

From: Michael Brodsky
Sent: Wednesday, March 28, 2012 3:50 PM
To: Messer, Cindy@DeltaCouncil
Subject: comment for 3/19 DSC meeting

Dear Ms Messer:

I am submitting this comment on behalf of the Save the California Delta Alliance, a citizens group based in Discovery Bay, California.

I tried to send the attached comment through the DeltaPlanComment@deltacouncil.ca.gov email address but it bounced back and Eric Alvarez advised me that there is an issue with this address and it isn't currently working. He said that he is working to fix the problem and that in the mean time I could forward my comment through you.

The attached pdf suggests specific wording changes to the staff's most recently proposed Option 2 : Delete in-Delta water users from WR P1. We believe that Option 2 is the best option and urge the Council to adopt it. However, we suggest several wording changes to make it internally consistent and to better reflect the intent that the policy requirements of reducing reliance on the Delta do not apply to upstream users and in-Delta users, but rather to those who "export water from or transfer water through the Delta" (essentially the SWP and CVP contractors).

We believe that the best policy is for existing law (e.g. 20% reduction in net water use by 2020) to apply to in-Delta and upstream users and for additional requirements to demonstrate reduction in reliance on the Delta to apply to exporters. We believe that this is consistent with the grand legislative bargain that was struck in SB1: that the state would sign on to go down the road with the SWP and CVP contractors on the peripheral canal if the contractors would agree to real reductions in reliance on Delta water.

Thank you in advance for considering our views and the specific wording changes proposed in the attached pdf.

Sincerely,
Michael Brodsky

Option 2 :Delete in Delta water users from WR P1

WR P1 – Reduce Reliance on the Delta

A proposed action to export water from or transfer water through the Delta is inconsistent with the Delta Plan if (1) one or more water suppliers that receive water as a result of the proposed action have failed to reduce their reliance on the Delta and adequately contributed to improved regional self-reliance; (2) that failure has significantly caused the need for the proposed action; and (3) the proposed action ~~would~~ **may** have a significant adverse environmental impact in the Delta.

For purposes of this policy, “reducing reliance on the Delta and adequately contributing to improved regional self-reliance” ~~may~~ **shall** be demonstrated by a significant reduction in net water use, or in the percentage of water used, from the Delta ~~watershed~~. Consistent with Water Code section 85021, reduced reliance and improved regional self-reliance ~~with~~ may be achieved 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. ~~At a minimum, a significant reduction in net water use, or in the percentage of water used from the Delta watershed must be achieved through compliance with existing state laws regarding water conservation, water efficiency and urban and agricultural water management planning.~~

WR RX: Expand Water Supply Reliability Element (previously part of WR P1)

Water suppliers that ~~receive~~ **export** water from ~~or transfer water through~~ the Delta ~~watershed~~ should include an expanded Water Supply Reliability Element, starting in 2015, as part of the update of its Urban Water Management Plan, Agricultural Water Management Plan, Integrated Water Management Plan or other plan that provides equivalent information on the supplier’s planned investments in water conservation and water supply development. The Expanded Water Reliability Element should detail how water suppliers are improving reducing reliance on the Delta and improving regional self-reliance consistent with Water Code section 85201 through investments in local and regional programs in volume of water used from Delta or expansion of local supplies relative to Delta water use. At a minimum, these plans should include a plan for possible interruption of Delta supplies up to 36 months due to catastrophic events, evaluation of the regional water balance, a vulnerability assessment to the impacts of climate change, and an evaluation of the extent to which the rate structure promotes and sustains efficient water use.

Water suppliers that receive water from the Delta watershed should comply with existing state laws regarding water conservation, water efficiency and urban and agricultural water management planning.