July 25, 2014

Bay Delta Conservation Plan Comments
Ryan Wulf, National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

RE: Draft Bay Delta Conservation Plan – Public Comments

Dear Mr. Wulf:

The agencies and organizations referenced below, representing a diverse coalition of governmental, business, and agricultural interests in Ventura County, California, offer the following comments on the draft Bay Delta Conservation Plan (BDCP) as released on December 13, 2013.

The State Water Project (SWP) is a vital component of Southern California’s water system, providing roughly 30 percent of the region’s water needs. However, nearly three-quarters of the annual water demand for an estimated 630,000 water users in southern Ventura County is met with about 110,000 acre feet per year of state water supplies. While many efforts are underway to reduce our service area’s imported water demand, including groundwater desalination, recycled water, and conservation programs, state project water will remain an essential water source for our region. It will continue to serve as a primary source for our drinking water supply
and recycled water projects. It is also the single largest recharge component of our
groundwater basins following treatment and discharge from local municipal wastewater facilities.
Moreover, given its comparatively high quality, it allows greater use of our native groundwater
that must be blended with imported water to meet state and federal water quality standards. As
such, a reliable supply of imported state water is critical for the future social and economic
vitality of Ventura County.

In recent years, both state and federal project deliveries have been repeatedly interrupted and
reduced due to operational conflicts with threatened and endangered Delta species. Since
2007, it is estimated that nearly 3.5 million acre feet of water that normally would have been
delivered by the SWP was lost due to these conflicts.

Additionally, both projects risk complete failure given the vulnerability of the Delta levee system
to catastrophic earthquake and flood events - threatening water supplies for Southern California,
the Bay Area, the Central Coast and the Central Valley for many years. These risks are clearly
unacceptable, and conditions are expected to worsen with climate change unless steps are
taken now to mitigate these concerns.

Southern California ratepayers have been investing in the SWP for more than four decades, and
have additionally invested billions of dollars in regional storage and conveyance to allow
Southern California to capture water when it is plentiful and reduce demands on imported
supplies during dry and critically dry years. These investments are effectively stranded if water
deliveries from the SWP continue to degrade.

The proposed BDCP, being developed under provisions of the state and federal endangered
species protection laws, is the most promising plan developed to date to solve these challenges
and resolve decades of conflicts among agricultural, urban, and environmental water users with
a comprehensive solution that achieves California’s co-equal goals of a reliable water supply
and a restored Delta ecosystem for the benefit of all water users.

The release of the public draft BDCP represents an important milestone in this eight-year
stakeholder process. In exhaustive detail, the draft BDCP illustrates the complexity of the
problems and the need for a comprehensive approach to resolve conflicts in the Delta through a
multi-species habitat conservation plan that protects the state’s water resources and
infrastructure.

We are supportive of the BDCP’s proposed twin-tunnel conveyance system that isolates and
protects drinking water supplies and helps restore natural flow patterns in the Delta for the
benefit of native species, as well as the complementary habitat restoration, water quality, and
predator control measures outlined in the BDCP. We also support the plan’s recognition that
changing conditions in the Delta will require ongoing scientific review and real-time monitoring
so the plan can effectively adapt over time to emerging science and the evolving ecosystem.
The draft plan also provides an important framework for a range of operational outcomes and
level of certainty necessary for a final plan to merit investment by participating public water
agencies and by the state and federal governments.

While key decisions remain relating to specifics on cost allocations, operations, outflow range,
financing, and other issues; the current draft details a workable solution to the challenges facing
California’s water resources and the Delta. The proposed BDCP is the most comprehensive
effort ever undertaken to address the chronic water challenges facing the state and federal
water projects in a manner that is protective of the Delta environment. We remain supportive of the efforts of state and federal water contractors in the development of the BDCP and urge the state to move forward with the draft plan and focus on resolving those remaining issues needed to provide assurances that the plan will achieve California’s co-equal goals of water supply reliability and ecosystem restoration in a cost-effective manner.

Thank you for the opportunity to comment on this historic draft plan.

Sincerely,

Bob Huber, Mayor
City of Simi Valley

Tim Flynn, Mayor
City of Oxnard

Jonathan Sharkey, Mayor
City of Port Hueneme

Kevin Kildee, Mayor
City of Camarillo

Janice Parvin, Mayor
City of Moorpark

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Association of Water Agencies of Ventura County

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cc: Governor Edmund G. Brown Jr.
Congress Member Julia Brownley
Senator Fran Pavley
Senator Hannah-Beth Jackson
Assembly Member Jeff Gorell
Assembly Member Scott Wilk
Ventura County Board of Supervisors
Mayor Bob Huber, City of Simi Valley
Mayor Janice Parvin, City of Moorpark
Mayor Kevin Kildee, City of Camarillo
Mayor Tim Flynn, City of Oxnard
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Mayor Andy Fox, City of Thousand Oaks
Randy Record, Board Chair, Metropolitan Water District of Southern California
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