



Vision. Passion. Community.

**Trinity Lake  
Revitalization Alliance, Inc.**  
North Trinity Lake, California

September 30, 2011

Joe Grindstaff, Executive Officer  
Delta Stewardship Council  
980 Ninth Street, Suite 1500  
Sacramento, CA 95814

Subject: **Comments on the Fifth Staff Draft of the Delta Plan**

Dear Mr. Grindstaff,

The Trinity Lake Revitalization Alliance asks that the Delta Plan address impacts on communities that surround the major reservoirs in Northern California. The reservoirs, which are crucial to “communities of origin” economies, will be impacted by additional exports of water south of the Delta.

The Trinity Lake Revitalization Alliance (TLRA) is a non-profit, volunteer community organization representing the forest communities, 900-plus people, and businesses surrounding Trinity Lake reservoir.

The north Trinity Lake area is extremely mountainous, forty-five minutes from State Highway 299, and one and a half hours from the nearest major city of Redding and Interstate Highway 5. Our area has limited Internet access, spotty cell phone coverage, and an unemployment rate of over 20%.

While once thriving with a diverse economy, the forest communities surrounding Trinity Lake reservoir are now dependent on tourism. With the USFS’s drastic reduction of logging combined with their current forest management practices, their policies limiting access to public lands, and other government laws eliminating mining, the only remaining economic opportunity is eco-tourism. Being in the mountainous forest means that there is little buildable ground for other economic, jobs-producing industries, not to mention that the travel distance for exporting goods makes product manufacturing cost prohibitive.

A mandate to supply scarce and over-allocated water to users with junior water rights, over the rights of counties of origin will further damage the fragile economy of our area. After losing our base forest economy due to ever-changing federal policy, our economic vitality is now tied directly to the lake's water level for eco-tourism.

According to the latest data from the Bureau of Labor Statistics, Trinity County has a higher unemployment rate than both San Joaquin and Fresno Counties. Over the last ten years, Trinity County has consistently ranked in the top five counties for unemployment. The plan to divert even more water could literally devastate our region.

While we work to diversify our economy and create jobs that do not rely on tourism, logging, or mining, our families and communities should not be put further at risk for the benefit of regions with lower unemployment and great economic opportunities.

We feel that the Delta Plan is yet another government policy that gives no consideration to the public, communities, and landowners at the “headwaters” of the system that will be economically impacted.

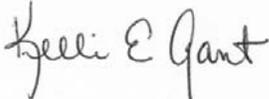
Our recommendations to be included in the Delta Plan and DEIR are:

1. Safeguard the northern California “communities of origin” dependent on reservoir levels for their economies. “Communities of origin” should not have a disproportionate burden for Delta “fixes” intended to benefit statewide interests. Therefore, endowment funding should be established to compensate communities for their loss of local tax revenues and assessments, and to build local infrastructure that will help break “communities of origin” dependence on water tourism.
2. Include an extensive statewide economic analysis that clearly and thoroughly reviews the true economic impacts of the Delta Plan on northern California communities.
3. Add a policy to not adversely impact the Trinity River, and the Trinity River temperature objectives defined by the North Coast Regional Water Quality Control Board. Trinity Lake is a part of the Delta Tributary Watershed under California Water Code Section 78647.4(b) and shown in Figure 1 of the Delta Plan. Legislative and administrative records clearly indicate that the diversion of Trinity River water is limited to water that is surplus to the needs of the Trinity River basin.
4. Enforce existing SWRCB water rights laws prior to establishing more laws to band-aid the root problem of the State water supply, namely, its overuse and over allocation.
5. Review and modify all CVP and SWP contracts and water rights to a yield that is predictably achievable and that can be reliably supplied. With the impact of climate change and already acknowledged over allocation of available water, “water supply reliability” cannot be defined by the current contract levels or the current level of diversions.

6. Do not allow the SWRCB to issue permits for increased water diversions or contributions to storage until the SWRCB flow criteria have been established, especially in view of the over allocation of supplies from the Delta.
7. Reestablish "Urban Preference" in the State Water Project contracts. Under "Urban Preference" urban water users have priority over agriculture per the California Water Code. During shortages, people take precedence over agriculture. This provision was arbitrarily removed from the State Water Project contracts by the Monterey Plus Amendments and needs to be reinstated.
8. Reduce the pressure on the Delta by increasing agriculture conservation requirements statewide and enforce junior water rights law on lands where junior-rights farmers plant perennial crops and trees. Because agriculture is the largest user of water in California, a conservation target of 1 MAF by 2020, 2.5 MAF by 2030 and 3.5 MAF by 2040 is appropriate.
9. Establish more ambitious, long-term urban water conservation mandates to exceed the 20/20 goal. We do not agree with the Draft Plan that pushes the establishment of that future target to some unspecified future date.
10. Ensure that any modifications to flood control management procedures for northern reservoirs take into account the environmental need to maintain an adequate supply of cold water in upstream reservoirs for the benefit of salmon, steelhead, and other fisheries downstream of the dams.

We strongly urge you to not put the forest "communities of origin" further in jeopardy as a result of the Delta Plan. We ask that you provide protection for origin communities while helping the people and businesses of Trinity County and agriculture landowners in the San Joaquin to diversify their economies away from water dependence and thereby create jobs and economies that will survive droughts and climate change and lower the demand on our shrinking state water supply.

Sincerely,



Ms. Kelli Gant  
President  
Trinity Lake Revitalization Alliance, Inc.