



To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights, supplies and water quality of our members.

October 9, 2008

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Re: Comments on Fourth Draft Strategic Plan

Dear Chairman Isenberg and Delta Vision Task Force Members:

We appreciate the opportunity to comment on the fourth draft Delta Vision strategic plan. We appreciate the separation of policy principles from proposed implementation policies, but those policies concerning streamflows into and out of the Delta – stated in the draft's volume two – still lack scientific support to show that they will improve Delta ecosystem conditions and there is no analysis of the very significant water-supply impacts that those policies would have. Without technical analysis of the strategic plan's water-supply impacts, Task Force members cannot reasonably conclude that the strategic plan would promote the "co-equal goal" of "a reliable water supply for California." We oppose the fourth draft strategic plan and urge the Task Force not to adopt any strategic plan that contains that draft plan's flow proposals.

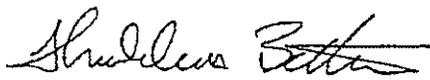
Volume one's recognition of the problems facing the Delta is ignored by volume two's specific flow proposals, such as inundating the Yolo Bypass in many years and increasing spring and fall Delta outflows. Volume one states, at page five:

The evidence is overwhelming: the Delta ecosystem is in deep trouble and the problems are increasing. Invasive species, water pumping facilities, and urban and agricultural pollution are degrading water quality and threatening multiple fish species with extinction. Urban development is reducing wildlife habitat today and foreclosing opportunities to improve the ecosystem – and the Delta water conveyance system – in the future. The levee system has eliminated the dynamic land-water interface crucial for aquatic and riparian plants and animals.

Nowhere in this summary of the Delta's problems are reductions in Delta streamflows cited. This is unsurprising given that the strategic plan also recognizes that: "Almost 200 non-native species exist in the Delta, and they constitute 95 percent or more of the biomass." (P. 15.) It would make little sense to release massive amounts of water into the Delta to try to replicate natural conditions when the Delta's biology has been altered so radically. Volume two of the draft strategic plan nonetheless still proposes specific Yolo Bypass inundation and Delta flow requirements that would reallocate hundreds of thousands to millions of acre-feet annually from Sacramento Valley and Sacramento metropolitan water supplies to Delta ecosystem enhancement, as demonstrated by the technical analysis by MBK Engineers that this group submitted with our September 11 comments. To date, the Task Force has not prepared, or requested that the Department of Water Resources prepare, a similar analysis to inform its consideration of how the draft strategic plan's flow proposals will affect water supplies. In the absence of such an analysis, it is impossible to reasonably conclude that volume two's implementation proposals are consistent with the "co-equal goal" of "a reliable water supply for California."

For these reasons, we oppose the Task Force's adoption of the fourth draft strategic plan or a strategic plan similar to it.

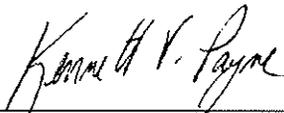
Sincerely yours,



Thad Bettner
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Delta Vision Task Force members

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Cc: Ms. Linda Adams, California Environmental Protection Agency
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Mr. Mike Chrisman, California Resources Agency
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Mr. Michael R. Peevey, President, California Public Utilities Commission
Mr. Lester Snow, Director, California Department of Water Resources
Mr. John Moffat, Deputy Legislative Director, Office of the Governor