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May 14, 2009

Delores Brown
Division of Environmental Services
California Department of Water Resources
901 P Street, Bonderson Building, 4th Floor
PO Box 942836
Sacramento, CA 95814

Dear Ms. Brown,

This letter is in response to the Notice of Preparation (NOP) for the Bay Delta Conservation Plan (BDCP) Environmental Impact Report/Environmental Impact Statement (EIR/EIS) (SCH#2008032062). This project may include the development of new conveyance and diversion facilities, habitat restoration projects, changes in the operation of both the Central Valley Project and the State Water Project, and other potential facilities.

The Gold Fields District of California State Parks has already written to you outlining its recommendations about assessing the BDCP's potential impacts on the State Park units or properties that it manages within the BDCP project area. In my role as California State Parks' planning division chief, I am writing to alert you to other State Park units that may be affected by potential changes in CVP or SWP operations that may result from the BDCP. These include these units at SWP or CVP reservoirs:

- Bethany Reservoir SRA. This State Park unit is comprised of 609 acres. About 45,000 visitors are estimated to recreate at this State Park annually.
- Castaic Lake SRA. This State Park unit is operated by Los Angeles County.
- Lake Del Valle SRA. This State Park unit is operated by the East Bay Regional Park District.
- Lake Oroville SRA. This State Park unit is comprised of 29,446 acres, including 902 acres owned by State Parks. Almost 1.05 million visitors recreate at this State Park annually.
- Lake Perris SRA. This State Park unit is comprised of 6674 acres, including 1429 acres owned by State Parks. Over 702,000 visitors recreate at this State Park annually.
- Millerton Lake SRA. This State Park unit is comprised of 6079 acres, including 303 acres owned by State Parks. Almost 312,000 visitors recreate at this State Park annually.
- San Luis Reservoir SRA. This State Park unit is comprised of 26,035 acres. About 542,000 visitors recreate at this State Park annually.
- Silverwood Lake SRA. This State Park unit is comprised of 2201 acres owned by State Parks. Over 354,000 visitors recreate at this State Park annually.

These State Park units provide a wide range of recreation opportunities and facilities, but water-dependent recreation activities account for most of the parks' visitation. The extent of lake access and the quantity and quality of aquatic recreation opportunities available at these units are directly connected to the operation of the reservoirs and the reservoirs' water levels, particularly during the primary recreation season, from April through October. To the extent that the BDCP could result in changes in CVP or SWP operations which would affect lake levels, State Parks is extremely concerned about potential impacts on recreation, other park resources, and revenues.

Other State Park units are located on rivers that may be affected by potential changes in CVP or SWP operations that may result from the BDCP. These include William B. Ide State Historic Park, Woodson Bridge SRA, Bidwell-Sacramento State Park (SP), the state park property at Butte City, Colusa-Sacramento SRA, and Great Valley Grasslands SP. To the extent that the BDCP could result in changes in CVP or SWP operations which would affect river flows suitable for recreation, State Parks is concerned about potential impacts on recreation and revenues at these units. The affects on other park resources caused by changes in river flows attributable to the BDCP should also be assessed.

Finally, California State Parks is completing its *Central Valley Vision Implementation Plan*, a 20-year plan for improving the State Park System in the Central Valley. The plan outlines potential projects to improve recreation and resource protection at existing State Park units in the Central Valley and identifies areas potentially suitable for addition to the State Park system. A draft of the plan is posted online at http://www.parks.ca.gov/default.asp?page_id=23483. Opportunities should be considered for synergies between the Central Valley Vision Implementation Plan's recommendations and the habitat restoration or other projects recommended in the BDCP. The implementation plan's recommendations may include some actions that might offset impacts to recreation or other park resources attributable to the BDCP.

Because the BDCP potentially involves State Park units, as delineated in the California Environmental Quality Act Guidelines (Section 15386), California State Parks is a trustee agency for the park units within the State Park System and may also be a responsible agency for this project.

California State Parks requests that the lead agencies, DWR and Reclamation, consider both the direct and indirect impacts to recreation to all of the State Park units potentially affected by the BDCP, both during construction and operation. This could include direct use of State Park lands for BDCP facilities, temporary and permanent impacts to recreation use resulting from changes to traffic routes and circulation, or impacts to recreation use and water access due to new water management facilities on waterways connected to State Park units. Additionally, State Parks requests that the potential impacts to the natural and cultural resources of any affected State Park units are

addressed in the environmental analysis. Potentially significant effects to recreation or resources would need to be mitigated.

If you have any further questions regarding this matter, please contact Dan Ray, Chief, Planning Division, California State Parks at (916) 651-0305. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Ray", with a long horizontal flourish extending to the right.

Dan Ray
Chief, Planning Division