1/22/14	YSFB	YSFB-09	Section 5.1, Page 5-2, Paragraph 2; and 6.3.3.13	<p>Expansion of the Sutter Bypass would have a tremendous negative impact on farmers, ranchers, the community and regional economy. Setting back the bypass 1,000 feet would cause an annual net economic loss of \$141 million over a 30-year horizon and the loss of 45 job-years; setting back the bypass 2,000 feet would cause an annual net economic loss of \$318 million over a 30-year horizon and the loss of 106 job-years (Hamilton, 3). The alternative of expanding the Sutter Bypass will have such a significant negative effect for the community and agriculture, it absolutely should not be considered within the Plan.</p>	<p>Please refer to response to Comment YSFB-04</p>

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1/22/14	YSFB	YSFB-10	Section 5.2, Page 5-4, top of page	This paragraph discusses "controlled inundation of adjacent agricultural lands to attenuate peak flows by providing temporary storage of flood waters." Transitory storage should only take place if it is agreed to by the landowner. Farmland and rural communities such as Robbins and Nicolaus should not be used as flood control relief valves for urban communities.	Paragraph 2 on page 5-4 entitled, "Provide off-stream transitory storage" has been deleted. A new paragraph 5.4 has been created to more fully reflect the concerns noted in this comment, as follows: "The concept of floodplain transitory storage essentially involves breaching, removing, or setting back levees to allow inundation of previously protected lands. In region which has suffered major flood damage due to levee failures over the past 160 years, this concept is a source of concern for many residents and property owners, due to the potential for loss of productive agricultural land, potential heightened risk for adjacent property owners, and related concerns. Nevertheless, the expansion of the active floodplain through controlled inundation of designated farm land can attenuate peak flows by providing temporary storage of flood waters, thereby relieving pressure on levees. It can also provide multiple secondary benefits such as transitory fisheries habitat, groundwater recharge, improved water quality, and other benefits. Any proposal to implement floodplain transitory storage should only be considered where supported by affected landowners and is consistent with local land use plans, with appropriate compensation for loss of agricultural productivity and land values. can provide multipurpose benefits in
1/22/14	YSFB	YSFB-11	Section 6.1, Page 6-1, Paragraph 1	It is very positive that agriculture is recognized in this section as an essential component of ecological stewardship, and that the agricultural heritage of the region should be preserved. It is also important that the resource stewardship and land management know-how of farmers is addressed and emphasized here as a valuable but under-used opportunity. YSFB and its members look forward to working collaboratively with FRRFMP and local agencies to develop maintenance solutions and voluntary incentive programs to provide ecosystem goods and services, given that "safe harbor" agreements can be achieved. It is particularly encouraging that the plan states that habitat enhancements and values already provided through farming must be acknowledged.	Comment noted.
1/22/14	YSFB	YSFB-12	Section 6.1, Page 6-2, last paragraph	This paragraph reads, "Compensation should include consideration for long-term loss of production income." This is absolutely a crucial component in making farmers whole for land that would have been in production for many years, typically 35 years for permanent plantings such as walnuts (Buchner,3).	Comment noted.
1/22/14	YSFB	YSFB-13	Section 6.2.1, Page 6-3, last paragraph	We strongly agree with existing language that wildlife enhancements to agriculture will "in all cases require the maintenance of agricultural productivity," however, the following language should be added to the end of the sentence: "and private ownership and operation."	The following text was added: "and private ownership and/or operation."
1/22/14	YSFB	YSFB-14	Section 6.2.1, page 6-4, top of page	"Wildlife-friendly agriculture," a term used throughout the document, should be defined with agricultural stakeholders to produce a reasonable, useful and universal meaning.	The Plan-specific definition of "wildlife-friendly farming practices" was agreed upon by members of the California Farm Bureau Federation and the Yuba-Sutter Farm Bureau on April 8, 2014. See the response to comment CAFB-20 for the definition.

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1/22/14	YSFB	YSFB-15	Section 6.2.1.2, page 6-5	"Sustainable" is a very broad and undefined term, and as such should be removed in this section as a descriptor for agricultural practices.	"Sustainable" has been removed.
1/22/14	YSFB	YSFB-16	Section 6.2.1.5, Page 6-6; and Section 6.2.1.5, bullets	This section should be removed. Language requiring growers to follow of yet undefined "best management practices" must be removed. It is unacceptable to include in the draft a requirement that has the potential to fundamentally change the way growers operate their farms but offers no details or a pathway for stakeholder development. Furthermore, the Plan does not have the regulatory authority to bind growers to specific farming practices. A regulatory program that does have this authority and does oversee all landowners with irrigated acreage in Northern California is the Irrigated Lands Regulatory Program under the State Water Resources Control Board. Regionally under the ILRP, the Butte-Yuba-Sutter Water Quality Coalition administers regulatory oversight, water quality testing and discharge monitoring for irrigated lands in Butte, Yuba and Sutter counties. The ILRP program is sufficient and effective in protecting and regulating water quality for humans, wildlife and the environment. Additional requirements for growers on this subject in this plan are unnecessary, impractical and unwarranted.	Text has been added to clarify that wildlife-friendly and organic practices would be on a voluntary, incentivized basis. Revised text reads: "To reduce pesticide risks to fish and wildlife species, operators of lands brought into the floodway or brought under easements funded by the regional partners could voluntarily follow best management practices to minimize pesticide exposure of fish and wildlife species and be encouraged to follow organic farming practices. Monetary incentive programs would be offered to offset the costs associated with these types of BMPs and organic farming, or, for those lands brought under easements, the price of the easements will take into account the those costs."
1/22/14	YSFB	YSFB-17	Section 6.2.1.5, Page 6-6; and Section 6.2.1.5, bullets	The language, "Operators... would be encouraged to follow organic farming practices" is not appropriate. "Encouraged" is a loose term and it is not explained exactly how or by whom growers would be approached. In addition, even minor flooding in an orchard or field can bring on disease, rot, pests and other significant issues that make it infeasible for widespread organic farming in the floodway. Organic farming decisions should be market driven and at the sole discretion of the landowner, without interference or harassment from public or private agencies or groups.	"Encouraged" has been removed. See the language change described under comment YSFB-16. Additionall, the bullet in Section 6.2.2 has been edited to read: "Offer monetary incentive programs to give growers the option of using best management practices and organic farming practices as well as native hedgerows and buffers to minimize risk of pesticide drift and accumulation."

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1/22/14	YSFB	YSFB-18	Section 6.3.1, Page 6-9	<p>We appreciate the language stating that public access should be limited to publicly-owned properties, and should include buffer zones and coincide with the FDA's Food Safety Modernization Act. We ask that the sentence be modified as follows, to ensure the safety of the public and its food supply, and to provide for additional safety measures that may be necessary beyond those required by federal law in the Food Safety Modernization Act (changes underlined):</p> <p>"Public access <u>must</u> be limited to publicly owned properties with an appropriate buffer zone between agricultural lands, to coincide with, but not be limited to, safety requirements detailed in the FOA's Food Modernization Act. Any necessary protective barriers and/or buffers between public access and agriculture <u>must</u> be paid for by public funding <u>and constructed on public lands, not to infringe upon usable farm ground.</u>"</p>	The language suggested in the comment was incorporated.
1/22/14	YSFB	YSFB-19	Section 6.3.2, Page 6-10, bullets	The backfilling of floodways with large earth mounds must be removed from the Plan. In the Plan, proposals to expand levees, then add back large amounts of dirt, is counterproductive to and negligent of the priority to protect life and property above all else. It is imperative that life-saving freeboard is not sacrificed for the creations of islands, when nearby levees are available for wildlife refuge. It is irresponsible and a gross mistake to include this "enhancement" measure in the plan, and mention of it should be removed.	The reference to this management action has not been removed, but the text has been substantially altered to reflect the concerns expressed in this comment. The revised text is as follows: "Levee materials from decommissioned levees and sediment materials excavated from flood channels may pose a significant disposal cost, due to haul distances to appropriate disposal sites. At times it is more cost-effective to dispose of these materials in the floodway, as was done by DWR downstream of Fremont Weir after the flood of February 19896. Such mounds also offer valuable refugia for mammals and reptiles which could otherwise drown during high water. As with other flood risk management and environmental restoration tools, this action must be carefully evaluated in terms of both its benefits and impacts. The most significant concern is the potential impairment of channel conveyance capacity, which must be carefully analyzed using two-dimensional flow modeling. Any fill in active channels or floodplains is also subject to review and permitting oversight by the the CVFPB, USACE, CDFW, and RWQCB)."

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1/22/14	YSFB	YSFB-20	Section 6.3.3.5, Page 6-16	The Laurel Avenue Project encompasses highly valuable permanent plantings of tree crops and would cause a significant economic hit to multi-generational historic farming operations, and in some cases cause the complete abandonment of farming as an economical unit. YSFB has conducted a preliminary survey of landowners in the Laurel Avenue Project area and has met with staunch opposition to any such project.	The text in this section has been revised to reflect the comment and recent information, as follows: "The concept of constructing a setback levee along the west side of the Feather River downstream of Laurel Avenue, near the southern end of the Sutter Basin has been suggested, Various setback options have been suggested, to achieve improved flood conveyance capacity and to provide additional opportunities for ecosystem restoration actions, and wildlife-friendly farming practices. Preliminary hydraulic evaluations of a range of setback levee options in this area do not demonstrate significant flood risk reduction benefits. They indicate flood stages may increase in the Sutter Bypass, absent a system-wide expansion of the Sutter Bypass that is outside the scope of this study. In fact, these studies indicate flood stages may increase in the Sutter Bypass under current conditions. Geotechnical studies by SBFCA and independent analysis by DWR indicate the Sutter Bypass east levee is highly susceptible to deep underseepage. Thus the proposal would substantially increase the likelihood of failure of some of the highest levees in the basin. Most of the acreage within the proposed setback area is currently devoted to orchards which are not compatible with flooding. Any setback crossing Highway 99 would require that a major
1/22/14	YSFB	YSFB-21	Section 6.3.3.8, Page 6-18	The dredging option discussed here for Cherokee Canal is a prudent choice for enhancing the capacity of the canal. It is also appropriate that there is no a setback, due to the widespread economic impact of such a measure, and that it would be met with significant public opposition.	Comment noted.
1/22/14	YSFB	YSFB-22	Section 6.4, Page 6-23, paragraph 4	We appreciate the recognition of farmers and ranchers as valuable potential partners for long-term habitat maintenance, providing a cost savings to the public and ensuring habitat is not left uncontrolled. We look forward to these partnerships.	Comment noted.
2/6/14	Butte County Rice Growers Association (BCRGA)	BCRGA-01	Page 4	(Re: "Agriculture provides the foundation for the regional economy. Loss of highly productive agricultural lands to accommodate larger flood conveyances, transient floodplain storage, and wildlife habitat could affect the long-term viability of the regional economy, including the many secondary and tertiary businesses which support agriculture.") Without Agriculture, the regional economy would suffer greatly and we concur with your assessment.	Comment noted.

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2/6/14	BCRGA	BCRGA-02	General	As an agricultural stakeholder on the northern end of the Feather River Region, we are concerned specifically with the operation and maintenance of the Cherokee Canal. This flood channel is within 1/2 mlle of our operations and the operations of key businesses that service the rice industry. Over the years, we have watched the canal capacity deteriorate due to increased sediment buildup and vegetation overgrowth. We appreciate the efforts of the Sutter Maintenance Yard 13 to try and maintain channel capacity, but they are challenged year after year with funding issues and environmental permitting on when work can be performed.	Discussion of Cherokee Canal existing conditions, opportunities, and management actions (Chapter 4, 6, and 8) have been revised in response to these comments.
2/6/14	BCRGA	BCRGA-03	Section 6.3.3.8	We sincerely agree with the points made in section 6.3.3.8: <ul style="list-style-type: none"> o "DWR has proposed to remove up to 750,000 cu yards of sediment up to the Cottonwood Creek confluence, with an undetermined amount of sediment to be removed between Cottonwood Creek and state highway 99, to restore channel capacity, to improve habitat conditions for a variety of species, including the giant garter snake, and to reduce ongoing channel maintenance needs" o "These actions should be pursued and followed by an evaluation of effrcacy <u>before</u> expansion of the cherokee canal levees is proposed as a viable project." 	Comment noted.
2/6/14	BCRGA	BCRGA-04	General	We believe that returning the [Cherokee] canal to its original design capacity would make a huge impact on flood control, and also be a cost effective solution rather than expansion and taking of additional productive agricultural lands through additional levees. This would further impact the state from a lost revenue standpoinot of agricultural land is taken out of production.	Discussion of Cherokee Canal existing conditions, opportunities, and management actions (Chapter 4, 6, and 8) have been revised in response to these comments.
2/6/14	BCRGA	BCRGA-05	Section 3.13	We also strongly agree with the statement in Section 3.13 regarding increased water supply storage: "In addition, if the moderating effects of snowpack on runoff decrease (due to Climate Change), there will be a need for more water supply storage, putting greater pressure on the multipurpose reservoirs protecting the region "	Comment noted.

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2/6/14	BCRGA	BCRGA-06	General	<p>We believe the Plan should also highlight the need for additional reservoir storage added to the North Valley. With the Statewide System Investment approach estimated to cost between \$13.92 billion and \$16.91 billion (source: 2012 CVFPP Table 3-5), why shouldn't some of that money be allocated to the building or expanding of additional reservoirs to capture flood runoff for later use? This would have a synergistic benefit as follows:</p> <ul style="list-style-type: none"> o Reliable supply of water for Agriculture which in turn provides stable tax revenue to State and local agencies (avoiding routine state water system cuts), o Aid the Environment (use this banked water to assist in enhancing the ecosystem in the Delta), o Increase flood protection without taking additional productive Ag land that contributes to the tax base. <p>A perfect example is the proposed Sites Reservoir. With the building of a Sites Reservoir (estimated cost \$2.3 -\$3.2 billion), you would be able to siphon off water from the Sacramento River prior to and during peak flood events, thereby relieving downstream levee pressures. The California Department of Water Resources own website clearly state the benefits:</p> <ul style="list-style-type: none"> o Enhanced water supply reliability for urban, agricultural, and environmental uses, o Improved Delta water quality, o Mitigation of snowpack storage losses due to climate change, o Contribute to flood damage reduction in the Central Valley, o Ecosystem restoration actions in the Sacramento River, o Dedicated storage that can be adaptively managed to respond to Delta emergencies and help with restoration actions. 	<p>Comment noted. The plan encourages DWR to explore improved storage for the Region, and supports F-CO and F-BO. A sentence was added to Section 3.13, page 3-12, as shown in bold: "In addition, if the moderating effects of snowpack on runoff decrease, there will be a need for more water supply storage, putting greater pressure on existing multipurpose reservoirs protecting the region. It may also provide additional justification for new multi-purpose storage projects such as the proposed Sites Reservoir in Colusa County."</p>
2/7/14	CA Farm Bureau	CAFB-01		<p>Farm Bureau had submitted comments dated July 26, 2013 on essentially the first four chapters that had been made available up to the point. Much of the local and regional detail has since been added to the Administrative Draft document in Chapter 6 through 10. Without running back over ground largely covered in our first letter for Chapters 1 through 4 (incorporated herein by reference), this letter instead focuses on the new content in Chapters 6 through 10.</p>	<p>The July 26, 2013 letter has been reviewed. Much of the letter focused on the nature of the plan formulation process, including the roles of the various participants. It also included a discussion of technical and policy issues and concerns. All of these concerns have been considered and are discussed in various portions of the report. Given that the comment letter responded to a very early draft of the plan an item by item response at this time is not warranted.</p>

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2/7/14	CA Farm Bureau	CAFB-02	Page 5-2	Ostensibly, the purpose of all of the proposed and already planned improvements for protection of urban and urbanizing areas in the Feather River Region is to achieve 200-year or greater flood protection (e.g., SBFCA's Feather River West Levee Project, the Marysville Ring Levee Project, and TRLIA's Feather River Setback Levees). Similarly, other regional downstream flood improvements projects in the City of Sacramento, West Sacramento, and the Natomas Basin likewise aim to achieve 200-year or greater protection for these urban or urbanizing areas. If these projects prove sufficient to achieve 200-year or greater protection for these areas, then it is not clear why either a Feather River Bypass or Sutter Bypass Expansion, as part of the statewide CVFPP, would be actually necessary.	Comment noted. According to the 2012 CVFPP, the proposed expansion of the bypass system is intended to provide long-term resiliency and flexibility and reduce overall flood risk for the system. DWR is evaluating the bypass system expansions in the Sacramento River Basinwide Feasibility Study.
2/7/14	CA Farm Bureau	CAFB-03	Page 5-2	This conclusion would be reinforced by the potential for additional flood improvements in the form of future reservoir modifications, forecast-based and forecast-coordinated reservoir operations, potential new on-stream or off-stream storage in the Feather River Region, and in connected upstream and downstream areas (e.g., the proposed YCWA New Outlet project for New Bullards (Draft Plan, p. 7-34), in addition to an emergency spillway for Oroville (Draft Plan, p. 7-33), the new spillway at Folsom Dam on the American River, a potential 6- to 18-foot raise of Shasta Dam, or a new Sites Reservoir).	Comment noted.
2/7/14	CA Farm Bureau	CAFB-04	Page 5-2	Strategic sediment removal, bank protection, and channel clearing measures in combination with potential non-structural measures—if pursued more aggressively and purposefully at both the basinwide and regional level—could further reduce the need for a Feather River Bypass or Sutter Bypass Expansion.	The text of Section 5.3, page 5-5, has been revised to include a discussion of channel sediment removal, grading, and dredging. It notes, however, that dredging is generally impractical due to permitting concerns. The Plan does not support expansion of Sutter Bypass or construction of the new Feather River Bypass. Setback levees will only be considered where they provide significant flood risk reduction benefits, are supported by affected landowners and LMAs, and where such setbacks are consistent with county land use plans.

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2/7/14	CA Farm Bureau	CAFB-05	Page 5-2	Additionally, increased flood conveyance capacity achievable in various proposed restoration locations, along linear river margins, in existing processes, and on existing public lands, could reduce the need for large-scale farmland conversion from a future Feather River Bypass or Sutter Bypass Expansion (see, e.g., Yuba Goldfields (Draft Plan, p. 7-13), the Feather River Wildlife Area - O'Connor Lakes Unit (Draft Plan, p. 6-20), Hamilton Slough (Draft Plan, p. 6-19), SBFA's and TRLIA's Lower Feather Corridor Management Plan, including the Feather River Wildlife Area - Nelson Slough Unit (Draft Plan, p. 6-17), the LD1 Star Bend Levee Setback (Draft Plan, p. 6-15), the Feather River Wildlife Area – Abott Lake Unit (Draft Plan, p. 6-15), and the Oroville Wildlife Area Multi-Benefit Project (Draft Plan, p. 6-14).)	Comment noted. The Plan does not support expansion of Sutter Bypass or construction of the new Feather River Bypass. Setback levees will only be considered where they provide significant flood risk reduction benefits, are supported by affected landowners and LMAs, and where such setbacks are consistent with county land use plans.
2/7/14	CA Farm Bureau	CAFB-06	Page 5-2	Before proceeding with either a large Feather River Bypass or a Sutter Bypass Expansion, regional planning efforts and efforts in the Basinwide Feasibility Studies by DWR and the Corps—and in any future updates of the CVFPP—should attempt to quantify the maximum collective benefits of an optimized package of all such opportunities. Thereafter, if new bypass areas are still determined to be necessary then, at a minimum, the capacity of any new areas should not be diminished by extensive unmaintained vegetation. A failure to consider an optimized mix of such measures, in order to reduce economic impacts and impacts on existing uses of land, is a basic flaw in the underlying CVFPP that has yet to be remedied or addressed in any meaningful way.	Comment noted. The Plan does not support expansion of Sutter Bypass or construction of the new Feather River Bypass. Setback levees will only be considered where they provide significant flood risk reduction benefits, are supported by affected landowners and LMAs, and where such setbacks are consistent with county land use plans.
2/7/14	CA Farm Bureau	CAFB-07	Page 5-2	By highlighting regional opportunities and local efforts already underway, each of the various regional flood management planning efforts can perhaps help to set a new, more balanced direction for the Central Valley as a whole. Such an approach is fiscally more realistic—and has the considerable advantage of much greater potential regional and local support.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-08	Page 5-4	The document's tone with respect to commonly employed and, in some cases, necessary physical bank protection and sediment removal methods is decidedly negative and unduly categorical. As a fundamental part of what had been the existing flood management toolbox for decades, the reality is that such methods are in fact essential to ensuring a robust flood system overall.	The text of Section 5.3, page 5-5, has been revised to include a discussion of channel sediment removal, grading, and dredging. The Plan supports all viable methods in dealing with strengthening levees in place, including placement of rip-rap (Section 5-2, Page 5-3 notes, "Provide waterside berms and erosion protection on the water side: Where levees are subject to the erosive effects of river currents and wave wash, erosion protection by various means will improve levee reliability. Management actions include planting appropriate erosion-resistant vegetation such as willow, placing rip-rap layers or berms on the water side, or using combinations of vegetation, soil, and rip-rap to create a highly erosion resistant, but habitat friendly, layer along the stream bank. "

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2/7/14	CA Farm Bureau	CAFB-09	Page 5-4	Setbacks to avoid erosion by “reconnecting rivers with floodplains” may in some places be an appropriate part of the overall mix, but such approaches are not practical, feasible, or safe in all locations—and so, certainly, they can not entirely displace the need for continued use of established flood protection techniques in much of the rest of the system.	Section 5-2, page 5-3, has been revised to reflect concerns about changes in land use as follows: "Reconstruct deficient levees in place or construct levee setbacks: With a limited footprint available, reconstruction in place with competent materials under current engineering practices can greatly improve levee reliability. While it is expensive to rebuild a levee in place with new materials, it may offer a solution where other options prove difficult to implement. Constructing a setback levee in its stead can provide additional channel storage and conveyance capacity, reduce the risk of levee overtopping and erosion failures, benefit habitats, and create recreational opportunities. However, a setback levee will fundamentally alter the potential uses of the land which transitions from levee-protected to floodplain. Given the potential local and regional impacts of such levee setbacks upon established land use, this approach is only recommended where supported by affected landowners, LMAs, and where consistent with county land use plans. Levee setbacks can be difficult and expensive undertakings, due to the need for large quantities of materials and the impacts on land use and agriculture in the vicinity. As an intermediate alternative between rebuilding a levee in place and constructing a new setback
2/7/14	CA Farm Bureau	CAFB-10	Page 5-4	The regional plan should avoid language and discussion that could lend credence to the notion that there is any such false dichotomy between so-called “traditional” methods and some new, enlightened, and now universally preferred “multipurpose” alternative.	Comment noted. The current draft does not suggest a dichotomy exists, but recognizes that current State law, bond fund language, grant program regulations, and State policies all encourage multipurpose or multiobjective projects. There are current financial incentives for such projects, which are likely to continue and be strengthened in the future. The Plan seeks to maximize State and federal cost sharing through implementation of multiobjective projects, where compatible with local interests and priorities.
2/7/14	CA Farm Bureau	CAFB-11	Page 5-4	Specifically, this section’s description of “channel vegetation management” is inadequate in that it essentially talks around the critical point that clearing, thinning, and outright exclusion of accumulated vegetation in the state’s floodways is a necessary and very important need. The point is an important one and should be made.	Text has been modified as shown in bold: "Channel vegetation management: Improved collaboration among maintaining and regulatory agencies, combined with flood corridor planning, offers the opportunity to optimize the channel benefits of flood conveyance and habitat, while reducing long-term maintenance costs. The need for clearing, thinning, and management of accumulated vegetation in the floodways is necessary and important element of effective flood management in the region. The Feather River Corridor Management Project is an example of this evolving multi-objective approach. "
2/7/14	CA Farm Bureau	CAFB-12	Page 6-1	This language is appreciated. (re: “The local flood management agencies within the Feather River Basin believe strongly that flood management and protection of our residents, farms, and communities is the primary focus of this Plan. A secondary but important goal is integrating agricultural land preservation, habitat enhancement, and restoration opportunities where feasible....”)	Comment noted.

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2/7/14	CA Farm Bureau	CAFB-13	Page 6-1	(section 6.1) The language in this section is accurate in our assessment and appreciated.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-14	Page 6-2	On its face, the views expressed here sound very positive and desirable. In practice, however, workable arrangements that optimally balance and harmonize production agriculture and species conservation have proven elusive. This is in part due to an overly rigid view of conservation that ignores broad and substantial benefits that can derive from remnant habitats and surrogate habitat functions beneficially co-located with productive agricultural land. Examples of such potentially beneficial habitat elements include "hedgerows along drainage canals and roadsides, construction or enhancement of ponds and other wetland habitats, and integration of native species, particularly native grasses, into agricultural areas where compatible with normal farming practices" as described on 6-18 of the Draft Plan. The net benefits that can accrue to fish and wildlife from such habitat elements are undeniable, even after considering the possibility of some disturbance from on-going agricultural activities in the same space. Unfortunately, under the existing paradigm, designation or dedication of an area of productive agricultural land to species protection or conservation is quickly transformed for the landowner into an unattractive limitation and potential liability. Within this framework, conservation is disincentivized and penalized to the	Text has been added to Section 6.2.1 to acknowledge and address this concern: "Local landowners and agricultural organizations involved in the RFMP process are supportive of efforts to maximize the species conservation value of production agriculture, but have expressed concern that attracting species covered under the ESA or CESA to their lands would quickly become a liability and jeopardize continued operations. The regional partners are sensitive to this issue, and have brought it before the state and federal environmental resource agencies (CDFW, NMFS, and FWS). CDFW and FWS have both developed programs designed to shield landowners from liabilities associated with species conservation efforts, and any voluntary wildlife-friendly farming programs related to the RFMP could be administered in coordination with these programs, which include CDFW's Voluntary Local Program, CDFW's Safe Harbor Agreement Program, CDFW's Private Lands Management Program, CDFW's Shared Habitat Alliance for Recreational Enhancement, or FWS' Safe Harbor Agreement Program. Funding for voluntary wildlife-friendly farming programs could be directed through organizations with existing capacity and understanding of these issues, such as local Resource Conservation Districts (RCDs) and the University of California Cooperative Extension."
2/7/14	CA Farm Bureau	CAFB-15	Page 6-2	Retaining agricultural land in private ownership is certainly a fundamental aspect of any effective agricultural preservation strategy—and in that spirit we appreciate the regional partners' commitment in this regard. Even more important than private ownership, however, is the principle of simply keeping regional agricultural economies viable—and, to this end, maximizing conservation of existing productive agricultural lands in long-term agricultural use. This can be accomplished through retention of the ownership interest—but it can also be accomplished through deed restrictions on acquired lands, agricultural and flowage easements that ensure continuation of the agricultural use, and through potential long-term, discounted leaseback arrangements. To avoid limiting the potential universe of the options that are available to achieve the overarching objective of agricultural preservation, it may be important for the plan to more explicitly consider these and any similar mechanisms in a more unified and integrated manner.	Long-term leaseback arrangements have been added as a potential action in Section 6.2, and "contracts" and "landowner incentive programs" have been added alongside "easements" as potential options in Section 6.2.1.

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2/7/14	CA Farm Bureau	CAFB-16	Page 6-2	(re: “[T]he successes in the Yolo and Sutter Bypasses show that agriculture and flood management need not be mutually exclusive endeavors....”) While this statement is generally true at the present time, it is also true that agricultural practices in the Yolo and Sutter Bypasses have not yet been tested by more frequent inundation or large areas of adjacent restored habitat. To the extent these things are now proposed or one day pursued, the compatibility of existing agriculture with these significant unknowns will be a critical consideration.	The text has been edited to read: "...and the successes in the Yolo and Sutter Bypasses show that agriculture and flood management need not be mutually exclusive endeavors as long as the crop types are compatible with the flood regime."
2/7/14	CA Farm Bureau	CAFB-17	Page 6-2	(Re: “In the cases where the floodway is expanded but the lands within the expanded floodway can no longer sustain farming, the landowners would be made whole, either through direct purchase of the land or by purchasing other farm land for the impacted property owner. Compensation should include consideration for long-term loss of production income, as well as the immediate value of the agricultural land. For example, a walnut orchard removed in its fifth year could have yielded additional years of production to the grower....”) This policy direction in the area of landowner compensation is appreciated.	Comment noted. Text added, with parenthetical note. Reason: When public agencies acquire private properties for public use, either through voluntary transactions or by eminent domain, they are generally compelled to offer market based, full appraised value for the fee simple value of each property or for the easement on each property being acquired. Such appraisals take into account the future income streams which can be generated from each parcel. Added: " (Public agencies typically rely on market value appraisals for land acquisitions, which take the value of future income streams into consideration)."
2/7/14	CA Farm Bureau	CAFB-18	Page 6-2	(Re: “To offset the resource and economic losses to the local community associated with taking land out of agricultural production, agricultural conservation easements (described below) should be purchased from willing farmers, and/or agricultural improvements could be made on “potential prime agricultural lands” as proposed by the Sacramento Area Council of Governments (SACOG) (2012)....”) In addition to the SACOG proposal, there is also adopted mitigation for loss for existing agricultural land in the CVFPP EIR/EIS. The Regional Plan should perhaps reference these existing mitigation measures as well.	A discussion of CVFPP Consolidated Final Program Environmental Impact Report mitigation measures AG-1a (NTMA), AG-1b (NTMA), and AG-1c (NTMA) has been added to Section 6.2.
2/7/14	CA Farm Bureau	CAFB-19	Pages 6-2 through 6-7	Portions of the text that acknowledge the importance of maintaining agricultural productivity and flexibility are key. In contrast, the commitment to uniformly convert to “wildlife-friendly” agriculture all agricultural lands placed under future agricultural conservation easements may be incompatible with this goal. A less categorical commitment to “wildlife-friendly agriculture” in all cases might be helpful.	Text has been added to clarify that wildlife-friendly and organic practices would be on a voluntary, incentivized basis. Revised text reads: "To reduce pesticide risks to fish and wildlife species, operators of lands brought into the floodway or brought under easements funded by the regional partners could voluntarily follow best management practices to minimize pesticide exposure of fish and wildlife species and be encouraged to follow organic farming practices. Monetary incentive programs would be offered to offset the costs associated with these types of BMPs and organic farming, or, for those lands brought under easements, the price of the easements will take into account the those costs."

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2/7/14	CA Farm Bureau	CAFB-20	Pages 6-2 through 6-7	In this context, the commitment to define “wildlife-friendly agriculture” in consultation with affected interests is very important. An approach that significantly compromises agricultural productivity and flexibility in the name of species conservation will predictably meet with resistance from the affected agricultural community.	The Plan-specific definition of "wildlife-friendly farming practices" was agreed upon by members of the California Farm Bureau Federation and the Yuba-Sutter Farm Bureau on April 8, 2014. The definition is: "Wildlife-friendly agricultural practices are for the purposes of this Plan defined as voluntary agricultural practices that are modified to benefit wildlife species. These practices typically reduce yield or otherwise increase cost of farming and therefore, when implemented as part of the Plan, farmers must be compensated for the associated financial losses. Farmers may be compensated by contract or under an easement that prescribes or limits uses of the property or requires particular farming practices for an agreed-upon duration of time, and provides financial compensation for implementation of these practices, or through a landowner incentive program."
2/7/14	CA Farm Bureau	CAFB-21	Pages 6-2 through 6-7	In many cases, merely retaining land in agriculture as part of a functioning flood system overall may itself provide a sufficient public benefit in the way of public safety and risk reduction. While wildfire preservation is no doubt an important secondary objective, agricultural economies must remain viable. Striking the right balance here is key to the success or failure of the proposed approach.	Agreed. Please see the language changes described in the response for comment CAFB-19.
2/7/14	CA Farm Bureau	CAFB-22	Page 6-3	Agricultural and habitat conservation easements are often discussed and employed in mutually exclusive terms. In reality, there is practically no reason why portions of an agricultural property retained in productive agriculture could not be restricted on a willing seller basis for limited wildlife purposes, with excellent outcomes for resident wildlife. Examples of such potentially beneficial habitat elements include “hedgerows along drainage canals and roadsides, construction or enhancement of ponds and other wetland habitats, and integration of native species, particularly native grasses, into agricultural areas where compatible with normal farming practices” as described on 6-18 of the Draft Plan.” Unfortunately, for such easements to work, there is an essential missing ingredient as of today: Namely, the ag/species dichotomy must be put aside, so that production agriculture can coexist with wildlife habitat, without constant fear of reprisal. Until this occurs, harmful disincentives to constructive conservation will remain.	Text has been added to Section 6.2.1 to acknowledge and address this concern. See the response to comment CAFB-14 for the full text.

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2/7/14	CA Farm Bureau	CAFB-23	Page 6-3	<p>(Re: “[i]f there are lands on the waterside of the new levee that previously were not located within the floodway, and if the landowner is amenable to such an arrangement, a flowage easement could be purchased from the landowner allowing the lands to be flooded during high river flows. This would allow the landowner to preserve ownership of the land and continue farming practices when the land is not inundated....”)</p> <p>To achieve the goal to “avoid or minimize the loss of agricultural lands to the extent possible” (Draft Plan, p. 6-6) through means including the flowage easement mechanism described here, it may be necessary to assist, reimburse, or compensate landowners for equipment and infrastructure modifications. Landowners may need to make newly created or severed areas suitable for continued farming—or, in some cases perhaps, to transition to some wholly different, new type of farming operation.</p>	<p>Language has also been added in Section 6.2, under the "Flowage Easement" bullet, stating that the flowage easement would also compensate the landowner for any necessary flood-related modifications to the land or operations.</p>
2/7/14	CA Farm Bureau	CAFB-24	Page 6-4	<p>First of all, the discussion of concerns over potential hydraulic impacts of orchards in floodways contrasts sharply with the Draft Plan’s comparative dismissal elsewhere of the importance of such considerations with respect to natural vegetation. (See, e.g., Draft Plan, p. ___.)</p>	<p>See response to CAFB-11.</p>
2/7/14	CA Farm Bureau	CAFB-25	Page 6-4	<p>Secondly, where there is existing orchard present in a newly created floodway, the primary consideration as to the retention of the use should not be hydraulic impacts, rodents, or other secondary issues, but rather the economic loss of the orchard and the compatibility of the use with the new flood regime. To inform these and other questions—and also to potentially eliminate some of the speculative tone of the text—the Regional Partners should directly solicit the agronomic, scientific, and technical expertise and input of knowledgeable persons in the agricultural field, including UC Cooperative Extension reps, NRCS reps, RCD reps, and actual local growers.</p>	<p>Public safety must be the first consideration when determining the uses of lands within the floodway. Language in Section 6.2.1.1 has been modified to state that orchards are often less desirable to have in the floodway "from a flood management perspective." However, additional language has been added to clarify: "Modeling by hydrologists and water resource engineers would be needed on a case-by-case basis to measure any impacts to the flood management risk reduction system by allowing orchards to remain within the floodway, but the Regional Partners believe that some orchards can be allowed to remain within any new or expanded floodway, as long as the orchard type would remain economically viable under the new flood regime and the grower wishes to continue operations." Additionally, the end of Section 3.2.1.1 states: "...it should be acknowledged that tree crops are not suited for survival in areas with prolonged periods of inundation."</p>
2/7/14	CA Farm Bureau	CAFB-26	Page 6-4	<p>(Re: “6.2.1.2 Row and Truck Crops”) Again, as generally noted above with respect to flood-compatible farming in the Yolo and Sutter Bypasses, the frequency and timing of future flooding is a determining factor.</p>	<p>Text has been modified to read: "Row and truck crops have proven potential to be successfully farmed in floodways and bypasses under certain inundation frequency and duration conditions..."</p>

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2/7/14	CA Farm Bureau	CAFB-27	Page 6-5	<p>(Re: "Seasonal cattle grazing on these lands provides benefits to native grasses as the cattle eat nonnative competing grasses and expose emerging native forbs to sunlight, a function that was historically achieved by pronghorn antelope and tule elk....")</p> <p>This point is an important one from a vegetation management standpoint—and also one that is supported ecologically by considerable science to date.</p>	Comment noted.
2/7/14	CA Farm Bureau	CAFB-28	Page 6-5	<p>The practice of winter flooding is not likely so widespread and ubiquitous that there are not, in fact, many unflooded upland areas that can be utilized by the GTS in most or all years. This limitation, to the extent it exists, would likely be very site-specific and not so universal as the text suggests.</p>	Agreed. The text has been modified to read: "The winter management of some rice fields and attendant water control structures located outside of the floodway to ensure rice fields or portions thereof are kept dry and have the necessary features to offer upland habitat during the snake's inactive period would benefit giant garter snake in areas where no nearby dry upland habitat is available during winter."
2/7/14	CA Farm Bureau	CAFB-29	Page 6-5	<p>(Re: "An option to be considered for effects to giant garter snake is the winter management of some rice fields and attendant water control structures located outside of the floodway to ensure rice fields or portion thereof are kept dry to offer upland habitat during the snake's inactive period. There may be other grading or drainage opportunities that could achieve this objective at lower cost to farmers. Input from rice growers is needed to determine if such practices are feasible and the availability of state, federal, and private funding programs to support these practices should be identified to mitigate costs to growers....")</p> <p>The point with respect to the need for grower input is no doubt correct.</p>	Comment noted.
2/7/14	CA Farm Bureau	CAFB-30	Page 6-5	<p>Additionally, if activities are to be undertaken for the GTS, participants should perhaps give consideration to the potential for dual benefits, not only from a flood perspective, but also to meet on-going mitigation needs for recurring north state water transfer activities. This could add value to such a program for area growers that might not otherwise exist.</p>	Text added to Section 6.2, 3rd paragraph: "Such mitigation measures may also provide dual benefits when land is temporarily fallowed for water transfer transactions."
2/7/14	CA Farm Bureau	CAFB-31	Pages 6-5 through 6-6	<p>(Re: "6.2.1.5 General Agricultural Practices") As noted, farmers farming throughout the Central Valley Region are already undertaking activities to comply with existing Regional Board and DPR regulations applicable to irrigated lands and required pesticide use. Details of the described proposal, with respect to lands in floodways or brought under easements, will require additional vetting.</p>	The following text was added toward the end of Section 6.2.1: "Before the details of any wildlife-friendly farming programs are finalized, they will require additional vetting from organizations, like the local RCDs, with a broad background in environmental stewardship and agriculture."

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2/7/14	CA Farm Bureau	CAFB-32	Page 6-7	(Re: "6.3.1 Conservation Strategy Integration") There is so far very little publicly available information concerning details of the mentioned CVFPP Conservation Strategy. This makes consistent planning from a regional planning standpoint difficult, and also creates a risk of significant public backlash if the Conservation Strategy finally released fails to align with local priorities, preferences, concerns, and economic realities. The overview information provided in this section of the Draft Plan does not remedy this situation. This is not the fault of the Regional Plan, of course, but rather of the current lack of available information concerning the Conservation Strategy itself.	Comment noted. DWR anticipates releasing a public draft of the Conservation Strategy in mid-2014.
2/7/14	CA Farm Bureau	CAFB-33	Page 6-9	(Re: the Memorandum of Understanding Regarding Feather River Regional Flood Planning and the Environmental Impact Statement/Environmental Impact Report for the Feather River West Levee Project) For those interested in additional details of this MOU, it would be helpful if a copy of that document could be provided in an Appendix to the Plan itself.	The MOU will be added to report as Appendix E.
2/7/14	CA Farm Bureau	CAFB-34	Page 6-10	(Re: "Rather than attempting to identify new, previously un-described restoration opportunities for the Feather River Region, the RFMP recognizes and builds upon the significant prior investment of time and resources that has been expended by various local, State, and non-governmental organizations to develop ecosystem restoration and enhancement actions....") In the area of habitat restoration, Farm Bureau concurs with the approach described.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-35	Page 6-18	(Re: 6.3.3.8 Cherokee Canal) Farm Bureau agrees that actions to address flood and sediment issues along the existing Cherokee Canal should be pursued without delay as a self-standing regional project in its own right.	Comment noted.

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2/7/14	CA Farm Bureau	CAFB-36	Page 6-21	<p>(Re: "6.3.3.13 Sutter Bypass Wildlife Area) This section includes no mention of the CVFPP's proposed widening of the Sutter Bypass. While Farm Bureau questions the need for such widening, the omission of any mention of this proposal in this section would appear to leave a large related unknown wholly unaddressed. If the proposal described in the text is the regional alternative or preferred regional option in relation to the large CVFPP proposal, then some discussion of this including, potentially, any alternative prioritizations or solutions the regional partner's might be offered in this area. At the very least, it would seem that some explanation of the relationship between the regional proposal and a potential statewide project is needed.</p>	<p>The last paragraph of Section 6.3.3.13 has been rewritten as follows: "Consistent with the input provided to the CVFPP during the CVFPP adoption process, the region remains concerned about the potential loss of agricultural lands, redirected hydraulic impacts, and public expense associated with the implementation of the Sutter Bypass expansion proposed in the 2012 CVFPP. Although opportunities to improve aquatic habitat, restore riparian woodland, or create other habitats in the Sutter Bypass are limited by the narrow strips of State-owned land that characterize much of the wildlife area, selective planting of infill of riparian vegetation within the narrow bands along the edges of the bypass parallel to the direction of flow could occur in locations that currently lack riparian habitat. Such plantings could provide a continuous corridor of habitat along the Sutter Bypass levees, so long as the vegetation does not significantly reduce the conveyance capacity of the bypass. Additionally, there are significant opportunities to encourage wildlife-friendly farming practices within the Sutter Bypass since the majority of the Bypass is privately-owned and actively farmed. The recent success of efforts to rear salmonid juveniles on fallow, flooded rice fields on the Knaggs Ranch in the Yolo Bypass is one such promising example. "</p>
2/7/14	CA Farm Bureau	CAFB-37	Page 6-21	<p>(Re: 6.3.3.14 Sutter National Wildlife Refuge "...targeted restoration of riparian habitat where needed to create a continuous corridor of riparian vegetation throughout the Sutter Bypass and where the planting of riparian vegetation would not adversely affect the Sutter Bypass' ability to convey water during flood events...."</p> <p>The underlined text raises a question for us: Namely, where habitat restoration is proposed in a flood bypass area, would such habitat be designed in a linear manner to simulate riparian habitat, possibly prevent erosion, and avoid adverse impacts on the existing flood conveyance capacity? This would be in comparison to a potential different habitat model that might allow non-linear, widely dispersed encroachment of riparian vegetation upon the floodway, away from the margins. That there should or must be unintended riparian forest allowed in the bypasses is a proposition whose soundness we sharply question. Consistent with the CVFPP, however, assuming there is such habitat one day put in our bypasses, at this time it would then seem to us that "clogging" the floor of the bypass from levee to levee is probably not desirable from a flood control and hydraulic standpoint, but a linear alignment along the bypass margins could lessen this problem significantly, while still allowing</p>	<p>Text in 6.3.3.14 was modified to read: "targeted restoration of riparian habitat within narrow bands along the levees that would be oriented parallel to the direction of flow where needed..."</p> <p>Text in 6.3.3.13 was modified to state: "However, selective planting of infill of riparian vegetation within the narrow bands along the edges of the bypass within the existing bands parallel to the direction of flow could occur in locations that currently lack riparian habitat to provide a continuous corridor of habitat along the Sutter Bypass levees, so long as the vegetation does not reduce the conveyance capacity of the bypass." as was the intent.</p>

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2/7/14	CA Farm Bureau	CAFB-38	Page 6-21	(Re: 6.3.3.15 Lower Yuba River Native Fish Habitat Enhancement) As with the Oroville relicensing agreement, we agree that any habitat actions already required or contemplated under the New Bullards relicensing should be coordinated with other existing efforts in the region to, in this way, maximize potential habitat and flood space benefits from existing activities, while potentially reducing the ultimate footprint of potential statewide actions as proposed in the CVFPP.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-39	Page 6-24	(Re: 6.4.1 Regional Habitat Conservation Plans) Requiring HCPs for routine agricultural practices is not an approach that Farm Bureau favors.	The text "and other agricultural infrastructure and farming practices that might result in take of listed species" was deleted.
2/7/14	CA Farm Bureau	CAFB-40	Page 6-25	(Re: "multi-benefit projects that provide improved conditions for HCP covered species beyond what would be needed to mitigate their own impacts could potentially incorporate those 'net positive benefits' into the HCP for use as mitigation for other projects, and be used as a way to reach habitat goals within the FRRFMP while avoiding loss of valuable agricultural lands....") While we are generally less than enthused by the prospect of an HCP that seeks to advance conservation goals and urban protection at the expense of rural and agricultural areas, the concept of streamlining flood permitting processes through the use of excess mitigation credits does have some potential appeal as an alternative to expensive and inefficient, piecemeal mitigation on a project-by-project basis. This is especially important for local management agencies in rural areas where the financial capacity for expensive mitigation and permitting processes is limited, but the need for on-going repairs and improvements is critical.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-41	Page 6-26	(Re: 6.4.4 Activity-Specific Programmatic Permitting) The SERP model sounds like a very practical approach that we would hope might be transferred to other areas of the Central Valley, including financially constrained rural areas of the Feather River Region.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-42	Page 6-27	(Re: Master or Programmatic Streambed Alteration Agreement) The Department of Fish and Wildlife has elsewhere attempted to use Programmatic SAAs improperly to impose conditions on water diversions with existing water rights. Farm Bureau is adamantly opposed to this attempted expansion of section 1602 of the Fish and Wildlife Code.	All references to programmatic SAAs have been removed from the Plan.

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2/7/14	CA Farm Bureau	CAFB-43	Page 6-28	(Re: Conservation and Mitigation Banks) Private mitigation banks can be a good way of providing positive economic incentives for conservation and restoration, while enabling necessary projects to move forward in a timely manner. For private mitigation markets to function well, however, habitat benefits must be properly valued without reasonable hyper-inflation of required mitigation ratios by regulatory agencies. Similarly, fish and wildlife agencies must not place overly onerous and inflexible crediting and permitting requirements on would-be private mitigation bank developers.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-44	Page 7-1	(Re: FRWLP) The text includes no discussion of whether the hardening and raising of the SBFCA's West Side Levee will have any redirected impacts on agricultural levees on the eastside of the Feather River north of Marysville, including potential increased flood risks and likelihood of failure. Has this issue been considered and, if so, how is it being addressed?	This issue was addressed by SBFCA in the Feather River West Levee Project, Final EIR, Responses to Comments, dated April 2013 (http://sutterbutteflood.com/wp-content/uploads/2013/09/FRWLP_Final-RTC_Apr2013_EIR-Pt2.pdf). Response 130-B states, "SBFCA has conducted a thorough analysis, including review by independent, third-party experts and technical review by the agencies for whom this is part of their permitting authority and mission (i.e., USACE, DWR, and the Central Valley Flood Protection Board [CVFPB]), and no issues have been identified with increased or transferred risk that may result from the FRWLP. Similarly, the agencies with flood management responsibilities adjacent to and downstream of the project have not raised any objections to its implementation. To reduce regional flood risk beyond the FRWLP, as the next phase of the Central Valley Flood Protection Plan, SBFCA is collaborating with partners on both sides of the river in the Feather River Regional Flood Management Plan to develop a mutually agreed and mutually beneficial framework to reduce flood risk for all communities in the region. SBFCA is a co-lead agency along with Three Rivers Levee Improvement Authority, Yuba County, Yuba County Water Agency, and the Marysville Levee Commission. " It is important to note that the SBFCA FRWLP project does not include any increases in levee crown elevations, nor is the geometry of the levees modified in any significant way. While the project

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2/7/14	CA Farm Bureau	CAFB-45	Page 7-3	(Re: SBFCA considering construction of a designated spillway at the southern end of the Sutter Basin) Are downstream and adjacent areas apprised of the different "breach scenarios" and whether and to what extent they might be impacted? Are they adequately prepared for and in agreement with such eventuality? Are there arrangements concerning potential compensation, indemnification, and post-flood recovery measures in the event an emergency levee breach in turn causes flooding or failure in some downstream or adjacent area?	Text at the end of Section 7.1.1 has been rewritten in response to the comment: "Therefore, SBFCA is considering, as a residual risk alternative, the construction of a designated spillway of appropriate width at the southern end of the basin, which would allow the floodwaters to drain from the Sutter Basin two to three feet below the levee crown. The spillway could be armored to prevent erosion and sealed with a fuse plug that could be released through the use of explosives or other means in the event of flood waters accumulating within the basin. Such a fuse plug weir about two miles long could reduce flood elevations within the basin by two to three feet. This conceptual alternative formalizes the past practice of breaching levees to allow flood waters to drain out of a basin when a levee failure has already occurred, thus preventing or reducing the consequences of interior basin flooding. In 1955, the lower Feather River was breached following the levee failure at Shanghai Bend, and in 1997 relief cuts were made on the Sutter Bypass and Bear River levees for this purpose. The impacts of hastening the drainage of flooded islands on the regional flood stages though the use of designated spillways vary depending upon the specific storm and breach scenario and can be modeled using currently available system hydraulic modeling tools such as the Central Valley Flood Hydrology Study HEC-RAS model or the Central Valley Floodplain Evaluation and Delineation HEC-RAS model. In general,
2/7/14	CA Farm Bureau	CAFB-46	Page 7-31	(Re: dredging) As noted elsewhere in these comments, the overwhelming negative treatment of channel dredging as one potentially useful and important tool in the historic flood protection toolbox is over-stated and inaccurate. If, as the text would suggest, regulatory constraints are a decisive reason dredging has been excluded as a tool, then the text should state this clearly, without denigrating the potential utility of the approach from a flood management and engineering standpoint only.	This text has been revised and moved to Chapter 5, Section 5.3, page 5-5. Revised text: "Channel Dredging: Channel dredging is distinguished from channel grading and sediment removal as described above by the fact that dredging involves excavating sediment from the bottom of an active flowing stream channel. Dredging of river channels has been undertaken to improve channel capacity for navigation, flood conveyance capacity, and other purposes in many locations throughout California, the nation, and the world. In the Central Valley system the most significant dredging projects undertaken include the Sacramento River Minor Project, which resulted in dredging of about 300 million cubic yards of material from the lower Sacramento River near Rio Vista, dredging of numerous new channels in the Sacramento-San Joaquin Delta by local RDs, and the construction of the Stockton Deep Water Ship Channel and the Sacramento Deep Water Ship Channel by USACE. Dredging continues in San Francisco Bay to enhance navigation and commerce, but its use upstream in the Central Valley stream system has been greatly reduced due to regulatory constraints. As with channel grading and sediment removal, the utility of dredging in any particular portion of the river system is affected by the flow and

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2/7/14	CA Farm Bureau	CAFB-47	Page 7-31	(Re: dredging) If it is true that “[t]he Feather River system continues to carry substantial loads of sand and silt,” and that “dredged stream segments would rapidly fill with the mobile bed load,” then it is unclear how a complete moratorium on all dredging anywhere in the system could possibly help to address the on-going of gradual sedimentation of river channels—and thus the gradual loss of available flood conveyance capacity over time. The notion that no such intervention is ever required or potentially efficacious because rivers and sediment loadings are in a state of supposed “dynamic equilibrium” is not well explained and does not comport with simple common sense. The fact is that dredging, like bank protection and new storage, appears for some reason, to have been categorically “taken off the table.”	Text has been revised as shown in response to CAFB-46. As with channel grading and sediment removal, the utility of dredging in any particular portion of the river system is affected by the flow and sediment regime, and any such action must be designed with a full understanding of the fluvial processes and evolving fish and habitat values in order to provide long-term flood risk reduction and habitat restoration benefits.
2/7/14	CA Farm Bureau	CAFB-48	Page 7-31	(Re: "dredging projects are not included among the recommended actions for the channels of the region.") When large bypasses expansions with enormous impacts and large-scale restoration of riparian forests in our designated floodways are proposed as the alternative, we think that the complete removal of these tools from consideration does rural and agricultural communities in the Valley a disservice.	The discussion of channel sediment removal and regrading in Chapter 5, Section 5-3, page 5-5 has been revised to reflect the utility of these actions for both conveyance and habitat restoration. However, as noted in the revised text, because dredging involves excavation in a body of water, key concerns center on the mobilization of toxic materials in sediment such as mercury, increases in turbidity, and direct impacts of large machinery operating within river channels. Resources agencies are particularly concerned about the resultant impacts on listed aquatic species, including migrating and resident fish. It is very difficult to obtain environmental clearances for channel dredging due to concerns about its environmental impacts. For this reason channel dredging is unlikely to play a significant role in multi-objective channel improvement projects in the region..
2/7/14	CA Farm Bureau	CAFB-49	Page 7-31	(Re: dredging) Even if permitting is the issue, to the extent coordinated mitigation is proposed as part of both the Regional Plan and the underlying CVFPP, surely then there must be ways to obtain permits for undertaking targeted dredging activities in at least some locations. Instead, rather than any true limitation inherent in the technology itself, it would appear that the decision to take dredging, storage, and bank protection “off of the table” is a policy choice based on someone’s personal value judgment. If that is the case, though, it is a policy choice which is not well-explained or justified.	Text has been revised as discussed in responses to CAFB-46 and 47.
2/7/14	CA Farm Bureau	CAFB-50	Page 7-32	(Re: 7.1.9 System Transitory Storage) As noted, the lack of private landowner and community support for such “transitory storage” proposals make them a virtual non-option.	Comment noted. The current text is consistent with the concern of the CAFB by noting that, "Any proposal to create transitory storage in these areas would need the support of affected property owners and local governments, with appropriate compensation for changes in land use and frequency of flooding." Chapter 5 has also been revised to be consistent. Please see comment YSFB-10.

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2/7/14	CA Farm Bureau	CAFB-51	Page 7-32	(Re: improved reservoir operations) How much are forecast capabilities likely to improve over the next 10, 20, 30 or 40 years, and how significantly does the potential of this technology increase over time? What, for example, is the maximum theoretical benefit which could be gained from reoperation of existing reservoirs with greater precision in future forecasting technologies?	The referenced text has been augmented in partial response to the comment. New text: "For example, Andrew Smith (2009), stated, "The two-day forecast of today is as accurate as the one-day forecast was in 1988. The seven-day forecast now is as accurate as the five-day forecast was then. Extreme-weather forecasts have improved even more over the same period. People who once received on average five minutes' warning before a tornado - and no warning at all 74 percent of the time - now get 13 minutes' warning on average, and receive some warning 69 percent of the time. Flash flood forecasts now come, on average, more than an hour before the floods themselves. Much of the improvement comes from a new generation of radar that went into service in the early 1990s. Unlike older radar technology, which basically bounced off storms, today's Doppler radar units can peer through fronts and measure things such as wind speed." While the technology continues improving, there is not clear agreement about the limits of future forecasting accuracy improvement, except that accuracy will never reach 100% . The Plan talks about FBO and FCO to offer a more reliable operational practice.
2/7/14	CA Farm Bureau	CAFB-52	Page 7-32	(Re: improved reservoir operations) Also, in addition to Oroville and New Bullards, what is the long-term potential of flood-coordinated operations with other reservoirs outside of the Feather Region, including Shasta and Folsom, as well as smaller Corps, power generation, and other smaller reservoirs? How also could a new Sites Reservoir affect future integrated flood operations basinwide?	Comment noted. However, a detailed discussion of the long-term potential of F-CO and new storage to improve system flood operations, water supply, and environmental benefits is beyond the scope of this study. The CAFB is encouraged to continue to monitor progress of F-CO and new storage investigations conducted by DWR, USACE, USBR, and other dam operators.
2/7/14	CA Farm Bureau	CAFB-53	Page 7-32	(Re: improved reservoir operations) Are there optimal synergies or relative trade-offs that could be achieved in this context in terms of flood control, environmental flows, and water supply?	Comment noted. Please see response to CAFB 52
2/7/14	CA Farm Bureau	CAFB-54	Page 7-34	(Re: 7.1.10.4 Structural Improvements for New Bullards Bar Dam and Reservoir) Assuming that there is no loss of water supply, this sounds like a very beneficial project.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-55	Page 8-1	(Re: residual flood risk management alternatives) This section highlights the importance of such "residual risk" for predominant rural and agricultural areas valley-wide, where the financial infeasibility of major capital improvements makes maintenance, inspection, improved forecasting, and rapid response the front line of rural and agricultural flood protection.	Comment noted.

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2/7/14	CA Farm Bureau	CAFB-56	Page 8-2	(Re: "Local agencies in the Feather River region can take many actions to improve local flood emergency response capabilities, including preparing flood emergency response plans, developing appropriate regional communications tools and processes for emergency response operations, stockpiling strategically-located resources for floodfight activities, and conducting training exercises....") For rural and agricultural areas, such efforts are well worth the investment. State, federal, regional, and local governments should accord such efforts a high level of priority.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-57	Page 8-3	(Re: Yuba-Sutter Flood Fight Coalition) This effort and others that may emulate it are a great asset to the region.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-58	Pages 8-3 through 8-4	(Re: 8.1.5 Emergency Preparedness Options for Improvement) As noted, all such efforts serve the region—and particularly the rural and agricultural areas that typically cannot count on major capital improvements—very well.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-59	Page 8-4	(Re: 8.2 Enhanced Flood System Operations and Maintenance) This section highlights another high priority area for rural and agricultural areas—system operations and management. Although the state has apparently determined that major capital improvements and investment in rural and agricultural levees and flood systems are not likely, the urgency and importance of state and federal financial assistance and support in the critical areas of "residual risk management" and "system operations and maintenance" is increased greatly.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-60	Page 8-5	(Re: 8.3.1 National Flood Insurance Program Refinement for Rural-Agricultural Areas) For obvious reasons, neither flood proofing and elevating, nor relocation, sale, or demolition are desirable options for rural and agricultural communities in the Valley.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-61	Page 8-6	(Re: 8.3.1 National Flood Insurance Program Refinement for Rural-Agricultural Areas) This discussion provides a good summary of the problems faced by rural and agricultural issues under existing NFIP rules. This is a serious issue for our rural areas and one deserving of significant attention.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-62	Pages 8-6 through 8-7	(Re: Proposed changes to the NFIP) These constructive proposals focus on a very important issue for our rural and agricultural areas, not only in California or the Central Valley, but ultimately nationwide.	Comment noted.

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2/7/14	CA Farm Bureau	CAFB-63	Page 8-7	(Re: 8.3.2 Development Impact Fee Program) Reliance on development to generate development fees to pay for levees to protect the developed areas risks perpetuation of a cycle that ultimately only increases public exposure and flood risk at great expense. Without ignoring the needs of regional economies and populations, it is nonetheless generally true that compact growth and agricultural preservation are the less expensive and the more sustainable path to reduced flood risk.	Paragraph has been revised to read: "Regional agencies such as counties and cities exert jurisdiction over land use within their boundaries. Concerns about the increase in Expected Annual Damage (EAD), which occurs when development occurs in floodplains can be mitigated by improving the capacity and reliability of flood protection concurrently with development. In this way increase in damageable property is balanced by the reduced chance of flooding, thus breaking the cycle of improvements in flood protection resulting in increased cumulative risk as development follows. Such a fee program is consistent with the State's goals of reducing the risk of flooding over time, while fostering robust economic health and environmental quality throughout the region. It is therefore more likely that regional projects to improve levees will garner State cost-sharing support when combined with programs, such this that address long-term concerns about the growing risk of flood damages. The application of a development impact fee program can also encourage more compact development, because the cost of offsetting new development flood exposure with improved flood protection is lower for compact development."
2/7/14	CA Farm Bureau	CAFB-64	Page 9-2	(Re: 9.1.2 Implementation Feasibility) With reference to the CVFPP particularly, in the context of an implementation feasibility analysis, we would stress the importance of "availability of right-of-way" and "public acceptability" as factors, and would also add to this list the critical factor of "financial feasibility."	The paragraph has been rewritten as follows: "Implementation feasibility is a broad term that summarizes the potential likelihood of successfully implementing an action. A myriad of specific factors, such as availability of right-of-way, the willingness of affected property owners to sell real estate needed for project facilities, technical challenges, permitting constraints, environmental impacts, and public acceptability, to name a few, could all affect feasibility."
2/7/14	CA Farm Bureau	CAFB-65	Page 9-2	(Re: 9.1.3 Flood risk reduction benefits) The "worst-first" approach, of course, makes good policy sense—but should have separate urban and rural/agricultural components to it, as rural and agricultural areas, despite significant infrastructure needs and flood risks, might otherwise otherwise be disadvantaged—for example, in terms of populations protected, assessed value, and impacts on state and national economies.	The paragraph has been revised to read: "There are a number of potential measures of flood risk reduction benefits, such as EAD; number of people protected; anticipated frequency of inundation; direct damage to lands, crops, and structures; indirect impacts on the local, regional, State, and national economies; risk of ecological damage; effects on water quality; and other effects. The CVFPP has established a "worst-first" approach, in which it will most likely give the highest priority to projects that address the most significant system weaknesses first in a cost-effective manner. It has also set protection of urban areas, urbanizing areas, and small communities, with the highest concentrations of people and property, as highest priorities. However, it is also important to improve flood protection for rural-agricultural areas, which should be prioritized under a separate category to assure that they are not left behind. All of these factors should be considered, although it is often difficult to quantify them."
2/7/14	CA Farm Bureau	CAFB-66	Page 9-4	(Re: 9.3.1 Alternatives Prioritization) These "regional priorities" and the mentioned "Financial Plan" will, of course, become a very important part of the Plan. At what point and through what process will be they be developed?	The revised Plan will include the financial plan and suggest project priorities.

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2/7/14	CA Farm Bureau	CAFB-67	Page 9-4	Also, in terms of the (as yet unprioritized) "Projects and Description" table which follows in the Draft Plan (pp. 9-5 through 9-8), the estimated cost of many necessary rural projects (e.g., RD 1001, p. 9-7) is very high—and yet the capacity of these districts is possibly quite limited. A pertinent question is what will be done in the case of high-priority rural projects for which local financial capacity is lacking?	Paragraph 9.3.1 has been revised, consistent with the comment to read: "Regional priorities will be developed in concert with Financial Plan development and displayed in Table 18. Some projects, particularly major levee improvement projects for rural-agricultural areas are likely not financially feasible under current conditions. However, it is important to identify all significant project priorities in this Plan in order to be prepared to take advantage of changing conditions and funding opportunities."
2/7/14	CA Farm Bureau	CAFB-68	Page 10-1	(Re: Tables 21-23) Although the reference tables are not yet part of the draft document, the Draft Plan's inclusion of this content is appreciated.	Comment noted.
2/7/14	CA Farm Bureau	CAFB-69	Pages 10-4 through 10-5	(Re: 10.2.1.2 Future Federal Funding) The prospect of little or no federal funding for the foreseeable future argues in favor of a potential revision of expectations—particularly, in terms of some of the major system modifications projects being proposed in the CVFPP.	See response to CAFB-67
2/7/14	CA Farm Bureau	CAFB-70	Page 10-5	(Re: 10.2.2.2 Future State Funding and 10.2.3 Local Funding Assessment) In terms of state funding, future reliance on future bonds is a highly uncertain financing strategy. Local agencies, as noted, face additional financial challenges. Again, given these fiscal realities, it would seem that some revision of expectations may be in order—perhaps focusing on local and regional projects and downsizing or reprioritizing proposed major statewide modifications to the system.	See response to CAFB-67
2/7/14	CA Farm Bureau	CAFB-71	Page 10-7	(Re: Matrix of Prioritized Projects and allocation of potential funding mechanism capacity, Discussion of Qualitative aspects of FEMA rate increases, and Recommendations/Management Actions for implementation....") While the above-referenced information is not yet a part of the Draft Plan, each of the items will obviously become an important part of the final plan.	The revised Plan includes a detailed discussion of financial considerations. As shown in Table 10-1, projects are prioritized within individual sub-basins, since each sub-basin has independent local funding mechanisms and are protected by levees unique to each.