

96-~~205~~
243

Bay Institute of San Francisco
California Sportfishing Protection Alliance
Environmental Defense Fund
Environmental Water Caucus
Friends of the River
League of Women Voters of California
Natural Heritage Institute
Natural Resources Defense Council
Pacific Coast Federation of Fisherman's Associations
Planning and Conservation League
Save San Francisco Bay Association
United Anglers

AUG 12 1996

August 12, 1996

Mr. Lester Snow, Director
 CALFED Bay-Delta Program
 1416 Ninth Street, Suite 1155
 Sacramento, CA 95814

Dear Mr. Snow:

We write to express our grave concern with the way in which the Delta portion of the ecosystem restoration component is being formulated within the CALFED Bay-Delta Program.

The theories upon which CALFED is basing its restoration program -- using the concepts of ecosystem services, functions, and limiting factors -- appear to us to be generally sound, and the common program of ecosystem restoration contains positive elements. Our concern lies more with the scope of in-Delta restoration which the CALFED Program will study in Phase II. There is no evidence to support, and much evidence to contradict, the view that restoration can be accomplished by restoring only a tiny fraction of the Delta back to habitat. An adequate, much less an optimal, level of in-Delta restoration must be far more expansive.

The apparent unsustainability of much of Delta agriculture reinforces this view. If the islands fail, the environment will be the biggest loser. Indeed, once the risk of permanent island inundation is factored into the equation, within a few decades the environment could end up with far less habitat than it has today. CALFED must do more to study the risks of major habitat losses, and ways to minimize those risks.

The Environmental Water Caucus (including both environmental and fishery interests) has, on numerous occasions: identified the restoration of freshwater tidal marsh as a high priority for the Program; urged that not less than 25% of predisturbance habitats be restored in the Delta and other parts of the Estuary; and recommended that agricultural activities be ended or restricted in all areas of the Delta with peat soils. The Natural Heritage Institute has recommended that the Program study the reconversion of all Delta lands below sea level to a mosaic of habitats. While the CALFED Program has been responsive to other concerns raised by the environmental community,

Lester Snow
August 9, 1996
Page 2

to date the Program has been unresponsive to the concerns related to the Delta component. For example, the Program does not mention our concern over the breadth of Delta restoration programs in the master list of concerns to be addressed prior to the initiation of Phase II.

It is not our intention that the CALFED Program commit at this time to adopt the most expansive Delta restoration program in its final recommendations. It is appropriate, however, for the Program to include a large-scale in-Delta component as the upper range to be considered as part of its common program of ecosystem restoration. To this end, the CALFED Program should make an explicit commitment to study the following topics in Phase II of the Program:

- o The technical and socio-economic feasibility of a large-scale ecosystem restoration program within the Delta which converts a large portion of the Delta into a mosaic of aquatic and terrestrial habitats.
- o The long-term sustainability of Delta agriculture in the deeper peat soils, in view of the increasing seismic risks and the costs of levee maintenance and repair.

We are very interested in working with the CALFED Program and other stakeholders on how and to what extent a program of Delta restoration might best be accomplished. In particular, the agricultural interests and social communities of the Delta must be heavily involved in any discussions about future management of the Delta islands.

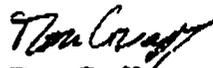
As a prerequisite to such an effort, the CALFED Program must make clear that large-scale Delta restoration will be considered as an upper range of the common program during Phase II.

We would appreciate the opportunity to meet with you and your staff to discuss this matter further.

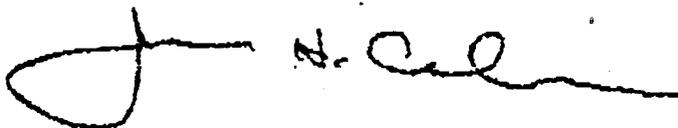
Sincerely,



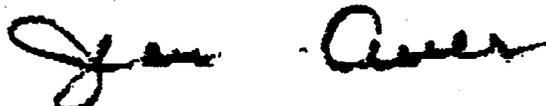
Gary Bobker
Bay Institute of San Francisco



Tom Graff
Environmental Defense Fund

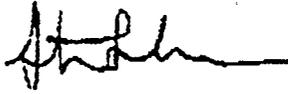


Jim Crenshaw
California Sportfishing Protection Alliance



Jean Auer
Environmental Water Caucus

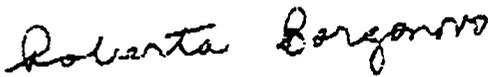
Lester Snow
August 9, 1996
Page 3



Steve Evans
Friends of the River



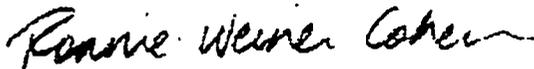
John Beuttler
United Anglers



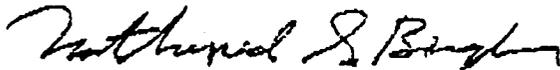
Roberta Borgonovo
League of Women Voters of California



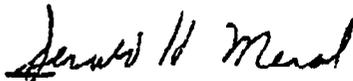
Greg Thomas
Natural Heritage Institute



Ronnie Cohen
Natural Resources Defense Council



Nat Bingham
Pacific Coast Federation of Fisherman's
Associations



Jerry Meral
Planning and Conservation League



Barry Nelson
Save San Francisco Bay Association