



January 28, 2011

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SUBJECT: Scoping EIR/EIS for the Delta Plan

We appreciate the opportunity to comment on the scope of the Environmental Impact Report/Statement on the Delta Plan commissioned by your office.

The **Primary Planning Area** described on page 13 of the Notice of Preparation includes several State Park properties:

- Brannan Island State Recreation Area (SRA),
- Delta Meadows River Park
- Franks Tract State Recreation Area
- Locke Boarding House
- State Park's Stone Lakes property within Stone Lakes NWR.
- Old Town Sacramento SHP's Walnut Grove Branch Rail Line

Potential impacts of Delta Plan recommendations to these natural and cultural resources should be considered. Changes that may affect the two most popular recreation activities: boating and fishing, as well as other activities such as waterfowl hunting, nature exploration, camping, picnicking, heritage tourism and swimming should be considered.

The **Secondary Planning Area** described on page 13 of the NOP is much larger and includes numerous State Park properties. These properties may be along rivers or surrounding reservoirs where changes in flows, fishery health, etc. may directly affect recreational opportunities and facilities and/or impact natural landscapes and historic sites. Examples of State Parks in the Delta Watershed that should be studied are: Oroville SRA, Colusa-Sacramento River SRA, Folsom Lake SRA, Old Town Sacramento SHP and Millerton Lake SRA. Other park properties potentially affected are located in areas that use water from the Delta, such as Bethany SRA, Lake Del Valle SRA, San Luis Reservoir SRA, Castaic Lake SRA and Lake Perris SRA.

The description of the **Department of Parks and Recreation's proposals** in the NOP Page 20, line 31-34 published on December 10, 2010, states:

Expansion of the state parks, including the Delta Trails, within the Delta, including consideration of a study to be developed by the Department of Parks and Recreation for consideration by the Delta Protection Commission in development of the Economic Sustainability Plan.

For comparison, the Sacramento-San Joaquin Delta Reform Act of 2009 states:

The Department of Parks and Recreation shall prepare a proposal, for submission to the commission, to expand within the Delta the network of state recreation areas, combining existing and newly designated areas. The proposal may incorporate appropriate aspects of any existing plans, including the Central Valley Vision Implementation Plan adopted by the Department of Parks and Recreation. [SBx7 1-85301(c)(1)]

The NOP proposes a narrower interpretation of our responsibilities than stated in the Delta Reform Act or the 2005 California Recreation Policy, which states:

The State of California, through its Department of Parks and Recreation, should encourage and actively stimulate and coordinate active participation of federal, state and local agencies, as well as the private and nonprofit sectors, in providing park and recreation lands, waters, facilities and programs.

http://www.parks.ca.gov/pages/795/files/rec_policy_final_2005.pdf

California State Parks' duty to encourage, stimulate and coordinate recreation among agencies, business interests and not-for-profit organizations is embodied in initiatives like the Delta/Suisun Marsh Recreation Plan. In order to meet these obligations, the study we have been commissioned to prepare may include proposals for expansion and enhancement of recreation areas, facilities and programs managed by many state agencies with recreation authority in the greater Delta, such as:

- Department of Parks and Recreation (including proposed, classified and unclassified properties, existing and proposed California Recreational Trails System routes, and properties serving, but outside, the legal Delta/Suisun Marsh)
- Department of Fish and Game (primarily Wildlife Refuges and Ecological Reserves)
- Department of Boating and Waterways (primarily boat launches and boating safety programs)

- Department of Transportation (primarily Scenic Highways, ferries, historic structures and rights-of-way)
- Department of Water Resources (primarily State Water Project and proposed BDCP lands, facilities and mitigation sites)
- State Lands Commission (navigable waterways)
- Sacramento-San Joaquin Delta Conservancy or State Coastal Conservancy (lands designated for environmental restoration)
- Delta Protection Commission (agri-tourism, recreation and heritage tourism)
- All state agencies responsible for publicly-owned and -maintained levees (recreational access)

Please include the full scope of the above in the EIR/EIS for the Delta Plan.

The EIR/EIS should consider how the proposed project may affect recreation at units of the state park system and other important outdoor recreation areas in the primary and secondary planning areas. These impacts may occur in several ways, including:

- Direct affects on or immediately around a unit, such as development of water facilities that would encroach within a state park unit or change its suitability for recreation.
- Changes in water reservoir operations or stream flows that affected use of recreational waters at or adjacent to a state park unit.
- Changes in water quality that affected a state park unit by impairing water-contact recreation, aesthetics, fishing and hunting at units where it is allowed.

Changes in recreation patterns may also have socioeconomic effects on local tourism-driven communities which should be considered when appropriate.

Thank you again for giving California State Parks the opportunity to shape this important document. Please contact Cheryl Essex at cessex@parks.ca.gov if you have any questions or comments.

Sincerely,

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