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# DELTA STEWARDSHIP COUNCIL

*A California State Agency*

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July 8, 2016

Norman Richardson, Chair  
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## **RE: Draft Solano Priority Conservation Area Assessment and Implementation Plan**

Dear Chairman Richardson:

Thank you for the opportunity to comment on Solano Transportation Authority's (STA) draft Solano Priority Conservation Area (PCA) Assessment and Implementation Plan hereafter referred to as the Solano PCA Assessment Plan. We are encouraged by STA and Solano County's leadership efforts to plan for PCAs at a regional scale, and are interested in working with you in future phases of PCA planning processes.

The Association of Bay Area Governments (ABAG) established the PCA program to identify open spaces within the Bay Area region that provide regionally important agricultural, natural resource, scenic, recreation, and ecological value – particularly those areas that were also at risk for urbanization. These areas could be designated as PCAs and subsequently be eligible for grant funding to implement certain projects that support various goals such as watershed health, agricultural sustainability, and public access. Funded through the Metropolitan Transportation Commission's (MTC) One Bay Area Grant Program (OBAG), STA drafted the Solano PCA Assessment Plan to affirm existing designated PCAs and identify potential new areas that could be adopted as PCAs in the future - along with potential projects within those areas that could be eligible for OBAG or other funding.

As you may know, the Delta Stewardship Council (Council) is an independent State agency with responsibility for ensuring the long-term management and sustainability of the Delta and Suisun Marsh. The Council plays an important coordination role, working with partner agencies to foster collaboration between local, State, and Federal interests in the Delta and Suisun Marsh. This letter was prepared solely with this coordination perspective in mind and we hope the following comments are useful to the STA in your ongoing planning processes.

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*"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."*

*– CA Water Code §85054*

In 2013 the Council adopted a legally enforceable management plan for the Delta and Suisun Marsh called the Delta Plan. The Delta Plan seeks to achieve the coequal goals of protecting and enhancing the Delta ecosystem and providing for a more reliable water supply for California, in a manner that protects and enhances the Delta as an evolving place. The Delta Plan has 14 regulatory policies with which State and local agencies are required to comply if they are determined to have a “covered action” under the Delta Plan. Additionally, the Delta Plan has 73 non-regulatory recommendations with which we encourage entities to follow.

The Delta and Suisun Marsh offer diverse outdoor recreational experiences such as fishing, boating, birdwatching, hunting, and hiking. The Council encourages protecting and improving existing recreational opportunities while seeking ways to provide new, and better coordinated, opportunities. As such the Delta Plan has multiple recommendations for encouraging recreation in the Delta and Suisun Marsh, including Delta Plan Recommendation **DP R12** which calls for encouraging partnerships with State and local agencies, local landowners and business people to expand recreation and tourism. Delta Plan Recommendation **DP R11** calls for using the California State Parks’ Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh as a guide for providing new and protecting existing recreation opportunities. Additionally, Delta Plan Recommendation **DP R14** calls for creating nature-based recreation opportunities like wildlife viewing, angling, and hunting.

### **Comments on the Solano PCA Assessment Plan**

We would like for STA to consider including Suisun Marsh as a proposed PCA during future PCA assessment processes. The Suisun Marsh is a truly unique place in California, being the largest contiguous brackish wetland on the west coast. It is important habitat for numerous native wildlife species including delta smelt, longfin smelt, Sacramento splittail, salt marsh harvest mouse, Ridgway’s rail, and black rail, and is critical habitat for native special-status plants like Suisun thistle, Suisun aster, soft bird’s beak, Delta tule pea, and Mason’s Lilaeopsis. The extensive managed wetlands located throughout Suisun Marsh serve as important habitat for migratory waterfowl along the Pacific Flyway.

The Solano PCA Assessment Plan explains that although it was acknowledged that Suisun Marsh represents an area of high conservation value, one of the reasons it was dropped from consideration as a proposed PCA is that “strong protections already exist” for the region. Council staff agrees that there are strong restrictions against development in Suisun Marsh. Suisun Marsh is protected from urban development through the Suisun Marsh Protection Plan (SMPP) developed and administered by the San Francisco Bay Conservation and Development Commission. Furthermore, the Delta Plan also has a regulatory policy (Delta Plan Policy **DP P1**, refer to California Code of Regulations [CCR] Section 5010) limiting urban development to areas that have been designated by city or county general plans for residential, commercial, and industrial development as of adoption of the Delta Plan. Since the Suisun City and Solano County general plans have been developed consistent with the SMPP, no areas within the Suisun Marsh are designated for these types of development.

However, we want to point out there is a definite need in the Suisun Marsh for habitat preservation and restoration, due to the wide variety of special-status native flora and fauna that depend on Suisun Marsh, as well as a huge value in enhancing recreation and public access to the unique place that is the Suisun Marsh.

The current draft Solano PCA Assessment Plan stated that “no clear projects” exist in the Suisun Marsh for which to apply funding if the region was designated a PCA. We would like to highlight a project that could benefit greatly from having this region designated in the future as a PCA. The Hill Slough Restoration Project, located just south of Suisun City, will reconnect tidal flows to a portion of the Hill Slough Wildlife Area managed by the California Department of Fish and Wildlife (CDFW) to restore valuable tidal marsh habitat. This project is currently being implemented pursuant to the Governor’s 2014 Drought Executive Order which included a call to restore habitat on CDFW property in order to mitigate for the impacts of the drought on native wildlife. The project has hit multiple roadblocks including the need to raise utility lines as well as increasing the elevation of a stretch of Grizzly Island Road. This county road is an extremely crucial transportation corridor for much of Suisun Marsh and is quite vulnerable to flooding, but could be subject to more frequent flooding with the reintroduction of tidal flows to adjoining parcels - if left as is.

Addressing those particular two infrastructure protection needs constitutes well more than half of the expected budget for the Hill Slough Restoration Project and hence represents a major financial challenge. Partnership with the STA and the PCA process would enable opportunities for CDFW to get some support for the costs related to raising Grizzly Island Road. The benefits of raising the road would first allow a much needed habitat restoration project to proceed, benefitting special status species like longfin smelt and Ridgway’s rail, and increase the reliability of an important transportation pathway in Suisun Marsh.

Additionally, there are multiple opportunities for partnership to promote recreation and public access within the Hill Slough Restoration Project area. CDFW’s restoration plan for the Hill Slough Restoration Project includes levee-top trails so the public can hike around and access better viewing points to observe marsh wildlife. California State Parks’ *Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh* has recommendations for improving environmental interpretations of wildlife areas and ecological reserves in Suisun Marsh, as well as creating an auto route based Delta/Suisun Marsh Birding Trail. Designation of the Suisun Marsh as a PCA would open up opportunities for funds that can be used to implement these public access improvements and enhancements to visitor experience.

There are several other planned projects in the Suisun Marsh to restore and enhance habitat, but the Hill Slough Restoration Project emerged as a clear case of how PCA designation for Suisun Marsh could clearly help enable habitat restoration to proceed, improve transportation within a region, and facilitate public access and nature-based recreation to an area quickly and easily accessible from several urban cores in Solano County.

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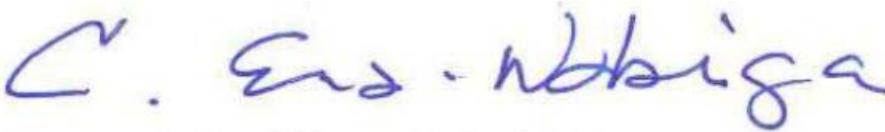
Additionally, we would like to inform you that the board of our sister agency, the Delta Conservancy, recently approved funding for an effort to develop a regional restoration strategy for the Cache Slough Complex (i.e., a region encompassing areas in and around Lindsay Slough, Cache Slough, Haas Slough, Barker Slough, Calhoun Cut) that will identify potential areas for habitat projects that would be eligible for funding by the Conservancy's Proposition 1 grant program or other funding sources. This regional restoration strategy will be developed through a stakeholder planning process that will include local agencies like Solano County, Solano County Water Agency, Yolo County, and Reclamation District 2068, along with State and federal agencies and consultants. This restoration strategy will take into consideration important land use issues such as local and regional agricultural sustainability and flood protection. We encourage you to coordinate with Delta Conservancy staff to evaluate whether the results of this planning process could be relevant to future PCA assessments.

### **Conclusion**

We encourage you to consider including Suisun Marsh and potentially areas within the Cache Slough Complex as proposed new PCAs when conducting future PCA assessments, so these areas can be eligible when ABAG reopens the process for incorporating new PCAs. We hope our comments are constructive and provide valuable input to STA staff as you finalize the Solano PCA Assessment Plan. If you have any questions or concerns about our comments, I encourage you to please contact:

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Daniel Huang [Daniel.huang@deltacouncil.ca.gov](mailto:Daniel.huang@deltacouncil.ca.gov).

Sincerely,



Cassandra Enos-Nobriga  
Deputy Executive Officer  
Delta Stewardship Council

cc Greg Martinelli, California Department of Fish and Wildlife  
Campbell Ingram, Delta Conservancy  
Steve Chappell, Suisun Resource Conservation District