



January 9th, 2013

Mr. Phil Isenberg
Chair, Delta Stewardship Council
Recirculated Draft PEIR Comments
980 Ninth Street, Suite 1500
Sacramento, California 95814

Subject: Suisun Resource Conservation District Comments on the
Recirculated Delta Plan Draft PEIR

Dear Mr. Isenberg,

The Suisun Resource Conservation District (SRCD) is a legislatively created special district with the primary local responsibility for promoting wetland conservation of the Suisun Marsh through improvements in water management practices on private lands within the primary management area of the Suisun Marsh (Public Resources Code 9962). The SRCD has taken the leadership role for over 40 years to ensure adequate water quality in the Suisun Marsh – a condition necessary to promote a diversity of productive waterfowl habitat, enhance the wetland resource values through appropriate management practices, and make sure the wetland and wildlife values of the Suisun Marsh are sustained and protected.

For the past decade, SRCD has worked cooperatively with California Department of Water Resources, the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, the National Marine Fisheries Services, the United States Bureau of Reclamation, and the CALFED Program (the predecessor to the Delta Stewardship Council) as a Principal Agency in the development of the Suisun Marsh Habitat Management, Preservation and Restoration Plan (SMP) and associated environmental impact report/statement (SMP EIR/EIS). The SMP is a comprehensive 30 year management plan for the Suisun Marsh region. The SMP's development process was based upon Agency collaboration with stakeholder participation to develop a plan to address conflicts regarding ongoing management of existing Marsh resources, the enhancement and long term management of managed wetlands, and the restoration of 5,000 to 7,000 acres of tidal wetlands to contribute to the recovery of listed terrestrial and aquatic species. The SMP significantly supports the coequal goals of the Sacramento-San Joaquin Delta Reform Act of 2009. It is consistent with the Delta Plan, it implements many of the near term and intermediate term ecosystem

Directors

Tony Vaccarella, President
Terry Connolly
Arnold Lenk
Mike Lewis
Jim Waters

Associate Directors

Dennis Becker
Kurt Black
Bill Brush
H. Kent Hansen

Directors Emeritus

James Bancroft
Dr. William Coon
Paul Crapuchettes
Timothy Egan
Leland Lehman
Ray Lewis
Gregory Palamountain

Staff

Steven Chappell
Executive Director
Bruce Wickland
Operations Manager
Kelli Perez
Office Supervisor
Orlando Rocha
Water Manager/Biologist
Tim Edmunds
Water Manager/Biologist
Jeff Taylor
Water Manager/Biologist
Steve Witherspoon
LJI Resident Caretaker
Martha Rocha
Education Coordinator

**SUISUN RESOURCE
CONSERVATION DISTRICT**

2544 Grizzly Island Road
Suisun, CA 94585-9539
(707) 425-9302
(707) 425-4402 FAX
srcd@suisunrcd.org
www.suisunrcd.org

restoration objectives called out in the Delta Plan Policies and Recommendations, and implements a viable strategy for restoring a healthy Delta ecosystem, while protecting and enhancing existing ecosystem resources of the Delta and Suisun Marsh in partnership with the stakeholders of the Marsh.

Recently, the Delta Stewardship Council staff and science program began to actively participate as a SMP Principal Agency and is becoming engaged in future adaptive management, science, and implementation elements of SMP. SRCD is pleased with these recent developments and is hopeful that the DSC will embrace the SMP as complementary to the Delta Plan and will work collaboratively with land managers and Agencies in protecting and restoring the wetland and wildlife resources of the Suisun Marsh.

On February 2, 2012 SRCD submitted comments on the 5th draft of the Delta Plan and Draft EIR. The following comments will be limited to the 7th draft of the Delta Plan and the Recirculated Draft Delta Plan PEIR. SRCD continues to be concerned that the Recirculated PEIR fails to adequately analyze the environmental impacts that may be associated with the implementation of the Delta Plan's current draft Policies on the Suisun Marsh. The implementation of some of these policies will cause significant direct and indirect physical changes in the environment and significant adverse and unavoidable environmental effects and consequences to the wetland and wildlife resources of the Suisun Marsh. The Recirculated PEIR has not adequately considered, disclosed, analyzed, nor proposed adequate mitigation for significant potential future negative impacts to the wetland and wildlife resources of the Suisun Marsh.

- ER P1 & P2 – Any increases in local and regional salinities in the Suisun Marsh due to changes in Delta outflow, increased upstream diversions, changes to timing and duration of Delta outflow, and/or the ecosystem restoration activities in Suisun Marsh and other priority habitat restoration areas in the Delta, will negatively impact the Suisun Marsh. Increases in salinities in the Suisun Marsh will decrease existing wetland diversity, decrease wintering waterfowl carrying capacity, decrease habitat quality for resident and migratory wildlife, decrease the operational life of managed wetland water management infrastructure and increase the costs of seasonal wetland habitat management activities. These significant adverse and unavoidable environmental effects must be analyzed, disclosed and adequately mitigated.
- ER P2 & R1- “Restore significant portions of the Suisun Marsh to brackish marsh with land-water interface”. The Recirculated PEIR has not defined what “significant portions of the Suisun Marsh” means nor has it identified potential impacts to the existing environment from the proposal. Any tidal restoration actions that exceed the SMP EIR/EIS tidal restoration targets will result in degradation, conversion, or direct loss of existing managed wetland habitats; it will decrease existing wildlife species

populations and diversity; it will reduce existing waterfowl species composition, abundance, and distribution; it will limit wintering waterfowl food resources; and it will negatively impact resident breeding and migratory waterfowl, raptors, water birds, and terrestrial wildlife species, including the endangered Salt Marsh Harvest Mouse. These significant adverse and environmental effects must be analyzed, disclosed and adequately mitigated.

- DP P2 - The economic and social impact of significant land use changes due to implementing the Policies of the Delta Plan, increased salinity from changes in Delta outflow, and tidal restoration conversion of existing managed wetland habitats in the Suisun Marsh will have significant detrimental impacts to the existing waterfowl hunting clubs, will reduce their financial viability, and destroy the legacy of wetland conservation activities in the Marsh. These significant adverse and unavoidable social economic effects must be analyzed, disclosed, and adequately mitigated.

SRCD supports the Delta Plan process and the coequal goals of protecting, restoring and enhancing the Delta ecosystem, but this will only be successfully achieved through partnerships and respect for existing landownership and continued protection and stewardship of the existing wetland resources in the Suisun Marsh.

If you have any questions regarding the content of this letter, please contact me at (707) 425-9302 or schappell@suisunrcd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Chappell" with a small flourish at the end.

Steven Chappell,
Executive Director, SRCD

Cc. Ms. Cindy Messer, Delta Plan Program Manager
SRCD Board of Directors
SMP Principal Agencies
Solano County