

# 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

August 4, 2008

**Subject: Delta Vision Strategic Plan; Second Staff Draft 7/11/08**

Dear Chair Isenberg:

Thank you for the opportunity to comment on the draft Delta Vision Strategic Plan. We very much appreciate all of the work that has been done to date on these important issues. Overall the document has many important concepts addressed; the Blue Ribbon Task Force and Staff are to be commended. Our comments are as follows.

**Governance and Finance, Strategy 1:**

We agree that a revised governance structure is necessary, particularly in the areas of water and ecosystem. However the proposed Ecosystem and Water Council does not appear to include a federal agency or agencies. We question whether federal funding for California water, levee, habitat and other projects will be as available or forthcoming without federal representation on the Council. We also believe that local agency representation will also be necessary to provide practical, on-the-ground knowledge and expertise.

As to land use governance, we think that the language on page 15, lines 36-38 should be modified. The sentence states that “the existing governance structure has been partially successful, but has also failed to protect the state interests in the Delta against certain key threats, such as inappropriate urbanization.” This sentence misses the point in that the Delta Protection Commission was very successful in preventing urbanization in the Primary Management Zone, and indeed, performed quite well within its existing mandates under the 1992 Delta Protection Act. We submit that it was the state that failed to adequately assess its needs on a regional scale. State interests have evolved as the problems in the Delta have become more acute. We believe that an enhanced Delta Protection Commission governance structure, with all of its powers intact, and with increased levels of local representation can continue to be successful.

Strategy 2, Action 2.3 (page 25, line 8); In terms of SWRCB oversight, we think coordination with other agencies (perhaps federal agencies) in addition to the Department of Fish and Game would be required to ensure compliance with environmental regulations.

The Ecosystem, Strategies 4-6:

We agree that significant ecosystem rehabilitation efforts are critical. Reference should be made to the entire San Francisco Bay Delta ecosystem in this section, and perhaps reference to continuing (ecosystem-wide) research, extensive monitoring, and adaptive management practices (described elsewhere in the document) be referenced in this section as well. There are short-term actions that need to be implemented now, such as improvements at Franks Track, additional and improved fish screens, and habitat improvements that the Vision endorsed that have not yet been implemented. Perhaps an action item describing short-term actions could be considered in this section.

Under Action 4.1 (page 31, line 17). We wonder how tidal marsh restoration and recreation are compatible; what recreational opportunities would, or should be available here?

Should Actions 5.2 and 6.3 be combined, or cross-referenced to one another? They both seem to be dealing with reducing the effects of exports on fish. It would also be helpful for the description of Action 5.2 (Reduce export effects of net Delta transport) to be expanded to be more clear to the layperson.

Strategy 6, ( page 39, paragraph 3, line 32); the sentence ending “Actions to limit this entrainment should be taken, including relocating or re-operating diversion points, improving fish screens, and timing diversions to avoid entrainment when possible.” The words “when possible” should be stricken, as they are redundant.

Strategy 7; Water Supply and Reliability:

The County supports the concept of Regional Self-Sufficiency.

Action 7.4 appears to be one of the few places where agriculture is referenced in the document. A section or paragraph should be added here requesting that an in-depth study be commissioned to look at agricultural water use throughout California; how water is being used today and how it can be improved in the future. Where we appreciate that agriculture has become much more efficient in water use in many areas, a great potential exists for significant water savings in this arena as well; in addition, similar language as that described in Action 7.2 regarding development of mechanisms to increase implementation and linking state funding to achievement of efficiency goals is recommended.

Regarding Action 8.4; we do not think a “clear decision process and public vetting of major modeling assumptions for the Bay Delta Conservation Plan” will occur until after the draft environmental review documents are out, and most decisions regarding the project and scope and scale have already been made. It is unfortunate that a more transparent process has not been a priority here. We believe the BDCP should be entirely consistent with the Delta Vision and Strategy, and decisions as to scope and content of modeling not finalized until after the Strategic

Plan has been completed. The broader policies contained in the Vision and Strategic Plan may suffer as a result of incomplete or too limited modeling and planning assumptions.....

Water Supply and Reliability; Strategies 9.1 and 9.3:

As strategies are developed to change conveyance in the Delta, the impacts of these changes on water quality need to be monitored, evaluated and perhaps mitigated. It would be helpful for this type of language to be included as part of the strategy and/or action.

Delta as Place, Strategy 11.2:

The inclusion specifically of Special Area Management Plans here is problematic. The County, in its collaborative planning processes briefly considered SAMP methodology as a potential planning tool, and discounted it in favor of other, less complicated tools to accomplish the same goals. We would recommend the language specifically regarding SAMPs be stricken in favor of more general language (SAMPs could then be evaluated with other tools to see what would work best). We also recommend that local agencies be the lead in any work related to special studies relative to land use.

Strategy 11.3; consistent with the above paragraph, we recommend a language change here to allow the local agency (in this case the Counties) as lead in drafting Specific Plans for legacy towns, or other areas.

Action 12.2 references enhancing the Delta Levee System by linking levee designs and financing to the land uses protected and services provided by the levees.

The County generally endorses this approach, and advocates for all remaining levees that constitute the renewed landform (ie those levees remaining in agriculture after flood plains and habitat areas are developed) be maintained at the PL 84 99 standard. We also see a need for other islands that have sustainable and significant populations (but do not qualify as urban) to be protected to 200-year levee standards. A multi-year funding commitment by the state for its portion of costs is critical to local reclamation districts ability to plan, finance and in construction activities.

And finally, we think another action should be added to direct that funding be released immediately for construction to commence on the western Delta islands, and for those islands in the central Delta with significant infrastructure upon which we depend.

Thank you for your consideration of our comments!

Sincerely,



Roberta Goulart  
Executive Officer  
Contra Costa County Water Agency