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GRAY DAVIS, Governor

DELTA PROTECTION COMMISSION

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CALFED Bay-Delta Program

March 24, 2000

Steve Ritchie, Acting Executive Director
CALFED
1416 Ninth Street, Suite 1100
Sacramento, CA 95814

Subject: Comments on the CALFED Governance Proposal regarding Levees Program and Ecosystem Restoration Program

Dear Mr. Ritchie:

The Delta Protection Commission has been reviewing the CALFED Governance proposal. This letter provides more comments in the areas of the Levee program and the Ecosystem Restoration program, both areas of critical importance to the Delta.

Coordination with Delta Protection Commission and Local Governments:

In a letter dated January 28, 2000, the Commission commented on the proposed membership of the proposed Bay Delta Commission supporting more representation from the Delta including local government representation. Key to the implementation of the CALFED Program will be the role of coordination of programs. To ensure agreement and compliance with the important goals of the CALFED program, it will critical be at all levels, and particularly at the local level, that the CALFED program be implemented from the "bottom up", not "top down".

For all programs which will impact the Delta and Delta land uses, it is important that the CALFED program consult with the Delta Protection Commission, the State's regional land use planning agency in the Delta. The Commission can assist with coordination of programs and projects to ensure fulfillment of CALFED's goals and objectives.

Levee Subvention Program:

The Levee Subventions program currently carried out by the Department of Water Resources and Department of Fish and Game works, and works well. The program is timely, cost-effective, well-run, and has the buy-in and support of the Delta Reclamation Districts. There is a great deal of concern that changes to the program could disrupt the levee maintenance projects that are critical for protection of human life, land uses,

water quality, habitat values, and flood control in the Delta region. As language regarding this program evolves, it is critical that the program be protected from budgetary and political wrangling. The program does need a continuous source of funds, and CALFED will be critical in acquiring those funds.

CALFED is supporting, through a Category 3 Directed Action grant, a study of the reuse of dredged material from the Delta waterways for both levee maintenance and creation of tidal aquatic habitat. The results of this study will hopefully support the ongoing practice of using dredged materials for levee maintenance, and will allow the regulatory process for that activity to be more cost-effective and timely.

Ecosystem Restoration Program:

In its letter of January 28, 2000, the Delta Protection Commission indicated its support of one agency to oversee the entire CALFED program, with the understanding that one agency would keep all parties at the table, ensure that all aspects of the program move forward together, provide comprehensive fiscal oversight, and be more cost-effective.

The current Governance proposal provides for the creation of a Conservancy within the CALFED program to implement the Ecosystem Restoration Program. The proposal also indicates that funds would go directly to the Conservancy, although the Conservancy would report to the Bay Delta Commission for "program direction and budget/funding". The Governance proposal should ensure that the Ecosystem Restoration program implementation entity be part of the overall CALFED program, and that authority over program direction and funding be retained by the Bay Delta Commission.

Thank you for the opportunity to comment on the CALFED Governance proposal.

Sincerely,



Margit Aramburu
Executive Director

cc: Kate Hansel, CALFED