



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

January 26, 2011

Ms. Terry Macaulay
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

[Transmitted via email to deltaplanscoping@deltacouncil.ca.gov]

Subject: ***Comments on Notice of Preparation of Draft Environmental Impact Report for the Delta Plan***

Dear Ms. Macaulay,

This letter provides Zone 7 Water Agency's comments on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) of the Delta Plan being prepared by the Delta Stewardship Council. By way of background, Zone 7 is a Bay Area water wholesale agency serving about 200,000 residents in the eastern Alameda County communities of Livermore, Pleasanton and Dublin, as well as a portion of San Ramon in Contra Costa County. Zone 7 also provides untreated water to the Livermore Valley's viticulture industry (estimated at a \$200 million/year industry), as well as providing flood-protection services throughout the Tri-Valley Area. In a normal year, over 80 percent of Zone 7's water supply flows through the Delta to the State Water Project pumps serving the California and South Bay Aqueducts.

Zone 7's reliance on Delta conveyance for its water supply led the agency to actively participate on the Steering Committee of the Bay Delta Conservation Plan. As with the Council, Zone 7 is committed to the state's co-equal goals of restoring the Delta ecosystem and ensuring a more reliable water supply for water users throughout the state.

We recognize that the Council and its staff must work within a tight timeline to meet the Legislature's deadline and we appreciate everyone's efforts to take on this challenge. We offer the following comments on the NOP:

- There needs to be a clearly-defined scope for the Delta Plan. The scope, as proposed, is much too broad. The plan needs to be significantly more targeted and limited in scope so that a measurable and successful plan can be developed and implemented. Following the direction of the enabling legislation and focusing on the Delta region is paramount to success and will limit the plan's scope to something more manageable.
- The Delta Plan must be written with the Bay Delta Conservation Plan -- and the BDCP process, itself -- in mind. The BDCP embraces and incorporates the co-equal goals and the legislation requires that it be folded into the Delta Plan once

it is approved by the permitting resource agencies. The Delta Plan should accommodate phased integration of appropriate elements of the BDCP and other ongoing efforts in the Delta to improve habitat and water-supply reliability.

- The Council needs to clearly define programs within the Delta Plan and how these will be integrated with the BDCP and other activities of state and federal agencies.
- The Council should limit the plan to the Delta region and let local agencies and other state and federal agencies address policies and practices that rightfully are within their purview.
- The science that is used to develop the plan should consider studies of all stressors that affect the Delta watershed in order to use good science to maximize improvements without overemphasizing flows or conveyance facilities for the State Water Project and Central Valley Project.
- It would be inappropriate to use Water Code section 85021 as the basis for Delta Plan objectives as this “is to reduce reliance on the Delta in meeting California's *future* water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency.” [emphasis added]

Thank you for your consideration of our concerns.

Sincerely,



G.F. Duerig,
General Manager