



Delta Stewardship Council

A CALIFORNIA STATE AGENCY

January 22, 2021

Virginia Gardiner
Delta Protection Commission
2101 Stone Blvd., Suite 240
West Sacramento, CA 95691

Sent via email: Virginia.Gardiner@delta.ca.gov

RE: Comments on the 2020 update to the Economic Sustainability Plan for the Sacramento-San Joaquin Delta: Recreation and Tourism Chapter

Dear Virginia Gardiner:

Thank you for the opportunity to review and comment on the Delta Protection Commission's draft Economic Sustainability Plan for the Sacramento-San Joaquin Delta: Recreation and Tourism Chapter [2020 Update](#) (draft update). The Delta Stewardship Council (Council) recognizes the objective(s) to update the 2012 Economic Sustainability Plan and incorporate best available current data, analysis of visitation, economic activity, and emerging recreation and tourism trends.

Background

The Council is an independent state agency established by the Sacramento-San Joaquin Delta Reform Act of 2009, codified in Division 35 of the California Water Code, sections 85000-85350 (Delta Reform Act). The Delta Reform Act charges the Council with furthering California's coequal goals of providing a more reliable water supply and protecting, restoring and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem. (Water Code, § 85054.) The Delta Reform Act further states that the coequal goals are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. The Council is charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan. (Water Code, § 85300.) Pursuant to the Delta Reform Act, the Council has adopted the Delta Plan, a comprehensive long-term management plan for the Delta and Suisun Marsh that furthers the coequal goals.

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The Delta Reform Act requires the Delta Protection Commission (DPC) to prepare an Economic Sustainability Plan (ESP) for the Delta region. The last ESP was published in January 2012, and includes information on a range of topics including Delta agriculture, recreation and tourism, public safety, levees, and conveyance and restoration impacts. The Council notes that the 2012 ESP helped inform recommendations that the DPC provided to the Council during development of the 2013 Delta Plan.

Comments and Questions

Since 2012, a number of changes have occurred in the region related to recreation and tourism, including the 2019 designation of the Delta as a National Heritage Area (NHA), continued planning work on the Great Delta Trail, creation of a marketing taskforce (visitCAdelta.com), and most recently the impact of the COVID-19 pandemic. In addition, in 2015 the proposed Bay-Delta Conservation Plan pivoted to California WaterFix and EcoRestore, and subsequently in 2019 to the proposed Delta Conveyance Project. The Delta Plan has been updated to reflect these and other updates, including amendments on Performance Measures used to track progress towards the coequal goals (including measures on [recreation opportunities](#) and [Delta tourism](#)), single-year water transfers, Conveyance, Storage, and Operations, and the ongoing Delta Levees Investment Strategy (DLIS). An amendment to Chapter 4 of the Delta Plan, focused on ecosystem restoration, is currently under consideration.

As the DCP notes, despite these changes, the Delta recreation and tourism economy declined by approximately 20% between 2012 and 2019. In the ESP Recreation Chapter, the DPC is proposing a number of potential tools to address this decline and plan for continued population growth and pervasive constraints to recreation. In a meeting held on December 16, 2020, DPC staff discussed the potential for a new Joint Powers Authority (JPA) that could be created to help coordinate recreation and tourism activities in the Delta. Section 8.4.3 of the draft update also discusses the benefits of establishing a facilitator organization, such as a JPA, to coordinate management of complex regional landscapes such as the Delta. It would be helpful for the DPC to describe the vision for the proposed JPA. More specifically, who would lead, participate, and identify sources of potential funding? In addition, how would JPA roles and responsibilities overlap with participants' current duties? How would this effort go beyond the status quo and potentially help coordinate funding across county and other jurisdictional boundaries?

Additionally, Council staff are interested in learning DPC's perspective on the expected impacts of the National Heritage Area (NHA) designation on recreation funding and conservation as it becomes more recognized. Council staff are participating in the NHA management plan advisory committee and note that recognition has to date received more attention than funding opportunities and needs.

The draft update touches on recreation trends, but Council staff are eager to learn more about recreation preferences in and outside of the Delta today, and how these preferences are expected to change with other factors such as climate change, conveyance, habitat restoration, and more. How do these changing recreation preferences intersect with a changing Delta population? Section 8.3.7 of the update notes that the DPC expects the breakdown of recreation

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types to remain relatively constant, yet many of the close-by recreation opportunities are disappearing. Council staff is interested in learning more about DPC's ideas to manage and prepare for these changes. The Council recently released a climate change [vulnerability assessment](#) for the Delta. The vulnerability assessment and a planned adaptation strategy could help inform implementation of the Recreation chapter update in the future.

Lastly, Council staff would like to see additional analysis of public land areas in the Delta that provide a dual conservation and recreation purpose. The Council is currently undertaking an amendment to Chapter 4 of the Delta Plan, focused on ecosystem restoration. The [draft amendment](#) identifies that a functioning ecosystem is important for and compatible with the recreational economy. The draft amendment also includes a proposed new ER Policy "A", which would require disclosure of social benefits (including recreation) for new restoration projects ([p. 4-70](#)). We encourage you to review this policy for potential applicability to future dual-use projects and contribution to social and environmental justice values in the Delta.

Closing Comments

As the Delta Protection Commission proceeds to finalize the Recreation and Tourism chapter update, Council staff are available to discuss comments outlined in this letter. Please contact Morgan Chow at (916) 445-5511 or morgan.chow@deltacouncil.ca.gov with any questions.

Sincerely,



Jeff Henderson, AICP
Deputy Executive Officer
Delta Stewardship Council