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August 24, 2010

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Delta Stewardship Council
650 Capitol Mall
Sacramento, CA 95814

Dear Chairman Isenberg and Council Members:

As we said in our letter of August 23, Contra Costa Water District (CCWD) is very pleased to see that Early Actions have been incorporated into the most recent version of the Interim Plan. However, upon closer review of the process outlined, we believe there is a serious flaw that can and should be rectified. As the process stands now, only implementing agencies can recommend a project to the Delta Stewardship Council and there is no way for the public to recommend, and the Council to add, a project that falls under the jurisdiction of a state or local agency but that the implementing agency has not recommended or acted upon. Such a process is needed so that the Delta Stewardship Council can provide the leadership to move forward with projects that advance the coequal goals.

For example, the Department of Water Resources (DWR) is the responsible agency for, and owner of, many levees in the Delta. DWR is also the responsible agency for state funding of levee work. If DWR were to be slow to advance a comprehensive levee protection and flood prevention plan, there should be a mechanism included in the Delta Stewardship Council process for the recommendation and prioritization of key levee improvements by entities other than DWR. Many agencies and stakeholders have previously recommended a priority list or priority criteria for levee improvement projects for infrastructure protection to the Delta Stewardship Council, but under the current version of the Interim Plan, there is no provision to advance such projects for consideration by the Council.

CCWD recommends that the Interim Plan be modified to provide for any stakeholder to propose a project under the jurisdiction of the Plan for consideration by the Stewardship Council, with an opportunity for the responsible agency to respond and provide information to the Stewardship Council, and with the final decision being left to the Stewardship Council to include the project as proposed, to modify it, or to reject it. This would allow the Council to provide the leadership necessary to move forward with its mission. Of course, should the number of proposed projects be excessive, the Stewardship Council could establish policies to provide guidelines for acceptable proposals and allow its staff to screen proposals prior to moving forward with Council consideration.

Delta Stewardship Council
August 24, 2010
Page 2

CCWD appreciates the opportunity to participate in the development of the Interim Plan and we look forward to continuing to work together in the future. Please call me at (925) 688-8100 or Maureen Martin at (925) 688-8323 if you have any questions or concerns.

Sincerely,



Greg Gartrell
Assistant General Manager

GG/MM:wec

cc: Delta Stewardship Council