

Reclamation District 2059

(BRADFORD ISLAND)

Welcome to Beautiful Bradford Island

Bradford Island is in the Sacramento-San Joaquin River Delta and is comprised of approximately 2,385 acres of predominately agricultural and recreational land, and it enjoys the isolation and protection of only being accessible by ferry.



Why Was Bradford Island Reclamation District No. 2059 Formed?

The Bradford Island Reclamation District No. 2059 ("District" or "RD No. 2059") was formed by petition of landowners in 1921 to address the flood protection concerns on Bradford Island. The District was formed under the laws of the State of California and is governed by Division 15 of the California Water Code (commencing with Section 50000). The District is responsible for the maintenance, operation, capital repair of the levee and flood control system on Bradford Island, and it maintains and operates about 7.5 miles of levees, one pump station with about 5 miles of associated internal drainage canals, and other flood control infrastructure.

Year Formed 1921

Population Served Approx. 48

Size: 2,385 acres

How Can the Landowner get more Involved?

RD No. 2059 is served by landowner volunteers on the Board of Trustees ("Board"), which takes public input from all Bradford Island landowners. Bradford Island can only continue to flourish with landowner involvement and a united commitment to protecting the island. Here are some opportunities for you to get involved:

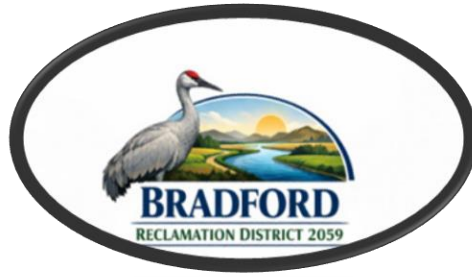
- Attend and provide input at District Board meetings,
- Attend Delta related public meetings such as the Stewardship Council
- Volunteer to serve on a District committee (including the budget or encroachment regulation committee), or
- Run for a trustee seat. Elections are held bi-annually each November in the odd years as mandated by Cal. Wat. Code § 50730.

Newsletter Highlights

- Ferry Information & The District's Joint Powers Agreement with the DFA
- Ferry Income & Expenses
- Emails to Landowners
- Board Meetings
- District Elections and Prohibited Campaign Activities
- Proposition 218 Updates
- District Funding Mechanisms
- Five (5) Year Glance at District Expenses

Upcoming Events:

- Appointment of a Sergeant at Arms
- Hiring NEW Legal Counsel
- Trustee Vacancy Appointment



STATEMENT OF INTENT

Transparency and Public Accountability

The intent of this letter is to provide full transparency to all property owners and stakeholders. As a public agency, the District has a legal and ethical obligation to clearly explain why decisions are made, how public funds are used, and why certain actions must occur in the manner they do. The District operates under strict state laws, engineering requirements, and financial regulations that govern levee maintenance, flood protection, and public safety. These rules are not optional; they define how the District must function.

This letter outlines the history, legal constraints, financial responsibilities, and operational realities that have shaped the District's actions over the past several years. It also explains why certain expenditures were necessary and how regulatory conditions have created a legally viable path forward.

Our goal is simple: to ensure every landowner understands the facts, the process, and the reasons behind the District's decisions. Transparency is not just a value—it is a requirement of public service, and the District is committed to upholding it.

ALTERNATE FERRY UNAVAILABLE

Bradford Reclamation District No. 2029 is notifying all Bradford Island landowners that the Victory II will be out of service from June 9, 2026 to June 16, 2026. In addition, the **alternate ferry vessel**, which is typically used when the Victory II will be out of service, is not available during that time.

The alternate ferry has sustained **significant mechanical and structural damage** and requires major repairs before it can meet U.S. Coast Guard safety and operational requirements. These issues were **unforeseen** and are **entirely outside the control** of the Board President, the Board of Trustees, and District staff.

Delta Ferry Authority Responsibilities

The **Delta Ferry Authority (DFA)** is the agency responsible for:

- Operating the Victory II
- Managing ferry service(s) & After Hour Services
- Posting ferry-related notices by utilizing their District Staff
- Issuing meeting notices in compliance with the **California Water Code**

The **District does not issue ferry notices**, does not operate the ferry, does not conduct the accounting for the DFA, and does not control ferry scheduling or vessel availability. The District acts as a liaison to notify the landowners of any changes in schedule. The Board President does attend the DFA meetings as the appointed Representative on the District's behalf. The President reports DFA matters and provides updates to the District Board of Trustees at the board meetings.

Due Diligence by the DFA

The DFA has conducted a thorough and good-faith search for any **replacement or temporary ferry options**. Despite these efforts:

- No compliant substitute vessel is available
- No rental or contracted ferry service exists that meets Coast Guard certification requirements due to the local available ferry needing significant repairs deeming it non safe for usage.
- No vessel is legally authorized to transport passengers or vehicles in place of the Victory II if it is not deemed not safe or has not been maintained or had up to date maintenance

The DFA has exercised due diligence and exhausted all reasonable avenues to secure an alternate ferry.

Reclamation District Responsibilities and Limitations

It is important for all landowners to understand:

Reclamation Districts are not transportation agencies.

Under the California Water Code, Reclamation Districts are responsible for:

- Levee maintenance
- Flood protection
- Drainage and reclamation operations

The District is not responsible for the alternative ferry's damages or repair costs. This is the reason why there is no alternate ferry. At this time, no other local ferry is available. If anyone is aware of one that is, please notify the DFA or the District's Staff and we can look into it.

The alternate ferry is not owned, operated, or maintained by Bradford Reclamation District No. 2029. Therefore:

- The District is **not financially responsible** for the vessel's damage(s)
- The District **cannot fund repairs**
- The District **cannot assume liability** for ferry outages

We understand the inconvenience this may cause, and we want to provide clarity on what is being done, as well as what our responsibilities are under the **Delta Ferry Authority Joint Exercise of Powers Agreement**, to which the District is a party.

Below, you'll find important information about the District's obligations and how we, alongside **Reclamation District No. 2026 (Webb)**, work together under this agreement to manage ferry services for the benefit of the community

Under the **Delta Ferry Authority Agreement**, the **Reclamation Districts** (Webb and Bradford) are responsible for ferry transportation between the islands. However, as part of the Agreement, both districts share the responsibility of ferry operation and maintenance.

- **Emergency Repairs & Maintenance:** When the ferry experiences mechanical issues, it is the responsibility of the **Delta Ferry Authority (DFA)**, which is governed by a joint Board consisting of representatives from both Webb and Bradford, to coordinate repairs and assess the necessary actions.
- **Temporary Suspension:** The ferry may be temporarily out of service due to repairs or safety concerns. During this time, the districts must ensure that the issue is addressed promptly within the financial and operational constraints agreed upon in the Agreement.

The District's Responsibilities Under the Joint Powers Agreement

As part of the **Delta Ferry Authority**, Bradford and Webb reclamation districts have clearly defined responsibilities, which are summarized here:

1. **Ownership and Operation:**
 - The DFA is authorized to **own, operate, and maintain** the ferry system, including the ferry boat, docking facilities, and related infrastructure. Both Bradford and Webb contribute to the operational costs and provide staffing as needed.
2. **Repairs and Maintenance:**
 - In the event of a breakdown, **Reclamation Districts No. 2026 (Webb) and No. 2059 (Bradford)** are required to ensure the ferry is repaired, following the guidelines and financial approvals set forth in the Agreement.

- The **Board of Directors** of the DFA, made up of representatives from both districts, will make decisions on repairs, costs, and service continuity.
 - Both districts must maintain appropriate funding for ferry operations, including emergency repair costs, as agreed in the **annual budget**.
3. **Operational Control:**
- Each district is responsible for providing a **qualified ferry operator** and must maintain insurance coverage for ferry operation. If the ferry is unable to operate for any reason, the districts are responsible for communicating this to the public and managing expectations until the ferry is back in service.
4. **Funding and Contributions:**
- Both Bradford and Webb are responsible for contributing to the **operating budget** of the ferry system, including costs related to repairs and maintenance. The DFA also has access to state or federal funding that can be used to assist with operational or repair expenses.
5. **Authority's Role:**
- The DFA has the power to **contract services**, including ferry repairs, and manage operational matters. This ensures that even if the ferry breaks down, the appropriate steps are taken to bring it back into service efficiently.
6. **Schedule Adjustments:**
- While the ferry is being repaired, we will work with the DFA to ensure that regular schedules are updated and shared with the community. Our goal is to minimize the disruption to ferry service.
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What Are the Next Steps?

The **Delta Ferry** will be undergoing repairs, and we are working closely with the DFA Board to resolve the issue as soon as possible. We ask for your patience and understanding as the necessary repairs are completed.

- **Regular Updates:** We will continue to provide updates via email and through community meetings to keep everyone informed of the ferry's status.
- **Ferry Schedule:** Once the ferry is operational again, we will ensure that the updated schedule is available for all landowners. A detailed timetable will be posted at the ferry slip and made available online.

Meanwhile, landowners Should be Planning for Alternate Access to the Island during the repair timeframe posted.

Because **no alternate ferry is currently available**, landowners must:

- Plan ahead for the scheduled Victory II outage
- Arrange **private transportation** (boat, barge, or other means)
- Coordinate essential services in advance

- Prepare for limited access during the outage period

The District understands the inconvenience this creates and will continue to share updates as they become available.

Questions or Additional Information

For ferry-related inquiries, please contact: **Delta Ferry Authority** Phone: (209) 943-5551

DISTRICT OBLIGATIONS REGARDING EMAIL NOTIFICATIONS

The Water Code Does *Not* Require Email Notifications

After reviewing Division 15 of the California Water Code (Reclamation Districts), there are **no provisions requiring a Reclamation District to notify landowners by email** for any purpose.

The Water Code was written long before email became common and Email is **optional**, not mandatory. The District is not required by law to provide e-mail notifications.

A Reclamation District **may** send e-mail notifications as a courtesy and will make an effort to do so to provide information in a timely manner, but:

- Email **cannot replace** legally required mailed or posted notices
- Email is considered **supplemental communication only**
- An Email was recently sent out to landowners requesting for their permission to remain on the District's Email Distribution List

NOTICE TO LANDOWNERS - QUARTERLY BOARD MEETING SCHEDULE

The District is providing this notice to inform all landowners that the District's Board of Trustees has **historically voted to hold quarterly board meetings** rather than monthly meetings. This decision was made to **reduce operational expenses** and preserve District funds for essential levee, flood protection, and maintenance activities.

Why Quarterly Meetings?

Reclamation Districts operate under the California Water Code, which allows each District to determine the frequency of its meetings as long as they are properly noticed and conducted in compliance with the law.

The Board of Trustees has chosen a **quarterly meeting schedule** because:

- The District must pay for **attorney attendance** at meetings

- The District must pay for **engineering attendance** at meetings
- Reducing the number of meetings reduces these professional service costs
- Savings can be redirected to **levee maintenance, emergency preparedness, and regulatory compliance**

This approach has helped the District remain financially responsible while still meeting all legal obligations.

Commitment to Transparency and Compliance

Even with a quarterly schedule, the District continues to:

- Comply with all **California Water Code** requirements
- Comply with the **Ralph M. Brown Act**
- Post meeting notices as required
- Make agendas and materials available to landowners
- Hold additional meetings when necessary for urgent District business

Quarterly meetings are not a reduction in transparency—they are a **cost-saving measure** that still meets all legal requirements.

Additional Meetings When Needed

If an issue arises that requires Board action outside the quarterly schedule, the Board may call:

- **Special meetings**
- **Emergency meetings**
- **Workshops or informational sessions**

These will also be noticed in accordance with the Water Code and the Brown Act.

DISTRICT ELECTIONS AND PROHIBITED CAMPAIGN ACTIVITIES

The Government Code prohibits elected officials from influencing elections

Under the **California Government Code Section 54964**, public agencies, including reclamation districts, **cannot use public funds, resources, or time for campaigning purposes**. Trustees are restricted from using their official position or the district's resources for personal campaigning.

- **Public Funds Misuse:** Using district resources (including free ferry passes) for political purposes would be considered an improper use of taxpayer money, which can lead to penalties and legal consequences for the trustee and the district.
- **Conflict of Interest:** A trustee's actions may also constitute a **conflict of interest**, as they could be using their position to gain personal or political advantage, which is prohibited by California's **Political Reform Act**.

Under **Water Code § 50752** and related sections, Trustees must:

- Act in the best interests of the District, not in self-interest
- Avoid influencing the outcome of landowner elections
- Not use their position to sway votes

This is especially important in a **five-member board**, because:

- Trustees cannot use their authority, access, or influence to affect who gets elected
- The District must avoid even the appearance of election manipulation

Notice To Landowners - Clarification Regarding Campaign Statements About Ferry Passes

Reclamation District No. 2029 is issuing this notice to address questions regarding statements made during the recent campaign process.

The District understands that **some landowners may have been told** that free ferry passes would be issued when the Proposition 218 passed. However, the District is governed by a **Board comprised of five elected Trustees**. As such, any action regarding ferry passes requires a majority vote of the Trustees at a duly noticed Reclamation District No. 2059 Board meeting.

Government Code Prohibits “Gifting of Public Funds”

Under **California Constitution, Article XVI, Section 6**, and related **Government Code provisions**, public agencies—including Reclamation Districts—are **strictly prohibited** from giving away public money, services, or benefits unless:

- The expenditure serves a **clear public purpose**, and
- The benefit is **equally available** to all who qualify under lawful criteria

Providing ferry passes as a political promise or in exchange for votes for the Proposition 218 to pass would be considered:

- A **gift of public funds**, and
- A **violation of state law**

The Board Cannot Ratify or Approve an Unlawful Promise

Because the District is a public agency:

1. Individual candidates **cannot make binding promises** on behalf of the District
2. Campaign statements by individuals **do not bind or create legal obligations for the District**
3. The Board **cannot adopt or carry out** any promise that violates state law

4. Board Trustees must follow the Water Code, Government Code, and constitutional requirements

If the Board knowingly approved ferry passes as a political reward, the Trustees would be in violation of:

- Their **fiduciary duties**
- The **California Water Code**
- The **Government Code**
- The **California Constitution**

Any ferry-pass program must be:

- Adopted by a majority vote of the Board Trustees
- Be based on **lawful, objective eligibility criteria**
- Supported by a legitimate **public purpose**
- Administered fairly and consistently

Commitment to Transparency and Legal Compliance

The Board is committed to:

- Following all state laws
- Acting in the best interest of all landowners
- Ensuring District funds are used only for lawful purposes
- Maintaining transparency in all decisions

While the District understands the frustration caused by campaign-related misunderstandings, the Board must comply with the law.

THE DISTRICT IS NOT BANKRUPT – BUT IT CANNOT USE WORKING CAPITAL TO GIFT PUBLIC FUNDS

It is important for all property owners to understand that **the District is NOT bankrupt**. The District maintains positive working capital and continues to operate and pay for items outlined but not limited to: payroll, maintenance, emergency response, regulatory compliance, general operating bills for overhead and ongoing levee operations.

However, as a public agency, the District is **legally restricted** in how it may use its funds. California law strictly prohibits any public agency from **gifting public funds**, meaning the District cannot use its working capital to pay for services, improvements, or benefits that must legally be funded through assessments, grants, or other designated revenue sources.

Working capital is reserved for:

- Day-to-day operations
- Emergency response

- Regulatory compliance
- Routine maintenance
- Payroll and administrative functions
- Cash-flow stability while awaiting reimbursements

It **cannot** be used to subsidize costs that must be funded through a Proposition 218 assessment or other legally authorized revenue mechanisms.

The District must operate within the boundaries of state law, even when those laws limit flexibility. The District's financial position is stable, but its **legal authority** to spend money is restricted by the California Constitution and public-agency finance rules.

This is why the District must pursue a Proposition 218 assessment for certain levee-related costs and cannot simply "use its working capital" to cover them. The issue is not lack of funds – it is **legal compliance**.

The District cannot divert, donate, or otherwise give away its **working capital funds**, as these funds are essential for conducting mandated drainage operations, routine maintenance, and other core services. Working capital is legally obligated to support the district's ongoing responsibilities and cannot be used in any manner that would compromise its ability to perform required functions. There are legal ramifications for a trustee who gifts public funds however not limited to being personally liable and can be required to repay the money out of their own pocket.

PROPOSITION 218 UPDATE

The District would like to inform all landowners that the **Proposition 218 assessment has successfully passed**. This is an important step forward in securing long-term funding for District operations, including levee maintenance and essential services.

However, due to timing requirements associated with the **Contra Costa County property tax roll**, the measure did not pass within the required timeframe to be included in the current fiscal year's tax roll. As a result, **the assessment will not be collected until it is placed on the tax roll for the following cycle**, with funding expected to begin approximately **December 2026**.

At this time, **no revenue has been collected from the Proposition 218 assessment**, which continues to impact the District's available operating funds.

The District appreciates your patience and understanding as we work through these timing constraints and continue to manage operations with limited resources until the new funding becomes available.

THE DISTRICT HAS THREE (3) MAIN FUNDING ELEMENTS

To ensure full transparency, it is important for all property owners to understand how the District is funded and why certain financial decisions must follow strict state laws. The District

relies on **three primary funding sources**, each with its own legal limitations and designated uses.

1. CB Assessment Levy Tax Roll ("AD Valorem")

(General Operating Revenue) \$158,257.80 is the total annual collection

Ad valorem taxes are the District's **baseline revenue source**, collected through county property tax rolls. These funds are used for:

- Day-to-day operations
- Administrative functions
- Basic maintenance activities
- Improvements to flood control, levee maintenance, flood protection, environmental compliance & drainage.
- Ferry Assessments (Generally because the District needed to use the ferry to access the island to conduct maintenance and for larger scale projects. A senate bill was historically passed to allow for the District to pay for the ferry through the general assessments.)

However, **ad valorem funds are limited** and cannot legally be used to pay for major capital improvements, long-term levee rehabilitation, or large-scale flood-protection projects. They also **cannot** be used to subsidize costs that must be funded through a Proposition 218 assessment.

Using ad valorem funds for purposes outside their legal scope would be considered a **gift of public funds**, which is prohibited under the California Constitution.

2. Subventions Funding (State Reimbursement Program)

Subventions funding is provided by the State of California to reimburse the District for eligible levee maintenance and repair work. This includes:

- Erosion repairs
- Slip-outs
- Seepage control
- Engineering and inspection
- Emergency flood-response work
- All other subventions eligible categories

However:

- The District must **pay all costs upfront**
- Reimbursements can take up to one year to arrive and at times even longer.
- Reimbursement is out of pocket 25% and the State pays 75% of the eligible claim.
- In addition there is a \$1,000 per District levee mile deducted
- Only certain types of work qualify

- Subventions funding cannot be used for routine operations or administrative expenses such as however not limited to: Pump station repair bills or construction, ditch cleaning, pump checks and general district maintenance not associated with the subventions categories.

Subventions funding is **not a replacement** for a Proposition 218 assessment. It is a reimbursement mechanism—not a revenue source.

3. DWR Project Funding (State-Funded Capital Projects)

The Department of Water Resources (DWR) provides funding for:

- Large-scale levee improvement projects
- Capital repairs
- Waterside slope work
- Major rehabilitation efforts
- Special flood-protection initiatives

These funds are **project-specific** and cannot be used for:

- Routine maintenance
- Staffing
- Administrative operations
- General district expenses

DWR funding also requires the District to provide **matching funds**, which must come from legally authorized revenue sources—typically a Proposition 218 assessment.

The District has taken out a loan from the Bank of Stockton to assist in funding necessary projects.

The District took a loan out with the Bank of Stockton and currently owes an estimated \$865,500 with interest accruing. The District historically had a majority of its debt obligations paid down to less than approximately \$200,000.

Necessary Projects:

- Pump Station Repairs
- 2021 Fire on Island (Costs not covered by insurance)
- 2023 FEMA Emergency Repairs (Pending payments just received in 2026)
- Other pertinent repairs needed to ensure public safety
- Consulting fees associated with the above
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DISTRICT EXPENSES (2021 - Current) pulled from the District's Financials

The following figures show that the District's spending has been heavily focused on **ferry operations, maintenance activities, and emergency repairs**. The **consulting and legal fees** are a significant part of the **maintenance costs**, while **loan-funded projects** have significantly increased debt obligations.

1. Ferry-Related Expenses

Ticket Sales Income:	\$163,148
Expenses:	
DFA Accounting	9,375
Ferry Repairs Monthly Assessment	89,181
Printing of Tickets	566,445
	5,151
Total Expenses	<u><u>\$ 670,152</u></u>
Not enough Revenue	\$ (507,004)

Total Collected CB Tax Assessment ("Ad Valorem") was \$633,031.20

The District used ONLY \$126,027.20 of the ad valorem funds from 2021-current for other District expenditures. The rest of our operational income went to pay for the ferry.

2. Maintenance Activities & General District Operations

Non Subventions Maintenance	
Ditch Cleaning	23,327.66
Equipment Rental	14,647.98
Equipment Repairs	5,113.16
Levee Super's Duties - Supplies	40,874.36
Pump Repairs & Maintenance	216,882.30
Vegetation Control - Mitigation	<u>5,529.58</u>
Non Subventions Maintenance	306,375.04

Insurance/Rent/Utilities/Fuel/Office Supplies/Dues \$144,443

The following fees have been paid through Ad Valorem/Department of Water Resources ("DWR") Special Funding Project Funds/Bank of Stockton Loan Funds:

Independent Auditors	52,725.76
Engineering - District Engineer	31,331.23
Engineering - Helix	1,468,298.38
Engineering EDB	48,979.45
Legal - District Counsel	55,215.83
Five Year Plan Engineering	8,014.11
Payroll Processing Fees	9,870.13
Professional Fees	1,760.00
Prop 218 Consulting	35,218.03
Website Maintenance Fees	3,240.00
Total Consulting Fees:	1,714,652.92

3. Subvention- 25% out of pocket to District 75% reimbursement by DWR**Subventions Categories**

Administration Costs	6,766.10
Emergency Cracks 11-2022	13,829.50
Encroachments - Remove or Rest	200.00
Engineering & Admin	8,900.00
Erosion & Slipout Repair	150,314.79
Levee Patrols & Routine Maint	24,800.00
Levee Rehabilitation	35,170.15
Payroll - Engineer - Subvention	148,258.77
Payroll - Lev Sup - Subvention	115,283.69
Payroll - Manager - Subvention	44,153.73
Rep. & Shaping Patrol Acc Roads	9,103.57
Routine Vegetation Control	14,302.96
Seepage Control & Boils	5,475.00
Shaping of Levee Crown	8,466.97
Subventions Levee Rehab	
North Levee Repair Project	473,786.86
Pump Station Levee Repair Proj	47,129.67
Total Subventions Levee Rehab	520,916.53

Subventions Categories 1,105,941.76

4. District Staffing and Payroll Funding

It is important to note that a significant portion of the District's staff payroll is not solely funded by general District revenues. A large amount of staff time is allocated to and billed through various **State-supported and project-based funding sources**, including:

- Subvention Program (DWR Delta Levees Maintenance and Special Flood Control Projects Programs)
- DWR Mitigation Site Projects
- Other DWR Project Funding Agreements

These programs are designed to support levee maintenance, rehabilitation, and compliance activities. Under these agreements, eligible staff time and associated costs are either **reimbursed (typically up to 75% under Subventions)** or directly funded through specific project allocations.

Because of this structure:

- Staff are often working on **grant-eligible or reimbursable activities**, not solely general operations
- Payroll expenses may appear high, but a **substantial portion is offset through reimbursement or restricted funding sources**
- The District is frequently required to **front these costs** and wait for reimbursement, which can take months or longer

This funding model allows the District to complete critical levee and infrastructure work that would otherwise not be financially feasible using only local tax revenues.

5. Larger Projects (2021 - Current)

- Pump Station Repairs – **\$47,129.67**
- 2021 Fire on the Island – **\$734,232.00**
- 2023 FEMA Emergency Repairs – **\$199,042.98**
- Waterside Slope Repairs – **\$17,631.00**
- Mitigation Site Expenses – **\$16,358.93**
- North Levee Repair – **\$473,786.86**

Larger Project Costs: \$1,488,182.44

Important Note:

The District was required to **pay all of these expenses upfront**, including emergency work, consulting, ferry operations, and subvention-eligible projects. Reimbursements—when available—**often took years to arrive**, placing significant pressure on the District's working capital and limiting its ability to redirect funds to other essential operations.

Why a Reclamation District Must Have Staff

Reclamation District No. 2059 Employs three (3) Part time staff members

- District Manager/Secretary holds 2 titles employed 2006-current
- District Levee Superintendent 2019-current
- District Engineer - Long Term consultant with the District, now an employee of the District 10 years

Staff Benefits:

- Sick Pay ONLY
- No Holiday Pay
- No Vacation Pay
- No raises issued to the Levee Super since the start of employment
- No raises have been given to any other staff for a number of years
- No health insurance
- No CalPERS/retirement
- Staff use their own vehicles to conduct district business

Why the District Employs Staff and ~~(Not Volunteers)~~

1. Legal Responsibility and Liability

A reclamation district is a **public agency** under California Water Code. That means:

- The District is **legally responsible** for levee safety, flood protection, and public infrastructure.
- If something goes wrong—levee failure, flood damage, injury—the **District is liable. The District's insurance does not cover volunteers performing these duties.**
- Volunteers are **not covered** under the same liability protections as employees or contractors.
- State and federal agencies (DWR, USACE, FEMA) require **qualified personnel** for levee work, inspections, and reporting.

Bottom line: Volunteers cannot perform duties that must be carried out by official District personnel..

2. Technical Expertise Is Required

Levee systems, pump stations, drainage canals, and flood-control structures require:

- Engineering knowledge
- Safety training
- Equipment operation certifications
- Environmental compliance
- Emergency response capability

Volunteers—even well-intentioned ones—cannot meet the technical standards required for:

- Levee patrols
- Slip-out and erosion assessment
- Pump station maintenance
- FEMA/DWR documentation
- Emergency flood response

State and federal reimbursement programs **require proof of qualified labor**, not volunteer labor.

3. Workers' Compensation and Safety Laws

California labor law requires:

- Workers' compensation coverage
- OSHA compliance
- Safety training
- Hazard mitigation procedures

Volunteers:

- Cannot legally operate heavy equipment
- Cannot be placed in hazardous environments
- Cannot be assigned emergency response duties
- Are not covered under workers' comp if injured

The District cannot expose itself to that level of risk.

4. Continuity of Operations

A reclamation district must maintain:

- 24/7 emergency readiness
- Routine levee patrols
- Vegetation management
- Pump station operations
- Regulatory reporting
- Financial administration

Volunteers come and go. A public agency must have **consistent, reliable staffing** to meet state-mandated operational requirements.

5. State and Federal Funding Requirements

Programs like:

- Subventions Program (DWR)
- FEMA Public Assistance
- USACE PL 84-99

require:

- Documented labor
- Certified timecards
- Qualified personnel
- Proof of training

Volunteer labor **cannot be reimbursed**, which means the District would lose hundreds of thousands of dollars in eligible funding.

6. Public Accountability

A public agency must maintain:

- Transparent financial records
- Auditable payroll
- Compliance with the Brown Act
- Public accountability for decisions

Volunteers cannot be held to the same standards of accountability as employees.

Long-Term Staff Are Essential to District Operations

The District's staff are all **long-term, highly experienced personnel** who have worked on this island, these levees, and this infrastructure for many years. Their institutional knowledge is irreplaceable. They understand:

- The history of the levee system
- The locations of past failures, weak points, and repairs
- The operation and maintenance needs of the pump stations
- The unique environmental and tidal conditions of the Delta
- Emergency response procedures specific to this island
- State and federal reporting requirements
- Subvention, FEMA, and regulatory compliance processes

This level of expertise **cannot be replicated by volunteers**, nor can it be quickly replaced by new hires.

Long-term staff provide:

- **Continuity of operations**
- **Reliable emergency response capability**
- **Accurate documentation for reimbursements**
- **Safe operation of heavy equipment**
- **Compliance with state and federal mandates**
- **Protection of district liability**

Their experience directly reduces risk to the District and ensures that maintenance, inspections, and emergency work are performed correctly, safely, and in compliance with all regulatory requirements.

Proposition 218:

In 2020, the District hired SCI Consulting Group to conduct a Proposition 218 assessment proceedings. The District paid \$32,500 for the preparation of the engineer's report, benefit analysis, ballot materials, and public outreach. Proposition 218 did not pass, primarily because the majority of the larger landowners voted against the assessment, resulting in a majority protest. From 2022 through 2025, the District continued to work with SCI Consulting Group to evaluate whether conditions had changed sufficiently to justify a new Proposition 218. During this period, the District paid an additional \$52,859.88 for consulting, analysis, and advisory services.

The legal requirement is that a Proposition 218 assessment must be supported by a majority of weighted ballots

The prohibition against repeatedly re running assessments without material changes

The risk of legal challenge if the District attempted to "force" a new assessment without changed conditions

The fiduciary duty of the District to avoid unnecessary public expenditures on repeated failed assessments especially since the District was in a financial deficit with the outstanding Bank of Stockton loan.

Attempting to conduct a new Proposition 218 without substantial changes in circumstances exposes the District to several legal risks:

Proposition 218 Constitutional Requirements are as follows:

A new assessment must be supported by:

- A new engineer's report (Very Expensive)

- A new proportional benefit analysis
- A materially different cost or benefit structure

Repeating the same assessment without changes can be deemed constitutionally invalid.

Spending public money on an assessment that has no reasonable likelihood of passing can be viewed as:

- Waste of public funds & Miss use of public funds
- Violation of fiduciary duty
- Potential Brown Act or public trust concerns

The District must demonstrate that expenditure serves a legitimate public purpose.

5. Consultant Recommendations Must Be Considered:

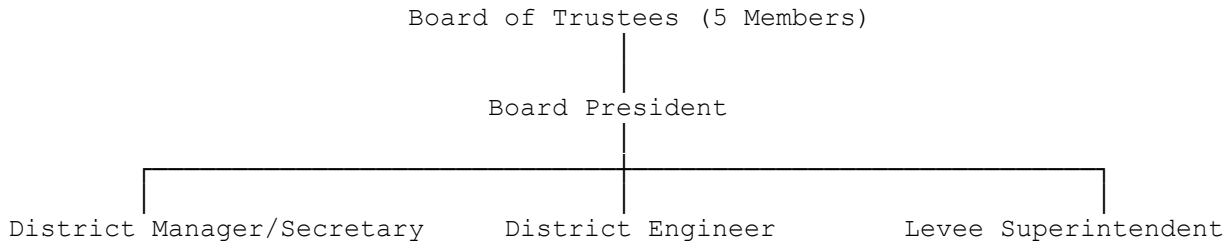
SCI Consulting Groups recommendation to the Board President and prop. 218 committee was not to conduct another Proposition 218 until the District could reasonably expect support from the majority of weighted landowner votes.

Significant changes occurred between 2024 and 2025:

- Several of the majority landowners who previously voted against the assessment sold their property
- Ownership changes shifted the weighted voting structure
- The District finally reached a point where a majority vote was reasonably attainable
- After a final consultation with Mr. John Bliss with SCI Consulting Group, they agreed that the potential to pass the vote was a potential go in 2025

These changes created the material difference required under Proposition 218 to justify a new assessment proceeding.

ORGANIZATIONAL STRUCTURE



How It Functions

- **Board of Trustees (5 Members)**
Governing body responsible for policy decisions, budget approvals, and overall direction of the District.
- **Board President**
Serves as the leader of the Board, presides over meetings, Ferry District Representative for the District, and helps guide District priorities.
- **District Manager / Secretary**
Oversees daily operations, administration, compliance, and Board coordination of meetings.
- **District Engineer**
Provides technical expertise on levee integrity, engineering projects, and regulatory compliance & oversees & provides guidance and the scope of work for the Levee Superintendent
- **Levee Superintendent**
Manages field operations, levee maintenance, inspections, and on-the-ground work.

At **Reclamation District No. 2059**, we take great pride in our work to ensure the safety and protection of Bradford Island. Our dedicated team of public servants works tirelessly, often in the harshest of conditions, to maintain and fortify the levees that protect our community. Whether it's braving the heat of summer or enduring the cold of winter, every effort is made with the utmost care and commitment.

We understand the importance of our work, and we do it not for recognition but out of a deep sense of duty to serve this island and its landowners. Every day, we strive to ensure that Bradford Island remains safe, secure, and well-maintained for all who own land here.

The strength of the District lies not only in our efforts but in the unity we share with our landowners. Together, we are a community that supports one another, and it is this bond that ensures our collective resilience. Your support and understanding of the hard work and dedication that goes into keeping the levees strong is greatly appreciated.

We are here for you, and we remain committed to serving this island with integrity, respect, and diligence, no matter the challenges we face. Staying united with our landowners is key to maintaining the safety and prosperity of Bradford Island for generations to come.

Acknowledgment and Appreciation

The District would like to extend its sincere appreciation to the many landowners who continue to support Bradford Island through their time, involvement, and commitment to the community.

We would especially like to thank those who:

- Assist with District-related efforts
- Attend and participate in Board meetings
- Provide input, feedback, and local knowledge
- Help look out for and report issues that may impact the safety of the island

Your involvement plays a vital role in helping the District operate effectively and respond to the needs of the island. Maintaining levee integrity and overall island safety is a shared responsibility, and your willingness to stay engaged makes a meaningful difference.

The strength of Bradford Island comes from the collective effort of its landowners, and we truly appreciate your continued support in helping to keep the island safe and resilient.



Life on a small island like Bradford Island teaches people the true meaning of unity, humility, and strength. The safety and future of the island depend not on any one person alone, but on neighbors, staff, elected leadership, and community members working together with trust and dedication. Over time, the island becomes more than a workplace or a place to live – it becomes home and family to those who protect and care for it every day.

The Board President, Trustees, District Staff and Consultants has proudly been a part of the island community, standing alongside the people, They share the same commitment to preserving and protecting the island for future generations. The staff do not simply work for the island – they feel they are a part of it. Their dedication reflects a deep sense of responsibility, pride, and love for the community they serve.

Together, the Board President, Trustees, District Engineer, Levee Superintendent, District Manager, and district staff work hand in hand with one common purpose: to protect the safety, stability, and future of the island. Through experience, teamwork, and mutual respect, they

continue to strengthen the levees, support the community, and face every challenge together with integrity and determination.

As public and sworn officials, along with district staff serving in positions of public trust, they are legally mandated to follow the laws, policies, and regulations that govern the district. Every action and decision must comply with the California Water Code, the Brown Act, labor laws, levee regulations, and other state and federal requirements. While some decisions may at times be misunderstood or unpopular, these laws are not optional, and failing to follow them could place the district, the levee system, and the community at risk or in violation of legal obligations. Their responsibility is to ensure that all actions are carried out fairly, lawfully, and in the best interest of protecting the island and its people.

District staff serve the island and it is their job to that laws, regulations, and safety requirements are properly followed. At times, this responsibility may make them appear to be “the bad guys” when enforcing the California Water Code, complying with the Brown Act, adhering to labor laws, or carrying out levee enforcement requirements. While these duties can sometimes create difficult situations, every decision is made with the people and the island at heart.

The Board President and Trustees also carry the responsibility of making difficult decisions that protect the entire district, often balancing the needs of individual landowners with the legal and financial obligations required to preserve the island for everyone. These decisions are never taken lightly, and they are made with the long-term health, safety, and sustainability of the island in mind.

Their commitment is not against the landowners, but for the protection of the entire community, the levee system, and the future of the island itself. It takes courage to uphold the rules and responsibilities that safeguard everyone, even when those decisions are not always easy or popular.

The island's greatest strength will always be its people – humble enough to stand beside one another, strong enough to work together through challenges, and dedicated enough to protect the land, levees, and community they all call home.

Thank you for taking the time to read the newsletter

