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May 2, 2012

Joe Grindstaff
Delta Stewardship Council
98 Ninth Street, Suite 1500
Sacramento, CA 95814

Regarding: April 18, 2012 Letter to the State Water Resources Control Board

Dear Joe Grindstaff,

It was good to see you at the DSC workshop on April 26, 2012. I appreciate your April 18, 2012, letter to the State Water Board as it opens an environmental review scoping and analysis phase to develop a new Delta flow objective. As you know, the proposed outcome of the State Water Board’s planning actions for the California Delta will have profound impacts.

While we agree with your statements to support a more “functional flow”, I would like to comment on a couple statements in the letter that cause concern. You mention that the Delta Stewardship Council “encourages the State Water Board to address flows in a way that relates to the natural functions that those flows historically provided”. The concern is “historically provided” in the sentence. According to the information sent with the letter to the State Board, that means pre-1849. You further urge the State Water Board by the comment “Until large-scale restoration is in place, a realistic, more natural flow regime should be used to protect, restore, and enhance the Delta ecosystem.”

As you know, the landscape and conditions in the Sierra Nevada no longer exist as they once did in 1849. Rapid and extensive expansion of urban development and rural development, forestry practices, hydroelectric power production, storage facilities, water supply and recreation in the Sierra Nevada watershed has vastly changed in the past 150 years. A far different paradigm exists today than a century and a half ago. Existing conditions in California require a far greater balancing strategy for Sierra water than simply shipping more of it to the Delta at the ultimate expense of Sierra Nevada area-of-origin counties. It is critical that the State understands the full ramifications and fully mitigates for its intended actions. Failure to fully analyze the impacts to upstream Delta tributaries will create a crisis upstream that will also ultimately lead to further degradation of the Delta ecosystem.

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We should all be extremely concerned that the State's proposal to greatly increase Sierra water flows to the Delta will have significant adverse impacts on local water supply reliability for consumptive use, hydroelectric power generation, and fish habitat.

One example: Folsom Lake is the first responder to a Delta levee failure. Increased natural flows to the Delta will prematurely drain Folsom, adversely affecting water supply for the region, hydroelectric power generation, as well as, the salmon and steelhead population that depend on the cold water pool for the Lower American River during their migration periods. If not fully mitigated, a Delta levee failure could have catastrophic consequences for this region and southern California.

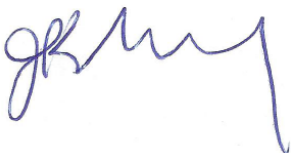
I also noticed that there was no mention in the letter that the State should address existing Delta stressors, such as illegal diversions and system water loss, rather just increase flows leading to adverse consequences upstream.

The State must also acknowledge and realize there are limited water supply alternatives in the mountain counties area. Communities heavily rely on storing springtime Sierra water in reservoirs for year-round water supply reliability as there is inadequate groundwater available and very limited access to recycled water. Our children and grandchildren will be further impacted by long-term droughts and climate change.

Lastly, as you know, much science on this subject is being done within the Sierra Nevada watershed. It is crucial that the State factor the science findings into the decision making process. I would like to invite you to attend the next Mountain Counties Water Resources Association's General Membership meeting on June 15, 2012 at the El Dorado Irrigation District in Placerville. The program will focus on the science being done in the Sierra Nevada by Dr. Roger Bales, Professor of Engineering at U.C. Merced and Director of the Sierra Nevada Research Institute at U.C. Merced as he discusses work on the "Sierra Nevada Watershed Ecosystem Enhancement Project" (SWEET). Joining Dr. Bales is Dr. Bill Stewart, Cooperative Extension Forest Management Specialist Director, Center for Forestry at U.C. Berkeley and Jim Branham, Executive Director of the Sierra Nevada Conservancy.

Thank you for your leadership and efforts working with the Ag/Urban Coalition to develop a Delta Plan to achieve the coequal goals for all of California. If you have any questions, please give me a call.

Sincerely,



John Kingsbury
Executive Director
Mountain Counties Water Resources Association

c: Board of Directors, MCWRA
Jeanine Townsend, State Water Resources Control Board
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Mark Rentz, ACWA