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**Via Email to: [circumments@deltacouncil.ca.gov](mailto:circumments@deltacouncil.ca.gov)**

DELTA STEWARDSHIP COUNCIL  
980 Ninth Street, Suite 1500,  
Sacramento, CA 95814

Attn: Terry Macaulay

Dear Delta Stewardship Council:

I am a resident of the Delta and live in Clarksburg, a legacy community in the north Delta.

Public Resources Code section 29702(a), enacted as part of SB1, states:

*"The Legislature further finds and declares that the basic goals of the state for the Delta are the following:*

- (a) Achieve the two coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."*

Numerous other sections also enacted as necessary components of SB1 reinforce the language set forth in section 29702(a) above. With these words our Legislature laid down a mandate which is repeated throughout and permeates much of the Delta Council's literature and communication.

I respectfully point out that the Programmatic Environmental Impact Report does not identify or analyze the impacts of either the project or any of the proposed alternatives in a manner which requires achieving more reliable water supply and protection, restoration and enhancement of the Delta ecosystem "in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." By failing to do so, the PEIR is fatally flawed. The PEIR must include at all levels of impact identification and analysis keen attention and faithful adherence to the mandate set forth in the second sentence of Public Resources Code section 29702(a).

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As a resident of the Delta I can say and testify that the second sentence of section 29702(a) refers to those values of the Delta which are fostered through the community, connection and relationship between the people who live and work in the Delta and the land where they live, work, play and invite others to do so.

Historically, Clarksburg and other communities have regular community-wide parades, dinners, fairs, and other **cultural** and **recreational** events. Institutions within all communities such as the fire districts, churches, schools, libraries, garden clubs, and guilds permeate the live of the Delta consistently reflect the values of the Delta.

The **natural resource** and **agricultural** values of the Delta are historically expressed in the high value crops and waterways found in the Delta for hundreds of years, since recorded time when the Indians farmed and fished in the Delta.

As all places on earth, the Delta changes, but still stays the same. The clearly observable characteristics of the Delta as a place of wide open features, quiet life and high degree of public safety should not change or be compromised.

It appears that the PEIR did not identify or analyze the impacts of the project or any of the proposed alternatives on the values of the Delta. Such identification of impacts, together with analysis of those impacts on the values of the Delta, are required by law. Without such identification and analysis, the PEIR is fatally flawed in the opinion of the undersigned.

I stand ready to assist the Council further. Please contact me with questions or for further information at: [mark@markpruner.com](mailto:mark@markpruner.com).

Thank you.



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