



April 25, 2012

Sent via email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**Re: Bay-Delta Plan Supplemental NOP – Comprehensive Review**

Dear Ms. Townsend,

The City of Antioch (Antioch) appreciates the opportunity to provide comments for consideration regarding the State Water Resources Control Board (SWRCB) Bay-Delta Plan Supplemental NOP-Comprehensive Review.

Antioch is located in the western Delta and receives all of its municipal water supply from in-Delta flows. The City has taken water from the Delta for well over a hundred years and was one of the early voices in efforts to protect the Delta and ensure sufficient Delta outflows. Maintaining sufficient water supply and water quality are of the utmost importance to the City and its inhabitants.

Antioch supports the SWRCB's efforts to update and refine its Water Quality Control Plan for the Delta (SWRCB Bay-Delta Plan). We believe that a comprehensive update of this plan for the Delta is particularly important in light of the many actions that are proposed for the Delta in the future.

The City encourages the SWRCB to consider actions and CEQA alternatives that would:

- Improve water quality in the Delta.
- Protect in-Delta beneficial uses, including in-Delta municipal uses and freshwater recreational uses such as fishing and boating.
- Protect the western Delta from increased salt water intrusion. Antioch has provided historical information and data to the SWRCB as part of the Delta flow criteria process, and requests that this information be included and considered in the CEQA analysis that will support any changes or additions to the water quality standards for the Bay-Delta.

- Protect and potentially increase Delta outflows.
- Protect fish and wildlife within the Delta. Antioch is the gateway to the Delta and has an economy supported in part by fishing and boating in a tidally influenced freshwater environment. Protecting the natural environment of the Delta is a high priority for Antioch.

Several Delta planning processes underway may result in significant changes to the amount of water that is diverted and/or exported from the Delta, and to the locations from which these diversions/exports may occur. Antioch requests that the SWRCB consider the following concerns as it develops CEQA alternatives for the SWRCB Bay-Delta Plan update:

- Delta flows for municipal and domestic supply (existing use) should be considered during the revisions of water quality standards for salinity. The BDCP effects analysis for its preferred project indicates increased salinity levels in the western Delta and at Antioch's intake. This is an increase over existing and historic conditions.
- The SWRCB should examine whether a change in the source or origin of water in the Delta will result in significant water quality changes. Currently, the majority of San Joaquin River water is either exported from the Delta or removed from the Delta via in-Delta consumptive uses. If the point of diversion from the Delta is changed in the future, it is reasonably foreseeable that more San Joaquin River water will remain in the Delta, and that water quality (both salinity and concentrations of other constituents) may change as a result of the implementation of currently planned Delta projects.
- The SWRCB should consider the impacts of planned Delta projects on the tributary flow of the Sacramento River to the western San Joaquin River. Historically, most of the water in the western Delta and in the western-most San Joaquin River came from the Sacramento River via Three Mile and Georgiana sloughs.
- The SWRCB should consider the full range of alternative water quality standards and implementation practices that would be needed to maintain water quality conditions necessary for municipal, habitat, and wildlife beneficial uses.
- The SWRCB should not permit any increased out-of-Delta exports from the State and Federal water projects that will result in reduced Delta outflow. The City of Antioch believes that any increases in the amount of water diverted from the Delta would result in further degradation of water quality and ecosystem habitat
- SWRCB should consider CEQA alternatives that maintain flow as the primary metric by which the health of the Delta is measured. There is pushback by water contractors to de-emphasize flow as a primary component of a healthy ecosystem, but rather to include it as one of many "other stressors." Flow requirements should not be lost in deference to "adaptive management" measures proposed by water contractors to eliminate or reduce flow requirements as part of habitat restoration and water exports. Scientists have testified that increased Delta outflow is key to species survival. Scientists who testified at the SWRCB flow criteria hearings and independent scientists (NAS and Delta Science Board) confirm that flow is one of the most important components for the survival of endangered fish species.
- The City of Antioch encourages the SWRCB to require habitat restoration measures,

goals and requirements that are independent of and separate from any flow or salinity requirements contained in or established by the BDCP. The City is very concerned with the results of the BDCP effects analyses that appear to show decline or extinction of endangered species with the implementation of the preferred project. Antioch is also concerned that the BDCP project may not include funding for the habitat restoration measures that are contemplated.

- In addition to the CEQA analysis and identification of alternatives, Antioch also urges the SWRCB to perform thorough, scientifically based analyses of the factors described in Porter-Cologne Sections 13241 and 13242, and to adhere to the "reasonableness" goals of Porter-Cologne as expressed in Section 13000.

In closing, Antioch urges the SWRCB to consider the science and to hold the line on increased Delta outflow. The question that the SWRCB will need to answer is "How much increased flow is enough?" and not "how much flow can we take out of the Delta?"

Thank you for allowing Antioch the opportunity to provide comments on the proposed Plan. Please feel free to call me at (916) 337-0361 if you have any questions or would like any additional information.

Sincerely,



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