

SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION

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TO: Commissioners and Alternates

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SUBJECT: Status Report on Bay-Delta Planning and Decision-Making
(For Commission consideration on September 4, 2008)

Summary

The Commission has directed the staff to provide information on Bay-Delta planning and decision-making processes. As the third in a series of speakers on Bay-Delta activities, Stuart Siegel, a science advisor to the Delta Vision initiative and the Suisun Marsh Charter Group, will brief the Commission on scientific analysis that is informing these and other planning processes on September 4, 2008.

The staff is continuing to work with Delta Vision and to participate in other ongoing Bay-Delta planning processes, focusing on the need for (1) providing adequate freshwater flows to the Bay and Suisun Marsh, and (2) developing a coordinated regional approach to wetland restoration, sediment management, and planning for climate change in the Bay and Delta. Attached for Commissioners' review are the *Delta Vision* report, a summary of the Public Policy Institute of California's report, *Comparing Futures for the Sacramento-San Joaquin Delta* (Attachment 1), and Environmental Defense Fund's paper, *Finding the Balance: A Vision for Water Supply and Environmental Reliability* (Attachment 2).

Staff Report

DELTA PLANNING UPDATE

The Delta crisis intensified during the spring and summer of 2008 with the crash of the salmon fishery and the continuation of drought conditions that began in 2007. In May, the



Making San Francisco Bay Better

National Oceanic and Atmospheric Administration (NOAA) closed the commercial and recreational salmon fishery off the coast of California and most of Oregon due to record low returns of salmon to the Sacramento River. In June, Governor Schwarzenegger proclaimed a statewide drought after Northern California experienced the driest spring on record.

At the same time, an array of planning and decision-making processes intended to address the Delta and California water issues are moving forward. They include but are not limited to:

- The Bay Delta Conservation Plan (BDCP) to reduce impacts of water project operations on species of concern and their habitats;
- The Delta Risk Management Strategy to evaluate and recommend ways to reduce levee risk;
- The CALFED Ecosystem Recovery Program's Conservation Strategy to identify priority areas for habitat restoration;
- The Suisun Marsh Charter Group's development of a restoration and enhancement plan;
- U.S. Fish and Wildlife Service (FWS) Delta Native Fishes Recovery Plan and National Marine Fisheries Service (NMFS) Central Valley Salmonids Recovery Plan;
- Reconsultations on the FWS and NMFS biological opinions on the Operations Criteria and Plan for the State Water Project (SWP) and Central Valley Project (CVP);
- The California Water Plan update to comprehensively manage water resources and delivery systems;
- The FloodSAFE California plan to reduce the risk of flood damage, improve emergency response and promote beneficial floodplain processes; and
- The Delta Long Term Management Strategy (LTMS) for dredged sediment.

Three major developments occurred in July 2008. On the judicial front, U.S. District Judge Oliver Wanger ruled that the plan for operating the state and federal water projects failed to adequately protect threatened and endangered Chinook salmon and steelhead populations from the threat of extinction. This ruling followed Judge Wanger's 2007 decision to protect delta smelt, which restricts water project pumping by approximately one third.

On the political front, Governor Schwarzenegger and Senator Dianne Feinstein proposed a \$9.3 billion water bond for legislators to present to the voters on the November ballot. This "compromise plan" would fund water storage, conveyance, ecosystem protection and water conservation. Earlier in the year, in response to allegations by some lawmakers that he was unilaterally pursuing work on a peripheral canal, Governor Schwarzenegger had issued a letter outlining his comprehensive approach to addressing California's water supply and the environmental crisis in the Delta. His agenda includes achieving a 20 percent per capita reduction in urban water use by 2020, protecting floodplains, planning for emergency response to floods in the Delta, establishing standards for Delta levees, protecting water quality, studying a full range of options for improving Delta water conveyance, and completing reservoir feasibility studies.

On the regulatory front, the State Water Resources Control Board (Water Board) adopted a new Strategic Workplan for the Bay-Delta that includes a review of water rights to ensure that

they are compatible with beneficial uses and the public trust. The Water Board Workplan also includes "consideration of the reasonableness of the State Water Project's and Central Valley Project's methods of diversion in the southern Delta, review of the southern Delta salinity and San Joaquin River flow objectives diversion methods, development and implementation of TMDLs, and other activities."

The Water Board's work, particularly the fact-finding public trust hearings, will be closely coordinated with the development of the BDCP that is being prepared by water project operators and contractors, resource agencies and nongovernmental organizations. The BDCP is a habitat conservation plan designed to meet the requirements of the federal and state Endangered Species Acts. Actions to be considered include restoring and enhancing habitat, changing

the water conveyance system (e.g., building a peripheral canal, enhancing through-Delta conveyance, or using “dual conveyance” to take water both through and around the Delta), and changing the timing and amount of water diversions. DWR expects to complete the BDCP by the end of 2010.

By the end of 2008, the Delta Vision process will produce a strategic plan to implement its long-term vision of ecosystem recovery, water supply reliability, and the health and safety of Delta communities. The Delta Vision Blue Ribbon Task Force’s “vision” report calling for equal emphasis on the Delta ecosystem and a reliable water supply for the state was released in January. The report called for comprehensive efforts in water conservation, flood management, habitat restoration, land use planning and emergency preparedness, as well as water storage and conveyance.

EMERGING THEMES

Efforts to “fix the Delta” appear to be crystallizing around three main themes:

- **Ecosystem-Based Management.** The first theme is a shift from species-based to ecosystem-based management (EBM). According to proponents of EBM, species-based management has been a useful means of preventing the extinction of species such as delta smelt and salmonids and drawing attention to underlying problems with the Delta ecosystem, but remedies to benefit individual species have sometimes led to unintended consequences for other species and the system as a whole. An ecosystem-based approach would enable managers to more proactively restore habitat and ecological functions to benefit a wider range of species at once.
- **Enhanced Land Use Planning.** The second theme is a shift toward stronger protection of state interests in the Delta, including flood safety, conservation of agricultural and wildlife values, and water quality. The main thrust of the second change will be to slow or halt the urbanization of the Delta, which is putting more lives at risk of flood-related disaster and cutting off future options for ecosystem restoration and water conveyance. It also will involve greater state support for managing floodplains and subsided land for both risk reduction and ecological restoration.
- **Peripheral Canal Revisited.** A third issue, until recently considered the third rail of Delta planning, is the proposal to build a peripheral canal, or the combination of a canal and through-Delta water routes known as “dual conveyance”.

Requiring EBM and strengthening land use planning in the Delta are prominent elements of the Delta Vision strategic plan, which is expected to propose legislation and other governance reforms. At the same time, other planning efforts are moving toward EBM and better land use planning under existing governance structures. The BDCP agencies and stakeholders are working on an ecosystem-based habitat conservation and water operations plan for the Delta, and the Suisun Marsh Charter Group is developing an ecosystem-based restoration and enhancement plan for the Marsh. The Delta Protection Commission is updating its land use and resource management plan, and the FloodSAFE program is developing floodplain management strategies intended to reduce the risk of flood damage while restoring ecological functions of floodplains.

The idea of peripheral canal, which was rejected by California voters in 1982, remains controversial. Proponents see the canal as the only way to ensure adequate water supply for

farms in the San Joaquin Valley and Delta and the urban populations of the Bay Area and Southern California, given the high probability of a catastrophic levee failure that would result in seawater intrusion into the vicinity of the pumps of the state and federal water projects. A peripheral canal could reduce reverse flows (where rivers temporarily flow backwards) and fish entrainment in the South Delta, but it would increase fish entrainment at the new diversion point on the Sacramento River. Critics point out that climate change and ecosystem needs are likely to reduce the volume of water that can be exported, thus reducing the canal's cost-effectiveness. As in the past, critics also are concerned that a canal would enable greater exports of water than the ecosystem can sustain and that the presence of such a canal would enable the state to "abandon" the Delta to salinity intrusion and levee failure.

COMMISSION'S ROLE

Delta planning and decision-making affects the Commission's jurisdiction by influencing freshwater inflows to the Bay and wetland restoration, particularly in the Suisun Marsh. Important decisions will be made regarding water storage and conveyance in the Delta and its watershed that will affect the amount and timing freshwater reaching the Bay and Suisun Marsh. The shift toward EBM means it is likely that freshwater flows will be required to meet a broader range of ecosystem needs, such as restoration of habitats that support the food web, and flow and salinity variability that favor native species over introduced invasive species. Habitat restoration plans for the Delta have identified Suisun Marsh as a key area for tidal marsh restoration because it contains undeveloped land that is less subsided than many other parts of the Delta. The Suisun Marsh has also been recognized as providing important habitat values in its current state.

Climate change is putting additional pressure on already stressed systems of water supply, flood management and habitat in the Bay-Delta and its watershed. Just as the Commission is planning for climate change impacts in and around the Bay, Delta planners are considering potential climate change impacts on levee stability, habitat, flood frequency and severity, and the reliability of state and federal water projects. It will be important to coordinate habitat planning in the Bay, Suisun Marsh and the Delta, as habitats may shift with sea level rise. The Marsh is one of the few areas around the Bay where tidal marshes could migrate upslope with sea level rise, while the Delta could take on some of the habitat values of Suisun Bay and Marsh if sea level rise and levee failures in the Delta shift brackish open water and wetland habitats eastward.

The Commission is helping to advance Bay-Delta planning and decision-making in two main ways. First, by providing the Delta Vision process with information about the Commission as a model of effective governance, the Commission has promoted greater understanding of the potential benefits of adopting a legally binding yet flexible plan for the Delta, and of extending federal consistency requirements under the federal Coastal Zone Management Act (CZMA) to the Delta. Second, in letters to decision makers involved in the Delta Vision and the Bay Delta Conservation Plan, the Commission has commented on the need for adequate fresh water inflow to the Bay and Suisun Marsh and the importance of coordinating wetland restoration and sediment management throughout the estuary.

DELTA GOVERNANCE

On December 6, 2007, John Kirlin, Executive Director of Delta Vision briefed the Commission on the draft report of the Delta Vision Blue Ribbon Task Force. The report identifies a healthy Delta ecosystem and a reliable water supply for California as the primary, co-equal goals for the Delta and recommends a new governance structure to achieve these goals.

In October 2008, the Task Force will present a strategic plan for implementing the recommendations in the *Delta Vision* report to the Delta Vision Committee, composed of state agency leaders. The Delta Vision Committee will present a final plan to the Governor and Legislature by the end of 2008. It is expected to include recommendations on legislation that would reform

governance of the Delta, such as developing a legally binding Delta Plan with which all state and federal agencies would have to comply, and creating new agencies and/or strengthening existing ones to effectively implement the plan.

Commission Role. The staff has contributed to the Delta Vision strategic plan by serving on the Governance and Strategic Finance Work Group, providing information about the Bay Plan as a model and about federal consistency under CZMA.

In sharing information with the Work Group about the Commission as a model of effective governance, we emphasized two key factors. First, the Bay Plan and Marsh Plan are strong, yet flexible. Both plans were endorsed by the Legislature, providing strength and durability to their visions of preventing inappropriate development, protecting and restoring wetlands, and providing public access. The plans are also flexible, because the Commission has the authority to amend them in order to adapt to changing conditions and incorporate new scientific information.

Second, the staff explained to the Work Group that the Commission has a federally-approved coastal management program under the CZMA. The CZMA requires federal agencies to carry out their actions that affect the Bay in a manner consistent with the Commission's laws and policies. The CZMA has been critical in protecting the Bay and Suisun Marsh from the potential adverse effects of dredging of federal channels, federally-financed highway construction, and military base activities and changes in use. If a Delta agency were to develop a federally-approved coastal management program, federal water diversions, dredging and levee maintenance, highway construction and power plant operations, for example, would be required to be consistent with that program.

The concept of a legally binding yet flexible plan to guide resource management and the use of federal consistency under CZMA to help coordinate state and federal action in the Delta are elements of the Delta Vision Task Force's draft strategic plan. The staff will continue to support the Delta Vision process as needed. (Delta Vision materials, including the latest draft strategic plan, are available at deltavision.ca.gov.)

FRESHWATER FLOWS

The Commission has consistently called for adequate freshwater flows for the Bay and Suisun Marsh, in accordance with its laws and policies. While dams and diversions provide water to support communities and the economy, their adverse environmental impacts are well documented and have fueled decades of battles in the state and federal courts, legislatures and regulatory agencies. The staff is participating in or tracking efforts that may result in new salinity standards and freshwater flow requirements that will affect Suisun Marsh, the Bay and migratory species that use the Bay, such as salmon and steelhead trout.

Salmonids. Even as Bay-Delta management shifts from species-based to ecosystem-based approaches, salmon and steelhead (salmonids) are likely to remain an important indicator of ecosystem health. (The adverse impacts of water management in the Bay-Delta on salmonids are summarized in recent report by the Natural Resources Defense Council, available at www.nrdc.org/water/conservation/salmon/contents.asp.)

Dams and diversions have significantly harmed salmonids, anadromous fish that hatch in creeks and rivers, migrate through the Delta and Bay to spend several years in the ocean, and

return to freshwater to spawn. While other factors, such as poor ocean conditions, contribute to the salmon declines, water operations are a significant impact that is under human control.

Dams have diminished spawning habitat by cutting off access to upstream reaches and, in the case of the San Joaquin River, drying up 60 miles of river downstream of the dam in all but the wettest years. Water projects increase water temperatures by altering and reducing flows and by releasing warm water from the top layer of reservoirs. Sudden changes in reservoir operations can dewater or scour out salmon eggs or strand juveniles in shallow pools. According to the Natural Resources Defense Council, the Sacramento River's population of spring-run Chinook, one of the populations most affected by water project operations, is doing especially poorly. Pumping water from the Delta directly kills fish by entraining them in the pumps. Pumping also has indirect effects, such as increasing predation by delaying migration as juvenile salmon are sucked toward the pumps by reverse flows in the San Joaquin River.

Although Congress passed the Central Valley Project Improvement Act in 1992 to better project fish and wildlife, the Act's goal of doubling salmonid populations in the Delta has clearly not been met, as salmon stocks have recently crashed. Other legal protections for salmonids include the Vernalis Adaptive Management Plan (VAMP), part of the San Joaquin River Agreement of 1999, recognized in Water Rights Decision 1641, and the San Joaquin River Settlement of 2006. VAMP requires a 31-day pulse flow in the San Joaquin River near Vernalis in April to May with corresponding Delta export reduction and analysis of salmon smolt out-migration survival. The settlement agreement with Friant water users and the United States Department of Interior will restore water flows and salmon to the San Joaquin River below Friant Dam while undertaking one of the West's largest river restoration efforts.

In the short run, the state and federal agencies have agreed to interim salmonid protection measures arrived at through court proceedings overseen by Judge Wanger. Those interim measures will be replaced by requirements in the revised biological opinion on the Operations Criteria and Plan (OCAP) for the state and federal water projects that NMFS is required to complete by March 2009.

In the long run, flows and other changes in water project operations to benefit salmonids will be guided by the BDCP. One of the key elements to be analyzed in the BDCP is shifting the point of water diversion from the South Delta to the Sacramento River and transporting water around the Delta via a peripheral canal. There is great uncertainty as to whether such a change would reduce or increase environmental harm to salmonids. During the BDCP process, water project impacts on salmonids will be considered within the broader context of the habitat restoration and adequate flows required to offset impacts of water project operations on all species of concern.

Delta. The Delta Vision Ecosystem Design Team has identified increasing freshwater flows, restoring habitat and reducing stressors as important ingredients in the "recovery recipe" for the Delta ecosystem.

Delta Vision scientists agree that higher flows are needed, but there is still much uncertainty regarding the optimal amount and timing of flows. Considerations include:

- Flows to produce sufficient volumes of open water habitat of the appropriate water quality, including salinity, temperature, and concentrations of dissolved oxygen and contaminants;

- Adequate flows for restoration of key habitats that support the food web, including floodplains, brackish tidal marsh, and seasonal wetlands;
- Flows to reduce fish entrainment in pumps and other water facilities; and
- Salinity variability that benefits native species and helps to control harmful invasive species.

These concepts regarding flows will be fed into the BDCP process. A BDCP technical team will evaluate proposed changes in flow and river operations using conceptual models developed by for the Delta Regional Ecosystem Restoration Implementation Plan (DRERIP). (DRERIP

is one of four regional plans intended to guide the implementation of the CALFED Ecosystem Restoration Program.) The technical team will analyze how the Delta ecosystem would respond to extreme conditions, such as high diversions, high outflows, and levee failure.

Suisun Marsh. The construction of the Central Valley Project (CVP) and State Water Project (SWP) and other upstream diversions have reduced the volume of fresh water flowing into the Suisun Marsh. In addition, the upstream storage and diversion of water, as well as water exports from the Delta, have muted flow and salinity variability in the Marsh.

Mitigation for impacts on Marsh salinity from the CVP, SWP, and other upstream diversions was addressed by the Suisun Marsh Preservation Agreement of 1987, signed by the Department of Water Resources (DWR), CDFG, the Bureau of Reclamation, and SRCD. The objectives of the agreement include assuring that the federal Bureau of Reclamation and DWR maintain a water supply of adequate quantity and quality for managed wetlands within the Marsh and improve Marsh wildlife habitat on these managed wetlands.

The State Water Board's 1995 "Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary" established salinity standards for Suisun Marsh channels that vary by month. DWR constructed salinity control gates in the Marsh, which are operated as needed from October through May to achieve these standards (Suisun Ecological Workgroup 2001).

In 2005, the Revised Suisun Marsh Preservation Agreement was signed to make its water salinity requirements consistent with water quality standards adopted in 1999 and to replace proposed large scale water management facilities with landowner water and management activities to meet the Agreement objectives in the western Marsh.

The Suisun Marsh Charter Group is developing a Habitat Management, Preservation and Restoration Plan for Suisun Marsh (Suisun Marsh Plan). The Charter Group came together to develop a regional plan that balances implementation of the CALFED Program, Suisun Marsh Preservation Agreement, and other management and restoration programs within the Suisun Marsh. Suisun Marsh water quality objectives, including salinity standards, will be recommended and submitted to the State Board as part of the Plan.

Bay. Upstream water use, exports from the Delta by the state and federal water projects, and in-Delta water use have reduced the total volume of water entering the Bay. A comparison of annual averages from the years 1930-1949 and the years 1990-2005 shows that outflow from the Delta to the Bay has been reduced from 81 percent to 48 percent of total flows (Delta Vision 2008). In addition to reducing the total volume of water entering the Bay, water management has changed the timing of flows into the Bay. Reservoir management has reduced average monthly flows during winter and early spring and increased flows during summer and early fall.

The U.S. Environmental Protection Agency and FWS set the X2 water quality standards in 1995. "X2" refers to the salinity level of two parts per thousand, which corresponds to the mixing zone of fresh and salt water. The standards require X2 to be maintained at particular locations within the Delta and Suisun Bay between February and June, which is considered beneficial for the reproductive success and survival of the early life stages of many estuarine species. DWR is charged with operating reservoirs to maintain salinity conditions required by Water Rights Decision 1641, including X2 standards.

At the request of the Delta Vision Task Force, DWR conducted an initial assessment of dual conveyance to determine its potential impacts on water supply reliability, seismic and flood durability, ecosystem health and resilience and water quality. The assessment predicted that X2 would shift two kilometers upstream compared to current operations due to increased water

exports. However, this analysis does not take into account climate change impacts, which will likely shift X2 further eastward as well. DWR modelers are currently working toward modeling the potential impacts of climate change on salinity in Delta, including changed hydrology, sea level rise, and changes in tidal amplitude and wave amplitude.

Commission Role. The development of the BDCP and Water Board public trust hearings provide opportunities for the Commission to participate in setting new standards for salinity and freshwater flows in the Delta, which will also affect Suisun Marsh and the Bay.

DWR announced in March 2008 that it would begin preparing a joint Environmental Impact Report/Statement (EIR/S) for the BDCP in cooperation with federal agencies. The staff recommended that the EIR/S include analysis of the fresh water flow needs of the entire estuary, not just the Delta. This includes the need for peak flows that transport sediment and nutrients to the Bay, increase mixing of Bay waters, and create low salinity habitat in Suisun Bay, San Pablo Bay and the upper part of central San Francisco Bay. More generally, the EIR/S should analyze how the entire project will affect the hydrology, sediment dynamics, water quality and biological resources of the Bay. It should include analysis of climate change impacts, including the potential impact of sea level rise. It should also analyze cumulative impacts, including the potential impacts of other projects being planned for the Delta.

On July 16, 2008, the State Water Resources Control Board adopted a resolution to approve its Strategic Workplan for the Bay-Delta. The San Francisco Bay and Central Valley Regional Water Quality Control Boards are expected to adopt similar resolutions.

The State Board Strategic Workplan states, in part:

The State Water Board will conduct a fact-finding proceeding on critical factual issues concerning the Delta's ecology and the impacts of water pollution and diversions on the ecology under its water quality planning authority and with testimony and cross examination under oath. Factual findings by the State Water Board, to the extent possible, will encourage and support the use of sound science in the Bay-Delta Plan review, BDCP, and Delta Vision processes....

The staff will track the progress of the State Water Board's fact-finding hearings, scheduled to begin in November, and will prepare testimony as appropriate.

WETLAND RESTORATION AND SEDIMENT MANAGEMENT

The Commission supports wetland restoration and beneficial reuse of dredged material in the Bay and Suisun Marsh, in accordance with its laws and policies. The staff is participating in or tracking Delta planning efforts related to wetland restoration, dredging and sediment reuse, with particular attention to plans that include the Suisun Marsh.

CALFED Conservation Strategy. During 2007, the CALFED Ecosystem Restoration Program (ERP) implementing agencies developed the Conservation Strategy, a guidance document for future ecosystem restoration implementation in the Delta. The Strategy is non-regulatory and based on willing-seller participation. In the future, conservation strategies will be developed for the entire Sacramento and San Joaquin River watersheds.

The Conservation Strategy identifies where restoration of the key habitat types would restore ecosystem health to the maximum extent, to achieve the ERP Strategic Plan goals developed in 1998. The ERP Delta-Suisun Planning area map identifies areas with potential for vari

ous kinds of habitat restoration within the Delta and Suisun Marsh. Elevation and soil type are the drivers for this preliminary depiction, which does not consider the constraints of water conveyance options, infrastructure, or land use patterns and ownership.

BDCP. The BDCP will contain a habitat restoration program designed to help achieve the conservation objectives for covered species. The BDCP “Points of Agreement” document states:

Initial habitat restoration and enhancement efforts will be directed toward areas that offer the greatest conservation opportunities, such as in Suisun Marsh and in the north and west Delta....The types of habitat restoration and enhancement actions which will be initially evaluated for inclusion in the conservation strategy include:

- Restoring intertidal habitat to establish vegetated marshes and associated sloughs to increase habitat diversity and complexity, food production and in-Delta productivity, and rearing habitat for covered species.
- Increasing hydraulic residence time and tidal exchange within the Delta sloughs and channels by changing circulation patterns to increase primary productivity and food web support and improve turbidity conditions for Delta smelt and longfin smelt.
- Increasing the amount of functional floodplain habitat to increase the quantity and quality of rearing habitat for salmonids and sturgeon and spawning habitat for Sacramento splittail, and generate food resources for pelagic species.
- Providing adequate water quality and quantity within the Delta at appropriate times to help conserve resident native fishes and improve rearing and migration habitats for salmon moving through the Delta.

As described above, the BDCP will likely include habitat restoration in the Suisun Marsh.

Suisun Marsh Plan. The Suisun Marsh Plan (described above) is intended to guide ongoing operations in managed wetlands and recovery actions for listed species, including the restoration of 2000 to 9000 acres of tidal wetlands. A Science Integration Group is developing conceptual models of ecological processes that will be used to develop performance criteria for restoration and enhancement efforts in the Marsh.

The staff has attended Charter Group meetings for several years. In January 2008, staff began participating in a Regulatory Working Group that will advise the Charter Group regarding permitting and NEPA/CEQA requirements. Implementation of the Suisun Marsh Plan may require amending the Suisun Resource Conservation District’s Local Protection Program to update levee standards and improve levee maintenance practices, among other changes.

Ship Channel Deepening. The Army Corps of Engineers and its local partners have proposed deepening the ship channels connecting the Bay with the Ports of Stockton and Sacramento. If implemented, these projects would generate huge volumes of dredged material and potentially change circulation patterns and water quality in the Delta and Bay.

Commission Role. In comments on the environmental documents for both the BDCP and the ship channel deepening projects, The staff noted that the Bay Plan’s dredging policies

encourage the reuse of dredged material in wetland restoration projects, as appropriate, and support efforts to fund the additional costs associated with transporting dredged material to project sites. We recommended that the coordination of use of dredged material in the Bay and Delta as part of a regional sediment management strategy.

The staff commented that the environmental documents should analyze how the entire projects, not just the portion within the Commission's permit jurisdiction, will affect the hydrology, sediment dynamics, water quality and biological resources of the Bay. We recommended that they include analysis of the climate change impacts, including the potential impact of sea level rise. We also recommended that they analyze cumulative impacts, including the potential impacts of other projects being planned for the Delta.

NEXT STEPS

The staff intends to continue following and commenting, as appropriate, on Bay-Delta planning and decision-making processes, including the following:

- **Delta Vision.** The staff will prepare comments on and a recommendation regarding endorsement of the Delta Vision strategic plan in November, as appropriate.
- **Suisun Marsh Charter Group.** Steve Chappell of the Suisun Resource Conservation District will brief the Commission on the work of the Suisun Marsh Charter Group in November 2008.
- **Water Board.** The staff will track the progress of the State Water Board's fact-finding hearings, scheduled to begin in November, and will prepare testimony as appropriate.
- **BDCP.** The staff will participate in habitat restoration and water conveyance planning meetings and will arrange a Commission briefing on the BDCP Conservation Strategy in early 2009. The staff will plan to comment on the Public Draft EIR/S, expected at the end of 2009.