



**COUNTY OF TEHAMA
DEPARTMENT OF PUBLIC WORKS**

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WATER CONSERVATION DISTRICT
SANITATION DISTRICT No. 1

September 19, 2008

F-08-13

Mr. Phil Isenburg, Chair
Delta Vision Blue Ribbon Task Force
1416 Ninth Street, Suite 1311
Sacramento CA 95814

RE: Delta Vision Strategic Plan

Dear Mr. Isenberg:

Tehama County appreciates the opportunity to provide comments on the Delta Vision and Strategic Plan process. We recognize that the Delta is a valuable ecological and economic resource in the State, much like the Northern Sacramento Valley, whose area of origin water supply provides for many thousand of acres of economic viability. Additionally, the majority of the managed wetlands in the Pacific Flyway and a groundwater supply that is critical to the region is located in the Northstate.

The strategic plan contains many positive elements that are proposed to protect and manage the Delta's ecosystem, communities and water supply reliability. Some of these actions, such as limiting urban growth on islands protected by marginal at best levees, and proposing State Parks in areas to reduce potential risk, is supported.

However, there are many very disturbing, and in fact, what appears direct assaults on Northern California water rights and resources.

Tehama County opposes the promotion of the Public Trust Doctrine over the current water rights system and area of origin water rights. Portions of the strategic plan have stated "that water required to support and revitalize the Delta would not be purchased but will be provided within the California's System of Water Rights and Constitutional Principles of Reasonable Use and Public Trust". This ignores Tehama County and Northern California's Area of Origin water rights and is unacceptable.

The Strategic Plan's proposal to call the Delta a "unique and valued place" and asking it to be a "Federally recognized National Heritage Area (NHA) by 2010" is laudable, however, should not be realized by reducing existing lawful water diversions in the Northern Sacramento Valley and redirecting ecological and economic impacts to north of Delta waterways and land. Tehama County recognizes the value of coordination, collaboration and cooperation as witnessed by the Four County Memorandum of Understanding (MOU) signed by the Counties of Butte, Colusa, Glenn and Tehama. Through that open, transparent, locally driven process, we are developing successful partnerships to enhance water management in Northern California.

This type of process is painfully missing from the Delta Vision Plan. One only needs to recall the CALFED attempt to resolve the Delta crisis with a "top down approach", similar to the Delta Vision Process, which, as the Little Hoover Dam commission reported, had failed in its efforts.

The Strategic Plan governance and finance proposal raises significant concerns for our County and region. While we understand the need to develop a better governance structure for the Delta, we oppose granting any new California Delta Ecosystem and Water Plan (CDEW) with authority to affect areas outside of the Delta, attempt to supersede existing water rights, or preempt local authority or police powers.

The County supports the Plans attempt to promote regional self-sufficiency, conservation and water use efficiency. We also support completion of the feasibility studies associated with the CALFED water storage projects. It is time to increase the overall water supply within California and the completion of new water storage projects is long overdue.

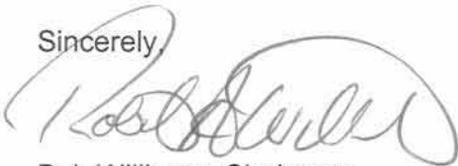
Regional self-sufficiency must apply to decisions on groundwater banking and exports. Those within a region are in the best position to determine local water demands and the availability of any potentially surplus water from within the region. The County is troubled by the concept of exempting groundwater banking projects from County permit requirements that regulate groundwater exports, and vehemently opposed to this preemption of local government authority. The reason that many counties adopted ordinances to regulate groundwater exports was due to real or perceived failures on the part of the state to manage these programs adequately. Tehama County does not support these actions being taken at the state level, which may do little to solve the problems facing the Delta and have the potential to cause irreparable economic, ecological and social harm to our region.

We are very concerned that while several of the proposed Strategic Plan actions may help improve the Delta, others will result in reduced diversions in the Northern Sacramento Valley, have a major adverse impact on our local groundwater supply, negatively affect our agricultural economy and the precious north state environment.

We commend the task force on its efforts to address the many issues of the crisis in the Delta. If any solution is to be successful, the process and planning must be in concert with, not absent the Northern Sacramento Valley.

Representatives of Tehama County and our regional partners would be happy to meet with you to answer any questions and assist the task force in moving forward with a strategic plan that meets the needs of all regions. Please feel free to contact Ernie Ohlin, Deputy Director of Public Works-Water Resources at (530)385-1462.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Williams", written over a circular scribble.

Bob Williams, Chairman
Tehama County Flood Control and Water Conservation District