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August 2, 2010

Delta Stewardship Council  
c/o P. Joseph Grindstaff, Interim Executive Director  
650 Capitol Mall, Fifth Floor  
Sacramento, CA 95814

Dear Council Members and Mr. Grindstaff:

The City of West Sacramento is pleased to respond to Phil Isenberg's request of July 19, 2010 to comment on the Second Draft of the Interim Plan ("Interim Plan" or "Second Draft") released by the Delta Stewardship Council ("DSC") on July 14, 2010.

As you know the City of West Sacramento is a historic urban community, with more than 40,000 residents in the far northern area of the defined Delta region. It is immediately adjacent to downtown Sacramento and serves as a large regional employer. Most of the City of West Sacramento is in the secondary zone of the Delta, but a significant portion of the community is not within the defined Delta region.

We are concerned that the Interim Plan's processes and potential impacts on local agencies are not adequately specified. Additionally, we can find little to distinguish treatment of areas in the secondary zone from those in the primary zone within the current Second Draft. This was an important part of The Delta Protection Act and subsequent legislation.

As you know, the geographical taxonomy of the Delta and the classification of major urban centers within the secondary zone has been a significant state policy issue. The Delta Vision upon which last year's legislation was based, as well as the flood management legislative package from the prior year, recognized that the place-types like West Sacramento are fundamentally distinct from rest of the secondary zone and more akin to the urban places outside of the legal Delta. Unlike other portions of the secondary zone, it is the affirmative public policy of the state through SB 375 and other statutes and plans to direct growth to West Sacramento.

The lack of specific distinction between place-types within the secondary zone or even between the secondary and primary zones leads to fear that

the Delta Stewardship Council and the Delta Plan could encroach on our land use prerogatives; change or delay our critical flood protection programs; disrupt essential agency alliances; and impede our ability to meet and advance state and regional objectives for air quality, affordable housing, and greenhouse gas emissions.

The Delta Protection Commission is currently responding to its mandate to assess the primary and secondary zones, but is doing so due to time and resource constraints in a manner that addresses only the absolute minimum requirements of the Delta legislation, considering only whether the status of a small subset of secondary zone areas should be remapped into the primary zone. It has been unable to consider the urban secondary zone issue identified in the Delta Vision, so the Interim Plan must account for the distinction with a more fine-grained treatment of the secondary zone than the draft presents.

In an effort to add appropriate specificity and clarity to the Interim Plan we are including a red-lined version of proposed changes to the Second Draft, as well as the following general comments:

**1. No Reduction in Flood Control Capacity (policy obj. (f), (g) and (h)).** The Second Draft (and ultimately, the Delta Plan itself) is intended to govern the process for recommending a suite of actions, projects and programs, some of which have a high potential to interfere with the existing flood control system. The Plan must therefore include a strong commitment to mitigating any and all such impacts. In general, higher water levels along a floodway will require higher levees, and changes in hydraulics will require increased levee armoring.

Several recent proposals have been made that are of serious concern to the City:

- The first is the multitude of plans to install habitat and other mitigation projects within the Yolo Bypass. Vegetation along a floodway influences hydraulics and reduces water velocity. The City appreciates the Bypass's potential to offset the environmental impacts of the Central Valley and State Water Projects, but the flood control function of this invaluable facility must remain paramount. Although the Bypass levees are substantial and were designed with five foot of freeboard, water levels rose to within a foot of overtopping in 1986, meaning projects in the Bypass would invariably require mitigation for flood control impacts, particularly given that the Bypass levees protect substantial lands on either side of the Bypass, including large parts of the City of West Sacramento as well as thousands of acres of productive farmland.
- The City's southern basin is bounded by the South Cross Levee, which connects the Sacramento River and Bypass levees and separates the City of West Sacramento from the largely agricultural lands within the boundaries of Reclamation District No. 900 (RD 900). The Bay Delta Conservation Plan, Delta Vision and other regional planning projects have identified large areas within RD 900 for potential use as a flood bypass and habitat enhancement area. Such a

proposal would substantially increase the risk of flooding within the City of West Sacramento. The South Cross Levee, maintained by RD 900, is a non-project levee and is not sufficient in its current state to protect the City from enhanced flooding to the south. Any intentional flooding of this area will first require substantial improvements to the South Cross Levee, including but not limited to increased armoring, raising and widening the levee geometry, and seepage control.

- Another proposal of concern to the City is the potential to use the Deep Water Ship Channel as a floodway. The Deep Water Ship Channel was built by the U.S. Army Corps of Engineers as a navigation project, and divides the northern and southern parts of the City. Levees line the channel, and a series of short levees run along Lake Washington (or the Port). To the City's knowledge, since the Deep Water Ship Channel was completed in 1963, it has never been used to carry floodwaters. Like with the South Cross Levee, the Deep Water Ship Channel levees would need to be significantly improved if this navigation feature were ever to be incorporated into any plan of flood control.

The funding to install such levee improvements should not only come from the City of West Sacramento, its residents, or the local districts that maintain the levees. Instead, costs should be covered as part of the particular projects that pose the heightened risk of flooding and by the state as state-wide benefits are identified. A permanent fund should also be established, again as part of the project cost, to maintain the needed flood control improvements with the Delta region. Given that the new flood control features will be required to offset the impacts of projects developed to advance statewide interests, it would be highly inequitable to leave ongoing operation, maintenance and repair costs to a community, such as the City of West Sacramento, that happens to be located adjacent to the levees.

**2. Prioritize New Flood Control Improvements (policy obj. (f) and (g)).** The Interim Plan should expressly prioritize evaluating all potential actions, projects and programs for ways to incorporate integrated flood control enhancements. Habitat, recreation, water supply, and transportation projects in particular provide significant opportunities for heightened flood control. This approach makes simple economic sense, i.e., trying to achieve as many goals as possible through each proposed action. Moreover, new physical improvements will require flood protection or risk being damaged by high-flow events.

A related matter is that the suite of actions and plans ultimately approved under the Interim Plan will undoubtedly result in the movement and excavation of materials that could be invaluable in improving the levees. The plan should prioritize making appropriate sediment, rock, and other materials available to local maintaining agencies without cost.

**3. The Delta Levee System Is Functional, though It Can and Should Be Significantly Improved (policy obj. (g)).** The Interim Plan selectively cites statistics suggesting the Delta levees are in particularly poor condition. Of course, there is an

urgent need for ongoing Delta levee repair and rehabilitation. Much work needs to be done to continue armoring and raising the Delta levees (both project and non-project), enhancing eligibility for federal disaster relief, increasing funding, and reducing regulatory roadblocks to levee improvements. But contrary to the impression conveyed by the Interim Plan document, the levees are generally in fairly good condition, and the risk of levee failure has been decreasing during recent decades. These improvements are in large part due to the establishment of the Subventions Program in 1973 and the Delta Levees Program in 1988. As one example, there are 1,100 miles of levees in the Delta, and during the last decade there was a single failure—Jones Tract (2004)—even though this decade included the seventh-highest water year on record for the combined Sacramento-San Joaquin River system (2005-06). The City of West Sacramento has never had a recorded levee failure.

**4. Cooperate on Vegetation and Levees (policy obj. (f) and (g)).** The Draft Interim Plan states: “Levee maintenance programs also eliminated riparian vegetation that provided shade for temperature control and protection.” It is the City’s position that when vegetation is selectively chosen and incorporated into levee design, it can improve structural stability and reduce surface erosion. Proper vegetation can also reduce levee maintenance costs while providing habitat value. Unfortunately, however, the current U.S. Army Corps of Engineers vegetation policy prohibits vegetation on and around levees.

There are two logical implications for the Interim Plan. First, the plan should emphasize that habitat-related projects should incorporate vegetation and other natural features that will help provide bank stability near levees, albeit without encroaching into the clearance area designated by the Corps vegetation policy. Second, the Council should monitor discussions among various Federal, State and local interests regarding whether to modify or grant regional and project specific variances from the vegetation policy.

**5. Increase Funding for Ongoing Levee Maintenance and Improvement (policy obj. (g) and (h)).** As discussed in the Interim Plan, Water Code Section 85020 recognizes the need for any new governance structure to include funding for flood improvements. As such, the plan should strongly recommend increased funding for maintenance, operation, repair and rehabilitation of levees, preferably under the existing Subventions Program. However, funding reimbursements should be more streamlined to help local agencies avoid loans and interest payments, and thus maximize the use of local and state funds for improvement work.

**6. Leverage Federal Financing (policy obj. (g) and (h)).** Non-project levees are an important component of the integrated Delta flood infrastructure. These non-project levee systems only become eligible for Federal emergency funds (PL 84-99) once they pass an initial inspection assuring they meet the Corps’s engineering, maintenance and qualification criteria. Once upgraded to PL 84-99, these levees will be repaired under federal funding. The potential for upgrading non-project levees to meet these criteria should be an important long-term consideration when considering actions, projects and programs.

**7. Make Best Available Science Standards Flexible and Easy to Understand (policy obj. (h)).** The Interim Plan details the need to rely on the best available science in making decisions. In determining what science is the “best available” in the context of flood control, it will be imperative to strongly consider the practical expertise of the engineering professionals, local flood agencies and firms that have practiced in the Delta for decades and have a solid understanding of both the controlling technical principles as well as the site-specific contexts in which flood control operations actually occur.

The Interim Plan should also state that all modeling and assumptions will be made available to the public as early in the process as possible. Transparency will enable the public to follow and review the technical basis for the Council’s decisions, and the Council will benefit from enabling third-parties to provide substantive critiques and appropriate scientific review.

**8. Focus Land Use Controls (policy obj. (g) and (h)).** The Interim Plan appears to give rather open-ended authority to review and influence land use decisions based on the eight policy objectives even before the Delta Plan is adopted in 2012. This seems to apply to the City of West Sacramento in spite of Section 29764 which limits the commission’s land use authority to the primary zone. We suggest that language be included that exempts projects in the secondary zone from land use scrutiny from the DSC.

The state legislature and recent state laws have encouraged responsible communities and state agencies to implement land use policies that further reductions in emissions that contribute to global warming. In general, the Interim Plan should support actions that will further reductions in carbon emissions and reduce regional contributions to climate change by providing incentives and exclusions for secondary zone communities that are forwarding sustainable land use strategies.

**9. Clarify DSC’s Authority and Process (policy obj. (h)).** The Interim Plan recommends consultation on projects that are potentially covered actions. As stated in the Interim Plan, the concept of a *potential covered action* appears unworkable, broad, imprecise and further, while any DSC provided comments following consultation are not binding, they could be disproportionately influential in funding or permitting decisions. In particular, they could have unintended influence with state and federal permitting agencies impeding public safety improvements and increasing risk to the public. The Interim Plan should refine and significantly narrow the types of projects on which the DSC would like to consult and comment. Additionally, the Interim Plan should clarify and minimize what is involved in consultation.

**10. Reduce Burdens Associated with Appeals and Review Processes (policy obj. (h)).** At previous DSC meetings, there has been significant discussion about the First Draft Interim Plan relating to appeals, reviews and evaluations. The collective processes identified in the Second Draft have the potential to duplicate processes already in place by other state and federal agencies designed to ensure regulatory

P. Joseph Grindstaff

August 2, 2010

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compliance and safeguard natural resources. If not streamlined, the additional processes proposed will have the potential to impede needed public safety improvements in our community and other communities within the Delta. If not integrated with the existing agency processes, including land use planning processes in secondary zone communities, the additional, duplicative reviews and evaluations will add significant cost burdens to local agencies, regional employers and ordinary citizens living within Delta communities.

**11. Reexamine the Secondary Zone (policy obj. (a), (g) and (h)).** In addition to language that could better identify authoritative distinctions and exclusions between the secondary and the primary zones, the Second Draft needs to better respond to the diversity of Delta communities and the diversity of impacts they generate. The City of West Sacramento is at the forefront of the sustainable communities strategy, regional land use planning, climate change efforts, and balancing economic development with natural resource conservation. The Interim Plan should not impede responsible secondary zone communities and carefully examine the secondary zone to determine which portions, if any, should be added to the primary zone and which portions should be deleted, or at least significantly restricted from DSC jurisdiction.

Finally, the Delta legislation contemplated that the metropolitan planning organizations would have adopted sustainable communities' strategies (or alternative planning scenarios) on a timeframe coincident with the adoption of the Delta Plan. The Air Resources Board will not adopt regional targets for greenhouse gas reductions until fall 2010, and the sustainable communities' strategies to meet the targets will not be in place until 2011-12. This Interim Plan should account for that timeframe so that West Sacramento and similarly situated communities are not subject to strict Council review that was not contemplated by the Legislature during the period that the Interim Plan is in force.

Thank you for your consideration of these comments. If you have any questions, please contact William T. Panos, Director of Public Works at [billp@cityofwestsacramento.org](mailto:billp@cityofwestsacramento.org) or (916) 617-4596.

Sincerely,



Toby Ross  
City Manager  
City of West Sacramento

Cc: Honorable Lois Wolk, State Senator  
Honorable Mariko Yamada, State Assemblymember  
West Sacramento City Council Members  
Mr. John Moffatt, Chief Deputy Legislative Secretary, Office of the Governor

Attachment: Revised Second Draft Interim Plan

## Attachment

### Revisions to the Second Draft Interim Plan

#### Page v

16 •Preparation of a proposal to coordinate flood and water supply operations of the State Water  
17 Project (SWP) and the federal Central Valley Project (CVP), for which DWR has lead responsibility with  
special emphasis on coordination with local flood control agencies and local government.

18 •Council review of the report of the Delta Protection Commission (DPC) regarding potential changes  
19 in the Primary and Secondary Zones of the Delta, in light of the coequal goals and the mandates of  
20 the Act

#### Page vii

26 4. **Current levee system integrity.** All uses of the Delta require ~~a-certain levels~~ of protection against  
27 river flooding, sea level rise, and earthquakes that increase the level of public health and safety. The  
Interim Plan must ensure progress toward  
28 congruence between the uses and resources at risk and the levees that provide protection. Pending  
29 the development of more detailed information on levee conditions and policies, this Interim Plan  
30 uses the levee classification system developed during development of the *Delta Vision Strategic*  
31 *Plan*, and now used by DWR and others.

32 5. **Map of planned Delta land uses.** One of the primary goals of the Act is to achieve more effective  
33 integration of land use policies in the Delta, that incorporate sustainable communities strategies and  
alternative planning strategies for land use. Many plans and projects can affect the land forms and  
34 land uses in the Delta, including work on flood management policies affecting levees; flood ways  
35 and allowable land uses; patterns of land use allowed under the policies of the DPC and local  
36 governments; ecosystem restoration projects; improved water conveyance; and other infrastructure  
37 investments. Among the existing plans shaping land uses in the Delta are county and city general  
38 plans and zoning, county Habitat Conservation Plans, and the DPC Land Use and Resource  
39 Management Plan, among others. The Council intends to develop a map of existing Delta land uses  
40 as a tool to begin to show and integrate the effects of land use policies.

#### Page 5

32 • Additional storage, both upstream and downstream of the Delta, and conveyance around the Delta  
33 would provide flexibility for water operations to provide a reliable water supply for the ecosystem  
34 and agricultural and municipal and industrial water users. Upstream storage could provide benefits  
35 for storage of flows during flood events that could later be released to meet Delta inflow and

36 outflow requirements and local and statewide water supplies. Downstream storage could provide  
37 flexibility to store water that would be diverted from the upstream area and/or the Delta during  
38 high flow events for later use. Currently, many areas that use SWP and CVP water do not have  
39 adequate water storage south of the Delta to provide water supplies for extended periods of time if  
40 the Delta water supplies are disrupted.

In general, higher water levels along floodways, new flood bypass options and habitat enhancement areas will likely have an impact on existing flood control capacities, and changes in hydraulics will likely require enhanced levee infrastructures. This will also provide an opportunity to increase recreational, habitat restoration, water supply and conveyance capacities that further encourage public use and overall support of the Delta ecosystem. Maintaining the current flood control capacity, evaluating all potential actions, and mitigating impacts to an integrated flood control system will require highly coordinated program development and implementation throughout the Delta region.

## Page 6

34 • DWR has primary responsibility for maintaining federal flood control project facilities throughout  
35 the Central Valley, including "project levees" located in the Delta. Project levees formerly certified  
36 for Federal Emergency Management Agency (FEMA) 100-year level of protection are under review  
37 and some have been decertified. More than 700 miles, or 65 percent, of Delta levees are classified  
38 as "non-project" because they are not part of an authorized federal flood control project. These  
39 levees have been built and maintained by landowners or reclamation districts, initially to protect  
40 agricultural lands. More recently, their impact on ecosystem and water supply reliability has been  
41 recognized. They are almost never as durable as the project levees.

While the risk of levee failure within the Delta has been decreasing during recent decades due to the establishment of the State of California Subventions Program in 1973 and the Delta Levees Program in 1988, and some communities have never seen a levee failure,

42 ~~Most~~ many Delta islands have flooded at least once. There were 31 levee failures in the legal Delta  
43 between 1967, when levees were improved to current levels, and 2004, somewhat less than an

## Page 7

1 average of one per year. There are more levee breaks and floods in Suisun Marsh, where levees are  
2 commonly built to lower levels of protection.

3 • ~~Most~~ Many of the Delta levees do not meet the FEMA definition for 100-year flood protection (per the  
4 National Flood Insurance Program). Many do not yet meet the minimum requirements to be eligible  
5 for federal disaster assistance.

...

28 SBX7 1 provides important new tools to address the widely accepted inadequacies of prior governance  
29 of the Delta. The reforms launched in the Act are substantial and offer promise of more effective action.  
30 They are initiated at time when many agree action is needed, but important stakeholders disagree on  
31 the meaning of the enacted legislation. Concurrently, the state's fiscal future looks bleak for many years,  
32 which means that financing aspects of the legislation will be uncertain. The funding to implement future  
improvements should not come from local communities, regional agencies, or the state alone. Needed  
funding should be primarily provided as part of federal and state partnerships that sustainably invest in the  
Delta region through particular programs and projects. Lack of a stable financing  
33 structure may lead to difficulty in achieving the coequal goals.

## Page 9

38 • The federal agencies agreed in a December 2009 Interim Federal Action Plan for the California Bay-  
39 Delta to coordinate the federal efforts to address ecosystem restoration with the state agencies. USACE  
issued the Vegetation Policy for Local Flood Damage Reduction Systems in April 2007 to keep local flood  
protection systems free of vegetation because vegetation can impact reliability, inhibit inspections and the  
ability to perform a flood fight, and interfere with levee maintenance. Later in July 2010, the USACE  
developed a vegetation variance policy allows levee maintaining agencies to request that trees remain on  
levees where they don't threaten public safety, levee integrity or levee system reliability.

40 • The Bay Delta Conservation Plan (BDCP) Habitat Conservation Plan and Natural Community  
41 Conservation Plan process is conducting a detailed evaluation of methods for ecosystem restoration  
42 including development of methods to conduct effects analyses.

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1 These examples demonstrate the enormous efforts and resources which have already worked toward  
2 addressing the challenges in the Delta. Despite this, the California Legislature's 2009 water package  
3 made clear findings about the ongoing crisis in the Delta, the need to monitor, appropriately influence and  
collaborate on state and federal policy matters and proposed coordinating these efforts  
4 through a new governance system with specific responsibilities.

## Page 11

23 The Act establishes new policies consistent with the Delta Plan (Water Code Section 85022) – including  
reduced reliance on the Delta in meeting California's future  
24 water supply needs in the future through a statewide strategy of investing in improved regional  
25 supplies, conservation, and water use efficiency (Water Code section 85021). The Act explicitly does not  
26 change a number of existing laws – such as area of origin, watershed of origin, county of origin, or any  
27 other water rights protections (Water Code section 85301(a)), or the California Endangered Species Act  
28 (Water Code section 85032(b)), among others. It also affirms “The longstanding constitutional principle  
29 of reasonable use and the public trust doctrine shall be the foundation of state water management  
30 policy and are particularly important and applicable to the Delta.” (Water Code Section 85023).

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29 • Preparation of a proposal to coordinate flood and water supply operations of the State Water  
30 Project (SWP) and the federal Central Valley Project (CVP) (Section 85309), for which DWR has lead  
31 responsibility with special emphasis on coordination with local flood control agencies and local  
government.

## Page 16

7 • Advice to local and regional planning agencies (Water Code Section 85212)

8 • Review and approval of Proposition 1E expenditures for selected projects (Section 83002 (a)(1)) not  
already funded or completed under the proposition 1E program.

9 Additionally, the Interim Plan will include important organizational and procedural matters that will  
10 assist the Council in its role as a responsible agency in development of the environmental impact report  
11 (EIR) for BDCP (Section 85320(c)) and potentially as an appellate body regarding the DFG determination  
12 of whether BDCP has met specified criteria (Section 85320(e)).

## Page 19

17 (d) The commission shall submit the proposal developed pursuant to subdivision (a)  
18 to the council. The council shall consider the proposal and may include any  
19 portion of the proposal in the Delta Plan if the council, in its discretion,  
20 determines that the portion of the proposal is feasible and consistent with the  
21 objectives of the Delta Plan and the purposes of this division.

85305. (a) The Delta Plan shall attempt to reduce risks to people, property, and state interests in the Delta by  
promoting effective emergency preparedness, appropriate land uses, and strategic levee investments.

(b) The council may incorporate into the Delta Plan the emergency preparedness and response strategies for  
the Delta developed by the California Emergency Management Agency pursuant to Section 12994.5.

22 85306. The council, in consultation with the Central Valley Flood Protection Board, shall  
23 recommend in the Delta Plan priorities for state investments in levee operation,  
24 maintenance, and improvements in the Delta, including both levees that are a part of  
25 the State Plan of Flood Control and nonproject levees.

## Page 24

9 SBX7 1 includes specific exclusions from the Delta Plan (listed in Water Code Section 85057.5(b)).  
10 Some exclusions focus on transportation plans (e.g. regional transportation plans, Water Code Section  
11 85057.5(b)(3)). Others exclusions apply to covered actions in the secondary zone (e.g. already consistent  
12 with either a sustainable communities strategy or an alternative planning strategy, Water Code Section  
13 85057.5(b)(4)).

Some

10 exclusions blanket a class of continuing actions (e.g., routine maintenance and operation of any  
11 facility...owned and operated by a local agency, Water Code Section 85057.5(b)(5)). Other exclusions are  
12 defined as reaching a particular point in time, including Water Code Section 85057.5(b)(6) and (7):

## Page 28

20 (b) (4) The mission of the Delta Science Program shall be to provide the best possible  
21 unbiased scientific information to inform water and environmental  
22 decision making in the Delta. That mission shall be carried out through funding  
23 research, synthesizing and communicating scientific information to  
24 policymakers and decision makers, promoting independent scientific peer  
25 review, and coordinating with Delta agencies to promote science-based  
26 adaptive management. The Delta Science Program shall assist with development  
27 and periodic updates of the Delta Plan's adaptive management program.

In determining what science is the "best available" it will be imperative to strongly consider the practical  
expertise of the engineering professionals, local agencies and individuals that have practiced in the Delta for  
decades and have a solid understanding of both the controlling technical principles as well as the site-specific  
contexts. Modeling and scientific assumptions should be made available to the public as early in the process  
as possible. Transparency will enable the public to follow and review the technical basis for decisions, and  
the DSC will benefit from enabling third-parties to provide substantive critiques and appropriate scientific  
review.

28 Over time, the body of scientific understanding of the Delta and of the effects of various policies will  
29 have powerful effects in shaping policy making options.

## Page 29

14 All uses of the Delta require a certain level of protection against river flooding, sea level rise, and  
15 earthquakes. The Interim Plan must ensure public health and safety as well as progress toward  
16 congruence between the uses and  
17 resources at risk and the levees that provide protection. Existing levees have been developed over  
18 decades, initially without design standards and then to a succession of standards developed by federal

**Page 38**

12 The Interim Plan can make progress on two important beginning points in a finance plan: (1) beginning  
13 to develop accurate and complete information on current finances and (2) initiating discussion of long  
14 term financing to support activities under the Act.

A permanent fund should be established to maintain the needed flood control improvements with the  
Delta region.

15 No accurate and complete accounting of the finances of public activities in the Delta exists and the  
16 creation of the first compilation of these data should be given high priority. Table 4-2 begins this effort,