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November 9, 2011

Mr. Phil Isenberg, Chair  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA. 95814

Re: Delta Stewardship Council Draft Environmental Impact Report

Dear Chairman Isenberg and Council Members:

Thank you for the opportunity to review and comment on the Delta Stewardship Council's (DSC) Staff Draft Environmental Impact Report. Our agency has participated in the DSC process through the review of previous documents, draft plans and DSC meetings and workshops. Additionally, our agency is a participant in the Ag-Urban Coalition and worked in the development of that group's Alternate Draft Plan as submitted to the DSC previously.

We note that the DEIR is over 2,200 pages in length and highly complex. Our agency has had the document only a few days, but we already have initiated our review. We have serious reservations concerning the limited time we will have to review this large, technical document, especially given the subject matter complexity. Additionally the timing of the review period is such that it is layered over the traditional holiday season.

If the Council truly wishes to allow the public and local agencies the opportunity to provide meaningful and timely review, we urge that the review period be extended for a more reasonable duration. Please consider the limited resources available to deploy on this effort by smaller local agencies and members of the public in your decision making. We fear that in the presently defined abbreviated review period, combined with the ability of small local governments and agencies like ours to deploy limited resources, will create a bias in comments received. That is, the more meaningful input you will receive will come only from other state agencies and large local agencies with the resources to review the document. This will not engender a balance in comments received but rather quite the contrary. Such an outcome is neither consistent with the intent of CEQA, or we believe, the commitment of the Council to include the public in its planning process.

We therefore respectfully request that the Council allow for a more reasonable and productive review period for the DEIR and extend the review period to 120 days. We hope that you'll take such action as soon as is possible.

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Thank you for your consideration of this important matter.

Sincerely,

CALAVERAS COUNTY WATER DISTRICT

  
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Joone Lopez  
General Manager

cc: CCWD Board of Directors