



PLANNING  
PERMITTING  
ARCHITECTURE  
CIVIL ENGINEERING  
PROJECT MANAGEMENT

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Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

To whom it may concern:

Please find comments on the Delta Plan Performance Measures below:

3.28 – Measurable reduction in reliance on the Delta.

Reduction in reliance should be hand in hand with a decreasing trend in exports from the Delta. The Proposed wording should read “ Demonstrate that water suppliers that receive water from the Delta watershed have reduced reliance *through the reduction in exports* and improved regional self-reliance.

The baseline condition should be the average allowed under the Biological Opinions of approximately 4.9 million acre feet of water per year. The baseline seems to be using an average of Delta imports during the time of the Delta Plan adoption. Delta imports increased substantially in the 2000’s much higher than what was acceptable through the BO’s. This baseline is too high and is not clearly defined in the Delta Plan. The reason behind reducing reliance on the Delta is due to the collapse of salmon and other fish populations in the past decade. Thus imports must be set at the highest threshold allowed by the BO’s, 4.9 MAF, and reduced from there. This value must be clearly stated here.

The “Target” should call for specific values obtained by specific dates rather than a decreasing trend in volume of water imported from the Delta because this trend could be miniscule and an ineffective way to actually reduce reliance on the Delta.

3.29 – Improve export reliability

“Demonstrate that water available to be exported through the Delta is not disrupted.” This goal is unrealistic. Natural and man-made disasters can and have disrupted exports significantly. This PM also must define “water available.” Will “water available” vary based on the type of water year? It should be noted in the Target that the water allocations will vary depending on the water year with significantly less water being available during a drought. There is no way deliveries can stay within 10% a certain set

allocation during a drought or when fish populations crash. This performance measure also in conflict with the performance measure to reduce reliance on the Delta.

#### 5.25 – No further Delta rural farmland loss

This PM irrelevant to the Delta. Floodplain restrictions, zoning and the Williamson Act successfully restrict any urban development from occurring within the Delta's Primary Zone and parts of the Secondary Zone (near Isleton). The real threat to protecting and enhancing the cultural, recreational and agricultural

#### 5.26 - Minimize water and habitat project impacts on local land uses

This PM should be reworded to say "Water management, ecosystem restoration, and flood management projects avoid, minimize or mitigate conflicts with adjoining uses ~~by including adequate mitigation measures~~ to avoid adverse effects. The phrase about including mitigation should be removed because mitigation is not an adequate way to **avoid** impacts. Rather mitigation will reduce negative effects. I would argue however that it would be difficult to mitigate for loss in land use in the Delta because you cannot replace land lost in the Delta anywhere else. The best would be to avoid placing water management and habitat projects on privately owned land. The Delta Stewardship Council is supposed to incorporate the WaterFix project into the Delta Plan. The WaterFix and associated mitigation will adversely impact large tracts of local Delta land uses. Incorporation of the WaterFix into the Delta Plan is inconsistent with this PM and goals to protect local land uses.

#### 5.29 - Progress towards Delta Legacy Communities

This PM should remain in the current wording. The new wording only specifies preparing plans for each legacy community. The communities can plan until they are blue in the face without any significant work being done to actually improve and protect the legacy communities. Without flood protection that meets FEMA standards the communities will ultimately not survive. Not due to actual flooding but due to high flood insurance prices that force people to abandon their homes. Flood protection projects on islands with legacy communities should be included in the PM metrics. A metric should also be included to measure the population and number of businesses to determine the health of the legacy communities. One of the targets should include a stagnant or slightly upward trend in population and businesses. In effect, to avoid a decline in population and businesses. Understandably, provided the inherent flood risk in the Delta it is not wise to allow development but a single family remodel or new home here and there should also not be discouraged.

#### 7.21 - Reduce casualties and economic damages

There are very few if any lives lost in the history of Delta flooding. There are very few times where a flood event occurs without ample warning time to evacuate. So the target has already been met for the no lives lost goal. The focus of this performance measure should be to reduce economic damages and improve emergency response plans.

#### 7.26 - FEMA reimbursement for emergency response and recovery

Very few levee districts are eligible under the PL84-99 program thus they are unable to get federal funding for levee rehabilitation. In order to increase eligibility for federal reimbursement, the levees must meet the PL84-99 standard, thus a metric must be included to measure the miles of levee eligible in the PL84-99 program.

Thank you for providing the public a chance to provide comment on these performance measures.

Sincerely,

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