Ms. Delores Brown
Chief, Environmental Review
Department of Water Resources
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As a fisherman and member of the California Striped Bass Association, I am requesting the Department of Water Resources to consider and provide an adequate answer to the following fundamental questions regarding the Bay/Delta Conservation Plan’s stated preferred alternative of a “dual conveyance” system, aka the Peripheral Canal.

How much water does the estuary require to maintain ecosystem integrity?
How much surplus water is available for export?
What are the economic and environmental consequences of various reduced export scenarios?

Without answers to these fundamental questions, the Department of Water Resources is unable to assess the ability to export water out of the Delta for agricultural and municipal uses in other regions of the state. It is clear that our Delta is at crisis with several of its 750 species of plants, animals and fish in endangered or threatened status. Of particular note is the number of fish species threatened or endangered within the past several years. Salmon and steelhead populations are down 90% from historic levels. Resident open-water species (Delta and longfin smelt, threadfin and American shad, striped bass, splittail and sturgeon) are at or near historical lows. Much of their native food supply — phytoplankton and zooplankton — has been reduced by 90-99%. The mass and diversity of bottom dwelling organisms has plummeted. Hundreds of non-native invasive species have become established, further destabilizing the estuary. In addition, the Delta is severely polluted by numerous pollutants.

The first and foremost factor is the massive quantity of water exported south by the most powerful pumping network in the world; pumps that can reverse the tide and cause the San Joaquin River to flow upstream; pumps that can suck a volume of water including fish and their food supply equal to the capacity of the south Delta every four days. In some years, these pumps export almost three-fourths of the water that would have flowed to the sea. Despite the obvious affect on the ecosystem of the Delta, pumping water south has increased exponentially since the 1950’s with particular increases since the year 2000.

It is our belief that the Bay Delta Conservation Plan’s stated co-equal goals of water delivery and improved habitat for the Delta is unattainable. This plan is essentially a water delivery plan sold to the general public as a conservation plan.

This plan does not pass the environmental test or the economic test. A recent study by the University of the Pacific estimates that the economic consequences to California from ending exports are far less than from continuing upon the same path with exports.
As stated by Jerry Johns, Deputy Director of the Department of Water Resources, at the March 2009 Stockton Scoping meeting when directly questioned, "The chance of an alternative system to the dual conveyance is less than 5%" Proposals such as the BDCP must consider viable alternatives or else it is not a proposal, simply a pre-conceived plan looking for a rubber stamp.

We acknowledge that our Delta, one of the world's greatest resources, is in a critical state. To do nothing is not an option, but the "dual conveyance" plan offered as a solution to our water problems, is not a viable solution. The Department of Water Resources is highly encouraged to develop and present viable alternatives that answer the three questions previously listed:

How much water does the estuary require to maintain ecosystem integrity?
How much surplus water is available for export?
What are the economic and environmental consequences of various reduced export scenarios?

Without answers to these questions, there is no plan.

Respectfully submitted,

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