

From: [Burt Wilson](#)
To: [Delta Council Delta Plan Comments](#)
Subject: Comments on Sixth Draft Plan
Date: Wednesday, June 20, 2012 10:53:33 AM

June 20, 2012

Delta Stewardship Council
980 Ninth Street, Suite 1500 Sacramento, California 95814
Re: Sixth Draft – Delta Plan

Transmitted electronically: deltaplancomment@deltacouncil.ca.gov.

Dear Chairman Isenberg and Members of the Council:

Thank you for allowing me to comment on the Sixth Draft Plan.

My concern is the "science" that is being practiced by the Bay Delta Conservation Plan and I believe that the BDCP's Effects Analysis will not pass muster with the DSC's Delta Plan as things stand now.

The DSC's own Independent Science Board concluded:"As it is currently written, the Effects Analysis is too inconsistent in its treatment of how effects are analyzed across listed species and the potential costs and benefits of the planned BDCP activities are too uncertain to provide an objective assessment of the BDCP on covered species.

"The Effects Analysis should be viewed as a working hypothesis with considerable uncertainty that requires a strong monitoring and adaptive management plan to ensure status of species improves over time. As such, the Effects Analysis should provide the best, scientifically defensible, assessment of how the covered species and ecosystems will respond, both positively and negatively, to BDCP implementation.

"The Effects Analysis can only achieve this goal by looking at the sum of effects across covered species; it is then up to resource managers to implement only if the BDCP does not appear to result in further declines, and to continue to monitor and evaluate adaptively through the evolution of the Plan. The Panel continues to find considerable lack of clarity in the description of the Effects Analysis process and details that would ensure it will meet that obligation."

This is an effective trashing of the BDCP's "science" which was characterized a little of a year ago by the National Science Academy as "merely a support for a Delta conveyance."

The ISB calls for more use of "adaptive management" in the BDCP's Effects Analysis in the future which really means we would have a conveyance built by trial and error. This is wholly unacceptable.

The BDCP should be completely excised from the Sixth Draft Plan

Burt Wilson
Editor

Public Water News Service
Member of the BDCP's Public Committe
Member of the Forum Sub-Committee of the 2013 Water Plan