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Authority  
P O Box 2157  
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March 29, 2012

Mr. Dave Mraz, Chief  
Delta Levees & Environmental Engineering Branch  
P.O Box 942836  
Sacramento CA, 94236-0001

Re: DRAFT Background/Reference Memorandum: Delta Region Integrated Flood Management  
– Key Considerations and Statewide Implications (BRM)

Dear Mr. Mraz,

We appreciate the opportunity to provide comments and input on the Background/Reference Memorandum which was created as a source of additional information regarding the history of the State's involvement in the Delta and its interest in providing effective flood management to protect assets statewide.

We understand that your objective is to provide "accurate, relevant, and timely information to people involved in making policy or providing funding that supports the Delta and its levee system for all appropriate purposes." However, we believe there are factual flaws and omissions in the BRM and that it fails to advance the co-equal goals established by the Governor and Legislature. Specifically, there is discussion regarding water quality impacts and broad economic effects of levee breaches in the Delta. This information is incomplete and does not accurately reflect the whole picture concerning Delta levee breaches. The current language narrowly suggests that Delta and export water quality is negatively affected when confronted with a levee failure. Although we agree that it is costly to recover flooded islands, it is crucial to recognize and include the positive outcomes of islands which remain flooded and avoid the high recover costs. For example, flooded islands like Liberty Island and Little Holland Tract have advanced the co-equal goals and provided substantial ecosystem benefits and reduced salinity at the Banks and Jones pumping plants according to modeling by RMA. Therefore, Figure 3-9 is extremely misleading at best. Modeling performed by RMA for DWR has shown repeatedly that the permanent flooding of certain islands (beyond Liberty Island) can improve export water supplies through reduced salinity. Another overlooked fact in the BRM is that all of the currently flooded islands are no longer subsiding, thus reducing water supply impacts caused by an ever increasing "hole" or accommodation space (AAS in your report) below sea level which can "gulp" sea water into the Delta during massive levee failures.

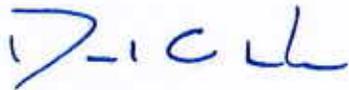
Finally, in addition to including the above background facts which broaden the scope of your BRM, we suggest you add a section on the background economics related to the Delta levee system. The Department's own DRMS report developed a range of levee costs and benefits that are not exhaustive but which need to be summarized in your report to provide for more informed investment strategies in the future.

Thank you for your consideration of this influential matter.

Sincerely,

Handwritten signature of Terry Erlewine in black ink.

Terry Erlewine, General Manager  
State Water Contractors

Handwritten signature of Daniel G. Nelson in blue ink.

Daniel G. Nelson, Executive Director  
San Luis and Delta Mendota Water Authority, Executive Director