



June 15, 2015

Delivered via U.S. Mail and email: dustin.jones@deltacouncil.ca.gov

Mr. Dustin Jones
Delta Stewardship Council
980 9th Street, Suite 1500,
Sacramento CA 95814

Re: Comments to the draft Delta Flood Management Investment Strategy Principles

Dear Mr. Jones:

The State Water Contractors (SWC) is an organization representing 27 public water agencies¹ operating within California who contract with the California Department of Water Resources (DWR) for water supplies from the State Water Project (SWP). The SWP supply delivered through the Sacramento-San Joaquin Delta (Delta) constitutes a significant portion of the supplies available to SWC members. The SWC are very concerned with the condition of Delta levees that have the potential for affecting water quality conditions in the Delta, as well as the SWP supply that is available.

It is a scientific certainty that the Delta's levees are vulnerable and have varying degrees of risk. According to Dr. Jeffrey Mount, the Delta Risk Management Strategy report, University of California at Los Angeles and University of California at Davis researchers and other un-biased experts, levee failures will occur and much of the Delta will inevitably change as a consequence. The Delta Stewardship Council (DSC) levee investment strategy must consider the combined weight of all physical and economic factors. Then, a levee investment strategy must recognize that these factors will cause significant change through the permanent flooding of islands. As stated by UC Davis Professors Jeffrey Mount and Jay Lund in 2009 (Contra Costa Times, May 2, "Managing the Inevitable"), most of this change will occur in the deeply subsided western and central Delta, where low land values and high failure risk coincide. Finally, the DSC levee investment strategy must learn from repeated flooding along the Mississippi River – nature and economics ultimately prevail over poor planning.

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¹ Alameda County Zone 7 Water Agency, Alameda County Water District, Antelope Valley-East Kern Water Agency, Casitas MWD on behalf of the Ventura County Flood Control District, Castaic Lake Water Agency, Central Coast Water Authority on behalf of the Santa Barbara FC&WCD, City of Yuba City, Coachella Valley Water District, County of Kings, Crestline-Lake Arrowhead Water Agency, Desert Water Agency, Dudley Ridge Water District, Empire West-Side Irrigation District, Kern County Water Agency, Littlerock Creek Irrigation District, The Metropolitan Water District of Southern California, Mojave Water Agency, Napa County FC&WCD, Oak Flat Water District, Palmdale Water District, San Bernardino Valley MWD, San Gabriel Valley MWD, San Geronio Pass Water Agency, San Luis Obispo County FC&WCD, Santa Clara Valley Water District, Solano County Water Agency, and Tulare Lake Basin Water Storage District.

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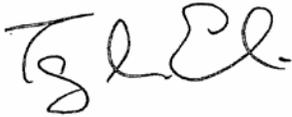
We must work with nature as the US Army Corps of Engineers ultimately did along the Mississippi when its system was economically unsustainable. Large drivers of change (sea level rise, salinity intrusion, earthquakes and human induced subsidence and artesian conditions) will overwhelm any DSC plans that have not included long-term economic and physical sustainability as its highest principle.

Consequently, the DSC's "Principles" should start with the most important and guiding principle:

1. To assure that public funds are spent wisely, levee investments must be consistent with a plan that considers all of the physical and economic factors that will drive changes to the Delta.

If you have any questions, please do not hesitate to contact me at (916) 447-7357 ext. 203.

Sincerely,

A handwritten signature in black ink, appearing to read "T. L. Erlewine". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Terry L. Erlewine
General Manager