

DEPARTMENT OF FOOD AND AGRICULTURE



1220 N Street, Room 409
Sacramento, California 95814
(916) 654-0321

March 11, 1999

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

Dear Mr. Snow:

The following are CDFA comments on the Draft Bundles of Stage 1 Early Implementation Actions.

This draft presents seven bundles, based on regions, actions, and issues. It does not seem to bundle stage 1 actions based on assurances continuous improvement will be realized by all sectors. The major purpose of bundling is to provide such assurances. With the exception of the Lower San Joaquin River Region bundle, this proposal does little to provide such assurances. Bundling as an assurance mechanism is specifically mentioned at the bottom of page 121 of the Revised Phase II Report.

Once again, CALFED is exhibiting a "top-down" rather than "bottom-up" approach to planning and implementation.

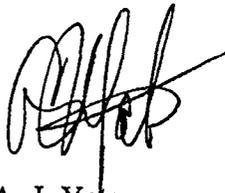
If this goes out to the stakeholder communities as proposed, it is tantamount to painting a big target on the back of CALFED and handing the stakeholders shotguns. This is a separation and division proposal, not a bundling proposal.

CALFED should, instead, issue a call to action to the stakeholders to develop bundles of their own. CALFED would provide guidance to the stakeholders as to what would constitute a good bundle. CALFED could facilitate the process. Stakeholders could organize themselves in various configurations for bundle development. Groups such as EWC, CUWA/Ag, Agricultural Caucus, RCRC, BDAC subcommittees, watershed groups should be sought out to provide suggested bundles to CALFED. Collaboration among groups should be encouraged and facilitated.

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CALFED would then take these bundles, and amalgamate them into a draft CALFED proposal that best serves all CALFED objectives and adheres to the CALFED solution principles, taking into full account the approaches proposed by all stakeholders. This strategy offers many advantages over the current approach. It would be perceived as a "bottom-up" rather than "top-down" planning effort by CALFED. It would be a much more inclusive, stakeholder driven process. It has the potential for being much more creative and innovative. It offers additional mechanisms for constructive communication among stakeholder groups. It does not set up CALFED staff and management as targets for criticism.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. J. Yates', with a long horizontal stroke extending to the right.

A. J. Yates
Undersecretary