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16  
17 BEFORE THE  
18 CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

19 HEARING IN THE MATTER OF  
20 CALIFORNIA DEPARTMENT OF WATER  
RESOURCES AND UNITED STATES  
21 BUREAU OF RECLAMATION REQUEST  
FOR A CHANGE IN POINT OF  
22 DIVERSION FOR CALIFORNIA  
23 WATERFIX

JOINT OPENING STATEMENT OF  
CONTRA COSTA COUNTY, CONTRA  
COSTA COUNTY WATER AGENCY,  
AND SOLANO COUNTY

1 Contra Costa County, Contra Costa County Water Agency, and Solano County  
2 (together, the "Counties") agree with many of the parties to this hearing that the status  
3 quo for the Sacramento-San Joaquin Delta system is unsustainable. But the California  
4 WaterFix Project, if built and operated as proposed by the Petitioners, would only  
5 exacerbate the Delta's existing challenges. The Project before the State Water  
6 Resources Control Board does not contribute to restoring and sustaining the Delta  
7 ecosystem. Instead, the Project would reduce flows to and through the Delta, would  
8 degrade Delta water quality, and would thereby further harm key fish species. The  
9 Project would fail to consistently capture "new" water during wet periods, and would rely  
10 instead on exporting more water from the Delta during dry periods than would occur  
11 under the No Action Alternative. The proposed changes requested in the Petitioners'  
12 Petition for Change are simply not in the public interest.

13 The modeling performed by the Petitioners in support of the Petition for Change  
14 is also seriously flawed. As a result of deficiencies in the modeling studies and  
15 environmental analysis prepared for the WaterFix Project, neither the State Board, nor  
16 the public, can accurately determine what the Project actually entails, what its  
17 environmental impacts will be, or whether any mitigation measures proposed by  
18 Petitioners will effectively lessen the Project's impacts.

19 The Counties are home to more than 1.5 million people. A healthy, vibrant  
20 Sacramento-San Joaquin Delta is closely tied to the physical, societal, and economic  
21 health of the Counties, the San Francisco Bay-Delta region, and much of the state. The  
22 Counties lie at the heart of the Bay-Delta region, and the future of this nationally-  
23 significant resource substantially influences the environmental and economic future of  
24 the Counties. Restoring the health of the Delta also protects San Francisco Bay.  
25 Residents rely on the Delta as a source of drinking and irrigation water, and as a place  
26 to live, work, and recreate. The Counties, and the persons who live, work, and recreate  
27 within the Delta are vitally interested in decisions affecting the Delta and will be directly  
28 and indirectly impacted by the Project's impacts on water quality and beneficial uses of

1 water.

2 The Counties' expert witness will be Dr. Richard A Denton, a registered civil  
3 engineer and water resources consultant with extensive experience in Bay-Delta water  
4 right and water quality hearings before this Board. Dr. Denton will testify that the  
5 WaterFix project is not in the public interest, and that the Project will neither enhance  
6 the Delta ecosystem, nor provide a more reliable water supply for California. His  
7 testimony will describe how other potentially viable alternatives could address the  
8 challenges facing the Delta while satisfying State policy.

9 Dr. Denton will also testify to major flaws in the operations and water quality  
10 modeling performed by the Petitioners and the problems with the long-term averaging  
11 used to present those modeling data. His testimony will explain why the Petitioners  
12 must revise and present the modeling data in a form that is accurate and usable for  
13 decision-makers, Bay-Delta stakeholders, and the public.

14 While Dr. Denton's testimony also presents principles for setting potential permit  
15 terms for the WaterFix Project for the Board's consideration, the Counties respectfully  
16 request that the State Water Resources Control Board deny the California WaterFix  
17 Petition for Change.

18 Respectfully submitted,

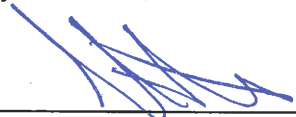
19 Dated: November 29, 2017

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