DELTA WETLANDS PROJECT

November 13, 2007

John Kirlin, Executive Director
Delta Vision
California Resources Agency
1416 Ninth Street
Sacramento, CA 95814

RE: DWR Comments on "Flexible Delta"

Dear Mr. Kirlin,

In a document dated October 19, 2007, DWR provided the Blue Ribbon Task Force with comments on "Features of Stakeholder Coordination Group Visions" including comments on in-Delta storage, also known as the Delta Wetlands Project. DWR's comments reflect its inclination toward an isolated facility and fall short of encouraging a vision that supports the Delta itself. The purpose of this memo is to balance the record, and help re-focus the discussion on an affirmative vision of a sustainable Delta.

Some of the most sobering testimony to the Task Force came from CALFED's Lead Scientist, Michael Healey who points out that existing scientific knowledge struggles to explain what is going on in the biological Delta and is inadequate to propose a solution that will fix it now, let alone over time. Many have concluded that we need an ADAPTIVE APPROACH to finding a solution wherein initial steps are monitored and each subsequent, incremental step is adapted to reflect lessons learned. As Dr. Healey points out, however, it is not realistic to believe that there is any fixed solution that will last whether or not it is approached adaptively. So, while it makes sense to approach the problem adaptively, it is also

Anson B. Moran, General Manager
1660 Olympic Blvd., Suite 350
Walnut Creek, CA 94596
Telephone (415) 730-5637

important to end up with an ADAPTIVE RESULT that can adjust to changing biological conditions.

The Stakeholders Coordination Group presented two visions, the "Flexible Delta" and the "Resilient Adaptive Delta." Both visions build on a concept variously called Delta Corridors and Eco Crescent that would hydraulically separate Old and Middle Rivers. This concept has both attractive aspects and unanswered questions. Of all Delta options, it is the newest and least studied. But it may be the simplest and least expensive of the potential solutions, able to be designed and implemented relatively quickly, and is both adaptive and reversible. The fact that there are questions and possible problems at this stage reflects creative rather than defective thinking.

The "Flexible Delta" vision presented by the Stakeholders Coordination Group is the most Delta-centric of their two visions. It explicitly seeks to make the Delta sustainable, preserve in-Delta values and at the same time improve water supply reliability. It places a high premium on operational flexibility with features such as operable rather than fixed barriers. It reflects the conclusion that we are not skilled or wise enough to design an effective, fixed Delta solution.

The "Flexible Delta" vision includes fresh water storage on Webb Tract and Bacon Island as proposed by Delta Wetlands. It also includes the conversion of Bouldin Island and Holland Tract to managed habitat as contained in the Habitat Management Plan agreed to by Delta Wetlands and the Department of Fish and Game. In the discussions that lead to inclusion of fresh water storage in the "Flexible Delta" vision, there was considerable interest in the idea that such storage, located as it is on the proposed boundary between Old and Middle Rivers, could be a very flexible and useful water resource management tool. As currently designed, the storage islands have intake/discharge facilities on both sides of the divide so that they could be operated to store and move water from one side to the other as needed. We are just beginning to study how such an operation might work.

Such an operation of in-Delta storage would be a new use of a project that has been around for a long time. All of the studies of Delta Wetlands to-date have been of a water storage project that is located in the Delta. With recent attention on Delta sustainability, the project is now being looked on, by some, as part of a Delta solution that also has water management benefits. The four Delta Wetlands islands are the largest block of land in the Delta under unified ownership. And, they're located in the middle of the Delta! It is impossible to have a Delta solution that does not make some use of these islands. Building the project will strengthen 56 miles of levees and reduce or eliminate subsidence on 20,000 acres of deeply subsided islands. That is good for the Delta. And it is on top of the water supply, flood control, emergency response, habitat and recreation benefits, already fully documented, that add value to the Delta and help justify the levee improvements that need to be made with or without the project.

When the time is right, we will be pleased to give a point-by-point rebuttal to DWR's technical comments. At this stage, however, the vision is the thing. And a vision of the Delta that is physically sustainable, biologically flexible, and adds value rather than just mitigates risk, is a positive and useful vision.

Sincerely,

Anson B. Moran
General Manager, Delta Wetlands
Member, Delta Vision Stakeholder Coordination Group