



January 27, 2011

Ms. Terry Macaulay  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

Dear Ms. Macaulay,

The Suisun Resource Conservation District (SRCD) appreciates the opportunity to provide comments on the Notice of Preparation for the development of a Delta Plan and Delta Plan Environmental Impact Report.

The SRCD is a special district of the States of California 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 to promote a diversity of productive waterfowl habitat, enhance the wetland resource values through appropriate management practices, and ensure the wetland and wildlife values of the Suisun Marsh are sustained and protected. The Suisun Marsh landowners and SRCD have been the stewards of these wetland and wildlife resources for Over a century and advocated for the passage of the 1977 Suisun Marsh Preservation Act to protect these wetland resources from development and loss as most of the wetland areas in the Central Valley and San Francisco Bay have experienced.

The SRCD is also Principal Agency in the development of the Suisun Marsh Habitat Management, Preservation and Restoration Plan (SMP). The SMP is a collaborative process with stakeholder participation to develop a 30 year plan for the Suisun Marsh to address conflicts regarding management of existing Marsh resources, the enhancement and long term management of managed wetlands, and the restoration tidal wetlands to contribute to the recovery of terrestrial and aquatic listed species. SRCD believes that the SMP significantly contributes and supports the coequal goals of the Sacramento-San Joaquin Delta Reform Act of 2009 and strategies for restoring a healthy Delta ecosystem. SRCD encourages the Delta Stewardship Council staff to work closely with the SMP Principal Agencies while developing the Delta Plan to fully understand the benefits and contributions the SMP will provide the Delta Plan.

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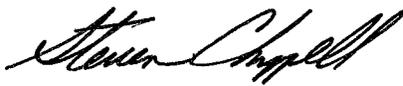
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SRCD encourages the Delta Stewardship Council to look at alternatives and actions for Delta ecosystem protection, restoration, and enhancements that complement existing functioning wildlife and wetlands resources and minimize potential impacts on existing Suisun Marsh wetland resources, wildlife values, and water quality. Any action under the Delta Plan that has a potential to affect the Suisun Marsh natural resources or physical environment should be fully analyzed and disclosed in the Delta Plan EIR. The following list of activities should be analyzed specific to the Suisun Marsh:

- The loss, conversion, or degradation of existing diked and tidal Suisun Marsh brackish wetland habitats.
- Any reduction in waterfowl species composition, abundance, and distribution.
- Any changes in wintering waterfowl carrying capacity.
- Impacts to existing resident breeding and migratory waterfowl populations.
- Impacts to resident breeding and migratory raptors, water birds, and terrestrial wildlife species.
- Changes of the Suisun Marsh salinities including seasonal, annual and regional salinity.
- Impacts of potential increased salinities of the following areas: decrease managed wetland diversity of diked seasonal wetlands, reduce waterfowl food production, increase soil salinities, and reduce the life expectancy of infrastructure needed to managed and operate the seasonal wetlands.
- Impacts of changes in Delta outflow that directly increase salinities in the Suisun Marsh. Changes in upstream diversion volumes and timing of these diversions could significantly impact environmental conditions in the marsh and wetland habitat conditions.
- The need for a funded Suisun Marsh levee maintenance program for the protection of existing resources and water quality.
- The economic and social impact of changes in existing Marsh features, landscape, and salinity regimes that could change existing waterfowl hunting and the financial viability of continued wetland conservation.
- The consistency with existing plans and policies related to the Suisun Marsh including, but limited to, the Suisun Marsh Preservation Act of 1977, the 1976 BCDC Suisun Marsh Protection Plan, the 1984 Plan of Protection for the Suisun Marsh, the Revised Suisun Marsh Preservation Agreement, etc.

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

Sincerely,



Steven Chappell,  
Executive Director, SRCD