

# NCPA

A Public Agency

## Northern California Power Agency

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January 6, 1997

Mr. Dick Daniels  
Assistant Director  
CALFED Bay-Delta Program  
1416 Ninth Street #1155  
Sacramento, CA 95814

Subject: Ecosystem Restoration Planning Process

Dear Mr. Daniels:

We appreciate the opportunity to comment on your efforts to develop the Bay-Delta restoration plan, and more specifically on the Draft Ecosystem Restoration Program Plan - Implementation Objectives and Targets.

As a result of attending a number of meetings, and reviewing the material provided by you, it is encouraging to notice real progress. We commend Lester Snow, you and the competent staff. This is an enormous task, and we need to ensure that we stay on course regarding our ultimate goal which as you have stated time and gain is to "FIX THE DELTA". In establishing the plan and processes to achieve the goal, we need to keep in mind that the participation and contribution by various entities are consistent with their roles and expertise. Our additional comments are as follows:

**Segregate Objectives from Actions.** In your interactions with the Ecosystem Workgroup, you appear to segregate objectives from actions. We are encouraged with the approach. In that regard, we suggest that we first and foremost establish measurable objectives. This is important and we should resist the temptation to come up with actions during this process. In our opinion, in the CVPIA process, this very thing has slowed us down considerably unfortunately.

**Clarify Stakeholders' Input.** We should better articulate a process for arriving at decisions and plans, and emphasize on the type of input sought from the stakeholders and other entities. As you know, several stakeholders are not experts at defining in detail the biological needs of the Delta, so it would not be beneficial to you and others to engage all of us in that type of discussions or debate, nor is it appropriate for some of us to spend our time on these type of discussions. We recommend that you establish a timetable and a flow chart of the process indicating where our input would be helpful. The attached flow diagram may be of some help.

**Targets should be set for monitoring progress on the objectives.** We envisage a set of actions to achieve an objective. In fact, these actions may be undertaken to reach more than just one objective. If, however, we find that neither one or a set of actions are not hitting the targets, then we ought to reexamine the actions but not change the targets. If on the other hand, we find it necessary to

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reexamine our targets based on the findings from the actions, we ought to go through the process of re-reaching a consensus on the objectives. Habitats and species are specific objectives. Targets should therefore be for habitat or species, and not for actions. Processes, functions and stressors are not objectives per se, but desirous means to achieve objectives. Thus, they would be used as evaluation criteria for project development and selection.

**Ecosystem Roundtable's role is to consider actions to achieve targets, and not establish those targets.** We need to be careful that we do not utilize the Roundtable to either come up with objectives or to establish targets. The Roundtable's role is to assist in prioritizing projects/actions by taking into consideration input from the staff, state, and federal agencies. It also must ensure that a proper coordination with CVPIA and Category III type of similar programs is achieved to ensure the maximum efficiency and economy.

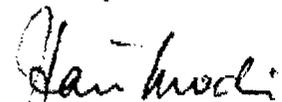
**Peer review of the process and actions is vital.** We can not emphasize the importance of the peer review enough. The CVPIA program is also in need of a similar peer review. We should come up with collaborative efforts to achieve maximum efficiency.

**Establishment of "vision" in addition to the objectives may be unnecessary.** We find it to be confusing and redundant to have so many terms having similar definitions. Our primary objective is to get programs or a set of actions underway without delay to "Fix the Delta". With that in mind, would we lose any objectivity if we drop the idea of developing "vision" documents? We don't think so.

**The idea of amending the document with phrases such as "In order to....." may be unnecessary.** We believe there is enough linkage and understanding among the various components on Tables 8, 9, 10, etc. Our time may be better spent on reexamining the objectives, targets and actions, and establishing a peer review committee.

We will be glad to go over our comments in detail at a time convenient to you. In the meantime, please call me at the above phone number if I can be of further assistance.

Sincerely



HARI MODI, Manager  
Federal Affairs

HM/dg

Attachment

cc w/att: Lester Snow  
Cindy Darling  
Gary Bobker  
Jason Peltier

# Generic Planning and Implementation Process

