



September 19, 2011

Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

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

Subject: *Comments on Fifth Staff Draft Delta Plan*

Dear Chairman Isenberg and Members of the Council:

This letter provides Zone 7 Water Agency's comments on the Fifth Staff Draft Delta Plan being prepared on behalf of 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 well as representing the State Water Project Contractors Authority's Delta Specific Project Committee on the State and Federal Contractors Water Agency Board. 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 Fifth Staff Draft Delta Plan:

- Although the Fifth Draft Delta Plan is somewhat improved when compared with previous drafts, we remain concerned that it does not adequately address the co-equal goals of improved water supply reliability and restoration of a healthy Delta ecosystem.
- The Fifth Draft remains vague about what kind of water supply is projected to meet the coequal goal of water reliability. Zone 7 cannot adequately plan and pursue economic development opportunities without some certainty as to our future water supplies. Because of the ecosystem challenges in the Delta and the resulting limitations on pumping, Zone 7 is no longer able to guarantee water supply for the ultimate build-out of the adopted general plans of the communities

we serve. The added uncertainty caused by the direction of the Fifth Draft will make this situation even worse. Neither Zone 7, specifically, nor the State, as a whole, can afford to advance any Delta Plan that creates additional local uncertainty and economic instability at this critical time.

- The Fifth Draft also seems to dictate local water management decisions on everything from rate structures to recycling targets. That level of micromanagement from Sacramento undercuts local planning hundreds of miles from the Delta and can actually prevent local governments from making decisions that make sense for local conditions.

Zone 7 respectfully asks the Council to consider these concerns and those outlined in our previous letters, as well as to fully analyze and discuss the Alternate Delta Plan developed by statewide water, business and agricultural interests through the Ag-Urban Coalition that includes elements we believe are essential to an effective plan. We urge the Council to work with the Coalition to identify the best options for meeting the co-equal goals for the sake of the economy, the environment and water supply reliability. Thank you for your consideration of our concerns.

Sincerely,



G.F. Duerig
General Manager

cc: Zone 7 Directors
The Gualco Group, Inc.
Ellen Martin, ACWA