



# Butte County

LAND OF NATURAL WEALTH AND BEAUTY

## WATER AND RESOURCE CONSERVATION

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**PAUL GOSSELIN**  
Director

October 6, 2010

Phil Isenburg, Chair  
Delta Stewardship Council  
650 Capitol Mall, Fifth Floor  
Sacramento, CA 95814

Re: Delta Flow Criteria

Chair Isenburg and Members of the Council:

The northern Sacramento Valley region is the Area of Origin for much of the water that flows through the Delta. Therefore our region is a major source for California's overall water supply picture. Much of our local water supply comes from the various groundwater basins throughout the region which are recharged through local creeks and rivers. Our water resources provide the life blood of our agricultural-based communities, economy and environment. The delicate balance of our water system is a testament to the stewardship of local governments, private landholders and water purveyors in our region. Butte County has joined forces with five other counties within the northern Sacramento Valley to develop an Integrated Regional Water Management Plan to protect local surface and groundwater rights.

Butte County has monitored the activities to improve the Sacramento-San Joaquin Delta. In this capacity we have reviewed the State Water Resource Control Board's (SWRCB) report entitled Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem which was finalized after a very short comment period. The Delta Stewardship Council (DSC) has a daunting challenge to develop a Delta Plan that will achieve the equal goals of improving water supply reliability and restoring the Delta ecosystem. As part of the Delta Plan, the DSC must take into consideration the SWRCB flow criteria.

Given the importance of your charge to develop the Delta Plan, we feel compelled to express our concern to you regarding the SWRCB flow criteria. The SWRCB flow criteria considers flows in a vacuum as the primary solution to the Delta's problems and suggests that the flow criteria are supported by the "best available scientific information". Although the Legislature forced the SWRCB to narrowly focus on flows within the Delta, it is abundantly clear that flows alone cannot solve the complex problems of the Delta. We strongly believe that a suite of activities should be considered to maintain the health of the Delta.

The SWRCB flow criteria do not consider the effect to environments outside of the Delta and the important role those areas play in a healthy and economically viable California. The SWRCB report does not take into consideration the devastating effect that the recommended flow criteria would have on the overall economy or ecosystem north of the Delta. Butte County is an agriculturally based economy reliant on a balance of ground and surface water. If these recommendations are implemented, they could remove approximately 50% of the surface water supply currently used to support local agriculture operations. The SWRCB report does not take into consideration the effect on the environment and economy resulting from increased groundwater usage within our region. The flow criteria ignores the ecosystem impacts north of the Delta. The criteria speak only to the needs of the Delta and fly in the face of the restoration projects that have been completed to protect and conserve resources within this region. It does not seem prudent to fix the Delta through actions that will decimate the environment and economies of areas to the north.

With the adoption of the SWRCB report by the DSC and further consideration for the Bay Delta Conservation Plan processes, it is critical that the SWRCB report be consistent with the legislative directive, but also appropriately address and clarify what is necessary versus what may be convenient. We believe that it is inequitable that our region will be entirely devastated to repair and maintain the Delta's health. To do so, you would ultimately fail in your responsibility. We implore you to assess these criteria carefully and consider the impacts to our local environment and economy prior to implementing them in any manner.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Gosselin", written in a cursive style.

Paul Gosselin, Director  
Butte County Water and Resource Conservation