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The Program Fails to Follow the Solution Principles

This is a response to many comments that said CALFED was not following the Solution Principles that it developed in conjunction with the Mission Statement and Objectives. Most comments focused on the principle of "Have No Significant Redirected Impacts."

Given the history of conflict in the Bay-Delta system, CALFED recognizes that any proposed program to address this broad spectrum of resources will be controversial. Stakeholders participating in the CALFED process have already identified significant concerns about virtually every component in the Program. Carrying out the mission, achieving the objectives, and adhering to the solution principles will ensure that CALFED fulfills its commitment to continuous improvement in all four problem areas.

The solution principles were developed early in the planning process as a means to achieve the Program's objectives in the context of a multi-purpose mission and a history of competing and contentious environmental, political, and institutional influences on the affected resources. The solution principles provide an overall measure of the acceptability of alternatives to different constituencies and guide the design of the institutional part of each alternative.

In the past, most efforts to improve water supply reliability or water quality, improve ecosystem health, or maintain or improve the Delta levees were single purpose projects. Single-purpose projects have the potential to solve one problem but create other problems, and thereby engender opposition to future actions.

The CALFED Bay-Delta Program has taken a different approach, recognizing that many of the problems in the Bay-Delta system are interrelated. Problems in one resource problem area cannot be resolved effectively without addressing problems in all four problem areas at once. As a result, the program as a whole, needs to be evaluated against the solution principles. Solution principles are not intended to be applied to individual components of the program.

The "Pose No Significant Redirected Impacts" solution principle states; "Solutions will not resolve problems in the Bay-Delta system by redirecting significant negative impacts, when viewed in their entirety, within the Bay-Delta or to other regions of California." In order to address the Primary Objectives of the CALFED Program, there will be impacts on all stakeholders/users. When the Program is viewed in its entirety, solutions do not simply redirect impacts to another area. The solutions are a broad range of actions that are designed to meet the Program Objectives and the resulting benefits to all stakeholders and users, as well as impacts. Individual portions of the Program, when looked at separately, do not provide the view of the entire Program and how the Program meets the Solution Principles.

In order to address the four problem areas, actions will need to be taken across all of the Program Problem and Solution Areas. While at an individual or site specific basis it may appear that CALFED is not following the Solution Principles, at the Program scale, there will be effects on all parties in order to develop solutions to the four problem areas.