

**Local Governments**

City of Folsom  
City of Placerville  
City of Rocklin  
City of Roseville  
City of Sacramento  
County of El Dorado  
County of Sacramento  
Sacramento Area Council of Governments

**Water Providers and Organizations**

Carmichael Water District  
Citrus Heights Water District  
Del Paso Manor Water District  
El Dorado County Water Agency  
El Dorado Irrigation District  
Fair Oaks Water District  
Georgetown Divide Public Utility District  
Grizzly Flats Community Services District  
Mountain Counties Water Resources Association  
Nevada Irrigation District  
Northern California Water Association  
Placer County Water Agency  
Rancho Murieta Community Services District  
Regional Water Authority  
Sacramento County Water Agency  
Sacramento Groundwater Authority  
Sacramento Suburban Water District  
San Juan Water District  
Woodland Davis Clean Water Agency

**Business and Civic Groups**

Citrus Heights Regional Chamber of Commerce  
North State Building Industry Association  
Rocklin Area Chamber of Commerce  
Roseville Chamber of Commerce  
Surveyors, Architects, Geologists and  
Engineers of El Dorado County  
Taxpayers Association of El Dorado County

January 20, 2012

Mr. Phil Isenberg, Chair  
c/o Ms. Terry Macaulay, Interim Chief Deputy Executive Officer  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

Re: Comments on Draft EIR and Water Supply

Dear Mr. Isenberg:

Thank you for the opportunity to comment on the draft EIR for the Delta Stewardship Council's draft Delta Plan. Many stakeholders in northern California have been following the development of the plan with concern. To better represent our interests as the quest for a Delta solution progresses, cities, counties, water agencies, business interests and civic groups throughout the Sacramento Valley, northern Sierra Nevada and Coast Range are coalescing around a set of principles that will enable us to move forward collaboratively (attached).

Together, we are committed to developing a Delta solution that helps the state, while continually improving water management to support our region's economic vitality, environmental resources and quality of life. In this spirit, the comments below represent a broad consensus of organizations in the rural and urban areas of the Sacramento Valley and the adjacent Sierra and Coast Ranges. The areas of the state represented by this alliance are the source of a vast majority of the water that flows to and is exported from the Delta. Under California's long-standing water right and area-of-origin laws, this region uses our local rivers and streams to meet the needs of our farms, businesses, residents, and environment.

In fact, unlike most regions of California, the north state is self-sufficient in providing affordable water supplies for all of these beneficial uses. These water supplies are a crucial economic and environmental asset of the region. These supplies not only allow our communities to maintain and attract businesses and jobs, but also support natural treasures for which our region is famous.

To maximize our region's implementation of the coequal goals of water supply and environmental stewardship, we have developed – through lengthy and arduous negotiations – groundbreaking agreements such as the Yuba River Accord; the Water Forum Agreement to protect the lower American River (a federal Wild & Scenic River); and numerous agreements on the Sacramento River that balance fish habitat and passage, critical habitat on the Pacific Flyway, and the water needs of farms and communities.

We are deeply concerned that the Delta Stewardship Council's draft environmental impact report (EIR) fails to analyze the impacts of the primary ecosystem tool on which the Council relies – implementation of a “more natural flow regime” – on our region's economic and environmental resources. The draft EIR states repeatedly that implementing a “more natural flow regime” – which we do not believe is defined in any meaningful way – will help improve the Delta ecosystem. Given the draft EIR's lack of clarity on this issue, we can only assume that implementation would result in less water being stored in reservoirs that our communities rely on. It simply is not possible to store enough water if it is released as soon as it runs off. Draining these reservoirs would have significant adverse impacts.

The draft EIR, however, fails to analyze impacts that will result from redirecting water supplies to the Delta. It dismisses water-supply impacts by assuming communities will simply develop other water supplies. (Draft EIR, pp. 3-84 to 3-85.) In our region, however, there are no other adequate water supplies to develop. We do not have the luxury of importing water from other regions of the state.

Similarly, there is no thorough analysis of the potential reduction in the capacity to produce hydropower. This clean, renewable electric power from north state rivers and streams is critical to California and the western U.S. The need to secure alternative power sources would be costly, both economically and environmentally.

The draft EIR also fails to analyze the impacts implementing the undefined “more natural flow regime” would have on refuges, rice fields, and managed wetlands that support migratory birds on the Pacific Flyway; reservoir cold-water pools on which the Central Valley's salmon and steelhead, and California's salmon industry, depend; and recreational opportunities that make this region unique. For example, the draft EIR simply assumes that, if such flow requirements were implemented, they would “take into consideration the flow needs of special-status fish species . . . [and] would represent a beneficial change for special-status fish . . .” (Draft EIR, p. 4-70.) The environment of the north state deserves more careful analysis than this.

In summary, the draft Delta Plan describes potentially catastrophic changes to river flows in the rivers of our region through the implementation of an ill-defined “more natural flow regime.” The draft EIR, however, fails to even identify, much less accurately analyze, the impacts this concept would have on the unique environmental resources of the north state, and on our region's critical economic asset – our locally sufficient and affordable water supply.

Thank you for the opportunity to comment on the draft EIR. As outlined in our shared principles, we look forward to working with the Stewardship Council and interests throughout the state to develop an effective and equitable solution to the water supply and environmental challenges that face the Delta. A number of the signatories below look forward to submitting additional comments.

Very truly yours,



David J. Guy, President  
NORTHERN CALIFORNIA WATER ASSOCIATION



John Kingsbury, Executive Director  
MOUNTAIN COUNTIES WATER RESOURCES  
ASSOCIATION



John Woodling, Executive Director  
REGIONAL WATER AUTHORITY



Mike McKeever, Chief Executive Officer  
SACRAMENTO AREA COUNCIL OF  
GOVERNMENTS



Brett Storey, Mayor  
CITY OF ROCKLIN



Pauline Roccucci, Mayor  
CITY OF ROSEVILLE



Steven M. Nugent, General Manager  
CARMICHAEL WATER DISTRICT



Bettie Cosby, President/CEO  
CITRUS HEIGHTS REGIONAL  
CHAMBER OF COMMERCE



Al Dains, Director  
CITRUS HEIGHTS WATER DISTRICT



Ken Payne, Chief of Environmental/Water  
Resources Development  
CITY OF FOLSOM



Dave Brent, Interim Director of Utilities  
CITY OF SACRAMENTO



Michael L. Peterson, Director of Water Resources  
SACRAMENTO COUNTY WATER AGENCY  
COUNTY OF SACRAMENTO



Debra J. Sedwick, General Manager  
DEL PASO MANOR WATER DISTRICT



David P. Eggerton, General Manager  
EL DORADO COUNTY WATER AGENCY



Bill George, Board Member  
EL DORADO IRRIGATION DISTRICT



Tom R. Gray, General Manager  
FAIR OAKS WATER DISTRICT



Ron Nelson, General Manager  
NEVADA IRRIGATION DISTRICT



Dennis Rogers, Senior Vice President  
Governmental and Public Affairs  
NORTH STATE BUILDING INDUSTRY  
ASSOCIATION



Michael R. Lee, Board Member  
PLACER COUNTY WATER AGENCY



Ed Crouse, Board Member  
RANCHO MURIETA COMMUNITY SERVICES  
DISTRICT



Wendy A. Gerig, Chief Executive Officer  
ROSEVILLE CHAMBER OF COMMERCE



John Woodling, Executive Director  
SACRAMENTO GROUNDWATER AUTHORITY



Rob Roscoe, General Manager  
SACRAMENTO SUBURBAN WATER DISTRICT



Shauna Lorange, General Manager  
SAN JUAN WATER DISTRICT



Dennis Diemer, General Manager  
WOODLAND-DAVIS CLEAN WATER AGENCY

- cc: Delta Stewardship Council  
Randy Fiorini, Member  
Gloria D. Gray, Member  
Patrick Johnson, Member  
Felicia Marcus, Member  
Hank Nordhoff, Member  
Don Nottoli, Member

Whereas, the Sacramento metropolitan area, the Sacramento Valley, the northern Sierra Nevada and Coast Range can benefit from regional coordination and collaboration in developing implementable solutions to future water resources challenges and opportunities, and

Whereas, conditions in the Sacramento-San Joaquin Delta have reached a state of crisis that threatens the environment of the Delta and the economy of California, and

Whereas, proposed solutions for the Delta could pose serious risks to the water supplies, economy, environment, and quality of life in northern California, and

Whereas, in order to protect these interests (*name of organization*) seeks to promote regional cooperation on water issues, and to be a part of a collaborative and comprehensive solution to the issues facing the Delta,

Therefore, be it resolved that we support a regional alliance based on the following principles:

Water rights priorities and area-of-origin assurances must be recognized and protected to ensure reliable supplies for all water uses and environmental needs in our region.

Stakeholders in the Sacramento region and northern California must be given the opportunity to be fully included in and consulted on all aspects of development of a Delta solution and other state and federal water policies that affect the region.

A Delta solution and other state or federal actions must honor and not reduce or preempt the authority and responsibilities of cities, counties, and other local agencies to take actions that further the interests of the jurisdiction and its citizens.

Northern California will continue to invest in and implement water supply, water efficiency, recycling and re-use, storage, and other water management projects and programs that are cost effective and improve our regional self-sufficiency.

We will support a Delta solution that:

- Is based on sound science to ensure it is effective and implemented in an equitable manner,
- Requires the beneficiaries of any actions associated with a Delta solution to fully fund the costs of such actions, and
- Avoids or fully mitigates negative economic, environmental, or societal impacts to areas in our region.

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Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title