

# 2022 Conservation Strategy Update

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
1	Dick Tzou	Solano County & LSDN	Page 1-8	The overall measurable objectives are projected to be achieved in a 30-year span. However, is there a proposed scheduled timeline on progress for achieving certain measurable objective milestones moving forward?	May be helpful to gage progress.	Information was added to the recommendations in Table 3-8 for next steps in revising measurable objectives and adding target species. While implementation progress is documented in Appendix F, no timeline has been developed for achieving intermediate milestones.	Yes
2	CDFW Staff	CDFW	Page 2-3	The Fremont Weir Adult Fish Passage Improvement Project is a mitigation requirement for the Central Valley Project (CVP) and State Water Project (SWP) and shouldn't count towards the Measurable Objectives.	Recommend language is added to clarify that this project was a mitigation requirement and therefore does not contribute to the Measurable Objectives.	Added text in this paragraph to clarify that this is a CVP/SWP mitigation project, and a footnote in Table 2-1 that the remediation of a fish passage barrier is the only component that counts towards measurable objectives. Content was added in Chapter 2 and Appendix F to clarify that habitat enhancement projects may also contribute to measurable objects.	Yes
3	CDFW Staff	CDFW	Table 2-1	Table 2-1 identifies projects that are required as mitigation for the CVP and SWP (i.e. Fremont Wier Adult Fish Passage and Yolo Bypass Salmonid Habitat Restoration and Fish Passage Projects (non-Central Valley Flood Protection Plan [CVFPP])). The Yolo Bypass Salmonid Habitat Restoration and Fish Passage Project (non-CVFPP) is a mitigation requirement in the 2009 Biological Opinion (BiOp) for the coordinated operation of the CVP and SWP. This project is intended to offset impacts of CVP and SWP operations on juvenile salmonid rearing and adult salmonid and sturgeon stranding in the Yolo Bypass. Implementation of this project only offsets project impacts. Additionally, the projects efficacy in achieving the intent of the Reasonable and Prudent Alternative's (RPA) driving this project needs to be evaluated after implementation. It should not be listed as an anticipated project toward the goals of the Conservation Strategy. Furthermore, both the 2019 BiOp on CVP and SWP operations and the SWP Incidental Take Permit were developed assuming implementation of this project was part of the environmental baseline. Implementation of this project is mitigation and should not be viewed as moving the environmental baseline forward toward the goals of the Conservation Strategy.	Table 2-1 identifies and clarifies the Yolo Bypass Salmonid Habitat Restoration and Fish Passage Project's contributions to the Measurable Objectives, but it does not clarify how the Fremont Wier Adult Fish Passage Project contributes to Measurable Objectives. Please clarify Fremont Wier Adult Fish Passage Project's contributions to the Measurable Objectives as well as its mitigation requirements. Clearly identify any projects that do and do not contribute to Measurable Objectives. Add a discussion about identifying if projects are reducing an existing impact or providing a net benefit while moving the environmental baseline forward.	Added text in this section to clarify that this is a CVP/SWP mitigation project, and a footnote in Table 2-1 that the remediation of a fish passage barrier is the only component that counts towards measurable objectives. Content was added in Chapter 2 and Appendix F to clarify that habitat enhancement projects may also contribute to measurable objects. Also, see response to Comment #2.	Yes

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4	CDFW Staff	CDFW	Table 2-1	The Fremont Weir fish passage improvement projects and the Lookout Slough Project are not multi-benefit projects or restoration projects but mitigation projects for CVP/SWP.	Recommend removing the projects from Table 2-1, putting them in a separate category, or adding footnote clarifying mitigation vs. contributions to Measurable Objectives.	Added text in this section to clarify that this is a CVP/SWP mitigation project, and a footnote in Table 2-1 that the remediation of a fish passage barrier is the only component that counts towards measurable objectives. Content was added in Chapter 2 and Appendix F to clarify that habitat enhancement projects may also contribute to measurable objects. Clarifying language was added to Table 2-1 footer to clarify that only surplus value for Lookout Slough will be considered as counting toward Conservation Strategy measurable objectives. Also, see response to Comment #2.	Yes
5	CDFW Staff	CDFW	Table 2-1	Text states "Because the Yolo Bypass Salmonid Habitat Restoration and Fish Passage Project is a non-CVFPP project and possibly designated as mitigation."	Recommend deleting 'possibly' from this line.	Removed "possibly" and updated footnote to read that the project may not contribute to measurable objectives unless surplus value is quantified.	Yes
6	CDFW Staff	CDFW	Table 2-1	Footnote c states Lookout Slough Project will contribute to the Measurable Objectives, however it is mitigation for the CVP/SWP operations. The EIR/EIS for the CVP/SWP states: "The Proposed Project would restore within the Proposed Project Site approximately 3,164 acres of tidal marsh that would partially fulfill DWR's obligations under RPA 4 of the 2008 United States Fish and Wildlife Service (USFWS) Delta Smelt BiOp and is consistent with RPA 1.6.1 of the 2009 National Marine Fisheries Service (NMFS) Salmonid BiOp for the coordinated operations of the State Water Project and the Central Valley Project."	Recommend language is added to clarify that the Lookout Slough Project is a mitigation requirement for the CVP/SWP and therefore does not contribute to the Measurable Objectives.	A portion of the restoration may contribute to measurable objectives, but the amount is still to be determined. Any acreages used for mitigation in the future will be subtracted from the appropriate category in the measurable objectives. Footnote C was updated to reflect that the project may not contribute to measurable objectives unless surplus value is quantified.	Yes
7	Ric Reinhardt	CA Central Valley Flood Control Association	Page 2-2	States that projects implemented after 2012 are considered towards contributing to the measurable objectives.	Consideration should be given to using 2006 as the baseline. This was the year that Prop 1E and 84 were passed. One of the grant programs that used these source of funds was the "Early Implementation Program". Projects implemented under this program were considered part of the CVFPP. Examples include the TRLIA Feather River setback levee. The TRLIA Bear River setback was constructed during this same timeframe, although the source of funding was Prop 13. A case can be made that all of the projects implemented by urban agencies after 2006 should be included as counting towards the measurable objectives as they became part of the CVFPP.	Added content stating that projects implemented prior to 2016 provided early benefits and are good examples of multi-benefit projects. The criteria has not changed due to the timeframe that was set as part of the 2016 adoption of the Conservation Strategy; therefore, projects that were planned and designed before 2012 were generally considered part of baseline conditions while the measurable objectives were developed and do not represent ecosystem improvements resulting from the CVFPP's implementation.	Yes

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8	Jenn Hobbs	FWS	Page 2-3	The Southport Setback Levee is mitigation for the entire West Sacramento General Re-evaluation Report Project and therefore will not count toward the measurable objectives or be available as use as a mitigation bank.	Remove project.	We are working closely with project proponents to determine the amount of habitat acreages created as part of the Southport project. Any acreages used for mitigation in the future will be subtracted from the appropriate category in the measurable objectives. Added content in paragraph, removed "banks," and added footnote in Table 2-1 clarifying that project is anticipated to be mitigation and uplift is temporary until credits are used.	Yes
9	Dick Tzou	Solano County & LSDN	Page 2-1	It is unclear as to the mechanism in which these multi-benefit projects were planned and developed. Were these projects developed through central planning by governmental entities, private enterprises, non-profits, or etc. Who are the project proponents and how long did it take to develop and construct these projects?	A description to clarify the questions posed.	This level of detail is not provided in the main document, but Attachment F.1 in Appendix F gives project descriptions with proponents/implementers and funding information for the projects completed between 2016-2021.	No
10	Dick Tzou	Solano County & LSDN	Table 2-1	Helpful to include additional project information such as project proponent, costs, completion dates, and a separate map containing all the completed projects.	Include table with additional information requested	This information is provided in Attachment F.1 of Appendix F for the projects completed between 2016-2021, along with project descriptions for ongoing and proposed projects. Development of a map has not been completed but could be considered for future updates.	No
11	Paul Dirksen	WSAFCA & LSDN	Page 2-3	Southport project was designed to provide on-site mitigation. The floodplain restoration project wasn't considered to be part of a mitigation bank.	None	We are working closely with project proponents to determine the amount of habitat acreages created as part of the Southport project. Any acreages used for mitigation in the future will be subtracted from the appropriate category in the measurable objectives. Added content in paragraph, removed "banks," and added footnote in Table 2-1 clarifying that project is anticipated to be mitigation and uplift is temporary until credits are used. Also, see response to Comment #8.	Yes

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12	Paul Dirksen	WSAFCA & LSDN	Page 2-3	<p>Southport Pilot Mitigation Crediting Agreement. WSAFCA has encountered some regulatory hurdles that have remained unresolved. BACKGROUND: WSAFCA coordinated and worked with CDFW for approximately two years to stand up an MCA. WSAFCA with the assistance of GEI, completed many of the MCA components, which generally mimic the components of Mitigation Banking Program. WSAFCA spent over \$100K, but never received written feedback/comments on the submittal from CDFW. WSAFCA encountered some regulatory hurdles that have remained unresolved.</p> <ol style="list-style-type: none"> <li>1. Conservation Easement –The CE is intended to ensure that the mitigation area is protected from future development and unencumbered by other easements that may affect the conservation values of the mitigation. The Southport mitigation areas are part of the recaptured floodplain and designed to inundate when Sacramento River Flows are high. Consequently, a flowage easement will be necessary for the waters to flow into the recaptured floodplain. CDFW couldn't agree to allowing for flowage rights over the mitigation areas or incorporating flowage rights into a conservation easement. An adaptive strategy for protecting mitigation in the floodplain is needed if DWR wants to continue to promote mitigation in multi-benefit levee improvement projects and in floodplain restoration areas.</li> <li>2. Long-term O&amp;M- The MCA requires a long-term management plan and non-wasting endowment. WSAFCA proposed adopting annual O&amp;M budgets to pay for long-term maintenance of the site. CDFW wanted to insert language into the CE that would obligate WSAFCA to approve annual increase to the parcel assessment as a requirement of using the assessment revenue for project maintenance. WSAFCA was not going to agree to annual increases and obligate future WSAFCA directors to satisfy CDFW, because the flood assessment was designed to be the local contribution toward the West Sacramento Project and because the assessment provided more than sufficient funding for O&amp;M costs for the mitigation areas.</li> </ol>	<p>Discussion to include a description of issues to implementing multi-benefit projects, in particular, projects proposed for restoration within a floodway. As it relates to the Southport Pilot Mitigation Crediting Agreement concept, WSAFCA offers the following context: Is the MCA the best vehicle for compensatory mitigation associated with flood multi-benefit projects?</p> <p>WSAFCA intended to use the floodplain restoration areas to compensate for the Southport levee improvement project and future levee improvement projects. The way the CDFW permit is structured, on-site mitigation can be accomplished with only five years of monitoring reporting to CDFW and achieving certain mitigation milestones. Mitigation could also be secured by purchasing credits from a CDFW mitigation bank. However, the MCA requires submission of a development plan, short term management plan, long-term management plan, an endowment, verification of property ownership, title insurance, credit ledger and credit release schedule, the conservation easement and identification of land manager. The CE makes a number of contractual requirements related to the potential loss of mitigation values, but fails to recognize the on-going benefits of a floodplain restoration project e.g. natural recruitment along the water; temporal benefits from inundation.</p> <p>Although its customary to have endowment funding for mitigation, why is forever funding required? Once the mitigation values are achieved and the area is protected from future development, why are there additional long-lasting requirements for an area that is considered re-captured floodplain.</p>	<p>Content related to using regional conservation investment strategies (RCISs) and mitigation credit agreements (MCAs) as an effective means of permitting and securing mitigation credits has been modified given the challenges experienced by this project proponent and that an MCA has not yet been approved within the State. Contacted California Department of Fish and Wildlife (CDFW) to get their perspective on the issue and incorporated some of their information. Deleted some of the content related to highlighting RCISs and MCAs in Section 3.4.4 and modified content in 3.4.1.2.</p>	Yes

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13	Ric Reinhardt	CCVFCA	Table 2-1 & Appendix F	Hallwood Side Channel Project is a MBP that may count towards Measurable Objectives	<p>Consider adding the following text: The Hallwood Side Channel and Floodplain Restoration Project is a multi-benefit project designed to restore and enhance ecosystem processes with a primary objective of enhancing productive juvenile salmonid rearing habitat to increase the natural production of fall-run and spring-run Chinook salmon (<i>Oncorhynchus tshawytscha</i>) and Central Valley steelhead (<i>O. mykiss</i>) in the lower Yuba River. Planning, permitting, design, and monitoring were initially funded by Central Valley Project Improvement Act (CVPIA via the United States Bureau of Reclamation) grants through the United States Fish and Wildlife Service's Anadromous Fish Restoration Program (USFWS AFRP). Yuba Water Agency is providing funding as the Project's implementation lead with assistance from Proposition 68 and the Wildlife Conservation Board (Proposition 1). The Project is intended to directly address the AFRP doubling goal to increase production of natural anadromous salmonids in the Central Valley. The Project will be implemented over 5 years, divided into four areas/phases and will rehabilitate or enhance up to 157 acres of seasonally inundated riparian floodplain. Phase 1 was implemented in 2019-2020 and created/enhanced 89 acres of seasonally inundated floodplain, 1.7 miles of perennial channels, and 3.7 miles of seasonal channels. Phase 2 was completed in November 2021, in which 34 acres of seasonally inundated floodplain habitat and 1.6 miles of seasonal channels were created, and 24 large woody material structures were installed. Across Phases 1 and 2, approximately 44 acres of riparian vegetation were planted across the combined 123 acres. During Phases 3 and 4, an additional 34 acres of seasonally inundated floodplain habitat will be created.</p>	<p>Hallwood Side Channel Project has been added and categorized as an ongoing project in Table 2.1 and Appendix F. Given that two phases are complete, one is underway, and one is planned for 2023, it was determined to treat the project as one unit categorized as ongoing/under construction. As such, project contributions to measurable objectives will be quantified in the next Update, as the project is anticipated to be finished within the next five years.</p>	Yes

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					<p>Phase 3 is being implemented in 2022, enhancing 13 areas of seasonally inundated floodplain and creating 0.7 miles of seasonally inundated channels. Phase 4 is funded and is planned to be completed in 2023, enhancing 21 acres of seasonally inundated floodplain and creating 0.9 miles of seasonally inundated channels. An additional 10 acres of riparian planting in Phases 3 and 4 is also planned for 2023. Large woody material will also be installed within the Phase 1, 3, and 4 footprints over the course of the 2022 and 2023 implementation years. Once completed (i.e., Phases 1-4), the Project will result in up to 3-feet of water surface elevation reduction for the 100-year design flow. This water surface elevation reduction is a result of removing 3,200,000 CY of sediment from the floodway, most of which comes from large linear tailings piles that separate the main channel from its floodplain</p>		
14	Ric Reinhardt	CA Central Valley Flood Control Association	Page 2-3	<p>The Feather River Conservation Bank in and of itself is not a multi benefit project. It is single purpose. The comment is not to dispute the contribution towards the measurable objectives. By definition a multi benefit project must provide a flood control and habitat benefit. In the case of the conservation bank, it does not provide a flood control benefit.</p>	Remove this project from the list	<p>Multi-benefit projects or habitat enhancement projects with a positive result for one or more measurable objective qualify to list in this section as counting towards measurable objectives. The language in this section and Appendix F was clarified for consistency in the inclusion of habitat enhancement projects. Language was also added highlighting the flood control benefits from the original setback levee as well as broader multi-benefits achieved by this bank within the landscape. Additionally, information was added to the recommendations in Table 3-8 for next steps in revising measurable objectives.</p>	Yes



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15	Jenn Hobbs	FWS	Page 2-6	In general it's good to highlight projects that are multibenefit, however I disagree with including projects that are being developed as advance mitigation because it creates confusion as to what is really being accomplished toward the measurable objectives.	None	Additional clarification was provided in Section 3.4.4.4 on the significance of advance mitigation and its role in meeting the overarching goals of the Conservation Strategy. We also clarified and provide a transparent process for counting measurable objectives. Advance mitigation can reduce delays in project approval and temporary loss of habitat by serving as the necessary compensatory mitigation for projects, allowing for their outcomes to count towards the measurable objectives. These mitigation projects can also provide better conservation outcomes than project-by-project mitigation: They can be larger and better connected to existing conservation areas, easier to maintain, and more viable over the long term.	Yes
16	Jenn Hobbs	FWS	Table 2-1	Lookout Slough is part of EcoRestore and is fulfilling part of the required 8,000 acres of tidal habitat per the 2008 biological opinion on delta smelt. There seems to be some crossing of mitigation and conservation.	The link to the 2008 biological opinion should be included in the footnote.	An updated biological opinion (bi-op) was published in 2019, and reference to 2019 bi-op was added to Appendix F. Also, see response to Comment #6.	Yes
17	Wendy Prester	SFWO	Figure 2-1 and Figure 2-2	Bar charts somewhat difficult to read with very low values. All of the benefits for natural bank due to Southport are offsetting a large amount of rock which is being placed as part of the overall project. Which is a bit deceiving because it looks as though both natural bank and SRA cover measurable objectives for Lower Sacramento have been met. This table shows 3.4 miles of natural bank due to I assume the Oroville Project, however Appendix F Table F-1 doesn't describe any restoration of natural bank.	Provide information in tabular form to facilitate comparison over time. And also to be able to tell what the projects are.	Bar charts were reformatted to improve readability. Additionally, Tables F-2 through F-4 provide the information on Figures 2-1 through 2-3 to facilitate review. In Table F-3, the 3.4 miles of natural bank are attributed to the Feather River Conservation Bank.	Yes
18	Wendy Prester	SFWO	Figure 2-1 and Figure 2-2	Projected projects not included in tallies	Add estimates of the benefits from projected projects that are expected to occur.	Projected and ongoing projects are identified in Chapter 2 and Appendix F, Attachment F1; however, given the uncertainty around timelines, acreages, and amount of uplift to be used as advance mitigation, quantities are not included. Project outcomes that are completed in the upcoming cycle will be included in the 2027 Update.	No

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19	Jenn Hobbs	FWS	Page 2-10	Same issue as above it doesn't seem as though there is an understanding of what agreements have already been made for Southport setback area.	Please coordinate with FWS and NMFS regarding how much of Southport would be available to meet measurable objectives. FWS current view is that the majority if not all of the setback area is compensation for the larger West Sacramento Flood Risk Reduction Project.	We are working closely with project proponents to determine the amount of habitat acreages created as part of the Southport project. Any acreages that are used for mitigation in the future will be subtracted from the appropriate category in the measurable objectives. In text and on Figures 2-1, 2-2, and 2-3, and in Appendix F on Figures F-1, F-2, and F-3, "compensatory mitigation" has been renamed to "advance mitigation." Also, see response to Comment #8.	Yes
20	Wendy Prester	SFWO	Page 2-11	Wordy	Remove first sentence of first paragraph. Combine into a single paragraph.	We retained two paragraphs, but removed the first sentence as recommended.	Yes
21	CDFW Staff	CDFW	Page 2-12	The descriptions of projects to improve fish passage at flood weir barriers are misleading. These projects are not removing fish passage barriers but are modifying the structures to reduce the impacts to fish passage. However, as long as the weirs exist, they will effectively be fish passage barriers, as they prevent full connectivity between river and flood bypasses, preventing both up- and downstream passage of adult and juvenile fish. Additionally, the projects in Yolo Bypass are mitigation requirements for the CVP/SWP and should not be described as contributing to the Measurable Objectives.	Similar to Comment 3, recommend discussion is modified to say that weir improvement projects will reduce the weir's impact to migratory fish species.	To more accurately reflect improvements made, "removed" was changed to "remediated" throughout document in reference to fish passage barriers.	Yes
22	CDFW Staff	CDFW	Page 2-12	Prioritization of invasive plants does not include adequate discussion of aquatic invasive species. The presence of aquatic invasive plants not only results in reducing critical flows by acting as a "natural" barrier, but also acts as a thermal blanket warming water and causing lower dissolved oxygen.	Recommend adding a list of priority aquatic invasive species for control in the update. Similar to the priority species listed for control in Section 6.2.3 of the 2016 Conservation Strategy.	A list of priority aquatic invasive species was not added to this update, but additional discussion on the removal of aquatic weeds was added to Sections 2.2.5, 3.4.4, and 3.4.5. Specific invasive aquatic species may be evaluated for priority categorization in future updates, per Table 3-8. Additionally, evaluation of aquatic weeds was added to the recommendations in Table 3.3 in the CVFPP for future consideration.	Yes
23	CDFW Staff	CDFW	Page 2-12 and Table F-1	The removal of 500 acres of water primrose could not contribute to the Measurable Objectives because the invasive plant priority list does not include aquatic plant species. The presence of aquatic invasive plants, such as water primrose, not only results in reducing critical flows by acting as a "natural" barrier, but also acts as a thermal blanket warming water and causing lower dissolved oxygen.	Recommend adding a list of priority aquatic invasive species for control in the update. Similar to the priority species listed for control in Section 6.2.3 of the 2016 Conservation Strategy. Accounting for 500 acres of aquatic invasives in the Measurable Objectives would be significant.	A list of priority aquatic invasive species was not added to this update, but additional discussion on the removal of aquatic weeds was added to Sections 2.2.5, 3.4.4, and 3.4.5. Specific invasive aquatic species may be evaluated for priority categorization in future updates, per the recommendations in Table 3-8. Also, see response to Comment #22.	Yes



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24	Wendy Prester	SFWO	Pages 2-12 and 2-15	Lacks detail	Provide some detail why the target was missed or what was accomplished towards it. As written, it appears that nothing was done towards this goal, and yet my guess is that isn't true. You actually discuss how some non-native vegetation was accomplished in some projects is there a reason those numbers were not included?	Only the removal of invasive species on the priority list count towards measurable objectives, but Section 2.2.5 discusses other activities and projects that contributed to the goals of the Conservation Strategy by removing non-prioritized invasive vegetation. Section 3.4.5.2 discusses future direction of focused studies on data gaps.	No
25	0	FWS	Page 2-15	There isn't a proposal on how to move forward on focused studies.	There should be a section of the document that discusses how the focused studies will be conducted.	Section 3.4.5.2 discusses future direction of focused studies on data gaps. A sentence has been added that notes the uncertainty regarding the timing and implementation of data gaps, but that they will be completed according to priorities and funding availability. Further, an example of a project being undertaken to fulfill a data gap is provided.	Yes
26	Wendy Prester	SFWO	Page 2-15	Lacks detail	Provide a brief description why the committees didn't convene and how that will be addressed over the next 5 years.	Details are not provided regarding why this did not occur, but considering how to best reconvene the proper advisory bodies is included as a recommendation in Table 3-8. Note that the Central Valley Flood Protection Board (CVFPB) Advisory Committee was reconvened as an active entity in preparation of the Conservation Strategy Update, and Appendix G provides their recommendations along with proposed actions.	No
27	Dick Tzou	Solano County & LSDN	Page 2-16	The survey responses were low (18%)	May be helpful to provide category groups that each survey recipient represents to better assess the responses.	Overall survey responses provided enough detail to accomplish the desired level of assessment for this section, so additional categorization was not provided.	No
28	Wendy Prester	SFWO	Page 2-19	Few projects completed and little information given regarding how to remedy that or how to be successful	Provide some lessons learned, specific things that worked or didn't work, or other useful information from the completed projects that could be included to help future efforts	Per Section 2.3.4, survey results identified funding availability, funding source requirements, and regulatory requirements as major factors limiting implementation of multi-benefit projects. Many of the recommendations and priority actions listed in Table 3-8 focus on these topics. Recommendations as provided in Appendix G also note challenges regarding implementing projects. This issue is also discussed in the CVFPP and components are included as high level recommendations for more effective implementation of multi-benefit projects.	No

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29	Dick Tzou	Solano County & LSDN	Page 2-19	Are there anticipated incremental measurable objective milestones to evaluate progress? And what incentives may be provided so that opportunities are not likely missed by not implementing projects that effectively integrate ecological restoration with flood risk reduction projects.	As a future recommendation, develop potential incentives that may be provided to effectively integrate ecological restoration with flood risk reduction projects.	Information was added in Section 3.4.5 and the recommendations in Table 3-8 for next steps in revising measurable objectives and adding target species. While implementation progress is documented in Appendix F, no intermediate milestones have been developed. Also, see responses to Comments #1 and #28.	Yes
30	CDFW Staff	CDFW	Page 3-1	White sturgeon were not identified as a target species in the 2016 Conservation Strategy or in the new additions to this document. Although they are not currently federal or state listed, they are categorized as a state Species of Special Concern. The American Fisheries Society considers the survival of sturgeon to be dependent on conservation measures taken to protect them. Similar to green sturgeon they are a long-lived species with relatively little data collected on recruitment to reproductive age classes. The data that does exist suggest recruitment has been poor and is heavily tied to wet water year types with large overtopping events occurring in the Sacramento Valley flood control system. Unfortunately, these are also times when adults on spawning runs have been stranded behind flood weirs decreasing reproductive success. The primary spawning habitat of Sacramento-San Joaquin white sturgeon is a short reach of middle Sacramento River, with some additional spawning occurring in the Feather and San Joaquin Rivers, so the species is vulnerable to habitat loss and climate change that might degrade or destroy those areas. Other factors that threaten white sturgeon include entrainment of early life stages into water diversions, contaminants from pollution and terrestrial runoff, and poaching and illegal fishing for meat and eggs.	Recommend adding white sturgeon ( <i>Acipenser transmontanus</i> ) as an additional species under the target species review section. White sturgeon appear to meet the criteria identified on page 3-1. White sturgeon are also listed as a species of special concern by the CDFW. Recommend considering the inclusion of white sturgeon as one of the species identified and would be affected by implementation of the CVFPP regarding projects in Conservation Planning Area's (CPA) 1, 2, 3, 5 and potentially 4. Double check appendices for white sturgeon consideration.	Although white sturgeon is currently listed as a California species of special concern, CDFW allows recreational fishing of this species. Due to this allowance, it is unlikely this species will be formally listed and therefore does not qualify as a target species under this criterion at this time. If that status changes, white sturgeon could be considered as a target species. Content has been added in Section 3.4.5 and Table 3-8 for next steps in revising measurable objectives and adding target species in future updates.	Yes
31	CDFW Staff	CDFW	Page 3-1	Longfin smelt (LFS) were not identified as a target species in the 2016 Conservation Strategy or in the new additions to this document. LFS habitat range overlaps with Delta Smelt	LFS appear to meet the criteria identified on page 3-1. LFS are also listed as threatened by the CDFW. Recommend considering the inclusion of LFS as one of the species identified and would be affected by implementation of the CVFPP regarding projects in CPAs 3 (Lower Sacramento River) and 5 (Lower San Joaquin River). Documentation for occupancy can be provided upon request.	Per Table A-1 in Appendix A, it was determined that implementation of the CVFPP would not substantially affect California populations of the longfin smelt (LFS). Therefore, LFS does not meet criterion #3 for addition as a target species. The description for criterion #3 in Section 3.1.1 has been updated to clarify the requirement to be "substantially" affected, to match Table A-1. Content has been added in Section 3.4.5 and Table 3-8 for next steps in revising measurable objectives and adding target species in future updates.	Yes

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32	Ric Reinhardt	CA Central Valley Flood Control Association	Page 3-6	“Due to the extreme risk and potential vulnerabilities of the Conservation Strategy habitat and species to the impacts of climate change, it is imperative that a more detailed analysis of regional multi-benefit opportunities is performed, followed by planning, design, and implementation once high-priority opportunities are identified. This will likely require conversion of lands from agriculture, and the removal, modification, or setting back of levee systems, which poses significant challenges politically and financially for the State and its federal, regional, and local partners” Comment – The text as worded reinforces past conflicts between environmental restoration and agricultural interests. That conflict has been an impediment to advancing habitat and multi benefit projects.	Suggest rewording to make clear that agricultural sustainability is a goal of the CVFPP. To achieve the desired outcome for the CS, projects will need to be developed that achieve the CS objectives in a manner that enhances the surrounding agriculture to achieve a goal of uplift to agriculture as well as the environment.	The goals of the 2022 CVFPP are being retained from the 2012 CVFPP and 2017 Update. This paragraph was not reworded, but content was added to the section to emphasize collaboration that protects the viability of agriculture. Additionally, Section 3.4.1.4. was added to address wildlife-friendly agriculture.	Yes
33	Earl Nelson	N/A	Page 3-6	The section referenced addresses the need to widen river corridors and setback levees to create needed habitat, and acknowledges that these actions could result in a loss of agriculture land. This was an issue with the Sacramento-San Joaquin Delta Comprehensive Study that the U.S. Army Corps of Engineers and the CVFPB undertook in the late 1990s-early 2000s. The proposed conversion of agricultural land generated substantial political opposition from the agricultural community, so the "Comp Study" was never completed. Similar opposition could occur from the CS recommendations.	If consistent with DWR and CVFPB policy, include a clear statement in the CS that land and easement purchases for habitat or flood inundation will only be secured from willing sellers, that the eminent domain procedure for land taking for public purposes will not be used. Also, when land or easements are purchased, land owners will be compensated for the fair market value of the land and for loss of agricultural productivity.	Content was added to emphasize collaboration that protects the viability of agriculture, particularly as provided in the Yolo Basin Cache Slough (YBCS) Master Plan description. The stipulation of willing sellers was not included as that already is incorporated in policy and the level of detail is not appropriate for this document.	Yes
34	Ric Reinhardt	LSDN	Page 3-6	This paragraph discusses the success of multi-benefit projects in the Yolo Bypass. What it leaves out in the text is that agricultural sustainability is a key tenet of the YB Partnership	A reference to ag sustainability should be added to this paragraph to reinforce that we have been successful because we've sought to understand how projects impact the broader agricultural economy and make look for investments to make land more productive, not just to offset impacts, but to seek uplift in agriculture as well.	Content was added to emphasize that the YBCS Master Plan and collaborative efforts aim to protect long-term viability of agriculture.	Yes

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35	CDFW Staff	CDFW	Pages 3-7 through 3-17	The Measurable Objectives for tracking progress towards meeting goals and indeed the goals themselves should include specific reference to riparian ecosystems and riparian forest plant communities. Out of recognition that riparian forest in the Sacramento Valley have been severely reduced and fragmented and are critical to ecosystem function and geomorphic process, Senate Bill 1086 called for a management plan (Handbook) for the Sacramento River and its tributaries that would protect, restore, and enhance both fisheries and riparian habitat. The substantial reduction and disruption of the riparian habitat has had major negative impacts on the wildlife and fish populations of the Sacramento River riparian corridor. Research indicates that only about 10 % of the combined Valley Oak Woodland and Great Valley Riparian Forest in the river corridor between Colusa and Red Bluff remains (Golet et al., 2003). In addition, the majority of the associated wetland basins that are located east and west of the river have been converted to agricultural and urban uses. The net effect is a huge reduction in the overall area of the habitats that once supported healthy and diverse populations of fish and wildlife. One of the goals of the Handbook is to preserve remaining riparian habitat and reestablish a continuous riparian ecosystem along the Sacramento River between Redding and Chico and reestablish riparian vegetation along the river from Chico to Verona. While there has been some progress since the bill's inception in preserving and restoring riparian habitat between Redding and Chico within the river corridor, little progress has been made outside of this area. As the CVFPP has direct effect on in this habitat type specifically, it should be more specifically addressed in the Conservation Strategy.	Recommend adding an evaluation to the restoration of different habitat types and projects that add or support connectivity of preferred or extremely limited habitats such as riparian forest. As different habitat types have differing abilities to support ecosystem function, restoration of riparian forest within the river channel and in the bypasses should not be valued the same as other habitat types such as managed agricultural floodplain habitats and should not be equal when evaluated by "improvements as net increases in habitat amounts". Recommend adding riparian forest community and connectivity and associated ecosystem function specially to Goal 2.	The significance of riparian habitat is discussed throughout the Conservation Strategy. Description of Goal 2 in Section 3.3 includes connectivity as a component of the goal, and the description of Goal 2 in Section 1.2.2 includes riparian habitat explicitly. While connectivity is a significant component of riparian habitat goals, acreage is a quantifiable component that can serve as a metric for measurable objectives.	No
36	CDFW Staff	CDFW	Table 3-1	Winter-run chinook salmon are marked as "NA" for the FR and LSJR planning areas. However, juveniles of this race are known to rear in areas other than the main channel of the Sacramento River. See "Phillis et al. 1997, Endangered winter-run chinook salmon rely on diverse rearing habitats in a highly altered landscape". The same goes for other races or species of native salmonids in the CA Central Valley.	Recommend species presence in the planning areas be reviewed and updated.	Corrections and revisions to this table will occur during future updates. This table is from the 2016 Conservation Strategy and has not been modified for this Update.	No

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
37	Dick Tzou	Solano County & LSDN	Page 3-14	It is unclear whether the impact of climate change have been considered in the development of the measurable objectives or future updates thereof.	Consider climate change for next measurable objective updates	Content was added to Section 3.3.1 acknowledging the need for modifications to the measurable objectives to better incorporate climate change. This was also added as a priority recommendation in Table 3-8. Additionally, Appendix H serves to provide the basis to reevaluate measurable objectives in future updates based on projected climate change and ecosystem responses.	Yes
38	Doug Brown	LSDN	Page 3-17	Although the Conservation Strategy identifies an implementation approach, it is unclear in this discussion how the planning team will effectively transition to implementation following completion of the CVFPP update. Without a strong focus on implementation, it will be difficult to timely achieve the CVFPP's and the Conservation Strategy's objectives.	CVFPB/DWR should consider establishing an implementation team or group that would focus solely on implementing the recommendations included in the updated CVFPP and the Conservation Strategy. This team should focus on further developing local partnerships, leveraging funding for multibenefit projects, working to resolve barriers to project development, and getting projects built. A resource for this team includes the recommendations developed by the Multibenefit Subcommittee to the Advisory Committee.	This recommendation is under consideration for both the CVFPP and Conservation Strategy but is not included at this time. Components of this recommendation are being implemented, such as through the YBCS Partnership efforts.	No
39	Doug Brown	LSDN	Page 3-17	The state is pursuing habitat restoration through multiple planning efforts that in addition to the Conservation Strategy, includes EcoRestore and Chapter 4 of the Delta Stewardship Council's Delta Plan. These efforts include different restoration metrics and are using different restoration quantification approaches. For example, EcoRestore and DSC assume mitigation acreage contributes to their objectives whereas the Conservation Strategy does not. These varying approaches create confusion regarding how much land the state is planning to convert to habitat, which can undermine trust among local interests.	The Conservation Strategy should identify how the measurable objectives relate to the restoration goals identified in EcoRestore and the Delta Plan. CVFPB/DWR should also consider establishing a working group to define how the various restoration initiatives are anticipated to be implemented in the different RFMP regions and the effects of these multiple initiatives on local partners and the regional landscape.	The objectives of the Conservation Strategy include increasing and improving floodplain and riverine habitats. Mitigation does not count toward the measurable objectives as it offsets losses. A more combined approach to improve the integration of projects with one another and with ecosystem functions on a landscape scale is discussed throughout the document, including Sections 2.3.1 and 3.4.1, however, a working group to specifically address this topic is not planned. Further collaboration with regional flood management plan (RFMP) groups and within California Department of Water Resources (DWR) is also encouraged as a priority in Table 3-8.	No

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40	Dick Tzou	Solano County & LSDN	Page 3-20	There are other flood management and conservation programs and State initiatives to consider regarding alignment and coordination: 30x30 Initiative and the Yolo Bypass-Cache Slough Partnership Program and Master Plan (yet to be completed).	Consider 30x30 Initiative and the Yolo Bypass-Cache Slough Partnership Program and Master Plan for alignment and coordination. It would also be helpful to keep track and coordinate all flood management and conservation efforts in the State (if not already, perhaps a plan as a future recommendation) so that the data shows an overall status of what is going on in the State and how we are progressing toward the implementation of the goals in a comprehensive manner.	The 30x30 Initiative was added to this section. YBCS is covered in Sections 3.2.1 and 3.4.4.1 as a DWR-involved initiative, and therefore was not added to Section 3.4.1.2. Statewide coordination on inventories is a priority and is listed in Table 3-8 as a recommendation.	Yes
41	CDFW Staff	CDFW	Section 3.4.3 (Page 3-30 through 3-48)	It is unclear if there's been very comprehensive focus in the funding section.	Recommend including a discussion encouraging project proponents to consider post-project monitoring and resources needs for ongoing assessments be included up front in planning estimates.	This content was added to Section 2.3.4, as it pertains more to implementation guidance, while the funding section is focused on the overall programmatic approach for obtaining funding.	Yes
42	CDFW Staff	CDFW	Section 3.4.3 (Page 3-30 through 3-48)	Many potential multi-benefit projects within the Sacramento Valley and especially those within the bypasses could affect current land management practices, like agricultural, through modifying flood easements or increasing habitat inundation. There may be financial considerations for property owners affected by multi-benefit projects and this may present potential conflict of interest for these parties proposing or participating in the development of projects. In addition, proposed projects may be inconsistent with existing restoration or recovery efforts. In recognition of this and from a public trust perspective, a detailed and transparent process should be developed and articulated for reviewing and funding proposed multi-benefit projects. Importantly, any biological or ecosystem benefits of proposed projects should be evaluated and supported by resource management agencies (CDFW, NMFS, USFWS). This will ensure public dollars are most appropriately spent for ecosystem restoration and multi-benefit projects.	Recommend adding a detailed description of a transparent process for reviewing and funding proposed multi-benefit projects. This process should include resource agency review and support for claimed biological benefits and ecosystem restoration benefits of proposed projects.	The CVFPP's role with regard to funding is to describe, estimate, and highlight the investment needed across the SPFC. Mechanisms for funding multi-benefit projects are described in Section 3.4.3.3, but the process for reviewing and funding individual projects is within the jurisdiction of the State and federal funding programs themselves. The Funding section provides details regarding options for financing multi-benefit projects. Information regarding incorporating agency review, particularly early in the process, is provided in several sections throughout the Conservation Strategy and CVFPP.	No
43	Wendy Prester	SFWO	Section 3.4.3 (Page 3-30 through 3-48)	Generally the document seems too broad and lacks specificity that could assist achieving targeted actions. While it is true that many of the issues raised in this chapter regarding funding affect the ability to working towards the measurable objectives, is the Conservation Strategy the appropriate place to include all this language?	Provide more specifics or streamline the document to reduce redundancy. Consider moving some of the funding discussion to an appendix. Also ensure that the funding issue is a major component of the update to the CVFPP where it may carry more weight.	Several entities have requested more information regarding funding of multi-benefit projects, and the request for funding details was a major theme of the CVFPB Advisory Committee recommendations as well; therefore, no edits will be made to the funding section as a result of this comment. Funding issues are also addressed in the CVFPP.	No



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
44	CDFW Staff	CDFW	Page 3-49	Suggesting that a landscape scale permitting regime would minimize regulatory requirements sets us up for not being successful. Permitting for each entity would be project specific. Additionally, each project would need to be evaluated for consistency with the various permitting requirements. It would be more beneficial to reduce this expectation that a blanket permitting action would be successful, and instead invest time and energy at the onset of the project to include permitting agencies as part of the process so input can be provided early on. This has been relatively successful for the Big Notch Project which had all permitting agencies provide input at the onset, providing the project proponent with what they could anticipate for timelines, and had the permitting agencies provide input early on so that potential issues could be addressed prior to permit application. This early on collaboration sped up the regulatory process.	Recommend highlighting the importance of early coordination with permitting agencies in the absence of a new permitting process as outlined in this section.	Both landscape-scale permitting mechanisms and early engagement and coordination with regulatory agencies are encouraged in the Conservation Strategy. The importance of early engagement is referenced in Section 3.4.4.2, and included as a priority recommendation in Table 3-8 and CVFPP Table 3.3.	No
45	CDFW Staff	CDFW	Page 3-49	In general, the update lacks a discussion of how project proponents can improve seemingly daunting regulatory permitting processes by including multi-benefit justification within environmental documents and permit applications. Environmental documents need to describe the full story in detail and connect the dots back to the Conservation Strategy/CVFPP. It would be incredibly beneficial to include detailed descriptions of how a project is determined to be multi-benefit; what the ecosystem benefits are; how target species are benefitting; and how the project is specifically contributing to the Measurable Objectives and ultimately the attainment of CVFPP goals.	Recommend including a discussion encouraging project proponents to include more detailed multi-benefit and ecosystem benefit justifications, highlighting project contributions to the Conservation Strategy Measurable Objectives, within environmental documentation and permitting applications.	A description of what constitutes a multi-benefit project and what counts towards measurable objectives is provided in Chapter 2 and Appendix F. Developing guidance to help project proponents identify these components is identified as a priority action in Table 3-8.	No
46	Jenn Hobbs	FWS	Page 3-49	Upon reflection of the previous parts of the document, it is clear that there have not been very many multibenefit projects that have been completed. I wonder if it is fair to cite permitting requirements as a major impediment to implementing multi-benefit projects.	Consider restating some of the above concerns that were raised and would benefit the regulatory process, such as early engagement of resource agencies.	Regulatory requirements were cited as a significant limiting factor for implementation in survey results, per Section 2.3.4 as well as being identified by various stakeholders. This section and Table 3-8 highlight the importance of early engagement between project proponents, stakeholders, and regulatory agencies. Additionally, this was a major theme of an impediment to implementing multi-benefit projects as provided by the CVFPB Advisory Committee, as well as comments received on the public draft.	No
47	Stephanie Falzone	Sustainable Conservation	Table 3-4	The title of the consultation with FWS was discussed with the action agencies and has been updated. To prevent confusion, we recommend updating this table to use the new title.	The new title of the consultation is: "Multi-Agency Implementation of Aquatic, Riparian, Floodplain, and Wetland Restoration Projects to Benefit Fish and Wildlife in California."	This has been corrected.	Yes

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48	Stephanie Falzone	Sustainable Conservation	Table 3-4	The title of the proposed General Order does not include the word "Large", and we recommend keeping the title in this table consistent with the title of the proposed General Order.	The current title of the proposed General Order is: "Proposed Order for Clean Water Act Section 401 Water Quality Certification and Waste Discharge Requirements for Restoration Projects Statewide"	This has been corrected.	Yes
49	Ric Reinhardt	CA Central Valley Flood Control Association	Page 3-56	Operations and Maintenance of Multi-Benefit Projects: The lack of clarity on O&M liabilities, responsibilities, and funding mechanisms, can lead to reluctance on the part of local and State O&M organizations to support multi-benefit projects within the SPFC footprint.	Evaluate establishment of a Multi-Benefit O&M entity with responsibility for, and funding support to, operate and maintain Multi-Benefit elements/projects within SPFC footprint.	Establishing an interagency workgroup related to Operation, Maintenance, Repair, Rehabilitation, and Replacement (OMRR&R) has been added to the CVFPP Table 3.3 of high priority recommendations. Table 3-8 of the Conservation Strategy also contains several recommendations related to supporting O&M needs on multi-benefit projects. This was a major theme of an impediment to implementing multi-benefit projects as provided by the CVFPB Advisory Committee.	No
50	Barry O'Regan	Mid & Upper Sacramento River RFMP	Page 3-56	Operations and Maintenance of Multi-Benefit Projects: The lack of clarity on O&M liabilities, responsibilities, and funding mechanisms, can lead to reluctance on the part of local and State O&M organizations to support multi-benefit projects within the SPFC footprint.	Evaluate establishment of a Multi-Benefit O&M entity with responsibility for, and funding support to, operate and maintain Multi-Benefit elements/projects within SPFC footprint.	Establishing an interagency workgroup related to OMRR&R has been added to the CVFPP Table 3.3 of high priority recommendations. Table 3-8 of the Conservation Strategy also contains several recommendations related to supporting O&M needs on multi-benefit projects. This was a major theme of an impediment to implementing multi-benefit projects as provided by the CVFPB Advisory Committee.	No
51	Jenn Hobbs	FWS	Page 3-56	The first paragraph of this section discusses advance mitigation as a temporary uplift? This is confusing in this section. This section also seems to infer that compensatory mitigation might "use up" some of the contributions toward the measurable objectives, but projects should be offsetting their effects to listed species and there shouldn't be competition between the species needs, effects of the project, mitigation needs, and Conservation Strategy.	Remove the word temporary. Also update the glossary. Reword the section on compensatory mitigation to be more neutral. It currently seems as though it is a detriment when in reality it is offsetting effects of the project.	This section was rewritten to provide more clarity and context on compensatory and advance mitigation and their relationship with each other and the goals of the CVFPP/Conservation Strategy. The definition of advance mitigation in the glossary has been updated.	Yes
52	CDFW Staff	CDFW	Page 3-60	Several data dissemination platforms are identified, but there are no metrics available to locate the data.	Recommend providing the hyperlinks to the different databases outlined in this section. If no hyperlink is available, recommend providing some method of contacting the database managers.	The platforms described in this section are internal to DWR and not accessible to the public at this time, therefore no links or contact information were added.	No

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53	Dick Tzou	Solano County & LSDN	Page 3-60	The concept of one-landscape approach to managing the flood system and planning future projects is a good one that would include all benefits comprehensively. It is not shown in the narrative what benefits are included for such conservation projects such as groundwater recharge, carbon sequestration, and etc.	Additional benefit description on the one-landscape approach would be helpful to understand the full scope of benefits in these multi-benefit projects.	Information regarding the one-landscape approach is provided in Sections 2.3.1, 3.4.1, and 3.4.5.1 with descriptions of programs implementing landscape-scale coordination, implementation, and tracking. An example project of the one-landscape approach is provided in Section 3.4.5.2. Additionally, a recommendation/priority action regarding internal coordination is provided in Table 3-8.	No
54	Jenn Hobbs	FWS	Page 3-65	Related to an earlier comment on how DWR intends to accomplish studies to fill data gaps. We agree that some studies are likely to be done by other groups, but it would be good to have a plan on what studies fit well with the CVFPP and should be pursued by DWR or state funds.	Include a list of studies that could and should be accomplished through the CS and CVFPP.	The data gaps listed in Table 3-6 are all candidates for focused studies that could be accomplished through the Conservation Strategy and CVFPP. Also, see response to Comment #25.	No
55	CDFW Staff	CDFW	Table 3-8	Under funding it is stated that DWR will "Seek revisions to federal funding guidelines to fully account for the benefits provided by agricultural lands." The document needs to clearly articulate what it defines as benefits provided by agricultural lands. Agricultural lands can provide some habitat benefits. However, they are not equal to or a replacement for restored ecosystems. Agricultural lands and restored ecosystem habitats should be separated into line items by themselves. Lumping the two misrepresents the fact that the two are functionally different and artificially creates a category that elevates the importance of agricultural lands to the level of restored ecosystem areas.	Recommend defining the benefits that agricultural lands provide and clearly separating the items that address ecosystem restoration and agricultural lands. Add a small bit of content from 2016 CS and add wildlife friendly reference in funding section.	This recommendation was reworded to read: "Seek revisions to federal funding guidelines to fully account for the benefits provided by restored ecosystems, wildlife friendly agricultural lands, and recreation, and thereby increase federal funding for multi-benefit flood projects." Content on wildlife-friendly agriculture was added as Section 3.4.1.4.	Yes
56	CDFW Staff	CDFW	Page 3-67	The initial priority actions mainly deal with funding, regulatory requirements, and outreach. It is concerning that the CVFPP does not include a mechanism to identify and fund projects that will result in broad scale flood resiliency. This document would benefit from providing potential projects that could be funded in the future or identifying how or which projects would most benefit the CVFPP. Most of this document has focused on shortcomings of current processes which should not be ignored. However, this document would be strengthened by clearly articulating which projects would most benefit flood resiliency in the face of climate change. These projects can range from large to small, but are actionable items that make progress as opposed to waiting for processes such as funding and permitting to change which will provide no immediate benefit.	Recommend adding a detailed section highlighting the most beneficial projects that would achieve multi-benefits, flood resiliency, or other goals outlined. These can range in size from small to large, but the section should include actionable items that would highlight need, thus enabling funding proposals to clearly identify which items in the CVFPP would be addressed.	Table 2-1 and Attachment F.1 in Appendix F highlight potential projects that are expected to contribute to the Conservation Strategy measurable objectives. These include multi-benefit projects and habitat enhancement projects that may result in benefits that contribute to the measurable objectives. Chapter 2 and Appendix F also describe what qualifies as a multi-benefit project and what can contribute towards the measurable objectives. Additionally, the projects that encompass the Conservation Strategy objectives have the highest overall benefits. Appendix H provides a detailed discussion of climate change and ramifications to Conservation Strategy objectives. A preface has been added that highlights the urgency in providing more resiliency to the system for both flood and Conservation Strategy objectives considering the effects of climate change.	Yes

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57	Dick Tzou	Solano County & LSDN	Page 3-67	One large ticket item on the 2022-2026 Science Action Agenda of the Delta Stewardship Council is to identify and evaluate the management need to expand multi-benefit approaches to managing the Delta as a social-ecological system. We believe this is an important piece that also can be applied as a conservation strategy for the CVFPP's systemwide planning area, which has not been emphasized in the current Conservation Strategy Update	In future recommended updates, the multi-benefit projects may need to be evaluated not just the benefits, but for the potential impacts as well including burdens to human and agricultural communities and sustainability and other externalities.	Flood projects and multi-benefit projects provide broader long-term benefits to people and agriculture by providing long-term flood protection, particularly when considering the impacts from climate change. The CVFPP recognizes the importance of agricultural sustainability and protecting long-term economic viability in project implementation.	No
58	CDFW Staff	CDFW	Table A-1	This table indicates that LFS have not been chosen for focused conservation planning. LFS are CESA listed as threatened and are susceptible to the same impacts as Delta smelt such as the location of X2, reduced delta outflow, and water clarity. LFS have also experienced similar decline as Delta smelt. LFS also occupy similar habitats such as the LSR and LSJR regions. more specifically the central Delta/San Joaquin River to about Turner Cut/Rough and Ready Island and north into Cache Slough and the Sacramento Deepwater Ship channel and rarely further up the lower reaches of the Sacramento and San Joaquin rivers.	Recommend including LFS as target species under the CVFPP Conservation Strategy.	Per Table A-1, it has been determined that implementation of the CVFPP would not "substantially" affect California populations of the longfin smelt (LFS). Therefore, LFS does not meet criterion #3 for addition as a target species. The description for criterion #3 in Section 3.1.1 has been updated to clarify the requirement to be "substantially" affected, to match Table A-1. Content has been added in Section 3.4.5 and Table 3-8 for next steps in revising measurable objectives and adding target species in future updates. Also, see response to Comment #31.	Yes
59	CDFW Staff	CDFW	Table G-1, No. P04	The recommendation "Work toward standardization of permitting and mitigation and avoidance and mitigation measure requirements..." is awkwardly stated and could be misinterpreted as written.	Recommend revising to read "...avoidance, minimization, and mitigation measure requirements..."	Recommendations as provided by the CVFPB Advisory Committee in Appendix G are verbatim and not subject to modification.	No
60	CDFW Staff	CDFW	Table G-1, No. P04	CDFW cannot standardize project mitigation. Mitigation requirements are based on many different project specific variables. Early coordination during project planning will help reduce permitting mitigation uncertainties.	Recommend including a discussion accompanying inclusion of P4, encouraging projects proponents to coordinate with CDFW and other resource agencies during the project planning phase to reduce permitting mitigation uncertainties.	The following comment was provided in Appendix G in response to this Recommendation: "DWR is participating in programs that are contributing to this effort; for example, the RCIS and MCA process in Yolo County and the Yolo Bypass Master Planning approach. However, given project-specific details and differences among permits, some standardization is not feasible."  Section 2.3.4 and Table 3-8 highlight the importance of early engagement between project proponents, stakeholders, and regulatory agencies.	Yes
61	CDFW Staff	CDFW	Table G-1, No. P04	The recommendation "permitting and mitigation and avoidance and mitigation measure requirements that can..." is awkwardly stated and could be misinterpreted as written.	Recommend revising to "permitting and avoidance, minimization, and mitigation measure requirements..."	Recommendations as provided by the CVFPB Advisory Committee in Appendix G are verbatim and not subject to modification.	No

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
62	CDFW Staff	CDFW	Table G-1, No. P06b	Recommendation states "agencies should clarify policies applied to determine mitigation needs and requirements for individual unique projects..." The request for clarified or standardized mitigation needs and requirements is an ongoing theme throughout the recommendations. However, CDFW consistently iterates standardized policies, rules, or requirements for mitigation cannot occur without a regulation change and that may not be appropriate as there is no one size fits all solution for varying species and habitats occurring throughout a region or the State. Mitigation requirements are determined on project-by-project basis because they are dependent on the project-specific variables.	Recommend a discussion accompanying inclusion of P6 continuing to encourage project proponents to engage with CDFW early in the project planning process to reduce regulatory uncertainties.	The following comment was provided in Appendix G in response to this recommendation: "Standardizing and streamlining permitting processes aligns with the purpose of the CVFPP; however, directing the actions of other agencies is outside the CVFPP's scope." Section 2.3.4 and Table 3-8 highlight the importance of early engagement between project proponents, stakeholders, and regulatory agencies.	Yes
63	CDFW Staff	CDFW	Table G-1, No. P07	Recommendation states "Where appropriate, include project components that seek to meet the definition of multi-benefit and which Measurable Objectives are being met within the project description." This statement is ambiguous and doesn't adequately convey what was intended. This was meant to convey the importance and level of detail expected within environmental documentation (CEQA/NEPA) and permit applications that describes how a project meets the definition of multi-benefit and contributes to specific Measurable Objectives.	Recommend a discussion accompanying inclusion of P7 in the Conservation Strategy/CVFPP clarifying that projects should incorporate a description and analysis within environmental documentation and permit applications describing multi-benefit components meeting the definition and how the components contribute to specific Measurable Objective's targets for a CPA by naming CPA, Measurable Objective, and the metric (acres, linear feet) the project will contribute to.	Description of what constitutes a multi-benefit project and what counts towards measurable objectives is provided in Chapter 2 and Appendix F. Developing guidance to help project proponents identify these components is identified as a priority action in Table 3-8. Also, see response to Comment #45.	No

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
64	CDFW Staff	CDFW	Table G-1, No. I08b, I08c, I09, and I12e	<p>Several comments recommend inclusion of considerations for agricultural lands when developing multi-benefit projects. I8 bullet 2 recommends "...to identify an agricultural sustainability program that would be implemented with large-scale, multi-benefit projects," I8 bullet 3 recommends the development of "an agricultural stewardship and land planning tool to improve the agricultural outcome," I9 speaks to supporting efforts to develop and refine an agricultural sustainability tool, and I12 bullet 5 recommends "...should prioritize multi-benefit habitat projects that enhance fish and wildlife benefits while retaining within the project footprint active agricultural production."</p> <p>CDFW recognizes the importance of sustaining agricultural lands and that some types of agricultural lands can provide habitat value where natural habitats cannot exist. However, CDFW is concerned competing interests may, at times, result in reduced outcomes of the CVFPP's goals to promote or increase ecosystem processes, habitats, populations of native species, and overall biotic diversity. Restoration of diverse natural habitat types and projects that add or support connectivity of preferred or extremely limited habitats such as aquatic, riparian, wetland, Shaded Riverine Aquatic (SRA) cover and floodplain habitat within the river channel and in the bypasses should be prioritized over other habitat types such as managed agricultural floodplain habitats when it comes to meeting the Measurable Objectives for ecosystem restoration.</p>	<p>As different habitat types have differing abilities to support natural ecosystem function, recommend an evaluation of the restoration of different habitat types and projects that add or support connectivity of preferred or extremely limited habitats such as aquatic, riparian, wetland, SRA cover and floodplain habitat. Recommend restoration of these habitat types within the river channel and in the bypasses not be valued the same as other habitat types that do not support natural ecosystem function, such as managed agricultural floodplain habitats.</p>	<p>The 2016 Conservation Strategy provided details regarding the restoration of ecological and geomorphic processes, habitats, and species, and their relevance and importance to the flood system. This Update references that information in Section 1.2 and throughout. While the importance of agricultural sustainability is recognized, it is not included as a specific objective of the Conservation Strategy. Further, recommendations as provided by the CVFPB Advisory Committee in Appendix G are verbatim and not subject to modification. Also, see response to Comment #35.</p>	No
65	Ric Reinhardt	CA Central Valley Flood Control Association	Overall Document	<p>The tone of the document suggests a sense of urgency over the lack of expected progress towards achieving the measurable objectives. One impediment is not allowing single purpose habitat and single purpose flood project in the same geographic area to be combined into a multi habitat project.</p>	<p>Consider allowing more flexibility in DWR grant programs to allow single purpose projects to be combined so that it results in a multi benefit project. This should help increase the pace of achieving the measurable objectives</p>	<p>This issue is not directly addressed in the 2022 Conservation Strategy Update as developing grant guidelines are beyond the scope of this document.</p>	No



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66	Justin Fredrickson	California Farm Bureau	Appendix F	<p>The tables and figures (e.g., Tables F-1, F-2, F-3, F-4 and Figures F-1 and F-3) showing projects completed between 2016 and 2021 should be a wake up call for the Department and for the State of California, as they appear to reveal some deep level of dysfunction. It should be the Department's job--in cooperation with the local agencies, sister and federal counterpart agencies, as well as the Executive and Legislative branches--to diagnose what that dysfunction is, and how to fix it. It is not for any fundamental lack of effort; rather, it appears to be the fault of some deeper underlying, systemic problem. The Department, the State and their partners need to project out whether the pattern of the last two Flood Plans has been acceptable or sustainable--and, also, if allowed to continue, where it will lead. We as a state have a limited time to prepare our system for the rest of this century--and, right now, we are far, far behind. This should be a troubling realization and, again, a wake up call.</p>	None	<p>A Preface was added to the Conservation Strategy that describes this urgency and need for resiliency as a call to action. In addition, a Call to Action is being added to the CVFPP.</p>	Yes
67	Justin Fredrickson	California Farm Bureau	Overall Document	<p>To the extent the Department, the State, and its partners can point to any significant successes over the last many years, it has tended to be the result of the culmination of some landscape-level step forward, in those few cases where years of work, and a confluence of available resources, exceptional leadership, and collaboration have led to some breakthrough (e.g., TRILIA, Dos Rios, Oroville, Bullock Bend). Another important element, it seems, has been the work, willingness, and contributions of some willing regional partner or partners. So far, this has been exception not the norm. If waves of successive planning, now years in the making, can bear fruit, it may be possible to achieve more such successes in the years to come. In the meantime, however, we as a state continue to fall further and further behind the curve--and the future challenges we face, therefore, only become greater with each passing year. If continued indefinitely, at a certain point this can only place our system on a long-term collision course with catastrophic failure and irreversible disrepair. This is the state, in fact, not only of our flood infrastructure, but of our water, transportation, and green infrastructure as well. It is unsustainable--and, in some sense, apparently symptomatic of the larger decline and general malaise affecting our society, direction as people, and present way of life. At the same time, it would be wrong to suggest there have been no successes--and so, what has worked is important to study and attempt to duplicate or build upon as a potential model for additional successes going forward.</p>	None	<p>Information regarding the one-landscape approach is provided in Sections 2.3.1, 3.4.1, and 3.4.5.1 with descriptions of programs implementing landscape-scale coordination, implementation, and tracking. An example project of the one-landscape approach is provided in Section 3.4.5.2. Additionally, a recommendation/priority action regarding internal coordination is provided in Table 3-8. Also, see response to Comment #66.</p>	Yes

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68	Justin Fredrickson	California Farm Bureau	Overall Document	Much of the action and investment to date has been driven by the greater proportion of available resources, as well as the greater concentration of political influence and economic influence in the urban areas. A notable characteristic of some of these urban protection projects, however, is their significant cost, on one hand, and, on the other, the relatively limited reach of the result obtained (e.g., the extremely expensive, yet ecologically unimpressive West Sacramento Southport project). In contrast, while there has been less action in rural portions of the system, and in communities and corresponding rural areas of the state, it is, at the same time, possible to see how strategic actions in rural areas of the state have, in some cases, delivered significant system-wide benefits at a much lower cost (e.g., Upper and Lower San Joaquin River projects).	None	It is acknowledged that relatively greater flood management investments have been made to date in urban areas in the Central Valley, where the greatest risk to lives and property exists. The 2022 CVFPP Update recommends increased investments in multi-benefit projects in rural parts of the Central Valley where there are growing opportunities. Additionally, the 2022 CVFPP recognizes equity as a high priority issue for consideration related to flood management in the Central Valley.	No
69	Justin Fredrickson	California Farm Bureau	Appendix H	Climate change projections highlight the need for bold action to increase system resilience--and also provide a significant opportunity. This is particularly important on the San Joaquin side, where changing hydrology, an ill-prepared flood system, relatively little development, and related reoperation, recharge, and floodplain reconnection opportunities afford potential significant opportunities. The Climate appendix (Appendix H) is helpful in this regard. This would include the important points on concerning groundwater recharge, reoperation, climate adaptation, etc. on pages 4-5, 4-6, 4-18, and 4-19, as well as the "adaptation strategies" table by region (Table H-15).	None	The need for urgent action in the face of climate change is addressed in the Conservation Strategy Preface and CVFPP Call to Action. Also, see response to Comment #66.	Yes
70	Justin Fredrickson	California Farm Bureau	Appendix H	Tables H-12 through H-21 in Appendix H showing potential spatially specific, reach-by-reach climate change adaptation opportunities represents a tremendous amount of work and amounts to an exceptional resource.	None	Thank you. These tables are intended to be a valuable resource to identify and prioritize possible adaptation actions in the face of climate change.	No

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71	Justin Fredrickson	California Farm Bureau	Overall Document	<p>This Flood Plan--and any associated follow-on implementation activities--should focus, longer term, on large-scale key landscape-level improvements that can deliver significant system-level benefits at the lowest cost possible, while also laying the foundation for subsequent and related actions along the way, both before and after. The Bypasses, for example, are a prime example. Big-picture visioning and strategic planning can counteract some of the notable tendency in the Flood Plan implementation of the last many years to bog down in overly technical, overly fragmented splintering and dissipation of meaningful, focused effort. At the same time, related regional test projects like Little Egbert, the Tisdale Weir, and the Yolo Fish Passage project relate to and build toward and upon such larger scale system improvements. Designing and implementing such projects with sensitivity to local needs, wants, and concerns--including existing land uses--is very important to long-term success in the larger context.</p>	None	<p>This aligns with the one-landscape approach highlighted in Sections 2.3.1, 3.4.1 and the recommendations in Table 3-8 of the Conservation Strategy and its approach to larger, systemwide capital investments and programmatic efforts such as the YBCS program that are highlighted in the CVFPP. Also, see response to Comment #67.</p>	No
72	Justin Fredrickson	California Farm Bureau	Appendix G	<p>The Appendix parsing the various Advisory Committee recommendations is helpful and appreciated, as are the prioritizations and efforts to address and respond to the same. The Advisory Committee process, itself, as well, has been robust and productive in many ways, albeit perhaps too myopically focused on the CS only, with no comparable process or forum for the larger Flood Plan itself. At the same time, this Flood Plan's approach to these recommendations should be seized upon as an opportunity to meaningfully and sincerely critique, reexamine, and potentially correct past shortcomings. It should be more than a mere 'box checking' exercise. This Draft CS is, itself, living proof of the many layers of dysfunctions and systemic failures that have brought us to this point. Many of the shared purposes, for example with respect to permit streamlining, improved funding of multi-benefit projects, and regional advance mitigation, etc., have fallen short (as the Draft CS itself recognizes). It is important to understand and commit to those new approaches and improvements that can actually take us in a better direction, leading to improved collective benefits for all. Simply tweaking or reaffirming, with minimal changes, those aspects of the existing approach that, we know, have not worked, will not move anything forward in the way needed. Frankly, given the history to date--and also considering the content of the present Draft--there is, honestly, that would appear to honestly signal any such fundamental shift or change in approach.</p>	None	<p>Content was added to Appendix G to expound upon the process, prioritization, and incorporation of the Advisory Committee recommendations housed in that appendix. Many of these recommendations shaped the development of the priority actions and recommendations listed in the Conservation Strategy Table 3-8 and CVFPP Table 3.3.</p>	Yes

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73	Justin Fredrickson	California Farm Bureau	Appendix G	In terms of what is "Included" versus what is identified as "Being Considered" for inclusion in the current Flood Plan, the Conservation Strategy, etc., it is not clear what process is involved, or how items "being considered" will be decided upon and resolved now in the short time remaining before the draft public update is released. Will there be some similar table to track where and how these recommendations are either addressed (or not addressed) hereafter--whether that be in the CVFPP Update, in a future Update, outside of the CVFPP in the context of some separate, but related effort (etc.) (e.g., the Cutting Green Tape Initiative, an RCIS effort, the YS-CS Slough Partnership, etc.)? Further, the summary dismissal of some of the tracking-related recommendations, for example, and of other recommendations as beyond the scope of the Flood Plan seems, in some places, too cavalier and unexplained. Even if not appropriate for or beyond the scope of the CVFPP and the CS, where then, if anywhere, does such tracking occur?	None	The terminology of "included" versus "considered for inclusion" was reflective of the draft process. All categories have been updated in the final draft to reflect the final status of each recommendation for the 2022 Update cycle. These recommendations were considered for inclusion in both the Conservation Strategy and the CVFPP. Comments in Table G-1 have also been strengthened as part of the draft process to provide additional explanation. Also, see response to Comment #72.	Yes
74	Justin Fredrickson	California Farm Bureau	Appendix G	In terms of Advisory Committee recommendations (many of them) deemed "Outside" of the Flood Plan's purview, to the extent it relies on some outside agency, some larger systematic issues, etc., this may be strictly true--and, yet, if the Department and the Flood Plan cannot commit to a process or a series of steps designed to include, coordinate with, and conduct outreach and communication of system needs to outside agencies and partners, the Department and the Plan may, then, be artificially and too narrowly constraining the definition of problems and potential related solutions. Both DWR and the CDFW are sub-agencies within the CNRA umbrella--while several recommendations relate to proposed actions or initiatives by the CNRA; and so, many of the CNRA-related recommendations should be possible to elevate from the DWR to the CNRA, in whatever form or capacity necessary to address the concern. Obviously, the Department also needs to articulate flood investment needs to the Governor's Office and the Legislature (notably, for example, on the critical issue of funding). Important, but broader actions falling "outside" of the immediate Flood Plan effort should not, on that basis alone, but be wholly discarded or excluded as a piece of a possible larger solution; rather, they should be tracked and incorporated into the broader context of potential improvement and necessary conditions for objectives to be met and actual progress to become possible and occur. The 'multiagency workgroup' referred to in AC recommendation P03 is one action that could help to further some of this necessary external coordination.	None	Appendix G comments and status recommendations regarding agency collaboration have been strengthened. Many of these recommendations shaped the development of actions listed in the Conservation Strategy and CVFPP Priority Recommendations tables. For example, see AC Recommendation I05b in Appendix G and the associated Recommendation #01 in CVFPP Table 3.3 of the CVFPP: "Establish basin-specific task forces of high-level decision-makers and staff from State, federal, and local agencies, Tribes, and other partners to further advance implementation of projects and programmatic implementation of the CVFPP by: Facilitating interagency coordination and collaboration regarding multi-benefit project funding prior to issuing guidelines, collaborating on funding strategies and priorities, and aligning funding programs to best advance multi-benefit projects." Also, see responses to Comments #72 and 73.	Yes

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75	Justin Fredrickson	California Farm Bureau	Table G-1, No. 112a-e	AC recommendations I12a-e in the AC Recommendations Table, regarding roughness and conveyance capacity, are very important.	None	These recommendations are generally considered as guiding principles or best management practices to inform other program or planning activities.	No
76	Justin Fredrickson	California Farm Bureau	Table G-1, No. 108a-d and I09	AC recommendations I08a-d and I09, concerning ag sustainability and the YB-CS Partner efforts are, also, important--and important to build upon and carry forward, in terms of a better standardized ag sustainability tool, as noted in future CVFPP planning.	None	Developing landscape-scale agricultural sustainability strategies alongside environmental conservation strategies to promote sustainable floodplain land uses that are compatible with periodic flooding and adaptive to climate change is a high priority recommendation included in Table 3-8.	No
77	Justin Fredrickson	California Farm Bureau	Table G-1, No. I107a and P02	The AC recommendations concerning Early Engagement are very important--and align with the survey responses identifying stakeholder support as a major impediment to successful project implementation.	None	Early engagement and coordination with regulatory agencies are encouraged throughout the Conservation Strategy. The importance of early engagement is highlighted in Section 3.4.4.2, and included as a priority recommendation in Table 3-8 and CVFPP Table 3.3.	No
78	Justin Fredrickson	California Farm Bureau	Overall Document	Unmet floodplain habitat efforts could be met much faster and on a much larger scale potentially met through appropriate incentives and a general redefinition of "floodplain habitat" to include transitory shorebird and waterfowl habitat, for example, in the form of transitory storage with land-side Flood MAR inundation of willing landowner's and jurisdiction's farmland for groundwater recharged. SGMA provides a natural incentive here on the SJR side, as does Climate Resilience, the SJRRP, etc. For connected habitat for fish species, including salmonids, the Bypasses (both north and south) represent a key opportunity, along with some potential levee breaches or expansions of existing breaches (e.g., Dos Rios). The amount of functional floodplain habitat that can be provided for this purpose through complicated, inordinately expensive levee setbacks is much smaller. Close coordination with DWR's parallel Flood MAR and SGMA offices is very important. Watershed-specific climate vulnerability assessments and potential adaptations actions, for example, are very important.	None	The importance of alignment and integration with these programs is described in Section 3.4.1.1. Landscape-scale permitting and inter-agency collaboration are also included as recommendations in Table 3-8.	No

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79	John R. Cain	River Partners	Page 3-1 and Appendix B	We are writing to strongly urge the Department of Water Resources and the Central Valley Flood Protection Board to include the Western Monarch butterfly in the 2022 update to the Central Valley Flood Protection Plan Conservation Strategy. Both the impacts of flood system maintenance on Monarch habitat and the opportunity for multi-benefit flood system management to advance their recovery warrant inclusion of Monarch in the Conservation plan. River Partners previously asked for the Monarch to be included and were under the impression that it would be, but we were disappointed that it is not included in the draft currently circulating for review.	Improved management of the rivers and floodways of the Central Valley is indispensable to the survival and recovery of the Western Monarch. The Western Monarch Conservation Strategy developed by the Western Association of Wildlife Conservation Agencies - a collaboration of 24 states and Canadian provinces – identifies the Central Valley as a “critical region for immediate habitat improvement actions.” Moreover, the Monarch Conservation Plan points out that rivers and waterways are the primary migration corridors for Monarchs, particularly across the Central Valley where intensive agriculture has eliminated almost all native vegetation and habitat that the Monarch once depended upon. Modifications to levee and floodway maintenance practices paired with planting activities could be incorporated at a large scale across the SPFC without compromising public safety or levee stability. Conservation Strategy approaches to protecting and restoring riparian habitat and grasslands are critical for conserving Monarch and can be easily revised to include criteria for Monarch, but the Conservation Strategy must identify Monarch recovery as an objective in order to ensure that flood management actions are consistent with Monarch conservation.	Monarch butterfly has been added to the 2022 Conservation Strategy Update target species list, and a conservation plan has been added to Appendix B.	Yes
CVFPP #44	CDFW Staff	CDFW	Overall Document	The 2022 Update references "2021" Conservation Strategy Update in places.	Recommend correcting throughout the document to "2022" for consistency.	This has been corrected.	Yes