



September 11, 2012

Mr. Joe Grindstaff, Executive Officer
Delta Stewardship Council
980 9th Street, Suite 1500
Sacramento, CA 95814

Dear Mr. Grindstaff:

We have reviewed the September 5, 2012 Proposed Final Draft Delta Plan (Plan) and commend your efforts to generally improve the Plan.

With respect to the ongoing discussion around the policy on reduced reliance on the Delta and improved regional self-reliance, you can be sure that the areas upstream of the Delta in the Sacramento River hydrologic region are committed to "improve its regional self-reliance for water through investment in water use efficiency, water recycling, advanced water technologies, local and regional water supply projects, and improved regional coordination of local and regional water supply efforts" as called for in Water Code §85021. We appreciate the efforts of staff to clarify how the Council would measure implementation of §85021. The September 5 draft, however, continues to misconstrue the way "reduced reliance" applies to water diversion and use outside the Delta, yet in the Delta watershed. Policy WR P1 continues to define success as the demonstration of "a significant reduction in the amount of water used, or in the percentage of water used, from the Delta watershed." (Page 104.) As we have stated in numerous letters and comments (See e.g., our July 11 and June 12, 2012 letters), this simply does not make sense for water management in areas upstream of the Delta and it is not workable for water suppliers we represent in the Delta watershed, which are completely dependent on local water supplies from the watershed. Finally, WR P1 is inconsistent with Water Code §109 and Water Code §85031(a), which ensures that water rights and area of origin provisions will not be impacted in any manner.

Water suppliers upstream of the Delta in both urban and rural areas have demonstrated success in implementing various programs over the past several decades that are truly improving regional self-reliance and we will continue to advance these efforts for regional self-reliance. We again urge the Council to remove or further clarify the language suggesting that success in implementing this policy requires reduced reliance on the Delta in areas outside the Delta.

Sincerely yours,

A handwritten signature in black ink, appearing to be "John Woodling".

John Woodling, Executive Director
Regional Water Authority

A handwritten signature in black ink, appearing to be "David Guy".

David Guy, President
Northern California Water Association