

## Delta Counties Coalition

Contra Costa County · Sacramento County · San Joaquin County · Solano County · Yolo County  
*"Working together on water and Delta issues"*

July 30, 2010

Delta Stewardship Council Members

P. Joseph Grindstaff, Interim Executive Officer

By E-mail

650 Capitol Mall, Fifth Floor

Sacramento, CA 95814

Subject: Delta Counties Coalition Comments on the Second Draft of the Interim Delta Plan

Dear Council Members and Mr. Grindstaff:

Thank you for the opportunity to provide comments to the Delta Stewardship Council on the second draft of the Interim Delta Plan. The Delta Counties Coalition appreciates the opportunity to provide these comments to the Council as we are the home to the residents, businesses, recreation facilities and agriculture of the Delta. In addition to our original Coalition letter sent July 2, 2010, each of the five Delta County Coalition agencies (Contra Costa, Sacramento, San Joaquin, Solano and Yolo Counties) have submitted individual comment letters to the Council. We urge the Council to seriously consider the issues and comments raised in each individual county response as they contain specific suggestions and language for the Plan and adopt as appropriate.

The purpose of this letter is to articulate the common elements of all of the Delta County responses and to emphasize the importance of these major issue areas to the Coalition. A summary of major issue areas in the Interim Delta are as follows:

- Per our original letter dated July 2, 2010, the Coalition has significant concerns about the "Administrative Procedures Governing Appeals" process including the potential for unnecessary project delays and substantial burdens on local governments. We will discuss this point directly and make specific recommendations during our meeting with Chief Counsel Chris Stevens on August 5, 2010.
- The Interim Delta Plan should include criteria to guide the Council's decisions on review and approval of Proposition 1E expenditures. In addition, the Interim Delta Plan should state that the Council does not plan to make recommendations for other funding sources outside of Proposition 1E.
- The Coalition strongly recommends that the Interim Delta Plan specifically address how the State will reduce reliance on the Delta as a source of water for municipal and agricultural purposes in both the near- and long-term. This needs to be done in a realistic and comprehensive manner that still provides a long-term and reliable water supply in the Delta and protects water rights and areas of origin.

- Each County will include a list of “early actions” in the Interim Delta Plan for adoption in August 2010, if a list is to be included as a part of the final draft.
- The Delta Plan should coordinate with all other ongoing related efforts including but not limited to the Central Valley Flood Protection Plan, the Bay-Delta Conservation Plan and the Delta Islands Levees Feasibility Study.
- A major focus of the Interim Plan should be advancing levee improvements. Levee improvements are a key task for meeting the Interim Plan’s objective to reduce risk to people, property, and state interests in the Delta. Specifically, the Interim Plan should:
  - Preserve the Delta Levee Maintenance Program (CWC §12980-12995).  
Recognize that different levels of flood protection and levee structural integrity are appropriate for different land uses.  
Fund the State Subventions Program at higher levels (with a multi-year funding commitment) and expedite the process for reimbursement to make this program workable. Voter-approved funding exists to accomplish this through release of Prop 84 and 1E funds.
  - Promote and maintain ongoing pre-placement of emergency rock stockpiles for levee repair is vital.
- The Interim Delta Plan should provide for coordination between DWR, FEMA and relevant local agencies, including the counties relative to levels of flood protection for Legacy communities to allow those communities to have economic sustainability.
- The Interim Delta Plan should stress the importance of agricultural economic development, as well as recreation, to the local economy and communities.
- And finally, to help build more support for the Interim Delta Plan, the Coalition strongly encourages the Council to integrate the latest draft of the Delta Protection Commission’s Land Use and Resource Management Plan. This plan was the result of diligence and hard work by the Delta Protection Commission and numerous stakeholders and as such, should certainly be considered an essential part of the Interim and Final Delta Plan.

As the local government and planning agencies for the Delta we are understandably vigilant and concerned about the development of plans and other actions required by state legislation. We are hopeful the Council will seriously heed our suggestions. We appreciate the Council’s efforts to facilitate productive meetings between the Coalition and Council staff and hope that this collaboration will continue.

Sincerely,



Mary Nejedly Piepho  
Supervisor, Contra Costa County



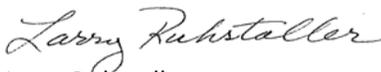
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Supervisor, Solano County



Don Nottoli  
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Mike McGowan  
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