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Delta Stewardship Council
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Dear Chairman Isenberg and Council Members:

Contra Costa Water District (CCWD) commends the Delta Stewardship Council (Council) on the effort that is being put forth to create the Delta Plan. The water resources white paper was a clear description of historical water development in California. The description of historical Delta water quality presented in the water resources white paper contrasts the description presented in the ecosystem white paper. As the Council moves forward with the Delta Plan, it is imperative that the final document be internally consistent.

As noted in this water resources white paper (page 3-5) and other studies, records from the late 1800s through 1920 indicate that Suisun Bay was fresh except during extended droughts. Sea water intrusion into the Delta has increased over the past 150 years due to decreases in Delta outflow (increased diversions means there is less fresh water to 'push against' the tidal energy) and changes to Delta geometry (channelization, removal of tidal marsh, dredging channels) that allow tidal energy to penetrate further into the Delta.

The ecosystem white paper offered a contradicting and inaccurate assessment of salinity in the Delta stating on page 4-20 "The Delta of today is managed to keep salinity uniformly low year-round..." Delta salinity is less variable than it was historically, but it is because the Delta freshens to a lesser extent in the winter and spring of dry years, and it remains saltier in the fall of all years, producing not a uniform salinity, but higher salinity with a variability that is reduced in range but similar regardless of hydrological conditions (wet and dry years all have similar salinity variation with fresh conditions greatly reduced). Attached are technical edits for the water resources white paper and CCWD previously submitted comments on the ecosystem white paper. We hope that the Delta Plan and EIR will reflect our comments and provide an accurate and consistent description of historical and existing conditions.

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CCWD appreciates the opportunity to participate in the development of the Delta 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

Attachment

Attachment
Technical Edits Water Resources White Paper

p. ES-1 line 9 should read “Since the beginning of European settlement of California in the late 1700s...”

p. 2-2 line 1 should read “Water use is impacted by water availability and varies based on temperature, precipitation, available runoff and demand. ”

p. 3-3 After line 35 should include a description of land use changes that also contributed to increased salinity intrusion. The following paragraph is suggested:

Sea water intrusion increased during the dry period (1920-1934) due to the decrease in river flow but changes in hydrology were compounded by changes to the landscape. Reclamation of Delta marshland began around 1850. By 1920, almost all land within the legal Delta had been diked and drained for agriculture. Before the levees were armored and the marshes were drained, the channels would have been shallower and longer (more sinuous), which would have slowed propagation of the tides into the Delta, reduced tidal energy and reduced salinity intrusion. Progressive deepening and straightening of shipping channels began in the early 1900's. Deepening the and straightening river channels increases the propagation speed of tidal waves, and decreases energy losses, leading to increased salinity intrusion. Original channel depths were less than 10 feet; channels were gradually dredged to depths exceeding 30 feet, and maintenance dredging continues today.

p. 3-7 Figure 3-7 The legend should be expanded to explain what the different colored areas and lines on the map represent.