June 26, 2012

Chairman Isenberg and Council Members
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

SUBJECT: Burbank Water and Power Comments on the Final Staff Draft Delta Plan

Dear Chairman Isenberg and Council Members:

As the General Manager of Burbank Water and Power (BWP), I appreciate the opportunity to provide comments on the 6th and final staff draft Delta Plan. BWP provided comments on the revisions to the 5th Draft and we believe this 6th draft is much improved over prior versions. While there have been improvements, there are some areas that need to be revised to remain consistent with the ideals and goals of the Delta Reform Act. In addition, BWP would like to endorse the comments submitted on the 6th draft Delta Plan by the State and Federal Contractors Water Agency.

The City of Burbank supported the Delta Reform Act and the co-equal goals embodied in the legislation to create a sustainable Delta. Burbank takes the goal of sustainability seriously. In fact, the California Sustainability Alliance awarded Burbank Water and Power with a **2011 SUSTAINABILITY SHOWCASE AWARD,** which highlighted the efforts of leading California organizations paving the way towards the state's sustainable future.

A main concern that we wanted to raise to the Council is the "reduced reliance" found in section 85021 as the central tenet and driving the force of the Plan. We feel this section needs to reflect that the co-equal goals, improved water supply reliability and ecosystem restoration in the Delta, are the driving force of the Plan and not the reduced reliance. This is a foundational point that needs to be clarified to reflect the Legislative intent.

In regards to improvements made to the 6th and final staff draft Delta Plan, we appreciate the improvements to the Water Quality chapter which now provides a more comprehensive discussion of Delta water quality issues, including the priority water quality concerns of nutrients, toxic contaminants and drinking water quality. The chapter also discusses the importance to address the Delta water quality concerns through the coordinated regulatory authority of other state agencies. We also appreciate the recognition that nutrients are a significant stressor and understand that there is a lot of research activity occurring in this area. However, we agree with other commenters that the complicated subject of low salinity zone and "X2" should either be removed or more fully include a discussion of relevant scientific studies, which would recognize the ongoing scientific study of this particular area.

Thank you for considering our comments. We applaud the work that the Council has done to date to put forward the multiple draft plans and extensive public comment.

Sincerely,

Ron Davis
General Manager, BWP

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