

# Water Agency

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# Contra Costa County



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Mr. Phil Isenberg, Chair  
Delta Vision Blue Ribbon Task Force  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

September 30, 2008

## **Subject: Delta Vision Strategic Plan; Fourth Staff Draft 9/12/08**

Dear Chair Isenberg;

Thank you for the opportunity to comment on the fourth draft of the Delta Vision Strategic Plan, and for the Task Forces' continuing work on a Strategy for the Delta.

### Volume One

#### 1) Near Term Actions, page 32

We were pleased to note that near term actions, including emergency response actions were included in the Report. However where information on water diversions is requested, we do not see a similar request for scientific basis related to the amount of water the Delta ecosystem needs in any season of any given water year. This information is critical to this process and others already underway, and as such should be included here.

If we expect to see improvements to the ecosystem, water quality, and the fishery anytime soon, additional near-term items need to be included. As the following near-term projects have yet to be implemented, continued strong advocacy is warranted.

- Funding and construction of western and central delta levee improvements.
- Water quality and fishery improvements at Franks Tract.
- Additional and improved fish screens at pumps.
- Subsidence reversal projects.
- Habitat improvement projects.
- Placement of rock at strategic sites in the Delta for levee repair.

### Volume Two

Strategy 3.2, Page 17, notes under h.iv. that Middle River would be enhanced as habitat if it is not dedicated to conveyance. Under what circumstances would Middle River not be dedicated to conveyance? It is an integral part of the dual conveyance alternative promoted by the Vision and Strategic Plan. If Middle River would not be used for through-delta conveyance, what is your Plan B for through-Delta?

Strategies 3.3-3.5. There is no recognition in these strategies that a reduction in exports could also achieve water quality improvements, reduce entrainment and reduce stress on the Delta.

Some overt mention would seem appropriate here, as export levels have been documented as one of the primary causes of decline.

Governance, pages 44-58

Because of the establishment of the co-equal goals as a primary tenet of the Vision and Strategy, it appears as though the primary problem the Delta Vision is attempting to solve is resolution of the dichotomy between provision of water supply and preserving the Delta ecosystem. If this is the case, then the Governance strategies are flawed in terms of an inconsistent approach, treating state agencies having primary authority relative to the co-equal goals (in keeping authorities intact) and treatment of local agencies that are far more removed from the primary problem (in removing authority).

Strategy 7.1 removed language to divest the state Department of Water Resources (DWR) of their day-to-day responsibility associated with the State Water Project. The prior language creating a Utility removed an inherent conflict with which DWR must contend. Where we understand the controversial aspects of such a change, we thought the attempt was at least consistent with promoting the co-equal goals. Study of models to allow DWR to focus on the Delta and the state rather than the water supply export component should be brought forward for consideration as part of the CDEW Plan.

Strategy 6.2. We contend (as we have in prior letters), that the Delta Protection Commission performed very well within the existing mandate of the 1992 Delta Protection Act, and it was the state that failed to adequately articulate its vision for the region. The counties incorporated the Commission's Resource Management Plan into their General Plans, which are the blueprint for development, and ensure consistency between the two Plans. After all of our work with the Commission over the years, we are dismayed to witness such a dramatic change to a system we thought was successful. Where we understand that growth is a contributing factor to some of the problems being experienced in the Delta, and we are willing to work together to solve these issues, we think the punishment is far harsher than the crime in this instance. The inconsistency becomes more glaring when state agencies directly at odds with the co-equal goals are left intact.

The Delta Protection Commission also questions the need to take on permitting authority, as is evidenced in their letter to you yesterday.

Thank you, once again, for the opportunity to comment on this important document. If you have questions, please contact me at (925) 335-1226, or [rgoul@cd.cccounty.us](mailto:rgoul@cd.cccounty.us).

Sincerely,



Roberta Goulart  
Executive Officer,  
Contra Costa County Water Agency