

July 10, 2000

To: Alf Brandt, CALFED

From: Margit Aramburu, Delta Protection Commission

Subject: Framework Agreement

The Delta Protection Commission submitted five key comments on the Revised DEIR, submitted in September 1999:

1. The proposed conversion of between 125,000 and 166,000 acres of agricultural land in the Delta to habitat, conveyance, and storage will have a significant impact on the Delta and should be minimized and possibly mitigated, e.g. through the permanent protection of other agricultural lands through conservation easements.
2. There has been no planning for recreation facilities and/or activities.
3. It is critical for successful implementation that there be local review of and input on CALFED programs and projects.
4. Acquisition of land under the CALFED program must be with appropriate CEQA and/or NEPA review, and bundled actions must move forward together.
5. The CALFED program should incorporate and support local government efforts toward habitat enhancement and mitigation through HCPs and other techniques. CALFED should ensure it is not interfering with implementation of such programs through acquisition, planning, etc.

To this end, the following changes to the June 2000 Framework agreement would be helpful:

p. 7: third paragraph, Line 7, add: In the Delta, implementation of habitat restoration on agricultural land will be paired with implementation of "wildlife friendly agriculture" with the goal of continuing commercial agriculture in the Delta. Appropriate mitigation for loss of agricultural land will be evaluated as enhancement projects are developed. Opportunities for public recreation will be evaluated and encouraged as individual projects are developed.

p. 7, third paragraph, end, add: such as the Sacramento River Conservation Area/SB 1086 program and the Land Use and Resource Management Plan for the Primary Zone of the Delta. These programs encourage early public review and input to development of programs and projects.

p. 38, Governance: add: CALFED will work with the Congress and the Legislature to draft legislation for a permanent CALFED governing body as quickly as possible.

p. 39: Acknowledge that local governments will be responsible for implementing much of CALFED. Local Delta interests should be directly involved in decision-making affecting the Delta land uses: