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WATER DISTRICT

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Delta Stewardship Council
650 Capitol Mall
Sacramento, CA 95814

Subject: Contra Costa Water District comments on the Delta Interim Plan

Chair Isenberg and Members of the Delta Stewardship Council:

Contra Costa Water District (CCWD) appreciates this opportunity to comment on the Delta Interim Plan. CCWD's comments focus on the importance of three items in the Interim Plan: Dutch Slough tidal marsh restoration, Clifton Court Forebay fish screens, and strategic levee investments

Interim Plan Item III.a. Dutch Slough tidal marsh restoration

The Department of Water Resources' (DWR's) Dutch Slough Tidal Restoration Project will provide benefits to the Bay–Delta ecosystem and to the local community. The Dutch Slough site is located in the western Delta, in the City of Oakley, in eastern Contra Costa County. It is bounded by Dutch Slough on the north, Marsh Creek on the west, Jersey Island Road to the east, and the Contra Costa Canal on the south. To restore this habitat to a tidal marsh, the levees currently surrounding the site will be breached. This could lead to salty water flowing into the Contra Costa Canal, degrading drinking water quality for CCWD's customers.

To protect drinking water quality, the Dutch Slough Project Mitigation Monitoring and Reporting Plan includes a commitment that the Project levees will not be breached until the Contra Costa Canal has been encased. CCWD's Canal Levee Elimination and Flood Mitigation Project (Project) has been planned, designed and permitted and only needs adequate funding to move forward. The Project has multiple benefits and is a continuation of water quality and levee projects started in the CALFED Program. The Project will remove a total of 8 miles of levees that constitute the unlined (earthen) portion of the Contra Costa Canal. These levees, constructed in the late 1930's as part of the Contra Costa Canal, were not designed for flood control; replacement of this section with a pipeline will protect water quality, remove a significant flood hazard and allow the Dutch Slough Project to move forward.

CCWD is working with DWR to search for and secure funding available under Prop 84, Prop 50, the American Resources Recovery Act, and the State Revolving Fund. It is crucial that CCWD receive sufficient funding assurances to allow pre-construction activities to begin in the fall of 2010 so that a significant portion of the Canal adjacent to the Dutch Slough site can be encased in 2011, allowing the Dutch Slough Project to be completed on schedule. The help of the Delta Stewardship Council in securing funding for these two inter-related and important projects would be greatly appreciated, as would the inclusion of the Canal Levee Elimination and Flood Mitigation Project in the Interim Plan.

Interim Plan Item V.d. Evaluate constructing demonstration fish protection screen at Clifton Court Forebay

Fish protection screens at Clifton Court Forebay could play a key role in protecting both fish and water supply, promoting both of the co-equal goals of the Delta Stewardship Council. Preventing or minimizing take of special status species at the pumps will directly benefit the species and in turn benefit water supply reliability. The Metropolitan Water District of Southern California, the Santa Clara Valley Water District, the Alameda County Water District, Zone 7 Water Agency, and the Contra Costa Water District are committed to this project and are preparing to begin a study to develop conceptual alternatives for positive barrier low-flow fish screens on South Delta exports, using modeling studies to evaluate potential concerns such as fish escapement from the south Delta. Interim study results are expected shortly and the study will be completed by the end of 2010. We anticipate working with the Independent Science Board on a peer review of study results. If the results and reviews are positive, we support implementation. Once constructed, the screens would provide benefits in the short term and would continue to provide benefits in the long term as significant exports from the south Delta would continue whether or not an Isolated Facility is constructed.

Interim Plan Item VI. Reduce risks to people, property, and state interests in the Delta by effective emergency preparedness, appropriate land uses, and strategic levee investments

The "strategic levee investments" portion of Item VI should be considerably strengthened as many Delta levees do not provide a level of flood protection commensurate with the level of beneficial uses they protect. Levees currently protect residential communities, agriculture, transportation, drinking water suppliers, other Delta infrastructure, wastewater dischargers, recreation and

tourism, commercial fishing, and the general public. The levees around Sherman Island and other western islands, and Central Delta island levees including Victoria Island that protect drinking water facilities are examples of opportunities to get the most 'bang for the buck' when protecting all of the beneficial uses in those locations.

One of the key features of the Delta is the physical configuration of the islands, lakes, and channels. Sherman Island is one of the westernmost islands that mark the transition from an estuarine system to a freshwater system. The size and shape of Sherman Island limits the amount of seawater that intrudes into the Delta. If levees around the island were to fail, the island would flood with salty water and would effectively pump salt into the Delta, degrading water quality in the Delta interior. Further investment into the levees around Sherman Island should be made. Victoria Island and other Central Delta islands are also in a strategic location. The location, size and shape of these islands protect the Mokelumne Aqueduct and afford CCWD, EBMUD, as well as SWP and CVP access to relatively fresh water. If the levees were to fail and the island to flood with salty water, the water supply reliability and water quality for over 23 million Californians would be affected. Securing the existing configuration of these islands should be a top levee investment.

Continuing the levee subvention program and investing in emergency response to levee failure is crucial but will not be sufficient to minimize the risk to people and property in the Delta. Additional investment in levee infrastructure must be made to truly preserve the Delta as a community, minimize the short and long term risk to critical infrastructure that is important on a statewide scale, and safeguard other investments made to promote the co-equal goals.

Please contact me at ggartrell@ccwater.com or (925) 688-8100 or Leah Orloff at lorloff@ccwater.com or (925) 688-8083 if you have any questions.

Sincerely,

Greg Gartrell
Assistant General Manager

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