



County of Yolo

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September 30, 2008

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

Dear Chair Isenberg and Members of the Task Force:

Once again we appreciate the opportunity to comment on the Blue Ribbon Task Force's draft strategic plan. We continue to hope these comments are helpful in improving the plan as it moves forward.

As the Task Force itself noted during its last meeting, the degree of attention paid to water management and ecosystem revitalization in the Delta has not been equaled by the attention paid to the Delta 'as place', to use the document's term. We strongly encourage you to focus on improvements to the document that will address this missing factor.

We would like to emphasize – as we have in all our previous letters - how unproductive it is that the strategic plan places such emphasis on "designating" the Delta as a special place and obtaining a federal designation for it as such. We would greatly prefer that the Task Force foster and support the features that make the Delta special. We also have to point out that we have asked repeatedly for some justification for reliance on the federal National Heritage designation; it appears to be solely a marketing ploy with a branding result. Absolutely nothing has yet been offered to support the tangible benefit of the designation in the face of the cost and effort required to obtain it. Leading with such a feeble recommendation is an indication of the level of real attention the Task Force has given the Delta itself to date. As noted above, the Task Force itself reinforced this impression in the discussion at their September meeting.

The Task Force has said publicly that development is not an issue in the primary zone of the Delta, but is a great concern in the secondary zone. In that case, the state's interests for the primary zone appear to center on levees and flood risk management, and ecosystem revitalization. In this case, it is unclear why the Task Force would recommend moving land use authority from local government to the Delta Protection Commission for the primary zone, since other state agencies oversee these areas of interest. There is not a clear nexus between the state's interests and the proposed solution relative to the primary zone. Land use control would seem to be of far more significance in the secondary zone, and yet there the plan proposes no more than business as usual. In both cases, if permit authority is transferred anywhere, the question remains – pursuant to what? The document currently proposes transferring permit authority immediately, but apparently pursuant to a plan that may be developed some day by an entity that does not exist. Please fix this.

The strategic plan proposes an extremely limited role for a Delta Conservancy. We have offered extensive comments on what a Delta Conservancy could do that would benefit both state and local interests. Please examine the full range of activities that a state conservancy could provide and expand your thinking to encompass their role in achieving other Delta Vision goals. Good examples of conservancies that have a similar range of action and mandates are the Santa Monica Mountains Conservancy and the Coastal Conservancy.

The plan does not acknowledge or examine cumulative impacts to the Delta's economy, our food supply, landowners in the Delta, and local governments from the conversion of tens of thousands of acres of agriculture to habitat in the Delta. While Yolo County supports both agriculture and habitat restoration, the state must, at minimum, analyze the impacts of such efforts before taking these steps and work with Delta local governments and residents to mitigate their effects.

As we have noted consistently, and the Task Force has also noted, the financing component of the strategic plan is weak and unformed. This is not surprising, given the complexity of the issue, but is also not acceptable. A very substantial burden will fall on local governments as a result of proposed actions in the strategic plan, and the economic and funding issues must be analyzed and addressed before the state institutes changes of the magnitude proposed in the plan.

We hope you will consider these comments and we look forward to continuing to work with the Task Force on future phases of the Delta Vision process. Please contact Julia McIver, of our staff, at 530.681.7372, if you have any questions.

Cordially,



Duane Chamberlain
Chairman
Yolo County Board of Supervisors



Mike McGowan
Supervisor, First District
Yolo County Board of Supervisors

cc: Senator Mike Machado
Assemblymember Lois Wolk
Solano County Board of Supervisors
Contra Costa County Board of Supervisors
Sacramento County Board of Supervisors
San Joaquin County Board of Supervisors