



by email and mail

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RE: ECOSYSTEM RISK ANALYSIS FOR DELTA VISION

Gentlemen,

As you know, the Bay Institute has been deeply involved for many years in long-term planning and implementation efforts to manage the San Francisco Bay-Delta estuary's resources, and was one of the original proponents of a "Delta Vision/Delta Strategic Plan" (DV/DSP) process to respond to emerging threats, as well as clarify policy issues not adequately addressed in the CALFED Record of Decision. We are encouraged that Governor Schwarzenegger has recently issued an Executive Order to begin such a process.

A successful DV/DSP will require, among other things, an independent task force and staff; an honest discussion of knowledge uncertainties, policy choices and trade-offs, and costs; creative thinking about future scenarios, decision

pathways and adaptive management procedures; and a thorough technical analysis of risks to the Delta and potential management responses. We are writing to identify a critical gap in the latter component.

Specifically, we are concerned that current efforts to assess and quantify risks to the Delta ecosystem and identify strategic responses to those risks are not adequate to support development of a DV/DSP. The conventional wisdom is that the Delta Risk Management Strategy (DRMS) effort will provide the risk assessment for Delta levees and that the Delta Regional Ecosystem Restoration Implementation Plan (DRERIP) will provide the technical information for the Delta environment. (Complementary efforts to address risks to infrastructure and other Delta uses also need to be initiated, obviously). DRMS has been given substantial resources and is now in the process of executing an ambitious workplan to address levee sustainability (which will include only a limited evaluation of ecological impacts). Unfortunately, although DRERIP is the only suitable vehicle for performing a similar function for the Delta ecosystem, its current workplan does not contemplate its doing so. Furthermore, we are concerned that DFG and other resource agencies may not be as fully engaged as necessary in the DV/DSP process.

We strongly urge you to consider the following actions to ensure that an adequate Delta ecosystem risk analysis is provided to the DV/DSP:

The DRERIP workplan must be revised. The comprehensive, science-based DRERIP process is making significant progress in developing conceptual models of, and tools for evaluating changes to, the Delta ecosystem, and this work must continue. However, DRERIP's current workplan only calls for the use of these tools to evaluate projects contained in the CALFED Ecosystem Restoration Plan (ERP) and the Multi-Species Conservation Plan (MSCS) milestones, and to potentially evaluate proposed projects developed for the Bay-Delta Conservation Plan (BDCP) process. This passive approach is deficient for a number of reasons. First, "vetting" a list of projects that may be obsolescent given current planning efforts and emerging threats is a misallocation of resources (although we agree that eventually all projects under consideration should be evaluated using these tools). Second, the BDCP is concerned with a subset of Delta issues and is likely to focus on shorter-term projects. Most importantly, the DV/DSP process represents perhaps the last opportunity to determine a comprehensive strategy for the Delta ecosystem that will be durable in the face of dramatic projected changes and that will provide guidance to the development of an integrated suite

of ecosystem restoration actions and projects. Not focusing on that opportunity is simply not acceptable.

We recommend that the vetting of most ERP, MSCS and BDCP projects be deferred and, in concert with the further development and refinement of conceptual models and evaluation tools, DRERIP be tasked with preparing a quantitative assessment of risks to the Delta ecosystem from existing and projected threats. Various risk trajectories, based on different assumptions, uncertainties, and policy choices that form boundary conditions, should be identified, and broad strategic approaches for managing the risks presented by these different trajectories developed. (This is consistent with and complements DRERIP's proposed priority setting effort, which is currently scheduled to occur only after the vetting exercise, and also builds on the recent work by a special CBDA science panel to identify drivers of change in the Delta). It is paramount that these tasks be performed with the active participation of independent science advisors and be reviewed by members of the Independent Science Board. Performing these tasks and ensuring adequate participation by independent scientists may require additional funding for the DRERIP budget.

Additional personnel and resources from DFG and other resource agencies should be allocated to the DRERIP and DV/DSP processes. Currently, the lion's share of DFG and other resource agency efforts seem to be focused on implementing current ERP projects and on developing the proposed BDCP. Whatever its merits (and we believe it is a potentially useful process), the BDCP is not intended to perform the broader, more comprehensive function of the DRERIP or the DV/DSP. On the contrary, the BDCP's success as a long-term agreement will rely heavily on the success of the DRERIP and the DV/DSP. For this reason, we recommend that some of the personnel and resources contemplated for assignment to the BDCP should instead be used to support the DRERIP and the DV/DSP. While the use of independent scientists will be crucial to these processes, the Delta expertise and regulatory experience of agency staff is also essential.

DFG and other resource agencies should assign responsibility for coordinating and overseeing Delta planning efforts to personnel at the deputy director level or higher. Recently, CBDA appointed a deputy director for strategic planning. We believe that DFG and other resource agencies need to take similar action, by designating managers at the deputy director (or federal regional equivalent) or higher level, who are specifically tasked with ensuring that Delta planning efforts are fully coordinated and as appropriate integrated, that agency resources

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are being effectively utilized in these processes, and that policy and regulatory issues critical to the resource agencies are being adequately addressed in these processes.

We request a meeting with you and key members of your staffs to discuss these recommendations. Please contact me at 415-506-0150 or bobker@bay.org if you have any questions regarding these comments.

We look forward to working with you to ensure that the DV/DSP process is a success.

Sincerely,

Gary Bobker
Program Director

cc:

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