

COMMENT MATRIX
CITATIONS FROM COMMENTS RECEIVED BY THE
DELTA STEWARDSHIP COUNCIL BETWEEN
NOVEMBER 9, 2010 AND DECEMBER 3, 2010

The following matrices include direct citations from comments received by the Delta Stewardship Council (Council) between November 9, 2010 and December 3, 2010. The citations are directly from letters and emails, and were not corrected for misspellings or grammar. Many comments were excerpted due to the length of the comment. All of the letters and emails are located on the Council website. The comments were placed into eight categories, as summarized below. Several comments occur in several categories. These comments do not include comments submitted to specific work groups.

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Matrix 1 List of Commentors (11/8/10-12/3/10)

Association	Signatory	Date
Antioch, City of	Harrington	11/15/2010
Coalition for a Sustainable Delta	Phillimore	11/5/2010
Coalition for a Sustainable Delta	Phillimore	11/17/2010
Delta Wetlands Project	Moran	11/16/2010
Environmental Water Caucus	Nesmith	11/15/2010
Resident of Clarksburg	Pruner	11/9/2010
Resident of Delta	Wilson	11/9/2010
Resident of Lafayette	Pyke	11/15/2010
Sacramento-San Joaquin Delta Conservancy	Nejedly Piepho	11/5/2010
Shasta County Board of Supervisors	Kehoe	11/9/2010
State and Federal Contractors Water Agency	Buck	11/9/2010
State and Federal Contractors Water Agency	Buck	11/23/2010

Matrix 2 Comments Related to Early Actions (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Sacramento-San Joaquin Delta Conservancy	11/5/2010	Because many of the proposed Early Actions fall under the mandated mission and principles of the Delta Conservancy (Pub. Resources Code, § 32322), we request that the Early Actions Review Committee consider the legislative purpose and priorities of the Delta Conservancy as you make decisions on which proposed actions to include in the Plan.	At this time, the Early Actions activities have been completed. If other Early Action activities are considered in the future, the mission and principles of the Delta Conservancy will be considered.
Sacramento-San Joaquin Delta Conservancy	11/5/2010	...before making any recommendations, the Early Actions Review Committee should consider the full range of alternatives related to the Yolo Bypass region including the Westside Yolo Bypass Management Option.	At this time, the Early Actions activities have been completed. Restoration methods for the Yolo Bypass will be considered as part of the development of the Delta Plan.
Sacramento-San Joaquin Delta Conservancy	11/5/2010	...the Conservancy appreciates the urgency and need for Early Actions to address multiple hazards in the Delta and efforts to support the Delta Multi-Hazard Coordination Task Force. The Early Action proposal titled "Delta Multi-Hazard Coordination Task Force Emergency Preparedness Recommendations" provides an excellent example of a coordinated effort that should be considered for the Interim Delta Plan.	At this time, the Early Actions activities have been completed. Restoration methods for reduction of risk will be considered as part of the development of the Delta Plan.

Matrix 3 Comments Related to Bay Delta Conservation Plan (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Antioch, City of	11/15/2010	<p>Antioch’s major concerns with the BDCP process and proposed project are summarized as follows: 1. The proposed BDCP proposed project will not comply with the Delta Reform Act, nor meet the co-equal goals in the Western Delta. The BDCP proposed project will: ☐ Reduce Delta outflow ☐ Increase reliance on the Delta for water supply by increasing exports over current levels ☐ Increase salinity in the Western Delta (and other portions of the Delta) ☐ Move X2 upstream from its present location. 2. The effects of the BDCP would likely continue the 150-year trend of degradation of the Delta, which was summarized in the draft Delta Ecosystem White Paper, presented to DSC on October 28, 2010. 3. The BDCP has not analyzed the impacts of increased Western Delta salinity on the Western Delta ecosystem. 4. The BDCP has to date not made any proposals to mitigate or pay for potential adverse impacts to Western Delta stakeholders.</p>	<p>This comment will be considered during the independent review of the BDCP process.</p>
Antioch, City of	11/15/2010	<p>During the October 28, 2010, Delta Stewardship Council (DSC) meeting, Antioch was pleased to hear that it appears to be the DSC’s position that the BDCP must be consistent with the co-equal goals. Unfortunately, based on recent modeling and Effects Analysis by the BDCP, the BDCP project as presently proposed is predicted to:</p> <ul style="list-style-type: none"> • Increase diversions and decrease Delta outflow. The BDCP is projected to increase diversions from the Delta above the amounts that have been exported to date by up to 1 million acre feet per year. These projected additional diversions will reduce Delta outflow. • Degrade water quality significantly in the Western Delta and at Antioch’s Intake. BDCP modeling results and Effects Analysis indicate an increase in salinity in the Western Delta as a result of the export of Sacramento River water from the northern Delta and reductions in net Delta outflow. The proposed BDCP project is expected to increase average seasonal salinity in the Western Delta, at Antioch, and in portions of the Central Delta by 5 to 30% in spring, summer, and fall. Daily increases in salinity within each of these periods, and in different year types, are expected to range to significantly higher values. • Relocate X2 in the summer and fall in wet and above normal years well upstream (eastward) of its present location. 	<p>This comment will be considered during the independent review of the BDCP process.</p>

Matrix 3 Comments Related to Bay Delta Conservation Plan (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Antioch, City of	11/15/2010	Reducing outflow and increasing salinity would adversely impact the Western Delta ecosystem, which has evolved as a primarily freshwater environment. Further, it appears that the BDCP project as presently proposed would neither protect nor enhance the cultural, recreational, public trust resources or agricultural values in the Western Delta. All of these values in the Western Delta are historically based on a Delta with lower salinity and greater outflow than the projected conditions following the implementation of the BDCP project. The BDCP's proposed project will also have impacts on Western Delta water supply reliability, water rights and economy. For example, potential costs to the City of Antioch as a result of the salinity increases projected by BDCP effects analyses are estimated to be \$24,000 per day (up to \$720,000 per month), when water is too saline for diversion at the City's freshwater intake location. Given Antioch's current budget of approximately \$20 million per year, the impacts of the proposed project will be significant.	This comment will be considered during the independent review of the BDCP process.
Antioch, City of	11/15/2010	The historic decline of outflow and increase in salinity clearly indicates that the Delta ecosystem has to date been given far lower priority than water exports...As outlined in the DSC White Paper on the Delta Ecosystem, the Delta environment has been substantially degraded by systematic alterations that have occurred over the past 150 years, including historic anthropogenic alterations that occurred prior to 1920 and that resulted in significant decreases in outflow and increases in salinity. The State and Federal Water projects (the Projects) resulted in additional, substantial impacts to the Delta following this time period. The BDCP proposed project will compound these historic injuries and will further degrade the Delta environment and the fisheries it supports. The US EPA, State Water Resources Control Board, California Department of Fish and Game, and most recently, Department of Interior biologists have all called for increased Delta outflow and reduced diversions, not the opposite, as BDCP is proposing.	This comment will be considered during the independent review of the BDCP process.
Antioch, City of	11/15/2010	Antioch strongly supports the DSC taking a more active role in reviewing the BDCP documents to ensure compliance with the Delta Reform Act, as was discussed at the DSC meeting on October 28, 2010. While the BDCP has analyzed and publicized certain environmental benefits of the project, it has done almost nothing to analyze potential mitigation approaches to address adverse impacts of the project.	This comment will be considered during the independent review of the BDCP process.

Matrix 3 Comments Related to Bay Delta Conservation Plan (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Antioch, City of	11/15/2010	<p>Antioch believes that potential solutions may exist that could allow the BDCP to meet the co-equal goals. These potential solutions include:</p> <ul style="list-style-type: none"> • Commit to the goals of restoring substantial areas of the Delta ecosystem and take measures to enhance Delta outflow prior to the construction of any new export conveyance facilities. • Establish effective and comprehensive restoration and enhancement goals and objectives for the Delta that are quantifiable, achievable, binding, and fully funded. • Establish a “Do No Harm” policy: The SWRCB, Department of Fish and Game, Department of the Interior biologists and US EPA have recommended increased Delta outflows and reduced diversions. The BDCP needs to adopt a policy not to reduce outflow or increase salinity beyond existing levels. • Incorporate mitigation for impacts into the BDCP planning and project design, rather than as an after-the-fact approach within the EIR/EIS process. Modeling has identified significant potential impacts of the BDCP project that can and should be addressed as part of the project design. • Consider physical and regional in- Delta options to mitigate potential impacts of the BDCP, such as: regional consolidation of intakes and desalination • Include reduced diversion and increased Delta outflow alternatives for the EIR/EIS. • Provide stakeholder engagement and comment disposition as part of the development of the BDCP and NCCP/EIR/EIS process. To date, stakeholder concerns have generally not been addressed, nor solutions discussed, with the exception of a few off-site meetings. 	<p>This comment will be considered during the independent review of the BDCP process.</p>
State and Federal Contractors Water Agency	11/9/2010	<p>The State and Federal Contractors Water Agency has no formal position on this option [Westside Option] or formal guidance on decisions before your committee on Friday. Informally, many of us share a perspective identical to that articulated by Yolo County Supervisor Jim Provenza – that a refined project description and further analysis will be necessary to see if it meets a variety of habitat objectives...The latest draft of the Bay Delta Conservation Plan calls for a full evaluation of a Westside alternative, and we anticipate comments Yolo County on that draft description this week. At this stage, any effort to further articulate this alternative is consistent with BDCP. Eventually, it will have to be the BDCP process to settle on the alternative or range of alternatives for formal analysis. Our members hope to work within BDCP process as well as any concurrent efforts by Yolo County and key stakeholders to better describe this alternative.</p>	<p>This comment will be considered during development of the EIR/EIS alternatives</p>
State and Federal Contractors Water Agency	11/9/2010	<p>While BDCP calls for formally developing the Yolo Bypass Fishery Enhancement Plan after BDCP’s formal adoption, we will continue to work with Yolo County and others on development of the plan specifics during the interim before BDCP is finalized.</p>	<p>This comment will be considered during development of the EIR/EIS alternatives</p>

Matrix 4 Comments Related to Notice of Preparation (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Resident of Lafayette	11/15/2010	in view of the controversy surrounding BDCP, the likelihood that it will not come together in time for inclusion in the Delta Plan, and the near certainty that it will not meet the statutory requirements for inclusion in the Delta Plan, should not the first bullet (bottom of p.18) be rewritten as: Prompt implementation of the BDCP if it complies with Water Code Section 85320 and/or alternatives designed to accomplish improvements in water conveyance and storage consistent with the co-equal goals of the Delta Reform Act. This would allow for inclusion of the BDCP in the Delta Plan should lightning strike but would also allow for alternate plans for improved conveyance.	This comment has not been incorporated into the NOP at this time because the full extent of the Delta Plan will be completed following the scoping process.
State and Federal Contractors Water Agency	11/23/2010	...the repeated use of "statewide" in the Act as a focus of various policy choices and direction to address some of those choices in the Delta Plan begs the question of appropriate geographic scope and raises the specter of the Delta Plan potentially crumbling under its own weight, as CALFED did.	Comment noted
State and Federal Contractors Water Agency	11/23/2010	Page (P) 1, Lines (L) 14-15: While there is no question the Delta Plan is intended to further the coequal goals as established in the Act, the Plan will not "meet" or achieve them but will rather contribute to their achievement by providing guidance, and in some cases direction, for the actions of others, in addition to "promoting" many other activities the Legislature deemed necessary to further the coequal goals. The Act itself recognizes that other agencies of the State, as well as federal and local government actions will be central to actually achieving the coequal goals and other objectives of the Act. Consequently, we urge the following change to this sentence, with consistent changes made to the similar language on P: 7, L: 11-12, 19-20. "The fundamental purpose of the Delta Plan will be to meet identify, recommend and, where authorized, implement policies, actions and activities to comprehensively address all stressors on the system in furtherance of the achievement of the coequal goals, as defined in Water Code section 85054, and all of as well as the inherent subgoals and policy objectives within the purview of the Delta Plan defined by the statute, as identified in this Notice of Preparation (NOP)."	This comment has not been incorporated into the NOP at this time.

Matrix 4 Comments Related to Notice of Preparation (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	11/23/2010	P 3, L 14: "Many of these issues..." The use of "these" is confusing because there is no reference point for "these". If this sentence is to be kept it would seem appropriate to replace "these" with "the following" perhaps. We suggest, alternatively, deleting the sentence and beginning the next sentence with "Over the last forty years,". It also would be informative to add a sentence or two about how most environmental laws affecting the "competition" for "freshwater resources" and which have become integral to California water management came into force long after the major water projects were constructed and contracts signed to deliver water supplies for agricultural and urban uses to meet then current and expected future needs. Consequently, the "environment" became an unforeseen but large "customer" of the water management system as a result of changes in public attitudes and expectations. These are two important drivers that led to the "escalation" of the "competition" that should be referenced. In addition, it would also be appropriate to mention climate change as an increasingly important driver, along with the need for adaptation to it.	The sentence will be modified to describe the word "these." This section is a brief summary of the issues. More information will be provided in the EIR.
State and Federal Contractors Water Agency	11/23/2010	P 4, L 21: We appreciate the Council at its November meeting accepting our suggestion that language be added here recognizing that the interruption of SWP/CVP deliveries, and not just the degradation of their quality, is a potential risk of levee failure.	Comment noted
State and Federal Contractors Water Agency	11/23/2010	P 4, L 26: strike "a" after "primarily" or, alternatively, change "wetlands" to "wetland".	This change has been made
State and Federal Contractors Water Agency	11/23/2010	P 4, L 31: There seems to be a missing word or phrase here?	This change has not been made
State and Federal Contractors Water Agency	11/23/2010	P 4, L 43: Again, the use of "these" is a bit opaque. We suggest the following substitution: "Initiating an effort that would ultimately lead to the Legislature's creation of the Delta Stewardship Council and its direction to develop the Delta Plan that is the subject of this NOP, the Governor...".	The sentence will be modified to describe the word "these."

Matrix 4 Comments Related to Notice of Preparation (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	11/23/2010	P 7, L 23: We reiterate our view that section 85021 of the Act is not a “policy objective” of the Delta Plan. Consequently, the reference to section 85021 should be deleted from this sentence, as well as its full citation on P 8, L 7-13. Section 85021 is explicit in calling for a “statewide strategy” of “investing in improved regional supplies” and then stating that “*e+ach region...shall improve its regional self-reliance” by undertaking specified activities. Section 85303 requires that the Delta Plan “shall promote statewide water conservation and water use efficiency and sustainable use of water,” (emphasis added) leaving implementation to local entities. While Council efforts to “promote” water conservation and water use efficiency in the Delta Plan will no doubt contribute to the achievement of the State’s policy to “reduce reliance on the Delta in meeting California’s future water supply needs” (emphasis added), the policy itself is not integral to nor appropriately referenced as an “objective” that helps “define” the Delta Plan. The Council should focus on the Legislature’s specific direction to it to “promote” water conservation and water use efficiency in its Delta Plan, and not seek to apply or achieve a general “policy of the State of California” that is not within the scope of the Delta Plan.	This comment has not been incorporated into the NOP at this time.
State and Federal Contractors Water Agency	11/23/2010	P 11, L10: We appreciate the Council at its November meeting accepting our suggestion that the list of “concurrent planning efforts” be expanded to include the Bay Delta Conservation Plan and the local Delta Counties’ HCPs.	Comment noted
State and Federal Contractors Water Agency	11/23/2010	P 11, L 26-29: We suggest the following changes for clarity and to remove redundancy. “The secondary planning area is defined by the watershed of the Delta (including areas within the Delta watershed upstream of the Delta and the Trinity River watershed that is “tributary” to the Delta via the CVP’s Clear Creek Tunnel) and the geographical areas of California that include the service areas of water agencies that use water from the Delta watershed.”	This sentence was modified.
State and Federal Contractors Water Agency	11/23/2010	P 12, Fig 1: We suggest adding a footnote or some other reference to the Trinity River watershed being included because it is not generally considered “tributary” to the Delta.	This comment was not incorporated.
State and Federal Contractors Water Agency	11/23/2010	P 14, L 21: Per our previous comment, “meet” should be replaced with “contribute to the achievement of”.	This change has not been made
State and Federal Contractors Water Agency	11/23/2010	P 16, L 18: Use of “determent” is awkward word choice. Suggest “negative effects” as a substitute.	This change has not been made

Matrix 4 Comments Related to Notice of Preparation (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	11/23/2010	P 17, L 6: We appreciate the Council at its November meeting accepting our suggestion that “will” be replaced with “could” and that this same change is to be made at P 19, L 35; P20, L 24; P 21, L 16; P 22, L 6; and, P 23, L 23.	Comment noted
State and Federal Contractors Water Agency	11/23/2010	P 17, L 14-25: We suggest reworking this section to reflect the Act’s direction to “promote” water conservation and water use efficiency. While helping to “facilitate compliance” with current requirements under SBX7 7, as noted at L 13, is appropriate, asserting the Delta Plan may include “requirements that would be more stringent” (L 14) and “mandated” (L 19 & L 21) is not. We suggest that if these concepts are retained that the words “requirements” and “mandated” on L 14, 19 and 21 respectively be changed to “recommendations” or “recommend”, as that would be consistent with the Legislature’s direction to “promote” and would not imply authority the Council does not possess. This comment is applicable throughout this section and its repeated inappropriate use of the word “requirements” or “requires” etc., including, but not limited to, the use of the word “requirements” on P. 18, L 16.	This comment has not been incorporated into the NOP at this time because the full extent of the Delta Plan will be completed following the scoping process.
State and Federal Contractors Water Agency	11/23/2010	P 18, L 19-20: The concept of the Delta Plan inserting itself into local water agency decisions as to “the most economic local supplies be fully developed prior to reliance on Delta exports” is contrary to the state’s longstanding policy to promote integrated resources planning and should be deleted. We suggest the following as a substitute that we hope addresses the concept attempting to be identified: “Develop methodologies for determining, and facilitate implementation of, an effective portfolio approach to investing in and achieving regional water supply reliability that reduces reliance on Delta watershed diversions during periods of drought or regulatory proscription, and in meeting future demands.”	This change has not been made
State and Federal Contractors Water Agency	11/23/2010	P 18, L 31: We suggest adding a bullet that cites sections 85020(f) and 85302(d) of the Act as an additional basis of storage and conveyance improvements to be contemplated in the development of the Delta Plan.	This change has not been made. Those citations are included on page 16.
State and Federal Contractors Water Agency	11/23/2010	P 18, L 34-35; P 19, L 1-5: We appreciate the Council at its November meeting accepting our suggestion that references to the 2008 Biological Opinions regulating the SWP and CVP need to be revised to reflect their uncertain status and certain amendment in the near future either as a result of judicial direction and/or as needed within the Bay Delta Conservation Plan process. This is also applicable to P 20, L 15-20. We suggest the following simple statement as a substitute for both of these references: “Actions consistent with requirements of applicable Biological Opinions pursuant to the Endangered Species Act.”	This change has not been made

Matrix 4 Comments Related to Notice of Preparation (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	11/23/2010	P 19, L 19-21: We suggest adding the words “through conjunctive use programs” at the end of this sentence since that is what is being described.	This change has not been made because this concept could include other water supply strategies.
State and Federal Contractors Water Agency	11/23/2010	P 19, L 25-27: We suggest deleting this bullet because it presumes “infrastructure repairs” that are impossible to predict and which may be necessary prior to “mid-century” or perhaps will not be required at all on such a definitive timeline. Moreover, the reference to SWP and CVP contract renewals is well beyond the scope of the Delta Plan.	This change has not been made
State and Federal Contractors Water Agency	11/23/2010	P 23, L 19: Delete “a new governance structure” since the words are repeated.	This sentence was modified.
State and Federal Contractors Water Agency	11/23/2010	P 24, L 1-3: We suggest a reference to Proposition 26 be added to inform the reader that the new limitations imposed by that initiative are recognized as a potential constraint on basing a financing plan “upon fees and charges”.	This sentence was modified.
State and Federal Contractors Water Agency	11/23/2010	P 24, L 11: We suggest adding a statement that recognizes the possibility of “findings of overriding consideration” for potential impacts that will not be able to be mitigated to a “less than significant” level.	This change has not been made. In accordance with CEQA, if it is necessary, a statement of overriding considerations can be prepared.
State and Federal Contractors Water Agency	11/23/2010	P 31, List of responsible agencies: We appreciate the Council at its November meeting accepting our suggestion that the State Water Project Contractors Authority (SWPCA), the San Luis and Delta Mendota Water Authority (SLDMWA) and the State and Federal Contractors Water Agency (SFCWA) JPAs all be added to the list of responsible agencies as each of these JPAs will have a role in or be affected by the implementation of the Delta Plan.	Comment noted

Matrix 5 Comments Related to Development of Alternatives (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Environmental Water Caucus	11/15/2010	In our power point presentation on September 24, 2010, we provided information that is important to reaching a balanced policy for Delta ecosystem restoration, less reliance on the Delta for water, and a path forward for water system reliability in California. In that presentation we requested that the Council include our report as an alternative for evaluation in the process of making a final Delta Plan. We are now formally requesting that our report, California Water Solutions NOW, be put forward as an alternative in the EIR process.	This comment will be considered for preparation of the Delta Plan and EIR, including description of alternatives
Environmental Water Caucus	11/15/2010	It is critical to find balance, and the EWC report essentially deals with all of the issues not being addressed by BDCP, and can meet the mandates of SB7X1, as the Legislature so clearly stated.	This comment will be considered for preparation of the Delta Plan and EIR, including description of alternatives

Matrix 6 Comments Related to Water Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	11/5/2010	The information on Slide 11 of the California's Water Supply and Uses presentation is taken from the 2009 Water Plan Update, which focuses on the 2005 water year. The environmental uses, represented by the blue column in the graphs, include wild and scenic river requirements and Delta Outflow requirements. Because DWR has not gathered, or at least published, the relevant information beyond 2005, the 2009 Water Plan—and hence slide 11—does not reflect more recent levels of environmental, agricultural and urban uses. 2005 was a fairly wet year, so even under Water Rights Decision 1641, which regulates water project operations, there was a good deal of required Delta outflow. However comparing a year like 2005 to 2008 or 2009 would provide useful and necessary information on the impacts of the recent federal court decisions issued by Judge Wanger regarding the salmon and delta smelt biological opinions. For 2008 and 2009, the green and gray bars, representing agricultural and urban use, would be much lower.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources. The presentation has been posted to the website.
Coalition for a Sustainable Delta	11/5/2010	The information in slide 13 is helpful to demonstrate the difference in ag, urban and environmental uses in wet, average and dry years, but the slide does not show the impacts of the recent court decisions issued by Judge Wanger regarding the salmon and delta smelt biological opinions. 2007 (a dry year) and 2009 (a below average year) should be added to illustrate the drastic difference (decrease) in water received by ag and urban under Wanger and the biological opinions when compared to 1641. Even if this information has not been published, estimates should be available from DWR. At a minimum, the slide should include a footnote discussing this issue.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources. The presentation has been posted to the website.
Coalition for a Sustainable Delta	11/5/2010	Slide 16 (Cumulative change in Central Valley groundwater storage (1962-2003)): Providing the total estimated groundwater storage for the Central Valley would help readers understand the order of magnitude for the chart as a whole.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources. The presentation has been posted to the website.
Coalition for a Sustainable Delta	11/5/2010	The first bullet point on Slide 18, which states that shifting to permanent crops results in “changing irrigation patterns” should more specifically describe the “changes” with respect to irrigation. In many cases, irrigation efficiency increases, but the demand hardens. This addition will provide more specific information to readers who may not be familiar with agricultural practices.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources. The presentation has been posted to the website.

Matrix 6 Comments Related to Water Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	11/5/2010	Slides 22-23 tell only a part of the story related to the predicted impacts associated with changing temperatures and precipitation patterns. Although there will be less snowmelt and overall water supply with increased temperatures, a shift in run-off is also predicted. Rather than precipitation in the form of snow, which melts later in the year and contributes to water supplies, there will be an increased amount of direct run-off occurring earlier in the year. The increased, earlier run-off means that additional storage is a key component to capture that supply for future use. Focusing only on the decrease in supply driven by a decrease in snowmelt doesn't address the need for additional storage. Increased runoff, timing, and storage issues are all discussed in the 2009 California Water Plan Update prepared by DWR.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources. The presentation has been posted to the website.
Shasta County Board of Supervisors	11/9/2010	We have also reviewed the Department of Fish and Game's "Quantifiable Biological Objectives and Flow Criteria for Aquatic and Terrestrial Species of Concern on the Delta."...The legislation that mandated these reports spoke of "coequal goals" but these reports do not...The proposed Delta flows draw down lake levels under virtually all scenarios. Power generation declines. The cold water pool for salmon and steel head is diminished. Lake-related aquatic species and recreational pursuits are adversely impacted. The scenarios would reduce North of the Delta water deliveries by 67 percent, contravening Area of Origin considerations. These resources are essential to our community. The proposed flows need to be considered in light of their full consequences - as the "coequal goals" require.	This comment will be considered for preparation of the Delta Plan and EIR.

Matrix 7 Comments Related to Ecosystem Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	11/17/2010	...the section of the white paper discussing the delta smelt (pp. 2-18 to 2-20) is missing important references, such as: • Thomson et al. (2010) and Mac Nally et al. (2010), two multivariate analyses, conducted by working groups convened by the National Center for Ecological Analysis and Synthesis (NCEAS) and the Interagency Ecological Program (IEP) to study the decline of pelagic fishes in the Delta including delta smelt, and published in the journal Ecological Applications; • Feyrer et al. (2007), the article which is cited as the basis for the requirement to manage the position of fall X2 (the isohaline of total salinity 2) under the delta smelt biological opinion; • National Research Council (2010), the recent NRC report which includes criticisms of the “weak statistical link” used to justify the fall X2 action and other concerns regarding the Reasonable and Prudent Alternatives (RPAs) imposed on water project operations under the delta smelt and salmon biological opinions; and • Glibert (2010), which discusses impacts to the delta smelt food web from ammonium originating from wastewater discharges.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
Coalition for a Sustainable Delta	11/17/2010	In the discussion of delta smelt entrainment on page 2-19, the white paper observes that “large numbers” of delta smelt are entrained at the state and federal water projects. Without any reference to supporting scientific literature and no information on the numbers of entrained delta smelt relative to either the total population or other sources of mortality, it is impossible for the reader to evaluate this assertion. Throughout this document, the language should be examined for rigor and precision, and statements should be supported by references.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
Coalition for a Sustainable Delta	11/17/2010	The section of the white paper discussing anadromous salmonids (pp. 2-20 to 2-21) also lacks several important references, such as: • National Marine Fisheries Service (NMFS) Draft Central Valley Salmon and Steelhead recovery plans (NMFS 2009), which discusses predation, and other relevant topics; • Lindley et al. (2009), which addresses the role played by ocean conditions, linked to the 2007 Sacramento River fall Chinook stock collapse; and • a striking lack of even a single reference in the paragraph discussing salmonid entrainment.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 7 Comments Related to Ecosystem Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	11/17/2010	As with the discussion of entrainment of delta smelt, the white paper fails to provide references for statements regarding salmonid entrainment and fails to provide any information on the proportion of fish entrained, even though there is ample data on this subject. The white paper also fails to acknowledge an extensive body of work regarding Chinook salmon survival during migration through the Delta (e.g., Perry et al. 2009, Perry & Skalski 2009b). And, the white paper fails to provide any quantitative information regarding predation impacts on salmonids even though such information is available (e.g., Hanson 2009, Lindley & Mohr 2003, NMFS 2009).	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
Coalition for a Sustainable Delta	11/17/2010	...the white paper lumps steelhead and Chinook salmon together in its discussion of salmonids, despite the fact that these two species have significantly different life histories, biological requirements and susceptibility to stressors. For instance, steelhead parr spend on average two years in freshwater, growing between 15-20 cm before migrating to the ocean, whereas Chinook spend on average one year in freshwater, growing only to an average size of 4-8 cm before migrating. These size and timing differences result in different vulnerabilities to stressors and different responses to conservation measures. In fact, the May 13, 2010 Independent Panel Review of the Vernalis Adaptive Management Program (VAMP) noted that “[l]ife history differences between Chinook salmon and steelhead are striking”. In an attempt to cover a broad set of topics, the white paper must avoid sacrificing important details relevant to future management decisions.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 7 Comments Related to Ecosystem Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	11/17/2010	...some sections of the white paper provide only partial information on the designated topic. For instance, in Section 6, the three listed items (conservation plans, biological opinions and levee vegetation policy) represent a small fraction of the "numerous regulations, policies, programs, and plans" that were to be described in this section of the white paper. This section is clearly incomplete. As recognized on page 6-1, such regulations, policies, programs and plans may constrain or influence future decisions and actions under the Delta Plan. The topic of existing regulations, authorities and plans merits a white paper of its own, and the discussion should include information on the Department of Fish and Game, Fish and Game Commission, State Water Resources Control Board and Regional Water Quality Control Board jurisdiction. Also absent from Section 7's discussion of future issues affecting the Delta ecosystem is a reference to contaminants, emerging or otherwise. Finally, Section 4 contains an incomplete discussion of the extent and impact of the numerous upstream diversions from the Delta, including diversions associated with uses in the San Francisco and East Bay areas of Northern California.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
Sacramento-San Joaquin Delta Conservancy	11/5/2010	...before making any recommendations, the Early Actions Review Committee should consider the full range of alternatives related to the Yolo Bypass region including the Westside Yolo Bypass Management Option.	At this time, the Early Actions activities have been completed. Restoration methods for the Yolo Bypass will be considered as part of the development of the Delta Plan.
Shasta County Board of Supervisors	11/9/2010	We have also reviewed the Department of Fish and Game's "Quantifiable Biological Objectives and Flow Criteria for Aquatic and Terrestrial Species of Concern on the Delta."...The legislation that mandated these reports spoke of "coequal goals" but these reports do not...The proposed Delta flows draw down lake levels under virtually all scenarios. Power generation declines. The cold water pool for salmon and steel head is diminished. Lake-related aquatic species and recreational pursuits are adversely impacted. The scenarios would reduce North of the Delta water deliveries by 67 percent, contravening Area of Origin considerations. These resources are essential to our community. The proposed flows need to be considered in light of their full consequences - as the "coequal goals" require.	This comment will be considered for preparation of the Delta Plan and EIR.

Matrix 7 Comments Related to Ecosystem Resources (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	11/9/2010	The State and Federal Contractors Water Agency has no formal position on this option [Westside Option] or formal guidance on decisions before your committee on Friday. Informally, many of us share a perspective identical to that articulated by Yolo County Supervisor Jim Provenza – that a refined project description and further analysis will be necessary to see if it meets a variety of habitat objectives...The latest draft of the Bay Delta Conservation Plan calls for a full evaluation of a Westside alternative, and we anticipate comments Yolo County on that draft description this week. At this stage, any effort to further articulate this alternative is consistent with BDCP. Eventually, it will have to be the BDCP process to settle on the alternative or range of alternatives for formal analysis. Our members hope to work within BDCP process as well as any concurrent efforts by Yolo County and key stakeholders to better describe this alternative.	This comment will be considered during development of the EIR/EIS alternatives
State and Federal Contractors Water Agency	11/9/2010	While BDCP calls for formally developing the Yolo Bypass Fishery Enhancement Plan after BDCP's formal adoption, we will continue to work with Yolo County and others on development of the plan specifics during the interim before BDCP is finalized.	This comment will be considered during development of the EIR/EIS alternatives

Matrix 8 Comments Related to Risk Reduction (11/8/10-12/3/10)

Association	Date	Comment	Status of Comment
Delta Wetlands Project	11/16/2010	The paper correctly points out that the stress on Delta levees increases as the differential between channel water elevation and island land elevation increases. It should be noted that in this respect, continued subsidence is a greater threat than sea level rise. The rate of subsidence on Delta islands can reach 2" per year. The rate of sea level rise is up to 0.5" per year. The importance of this is obvious and clear; while sea level rise can't be stopped, land subsidence can. We recommend that the Delta Plan recognize the interrelationship of sea level rise and subsidence and deal with both together and comprehensively.	This comment will be considered for preparation of the Delta Plan and EIR.
Delta Wetlands Project	11/16/2010	In addition to stockpiling materials and coordinating response efforts, the Delta Plan should consider facilities and strategies that could isolate salty water that gets introduced to the Delta as well as facilities and strategies that could flush any uncontained salty water from the channels that feed the export pumps.	This comment will be considered for preparation of the Delta Plan and EIR.
Resident of Clarksburg	11/9/2010	Your draft "Flood Risk White Paper" asserts in a monolithic manner that all of the levies in the Delta are subject to earthquake risk. This central conclusion is in error because earthquake faults, and the consequent risk levels related to damage from earthquakes, are much fewer (if present at all) in the Northern Delta. Please do not run your analysis from the assumption, or conclusion without adequate facts, that all of the levees in the Southern Delta face the same risk of damage or failure as the levees in the Northern Delta.	This comment will be considered for preparation of the Delta Plan and EIR.
Resident of Delta	11/9/2010	All the fault maps I have from Cal Berkley show the north Delta to be seismically inactive.	This comment will be considered for preparation of the Delta Plan and EIR.
Sacramento-San Joaquin Delta Conservancy	11/5/2010	...the Conservancy appreciates the urgency and need for Early Actions to address multiple hazards in the Delta and efforts to support the Delta Multi-Hazard Coordination Task Force. The Early Action proposal titled "Delta Multi-Hazard Coordination Task Force Emergency Preparedness Recommendations" provides an excellent example of a coordinated effort that should be considered for the Interim Delta Plan.	At this time, the Early Actions activities have been completed. Restoration methods for reduction of risk will be considered as part of the development of the Delta Plan.