



*To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights, supplies and water quality of our members.*

July 1, 2010

Phil Isenberg, Chairman  
Delta Stewardship Council  
650 Capitol Mall  
Sacramento, CA 95814

Dear Chairman Isenberg and Members of the Council:

The Northern California Water Association (NCWA) provides the following comments on the June 14 "First Draft Interim Plan" (Plan) under consideration by the Delta Stewardship Council (Council). Both NCWA and the Glenn-Colusa Irrigation District previously provided detailed comments on the framework for the Plan we hope the Council will consider as it refines the Plan. We will not reiterate these comments, but instead offer a broader perspective that we believe is important as the Council develops both the interim and long-term Plans and other state agencies implement their related parts of the legislative package.

In looking at last year's legislative package, the Legislature found and declared that the basic goals of the state for the Delta are to "achieve the co-equal goals to provide a more reliable water supply for California and protecting, restoring and enhancing the Delta ecosystem." (Water Code §29702 (a).) As the various state agencies begin to implement these provisions, the focus and emphasis is appropriately on the legal Delta as generally suggested in the Plan. We urge the Council to further clarify the Plan's focus on the Delta. With the limited resources available to implement the Delta Plan, especially with the potential delay of the water bond to the November 2012 ballot, it is critical that investments in the Plan contribute as much as possible to the implementation of the co-equal goals. Concentrating on programs and projects in the Delta will properly direct these resources to where they are needed most at this time.

For areas outside the Delta, there was a parallel policy in the legislation to encourage regional sustainability as follows: "each region that depends upon water from the Delta watershed shall 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." (Water Code §85021.) Regional sustainability in the Sacramento Valley can be viewed on two levels. First, there are important legal principles that guide sustainability in the Sacramento Valley and which were confirmed in the legislation. These provisions recognize the ability to use water within the areas, watersheds and counties of origin

described in Water Code §85031 and the water right priorities in Water Code sections 85031 and 85032. These protections provide Sacramento Valley water users with the water supply certainty that allows them to participate in programs to improve the Delta ecosystem and enhance water supply reliability in other areas of the state.

Second, entities and individuals throughout the Sacramento Valley have seriously pursued progressive water management over the past several decades to manage water resources in a regionally sustainable manner for the benefit of farms, communities, fish and wildlife. These programs and projects have reduced conflicts in the region and have fostered numerous partnerships that provide water for multiple purposes. These partnerships have benefitted public trust resources upstream of the Delta, as well as providing benefits to the Delta and anadromous fish that migrate through the Delta. As a result of these measures, water is increasingly managed in an integrated manner throughout the region and overall water use in the Sacramento Valley has not increased during the past 40 years. (Delta Vision Figure 7, revised by MBK Engineers.)

Most importantly, integrated regional water management plans reflect the regional values placed on water resources and they build upon the region's water rights and supplies within the state's watersheds of origin to ensure the region can remain self sufficient and provide sustainable supplies—both now and into the future. Significant public and private capital has been invested in these regions to efficiently use, manage and store the water supplies that serve as both the socio-economic and environmental foundation for the region.

We therefore urge the Council to encourage and help facilitate regional sustainability in accordance with state policy. This not only serves as an effective mechanism to achieve statewide reliability, it can also provide assurances to regions that are currently self sufficient that future efforts to achieve statewide reliability will respect the importance of regional sustainability and not preclude these regions from maintaining their self-sufficiency. We also urge the Council to develop and refine the Plan to focus on the Delta in a way that does not impair or otherwise preclude regional sustainability for areas outside the Delta, including the Sacramento Valley.

The Sacramento Valley stands committed to enhance regional sustainability in a way that water supply and ecosystem benefits are realized in the Delta and other areas of the state.

We appreciate your consideration of these comments.

Sincerely yours,

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

David J. Guy, President

cc: Delta Stewardship Council Members  
Joe Grindstaff