

Friends of the River
1418 20th Street, Suite 100
Sacramento, CA 95811

June 5, 2017

Delta Independent Science Board Members **via Email**

Re: Proposed Delta Stewardship Council Plan Amendment on Conveyance, Storage, and Operations of Both

Dear Chair Jay Lund and all Delta Independent Science Board Members:

By this short letter to you, our Coalition of 10 public interest organizations¹ follow up on our detailed letter of May 22, 2017 to you addressing alternatives analyses issues with respect to the California Water Fix Final EIR/S review. While most of our letter pertained to the Water Fix Final EIR/S review, we did also suggest that you comment to the Delta Stewardship Council

¹ AquAlliance, California Water Impact Network, California Sportfishing Protection Alliance, Center for Biological Diversity, Environmental Justice Coalition for Water, Environmental Water Caucus, Friends of the River, Planning and Conservation League, Restore the Delta, and Sierra Club California join in this letter.

(DSC) about its rush to make dual-conveyance the preferred alternative and promoted option in its proposed Delta Plan amendment on Conveyance, Storage, and Operations of Both. (Our May 22, 2017 letter at pp. 16 -17). The proposed DSC Plan Amendment states that the California Department of Water Resources (DWR) and the U.S. Bureau of Reclamation “should pursue a dual-conveyance option for the Delta.” (Agenda Item 10, May 25, 2017 DSC meeting, Attachment 5, p. 21).

The DSC plans on asking for your views *after* they act rather than *before* they act. As set forth in the staff report for Agenda Item 10 (for the May 25, 2017 DSC meeting, p. 7):

Following Council approval to proceed with environmental review of the draft Delta Plan CSO amendment, staff will ask the Delta Independent Science Board to conduct a review of the draft Delta Plan CSO amendment and provide a report for consideration during the CEQA review period.

We believe it would be good for the DSC Members to receive your views before their dual-conveyance train leaves the station at the June 22, 2017 DSC meeting.

As we have explained before, the Trial Court Order and the Delta Reform Act (DRA), require “quantified or otherwise measurable targets associated with achieving reduced reliance on the Delta” and “restoring more natural flows.” (Our May 22 letter, p. 7). Moreover, DRA (Water Code) § 85320(b)(2) in subsections (A) and(B) requires determination of “the flows necessary for recovering the Delta ecosystem and restoring fisheries” so as to “identify the remaining water available for export and other beneficial uses.” (Our May 22 letter pp. 7-8).

The law, science, and common sense require the DSC to determine how much, if any, water remains available for export *after* meeting the express Delta restoration requirements set forth in the DRA, *before* deciding whether to promote new, upstream dual-conveyance over existing through-Delta conveyance. The work has not been done that would justify favoring new, upstream conveyance reducing through Delta flows over the alternative of maintaining through-Delta conveyance and increasing through Delta flows by reducing exports.

We believe it appropriate for you to recommend to the DSC now, in writing, that the DSC set targets to achieve reduced reliance on the Delta, restore more natural flows, and determine the flows necessary for recovering the Delta ecosystem and restoring fisheries, *before* making a policy choice whether to favor dual-conveyance.

Should you have any questions, please contact Conner Everts, Facilitator, Environmental Water Caucus at (310) 804-6615 or connere@gmail.com, or Robert Wright, Senior Counsel, Friends of the River at (916) 442-3155 ext. 207 or bwright@friendsoftheriver.org.

Sincerely,



E. Robert Wright, Senior Counsel
Friends of the River



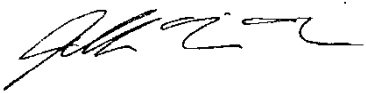
Bill Jennings, Executive Director
California Sportfishing Protection Alliance



Barbara Barrigan-Parrilla, Executive Director
Restore the Delta



Conner Everts, Facilitator
Environmental Water Caucus



Jeff Miller, Conservation Advocate
Center for Biological Diversity



Carolee Krieger, Executive Director
California Water Impact Network



Barbara Vlamis, Executive Director
AquAlliance



Kyle Jones, Policy Advocate
Sierra Club California



Colin Bailey, Executive Director
Environmental Justice Coalition for Water



Jonas Minton, Senior Water Policy Advisor
Planning and Conservation League