**Department of Conservation & Development**

**Water Agency**

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**Contra Costa County**

**Catherine O. Kutsuris**
Director

June 12, 2012

Delta Stewardship Council
(Via email to deltaplancomment@deltacouncil.ca.gov)

Thank you for the opportunity to review the *Sixth Staff Draft Delta Plan*. Contra Costa County staff has reviewed the portions of the plan that are of most interest to us.

We also appreciate the meeting our staff had with Dan Ray, Deputy Executive Officer, and Cindy Messer, Delta Plan Project Manager, on June 11 to discuss the issues in this letter. Our comments below will refer to the discussion in our meeting.

We offer the following comments on the document.

1) Page 192, lines 34-43 -- Policy DP P1 ("Locate New Development Wisely") conflicts with Contra Costa County's Urban Limit Line (approved twice by voters, in 1990 and 2004) and therefore conflicts with Contra Costa County's General Plan, because it excludes planned growth areas in unincorporated areas of the County. As a suggested revision, we offer the following, as we discussed with Mr. Ray and Ms. Messer.

> New urban development, including residential, commercial, and industrial uses (other than commercial recreational visitor-serving uses or facilities for processing of local crops or that provide essential services to local farms) must be limited to areas that city or county general plans, as of the effective date of this policy, designate for development in cities, their spheres of influence (as shown in Figure 5-1), **unincorporated areas within Contra Costa County's voter-approved Urban Limit Line,** or Legacy Communities (as shown in Appendix K).

2) Page 175, line 10 – This sentence states: "Among Legacy Communities, Bethel Island warrants a special note." No explanation is provided as to why the Council believes Bethel Island warrants a special note. As written, the sentence indicates the Council has some particular concern about Bethel Island but the concern is not stated. Explanation would be helpful.

3) Appendix K, page 11 -- Figure K-9 shows the "Legacy Community of Bethel Island," but the boundary shown in the figure does not include all of Bethel Island. Rather, the proposed Legacy Community boundary only includes an unbuilt future residential area known as Delta Coves (which has no Delta legacy) and a small existing commercial/retail strip. Council staff indicated at our June 11 meeting that the Council does not want to encourage urban development on Bethel Island and so they limited the Legacy Communities boundary to an area that is already approved for development.

While we understand this reasoning, we would like to suggest changes to the Legacy Community boundary that we believe will make it better reflect the Delta legacy as intended by the Delta Reform Act in its designation of Bethel Island as a Legacy Community.

We offer two alternative suggestions for this:

Alternative 1 is to include all of Bethel Island in the Legacy Community, as indicated by the Delta Reform Act. This is our preferred alternative, since all the existing uses on Bethel Island reflect the Delta's legacy. By including all of Bethel Island as a Legacy Community, the Council would be consistent with the Delta Reform Act and consistent with the Delta Protection Commission's *Economic Sustainability Plan*.

Alternative 2 (see black boundary on attached map mark-up) is to expand the Council's boundary slightly westward to include existing retail/commercial on the west side of Bethel Island Road, and to expand the boundary eastward to include approximately the southeastern quadrant of the island. This area is a popular recreational area with marinas for boating. This recreational use is a large part of the Delta's legacy, and some of these properties may seek to expand or improve their facilities, thereby improving utilization and stimulating economic growth. As described in Chapter 10 of the *Economic Sustainability Plan*, *"Legacy Communities of the Sacramento-San Joaquin Delta are integral to the cultural fabric of the Delta. These towns provide key services and support functions for surrounding residents and businesses, serve as important visitor waypoints, offer unique cultural activities, and lend great character to the Delta as a place. These communities have existed to support agriculture and recreation activities in the Delta, and until recently have been economically sustainable in their own right. However, demographic, economic, and land use trends have changed these communities considerably—some to the extent that visible signs of underutilization and decline are prevalent—and continued evolution of economics and public policy in the Delta will greatly affect their ability to thrive in the future… [P]romoting the uniqueness of these communities, in combination with strategic investments, will attract new residents, businesses, and visitors, thereby stimulating overall economic health and sustainability."* These provisions apply directly to the areas we are suggesting to add. This provides good reason to include them within the Legacy Community boundary.

Thanks in advance for your consideration of these comments. Please let me know if you have questions.

Sincerely,

John Greitzer
Principal Planner
Contra Costa County Water Agency

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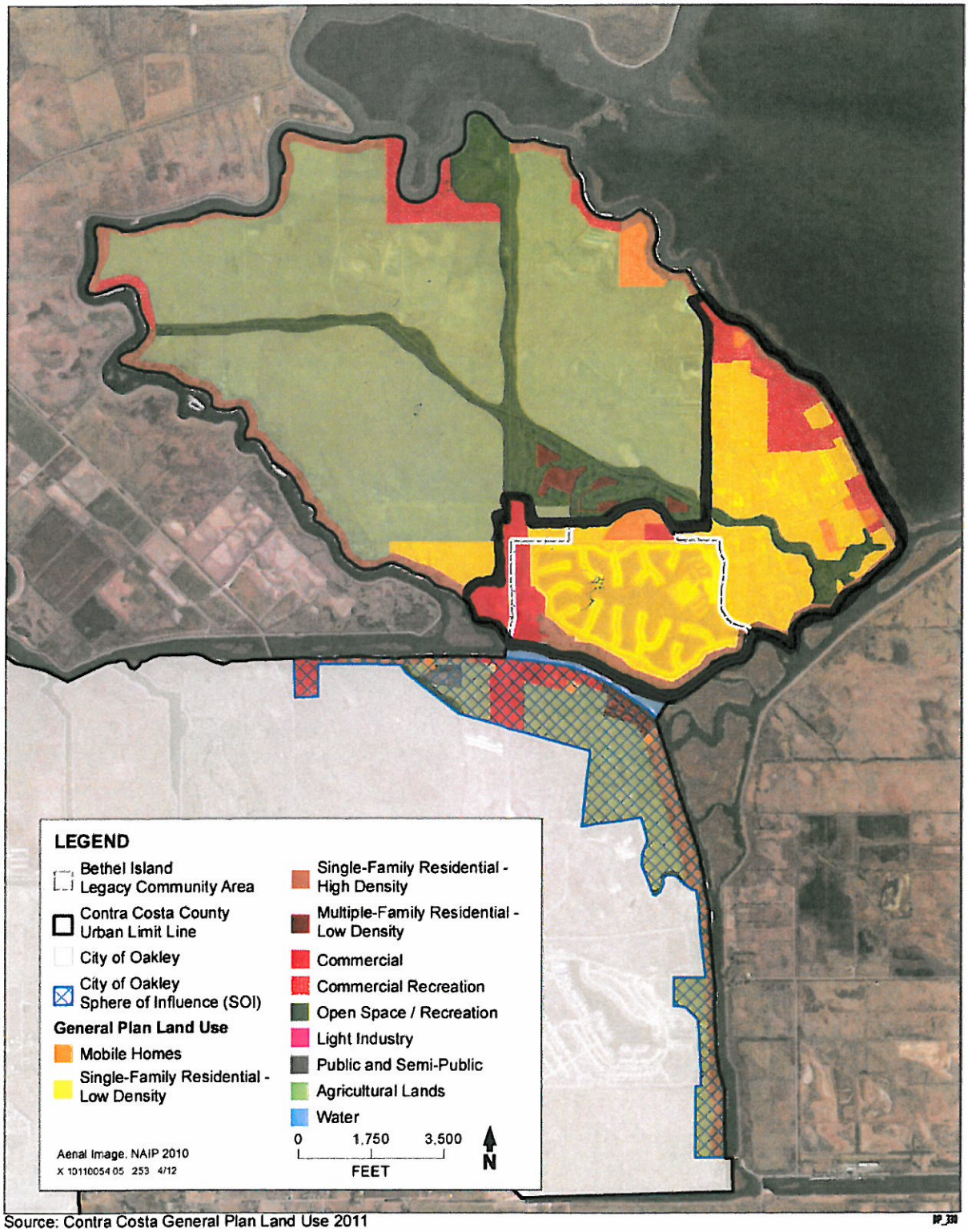


Source: Contra Costa General Plan Land Use 2011

**Figure K-9**

**Legacy Community of Bethel Island**

*Source: Contra Costa County General Plan Land Use (2011)*