Rice-Cover Crop Rotation Pilot Program

Robert L Capriola

Initial Selection Panel Review

0044

Rice-Cover Crop Rotation Pilot Program

California Waterfowl Association

Applicant amount requested: \$1,649,051

Fund This Amount: \$1,649,051

The positive aspects of the proposal include: generation of data and information on multi-species management approaches that would inform the agricultural community how they could provide benefits to waterfowl while at the same time improving conditions to benefit the giant garter snake; determining if the mosaic of land use provides better wildlife benefits than typical land use patterns; and developing strategies, monitoring methods, and tools for evaluating losses in habitat quality from rice fields being fallowed, as required by the Environmental Water Account (EWA) Biological Opinion. The Program will reconsider this proposal for funding provided the following revisions are made:

(1) Clarify the project's conceptual model and discuss the potential for experimental testing of hypotheses, including consideration of landscape scale issues (habitat fragmentation, connectivity);

(2) Include a rigorous economic analysis (seek collaboration with an ag. economist) and address impacts of uncertainty related to EWA, CREP, water transfers, and subsidies;

(3) Clarify the relationship between this project and CREP so that agencies can evaluate the policy implications. Are the subsidies proposed intended to replace or supplement CREP payments? If the intent is to replace CREP, the applicant needs to better articulate reasons why farmers would participate in this program rather than CREP since the incentive payments offered here (\$100) seems to be lower than

Initial Selection Panel Review

the \$165 for rice provided through CREP;

(4) Deliverables must include publications that utilize data on giant garter snake and mallard nesting obtained from this project and synthesized with previously unpublished data (only found in the various annual reports);

(5) Include a more detailed budget broken out by task, that includes breakdown of how dollars for each task will be allocated. Each cost needs to be justified.

Additionally, the applicant should note that the incentive portion of the budget is not transferable across budget categories.

Reconsider if Revised

Technical Panel Review

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

Amount Requested: \$1,649,051

Panel Rating: Fair - Lacking in one or more critical aspects

Panel Summary

The panel felt that this proposal had one or more sound or worthy concepts. Based on its technical merits, however, this proposal is lacking in one or more critical aspects and should not be funded in its current form.

Given the annual flux of rice acreage, the proposal would move the decision making for a subset of those acres from the spring to the previous fall, providing new opportunities to improve wildlife habitat in the region by proactively helping farmers develop cover in fields that may be fallowed for other reasons (e.g. water transfer, rice market condition). Given the intent is to encourage cover crops on fallowed ricelands, it has the potential to be revised and reconsidered as a landscape-level project with wildlife benefits.

Panelists had numerous criticisms of the proposal's methods and conceptual approach. The overall approach lacks an experimental design, discussion of replication, explicit units of study, and necessary budget detail.

The goals were vague and lacked detail on project evaluation. The conceptual model lacks reference to the abundance, production, and population biology of the target species. The proposal does not address possible consequences on non-target species (e.g., nesting black tern, shorebirds) for taking land out of rice production. The proposal also does not address the risk of creating sink habitats. The proposal's effort to reduce water usage is potentially inconsistent with the

Technical Panel Review

creation of seasonal wetland habitat, which would increase water usage, and the proposal does not address this potential conflict. Details were strong on waterfowl production but very weak on all other species, particularly giant garter snakes. Some aspects of the proposed work (e.g., duck banding) bare no clear connection to the proposed goals. These issues would need to be addressed if resubmitted in the future.

Despite these problems, the project had merit. First, this proposal reflects a strong connection to farmers and the agricultural community and provided a vision of a rice-landscape with more wildlife and natural habitat. The proposal also provides opportunities for a landscape-wide approach if it is revised. In particular, the investigators should be commended for their involvement of the grower community in project development. The following recommendations could be undertaken to improve the project:

• The applicant would need to better develop the monitoring section, with available data for waterfowl, especially by adding information on the evaluation of the effects on GGS, grassland birds, and other species.

• The applicant should consider including an agricultural-economist on the team. This would greatly benefit the proposal and could provide information to increase the likelihood of long-term implementation upon expiration of the "pilot" short-term incentives.

• The Panel was concerned with a lack of long-term economic analysis. Any economic analysis that would be done should consider the situation with or without subsidies.

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

Amount Requested: \$1,649,051

Goals

Rating	good
Comments	The proposal adequately describes the problem to be addressed. That is, water-issues and agriculture in California have resulted in loss of upland and wetland habitats in the Central Valley (CCV). Further, rice agriculture is generally increasing in the region, with a correlated reduction in area of idled land and fall-seeded cereal grains that serve as upland nesting cover for birds. It seems the trade-off is not one-sided. For example, landowners may sell water and leave land idle. This results in upland habitat, but may lead to reduced wetland area when water is sold from existing impoundments. Therefore, an incentive program to provide upland and wetland habitat for breeding waterbirds and other native wildlife would be beneficial.
	I believe the proposal struggles a bit with framing the problem. For example, the problem is initially stated as one of water transfer and conversion of agriculture to uplands and wetland loss. Later, it is stated that idled lands (uplands) have been lost to increased rice production (water-intensive). Can it truly be both ways? If uplands are the key issue then it seems that increased water transfer would produce idled land as a byproduct. Rice agriculture is water intensive and reduces upland cover, but perhaps would

not reduce wetland area (to the contrary, increase it for short periods).

It is my opinion that the problem and solutions are best stated when the cover program itself is proposed. However, it is somewhat difficult to understand from an outsider's perspective why the free market wouldn't result in upland habitat as water became too valuable to keep. Perhaps the goal of the program from the upland standpoint would be to bring some consistency to this process. It is also quite obvious from this proposal that the underlying goal is to increase waterfowl production. I find nothing wrong with this, and waterfowl and economically and ecologically important organisms. However, discussion of goals to benefit species other than waterfowl is vague at best and obviously not of primary concern. It's common knowledge that good waterfowl management results in habitat for a variety of upland and wetland species, but given that no breeding waterfowl targeted by this program are facing significant population declines, I would think the proposal would benefit from further discussion of how the program would promote biodiversity. There is little doubt in my mind that it would do so. The only species of concern mentioned is the Giant Garter Snake (GGS), and nearly all discussion of this species seems added on to incorporate a threatened or endangered species 'spin' to the project. Without some discussion of GGS habitat requirements and potential bottlenecks it is difficult to evaluate how this program might positively influence the GGS.

I believe the proposed objectives and outcomes are mostly reasonable, but some statements are of them are nearly nonsensical or tautological. For example, a stated outcome is "measurable increases in waterfowl nesting densities and success compared to existing condition in rice fields and seasonal marshes". Of course this should be the case, otherwise the program is pointless. Indeed, they are tangible and

measurable, but are vague in some cases. How much of an increase in nest density would be deemed successful? How many nesting bird species might you expect? I understand the reasoning for planting agricultural cover crops, especially given that the land is likely to be in short-term cover. However, I can't help but think that wheat, oats or vetch will not provide the structural heterogeneity of native grasses and, thus, may benefit only the most generalist species. Further, allowing the crop to be harvested potentially sets a variety of late-nesting species to fall into an ecological trap. Most waterfowl should complete nesting by July 15, but other species may not. I also have concerns regarding the nature of uplands as ecological traps based on the short-term nature of the program. Will the desired response be attained if lands are in cover crops for only 1 year and, if so, will birds seek the same fields the following year to find them unsuitable? In the end, I assume that if farmers strongly desire short-term programs we are faced with the fact that short rotations are better than no upland cover at all.

Fall flooding of these fields is not allowed and, frankly, I am not sure why this is the case. I know from discussions with colleagues that many believe increased fall flooding in the CCV has resulted in widely distributed fall duck populations and, thus, poorer hunting. However, I wonder if the proposed project could provide both upland nesting cover and seasonal foraging habitat. I admit I could be very wrong here, but why not allow fields to come up in natural, annual weeds? Being that soils are likely hydric and rice fields often have annual weeds I would think you could grow a decent crop of moist-soil plants as nesting cover, and flood these fields during fall to provide high-quality foraging habitats. Something to ponder; perhaps this is not possible.

The specific project goals make sense, but no

monitoring of grassland bird species other than waterfowl is specifically proposed. I believe this is critical, especially given the relatively small land area enrolled. It does not seem difficult to me to incorporate structured point-counts to estimate use by breeding passerines. Playback surveys could identify breeding marsh birds on semi-permanent wetlands. I cannot find where this proposal includes provisions for this type of work, other than the contracted GGS surveys and scan-sampling of wetlands. Thus, I am left wondering how the project evaluation will determine if it helped meet ERP goals, many of which relate to endangered, at-risk, or native biotic species. Nonetheless, other objectives will undoubtedly help meet ERP goals, particularly with respect to watershed management that promotes hydrologic structure and function, restoration of wetland habitats, and minimizing conversion of agricultural lands to urban or suburban uses. Finally, the project in itself allows producers to integrate environmentally beneficial practices into their agricultural activities; thus, this goal is clear.

Justification And Conceptual Model

Rating	good
	The proposal clearly states that the California Grassland Bird Conservation Plan has information needs with respect to biological data on grassland dependant avifauna. Once again, however, it is unclear how the evaluation portion of this project will provide any data on birds other than waterfowl, or other terrestrial species except the GGS. The previous section of the proposal does, however, adequately link ecosystem processes and the agricultural system.
	I do not believe hypotheses to be tested are explained clearly. Indeed, they are stated but are vague and almost certainly framed to result in success. For example, if you add grass to a place that had none, you certainly would expect to attract grassland birds

compared to fields without grass. I would have preferred to see some expanded research hypotheses detailing predicted responses, perhaps some estimated effect sizes. The evaluation portion of the project appears to include no control, thus other lands not in the program are not concurrently evaluated. I assume success will be based on comparisons to literature estimates?

I do not believe the proposal specifically justified the choice of a pilot study. However, the fact is that large-scale implementation would be too costly for this program right away. I believe that this is adequate justification.

Approach

Rating dood Comments The approach is sound with respect to administration and generally adequate with respect to implementing the program (planting). I know that space was limited, but some of the approach lacks justification, such as limiting program fields to 160 acres and not allowing fall flooding. It would seem to me that allowing fall flooding would double the benefit to wildlife by providing breeding and migratory habitats. The approach is somewhat vague and is redundant at times (i.e., description of nest searching and vegetation work at beginning and end of Task 3). I also can think of no good to capture and band nesting ducks during this study and believe it could bias results by increasing nest abandonment. The only advantage I could see would be in determining the age of nesting waterfowl, and I don't believe collection of these data justify the potential for bias. Monitoring of the GGS is vague and I would have liked to see some more detail provided by the USGS. That said, Dr. Wylie is certainly an expert with respect to the GGS and based on my readings I am confident this part of the evaluation will be conducted

appropriately.

The proposal does contain adequate information about the eco- and agricultural systems that the project will involve. I believe the results of this pilot project will add to the knowledge base of integrating restoration into agricultural activities, although the extent to which this will work is not certain (hence the pilot nature of the project). Although not mentioned, I think an important aspect of this project is a cost evaluation. That is, how does income potentially change by taking land out of production, receiving a subsidy, and selling the water? I assume the intent is to break even, but there may be an associated loss of income by not flooding during fall and therefore not being able to lease land for waterfowl hunting. Other benefits may include reduced soil erosion and fertilizer application (i.e., post-vetch crop). Overall, I believe this project will provide information that is indeed useful to farmers, cooperating agencies, and decision makers.

Feasibility

Rating	excellent
Comments	I believe this project is technically feasible. If success is measured by implementing the program, then I believe the likelihood of putting 1000 acres of cover and wetlands on the landscape is very high; I would be surprised if the project did not achieve this. I do not see where the proposal specifically addresses

Performance Evalutation

Rating	good
Comments	I believe I have addressed any concerns with performance evaluation in previous sections. It is a strength of the proposal that a relatively detailed monitoring plan is included. Again, my concerns are voiced earlier (e.g., evaluation may be too duck-centric, no control from what I could tell, etc.), but the project evaluation will be able to demonstrate some measures of efficacy, regardless of my perceived shortcomings.

Proposed Outcomes

Rating	very good
Comments	Products of value will likely be generated from this project in the form of increased upland and wetland habitat for terrestrial and aquatic species and associated environmental improvements. I also believe this project will promote the health of the agricultural system through soil retention, decreased water use, soil nitrogen fixing and so forth.
	This project could possibly be applied to other systems, although it might work best in another rice-agriculture system. Rice is grown in large expanses of the Gulf Coast and Mississippi Alluvial Valley and issues of water use are increasingly important in these regions. For example, Arkansas's Grand Prairie which, as the name implies, was historically grassland, might especially benefit from a similar program (although not specifically for waterfowl production).
	Data storage seems adequate, and one of the major strengths of CWA's involvement is the potential for outreach. CWA has a vested interest in making the success of this project known to its constituents and,

in doing so, gain support for the program's expansion. It is unfortunate that the other leader of wetland restoration efforts in California, Ducks Unlimited, Inc., is not involved as well. It is my opinion that the two organizations together could do much more to reach the target audience than CWA alone. Overall, I do believe information from this pilot program will reach those in agricultural and natural sciences and the lay audience.

Capabilities

Rating	excellent
	The track record of the project team is excellent. The applicants state they have specific experience with implementing previous CALFED projects, and I am aware of other habitat implementation and research projects that CWA and partners have conducted

Cost–Benefits

Rating	very good
	The 'resolution' of the budget is not terribly high so it's difficult for me to say what is reasonable or not. Generally, I find the budget reasonable, especially given that a large portion of the cost will go to subsidies to landowners and direct restoration work. The fringe benefit rate of 33.6% is not out of line from my experience.

I do balk somewhat at the need to purchase 3 ATVs for the project, especially given that the applicants state they are already conducting a similar evaluation of California CREP projects. The overhead rate is about that allowed by other granting agencies. I wonder somewhat about the cost of monitoring fields and wetlands, especially given that only half of the area is slated for monitoring. The combined cost of tasks 3 and 7 are over \$200K per year for monitoring only 500 acres of each wetlands and uplands. I realize this cost includes salaries and vehicle costs (becoming quite expensive), but the cost is on par with radio-telemetry work, which I would argue is much more intensive than what has been proposed. Because the budget is not more specific I am unable to offer any specific recommendations. Indeed, this portion of the budget may be spot-on given fringe benefit rates, but I encourage the funding agency to look at a more formal breakdown (if they have not already done so). I roughly estimated costs based on what I believe to be liberal technician salaries (\$15/hr; this would be quite high in much of the country but perhaps not in California), vehicle costs and fringe rates and my back-of-the-envelope guess was lower than proposed. I completely admit that I do not know the realities of working in California and if the budget is justifiable I have no problem with it.

Overall Evaluation Summary Rating

Rating very good

Comments Generally, I support any program intended to cooperate with agriculture and put grass and water on the landscape. Despite some shortcomings I do indeed

believe this project has the potential to demonstrate how an incentive program might provide multiple benefits to producers, the environment and the general public. I suggest the applicants tighten up portions of the proposal, keep a keen eye on promoting biodiversity (and not just raising mallards), and strive for more specific research hypotheses and good science. Nonetheless, I recommend this project receive funding from CALFED because it has the potential to begin to bridge an important gap between environmental restoration and intensive agriculture. I hope the applicants find my comments constructive.

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

Amount Requested: \$1,649,051

Goals

Rating	very good
	This proposal appears to be consistent with the goals and objectives of the CALFED ERP since the proposed rice-cover crop rotation pilot program is designed to increase breeding habitat for waterfowl, other nesting birds, and the federal- and state-threatened giant garter snake. It does a good job of describing the "Problem" and why such a program would enhance wildlife values by expanding upland and semi-permanent wetland habitats-especially if it was expanded to include larger acreages in rice growing districts of the Sacramento Valley.

Justification And Conceptual Model

Rating	good
	The proposal states that this program will benefit many bird species (e.g., shorebirds, wading birds, northern harrier, short-eared owl, American bittern, many songbirds, etc.), but the main proposal and sample design appear to focus primarily on nesting ducks, especially mallards. As written, the sample design does not provide sufficient detail on how other possible nesting birds will be sampled or evaluated or how the stated predictions will be tested. I have the same concerns about monitoring of giant garter snakes using this study design, as discussed under "Approach"

below.

Approach

Rating	good
Comments	<pre>good Aside from transects to detect and monitor nesting mallards, the overall approach is not presented in sufficient detail to evaluate whether the stated predictions can be tested. The proposed sample sizes and transect lengths are not described or estimated, and the "standardized methods" (p. 7) should be specified—especially with respect to non-waterfowl species. The reference to "California's Grassland Bird Conservation Plan" should be supported with a citation. The use of this reference is also confusing in this context, since the proposed vetch, vetch/grass mixes for cover crops would be considered "agricultural" rather than "grassland" habitats by most botanists. The proposal (p. 8) states that: "disturbance shall be limited during the nesting season, from March 15 until July 15." However, the proposed bird monitoring methods (p. 9) will employ two ATV's dragging a rope with tin cans attached. This type of surveying would be very disruptive to most nesting birds (e.g., northern harriers, short-eared owls, American bitterns, and most passerines), and it could result in the incidental take of giant garter snakes since these fields will also be managed to provide refugia for this threatened species. Any take of a threatened species will require consultation with USFWS and DFG. It seems similar results could also be obtained by dragging the ropes on foot for measured transect distances (e.g., 1 km). Again, the number of plots &transects should be specified in this section. The proposed transects would cover a "mix of habitats" (p. 9) but it seems that each transect should focus on</pre>
	a single habitat type to avoid a "mix of results." This should be easy to accomplish by stratifying the relatively uniform habitat types that will be incorporated into this study. Under Task 3, "Bird
	Monitoring," the "Nest Searching" has a somewhat

misleading title, since the only references (p. 10) are to "duck nests." It seems that protocols for searching for the nests of other target species should be described and incorporated into this design. The use of principle components analysis (p.10) is very brief and provides no discussion of sample sizes or methods required to perform this multivariate analysis. The giant garter snake monitoring methods (p. 10) are covered in only two sentences, and could be expanded to a similar level of detail as the mallard nest searches and vegetation measurements. It is not clear how the excavation of 1,000 acres of semi-permanent wetlands (Task 5) might affect giant garter snakes. Two other special-status species that could potentially breed in these created wetlands include redhead and tricolored blackbird (see DFG's 2003 list of Bird Species of Special Concern in California). Under Task 7, it is not clear how the results of the "avian" surveys might be used, since the subtasks only refer to "waterfowl breeding pair surveys" and "brood counts." Will the results of the 10-minute "scans" be incorporated into the annual monitoring reports?

Feasibility

Rating	excellent
Comments	This section appears to be well-supported and the project seems very feasible. The California Waterfowl Association seems well-qualified to perform this work, and the Richvale Irrigation District is an important participant. If willing landowners can be identified through the solicitation process, this project seems very feasible.

Performance Evalutation

Rating	fair
Comments	

This section seems weak. Tasks 3 and 7 address some of the monitoring issues, but demonstration of the efficacy of agricultural management and restoration actions presented previously could be summarized here in terms of their cost and benefits to the CALFED program.

Proposed Outcomes

Rating	excellent
Comments	It seems that valuable products could result from this project that could be applied to other rice growing districts in the Sacramento Valley. The analyses and data resulting from this study should provide important baseline information on the applicability of this pilot to larger-scale projects that should result in substantial wildlife benefits.

Capabilities

Rating	very good
Comments	The principal investigators shown for this project appear to have substantial experience in performing similar studies. However, Robert Capriola's resume (presented twice) does not contain a list of relevant publications despite his many years of similar work experience. Based on the citations in the Work Plan, Dan Loughman has an impressive list of publications but his resume was not included in this proposal. Glenn Wylie also appears to have extensive work experience and publications on the giant garter snake, and is very qualified to perform the tasks outlined in this proposal.

Cost–Benefits

Rating	good
	These costs seem somewhat high for a "pilot" study, but it is not possible to evaluate the estimated
	annual costs by task without some indications of hours

per task and billing rates. Some of the costs would be applied to direct payments to affected landowners for enrolling in this program. The purchase of 3 ATVs for this project may not be required, see comments on Approach above. Overall the discussion of project costs seems reasonable, and the applicant will actively pursue cost-share opportunities.

Overall Evaluation Summary Rating

Rating	very good
	This seems to be a valuable study that would significantly improve our knowledge of rice field-cover crop rotations and the use of semi-permanent wetlands to provide habitat for an array of associated wildlife species. As mentioned above, I feel that the Approach section needs some revisions to test the hypotheses and predictions posed in this proposal. With some constructive editing (I noted many typographical and grammatical errors) and revision of the sample design, I feel that this project is very worthy of funding under the CALFED ERP.

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

Amount Requested: \$1,649,051

Goals

Rating	very good
Comments	The proposal clearly outlines the backdrop for this project, and describes in detail the goals for ecosystem restoration efforts in concert with economically viable (or at least potentially so) strategies that could be employed by agriculturalists.

Justification And Conceptual Model

Rating	very good
Comments	Pilot-scale proposal is appropriate given the absence of prior such studies. However, there is enough background knowledge concerning the occurrence of giant garter snakes in wet-crop settings (e.g., ricefields) to justify the premise of this study.

Approach

Rating	very good
Comments	With regard to the giant garter snake component/s of this project, field personnel have considerable experience within the geographic area and ecosystem under study. As indicated below, information derived from this pilot study could be crucial for informing future conservation efforts on private lands and involving multiple stakeholders.

Feasibility

Rating	very good
	With regard to the giant garter snake component/s of this project, the scope of proposed work is technically feasible, contingent upon the called-for participation by species experts Wylie and Casazza.
Comments	The following concerns may not be valid, but I was unable to resolve these by reading of the proposal. Namely, as Wylie is no doubt aware, when wetland areas are deprived of water (via drought or man-made diversion), garter snakes disperse. During such periods of overland movement, they are subject to greater-than-normal predation pressures. So my questions are two-fold. 1) Will there be periods when wetlands occupied by garter snakes are drained? 2) Will there be periods when areas occupied by garter snakes are subject to mechanical disturbance (e.g., discing) that might result in both direct injury/death or forced dispersal at inopportune times? I am unaware of the specific overwintering sites of giant garter snakes in the Sacramento Basin, but it would be useful for Wylie to weigh in on this
	matter as it relates to project goals.

Performance Evalutation

Rating	very good
	Adequate benchmarking appears to have been incorporated in this proposal.

Proposed Outcomes

Rating	very good
Comments	It is clear that future conservation successes for the giant garter snake will require close cooperation between wildlife agencies and Sacramento Basin agricultural interests, given that the vast majority of habitat lies in private ownership. Therefore, pilot projects such as this one have the potential to develop information that could be critical both to

Capabilities

I am familiar only with the work of Wylie and Casazza (the biologists working on the giant garter snake element of this project), and their inclusion is essential for project outcomes to have scientific credibility.	Rating	very good
	Comments	I am familiar only with the work of Wylie and Casazza (the biologists working on the giant garter snake element of this project), and their inclusion is essential for project outcomes to have scientific

Cost–Benefits

Rating	very good
Comments	This is difficult for me, as a scientist, to evaluate. But on the surface, the budget seems appropriate given the scope of work proposed.

Overall Evaluation Summary Rating

Rating	very good										
Comments				the	sort	of	project	that	ought	to	be

undertaken to examine the viability of habitat protection/species conservation efforts at an agricultural interface. The results have the potential to influence the direction of giant garter snake recovery efforts over the next several years.

Sacramento Regional Panel Review

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

1. Applicability to ERP goals and regional priorities.

Apears to fail at Goal 1, Objective 2. No demonstrated meeting of Goal 2, Objective 1. Appears to meet Goal 3 objective 3. Appears to fail at Goal 4 Objective 2. Apears to succeed at Goal 4, Objective 4.

Proposal lacks critical demonstrated understanding of giant garter snake life cycle and viability requirements. Some of the actions described have the potential to result in harm to giant garter snakes and their habitat.

notes:

This proposal mostly addresses waterfowl which are listed as MSCS H spp. It will enhance harvestable species populations which is an ERP goal.

2. Links with other restoration actions.

Expands CREP, makes it more favorable to farmers by reducing commitment period.

notes:

3. Local circumstances.

Sacramento Regional Panel Review

Appears feasible but does not demonstrate or document individual farmers that agree to participate.

notes:

4. Local involvement.

Public outreach likely adequate. Specific cooperating landowners not identified.

notes:

5. Local value.

Not demonstrated.

notes:

6. Applicant history.

unknown

notes:

7. Summary of Overall Panel Discussion and Review

This proposal is focused on determining the beneficial effects of rice field fallowing on waterfowl production. The applicant suggests that these activities will not be adverse to GGS

Sacramento Regional Panel Review

foraging and hibernation. However, the timing of the work proposed is unclear and it would be critical to the GGS. It is not known how many seasons rice fields must lay fallow for GGS to use them as upland habitat. One reviewer suggested that some of the work to be done to improve habitat for waterfowl may result in take of the GGS which is not addressed by the proposal and is a serious concern.

The proposal is designed to supplement a program by the CREP to inform the 2008 Farm Bill. A host of other species may utilize fallow sites created through this project. The partnerships between the CWA, environmental interests, and the irrigation district are positive components of the project.

8. Panel Quality Ranking

Good notes:

9. Regional Priority Ranking

Medium notes:

Environmental Compliance Review

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

1. Is compliance with California Environmental Quality Act (CEQA) required for this project? Yes.

2. Is compliance with National Environmental Policy Act (NEPA) required for this project? **Yes.**

3. Does this project qualify for an Exemption or Exclusion under CEQA and NEPA, respectively? **Yes.**

4. Did the applicant correctly identify if CEQA/NEPA compliance was required? **Yes.**

5. Did the applicant correctly identify the correct CEQA/NEPA document required for the project?

Yes.

6. Has the CEQA/NEPA document been completed? **No**.

7. If the document has not been completed, did the applicant allot enough time to complete the document before the project start date? **Yes**.

8. If the document has not been completed, did the applicant allot enough funds to complete it?

Yes.

Comments:

Did not indicate amount of time or funds to complete CEQA/NEPA compliance. The project will begin in 2007 which allows enough

Environmental Compliance Review

time to complete the documents and there is a relatively low cost associated with Cat. Ex. fee's.

9. Did the applicant adequately identify other legal or regulatory compliance issues (Incidental Take permits, Scientific Collecting permits, etc.) that may affect the project? **No**.

Identify those additional permits that may be needed by this project:

ESA compliance, 10(a)(1)(A) take permit

10. Does the proposal include written permission from the owners of any private property on which project activities are proposed or, if specific locations for project activities are not yet determined, is it likely that permission for access can be obtained? **Yes.**

Comments:

All participating landowners had not been identified prior to submission of the PSP but access agreements will be obtained prior to beginning work.

11. Do any of these issues affect the project's feasibility due to significant deficiencies in planning and/or budgeting for legal and regulatory compliance or access to property? **No**.

Comments:

The project did not indicate the time alloted to obtain all permits but waterfowl and giant garter snake surveys will not begin until spring/summer 2007 which allows enough time to obtain permits.

Proposal Number: 0044

Proposal Name: Rice-Cover Crop Rotation Pilot Program

Applicant Organization: California Waterfowl Association

1. Does the proposal include a detailed budget for each year of the requested support?

No.

2. Does the Budget Form include a detailed budget for each task identified on the Task and Deliverables Form and in the proposal text?

No. If no, please explain:

Only a budget summary was provided.

3. Are the costs associated with each task and deliverable reasonable costs for performing the services?

No.

If no, please explain:

Difficult to evaluate since no detail was provided by task.

4. Is each person (employee, consultant, subcontractor, etc.) identified on the Personnel Form also included on the Budget Form?

No. If no, please explain:

No Personnel Detail was provided on Budget Form.

5. Are there estimated hours and an associated hourly rate of compensation for each person identified on the Personnel, Tasks and Deliverables, and Budget forms?

No. If no, please explain:

No Budget Detail

6. Does the budget include the benefit rate for all personnel identified on the Personnel and Budget forms?

No.

If no, please explain:

No Budget detail. However, benefit rate was indicated in the narrative.

7. Are the proposed labor rates comparable to state rates?

No.

8. Is more than 25% of the work proposed to be performed by subcontractors?

Yes.

If yes, what is the exact percentage to be performed by subcontractors?

Possibly. Difficult to tell without detail.

9. Are project management expenses appropriately budgeted?

No. If no, please explain:

Unable to determine.

10. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs? Are indirect rates, if used, appropriately applied?

Yes.

11. Does the proposal adequately explain major expenses? Are the labor rates and other charges proposed reasonable in relation to current state rates?

Yes.

12. For equipment >=\$5,000, was a separate worksheet filled out? Please note: No overhead or indirect rate charges are allowed on the equipment purchases

No.

13. Is the purpose for all travel clearly represented in either the proposal itself, or in the Tasks and Deliverable Form?

Please note: Recurring travel costs for a specific task or subtask may be combined into one entry on the Budget Form, but the number of trips and cost for each trip must be clearly represented.

No.

14. Are travel and per diem at <u>rates specified by the California Department of Personnel</u> <u>Administration</u> for similar employees?

Yes.

15. Are other agencies contributing or likely to contribute a share of the projects? costs?

Yes.

If yes, when sufficient information is available, please total the amount of matching funds likely to be provided:

\$327,586 - Wildlife Conservation Board

16. If the applicant identified cost share or matching funds, are they also described in the text of the proposal?

Yes.

17. Does the applicant take exception to the standard grant agreement's terms and conditions? If yes, are the approaches the applicant proposes to address these issues a reasonable starting point for negotiation a grant agreement?

No.

18. Are there other budget issues or "red flags" that warrant consideration?

Yes.

If yes, please explain:

The proposal narrative indicates the request to purchase three

four-wheel drive terrain vehicles. Recommend evaluate rate to ensure comparables are with State rate or leasing equipment for the term of the agreement.

19. Provide revised amount requested based upon your review:

Other comments:

Recommend more detail for Task 6 - Wetland Management -vehicle purchases, and subcontractor expenses.

Recommend review of Task 4 - Incentive Payment - Payment to growers \$100 per acre.