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April 12, 2017

Delta Stewardship Council
Attn: CEQA for Amending the Delta Plan
980 Ninth Street, Suite 1500
Sacramento, Calif. 95814

RE: Comments on Proposed Amendments to the Delta Plan Performance Measures

The Sacramento-San Joaquin Delta Conservancy (SSJDC) staff appreciates this opportunity to comment on the Delta Stewardship Council (DSC)'s proposed Delta Plan amendments. The Delta Plan is integral to many of SSJDC's activities, particularly our Proposition 1 grant program, regional restoration planning, and our inter-agency coordination on water quality and invasive species. SSJDC staff has been working with California Department of Fish and Wildlife (CDFW) Watershed Restoration Grant Program staff to develop Proposition 1 performance measures that appropriately guide and track progress towards relevant Delta Plan outputs and outcomes. We have also met with staff from other state agencies, including DSC, in order to ensure compatibility across program performance measures, particularly for habitat/ecosystem output measures. Given that context, we have the following comments for your consideration:

- **Delta Plan output 4.4:**

- We encourage DSC to consistently refer to habitat/ecosystem types utilizing the San Francisco Estuary Institute (SFEI)'s Delta Landscapes nomenclature throughout the Delta Plan, to the extent possible. This would allow for clear and consistent reporting across related Delta Plan outputs and outcomes. Delta Plan outcome 4.8 currently uses these types; however, Delta Plan output 4.4 uses EcoRestore habitats. Ideally, Delta Plan output 4.4 types could be converted into the same habitat/ecosystem types used in outcome 4.8 with a cross-walk table included as necessary. At a minimum, the Delta Plan language in output 4.4 could include both sets with EcoRestore habitat type followed by parenthetical with the corresponding Delta Landscape types (e.g., "Riparian forest (including willow thicket, willow riparian scrub/shrub, and valley foothill riparian)").
- Moving forward, we encourage DSC to incorporate, to the extent possible, ongoing efforts of the Delta Conservancy – working with SFEI – and of the Inter-Agency Adaptive Management Integration Team (IAMIT) performance measures sub-group to develop and apply consistent nomenclature for Delta habitats.



- It would be helpful to include definitions for all habitat/ecosystem types used within the Delta Plan itself, and to be precise and consistent about the terminology across all outputs and outcomes. Specifically, in output 4.4, habitats are referred to in the description as tidal/subtidal and later, in the target section, as intertidal/subtidal; as shaded riparian aquatic and later as simply aquatic; and as riparian forest and later simply as riparian. Tidal marsh and managed wetlands are referenced in the target section, but not addressed in the description.
- **Delta Plan outcome 4.7 (birds):** We recommend incorporating recently published objectives for Central Valley migratory birds from the Central Valley Joint Venture into this performance measure.
- **Delta Plan outcome 4.7 (fish):** We encourage DSC to incorporate regional fish monitoring, in addition to relative abundance of native fish in and around individual project sites.
- **Delta Plan outcome 4.8:** Given variability in California weather patterns, re-evaluating at a fixed 10-year interval regardless of weather (dry/wet) type for that year could be non-representative of conditions within that 10-year period under the other (dry/wet) weather type. If possible, consider re-evaluating in both a wet and dry year within each 10-year period. Furthermore, evaluations would ideally occur during a consistent period within the rainy season to evaluate inundation and flooding.
- **Delta Plan outcome 4.10:** For clarification purposes, the Arundo surveys that were conducted by Sonoma Ecology Center (under contract with SSJDC), were primarily based on imagery from 2011 - 2012 available through Esri online, and were validated with site visits in January 2015.
- **Delta Plan outcome 5.8:** The Delta Marketing Task Force, in collaboration with SSJDC and the Delta Protection Commission, produced a Delta Tourism Awareness 5-Year Marketing Plan in February 2017. That plan includes the following metrics that could be considered within this outcome measure.
 - Increase direct tourism expenditures.
 - Increase gross restaurant and lodging taxable sales.
 - Increase the volume of first-time visitors.
 - Grow off-season visitation consistently over the next 5 years.
 - Increased website views and social media traffic.
 - Increased engagement from existing and new visitors.
 - Sustainable economic growth over the next 5 years.
- **Delta Plan outcome 6.10:** In addition to spatial extent of harmful algal blooms, the My Water Quality Portal for harmful algal blooms also provides information on other metrics that could be considered, including the duration of harmful algal blooms, and duration and extent of recreational advisories for swimming and fish and shellfish consumption.

Thanks for the opportunity to provide comments. If you have any questions or would like to discuss further, please contact me at 916-375-4994.

Sincerely,



Beckye Stanton, Ph.D.

Senior Environmental Scientist (Specialist)