

July 25, 2014

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

**RE: Draft Bay Delta Conservation Plan – Public Comments**

Dear Mr. Wulff:

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.

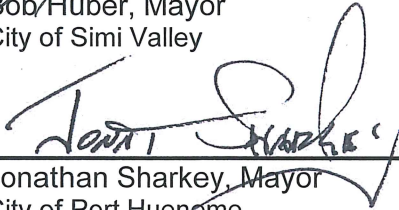
Sincerely,



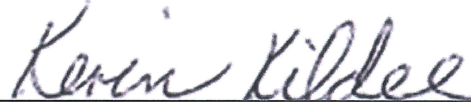
Bob Huber, Mayor  
City of Simi Valley



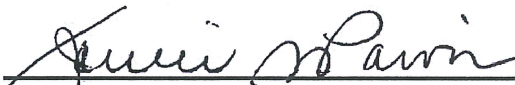
Tim Flynn, Mayor  
City of Oxnard



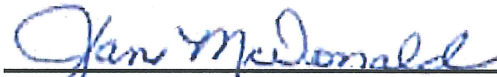
Jonathan Sharkey, Mayor  
City of Port Hueneme



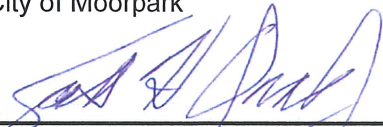
Kevin Kildee, Mayor  
City of Camarillo



Janice Parvin, Mayor  
City of Moorpark



Jan McDonald, Chair  
Ventura Council of Governments



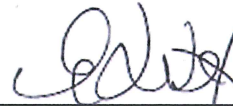
Scott Quady, President  
Calleguas Municipal Water District




Lynn Maulhardt, President  
United Water Conservation District



Bryan MacDonald, President  
Association of Water Agencies of Ventura County



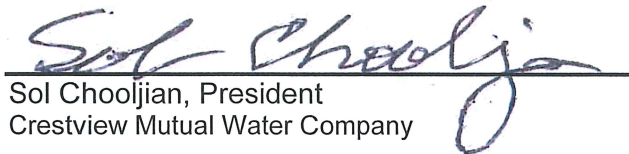
Eugene West, President  
Camrosa Water District



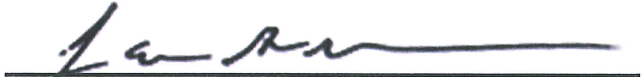
Ed Simon, Vice President of Operations  
California American Water Company



Steven Iceland, Chair  
Triunfo Sanitation District



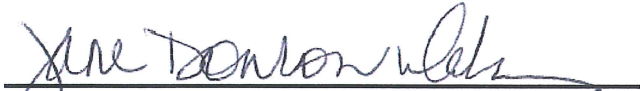
Sol Chooljian, President  
Crestview Mutual Water Company



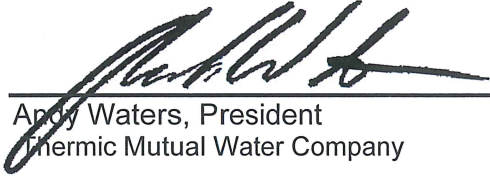
James Graham, President  
Pleasant Valley Mutual Water Company



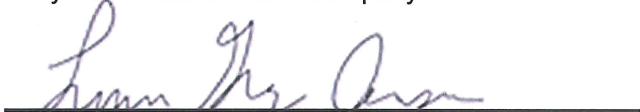
Craig Underwood, President  
Zone Mutual Water Company



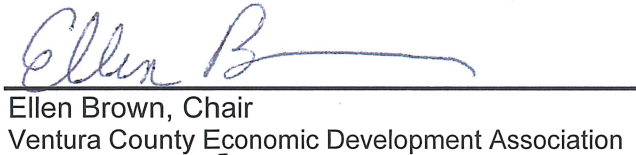
Jane Donlon Waters, President  
Berylwood Mutual Water Company



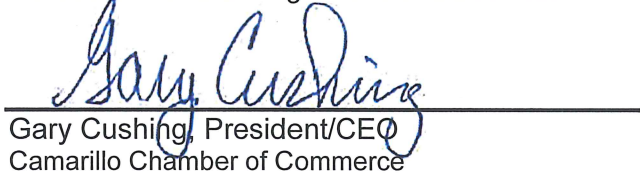
Andy Waters, President  
Thermic Mutual Water Company



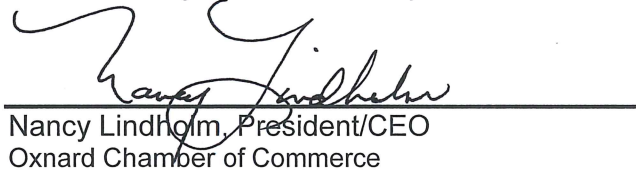
Lynn Gray Jensen, Executive Director  
VC Coalition of Labor Agriculture and Business




Ellen Brown, Chair  
Ventura County Economic Development Association



Gary Cushing, President/CEO  
Camarillo Chamber of Commerce



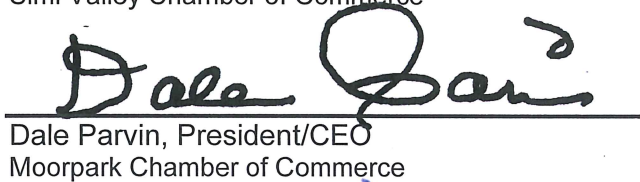
Nancy Lindholm, President/CEO  
Oxnard Chamber of Commerce



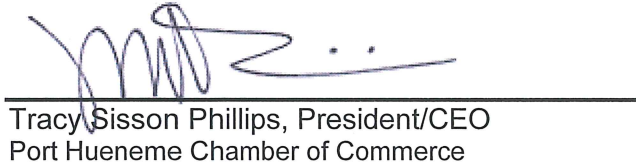
Leigh Nixon, President/CEO  
Simi Valley Chamber of Commerce



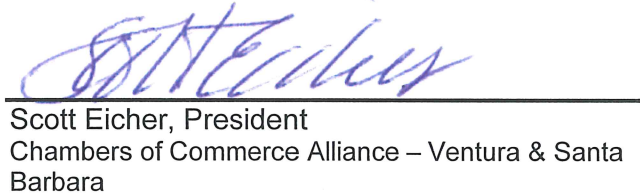
Jill Lederer, President/CEO  
Greater Conejo Valley Chamber of Commerce



Dale Parvin, President/CEO  
Moorpark Chamber of Commerce



Tracy Sisson Phillips, President/CEO  
Port Hueneme Chamber of Commerce



Scott Eicher, President  
Chambers of Commerce Alliance – Ventura & Santa Barbara

- 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  
Mayor Jonathan Sharkey, City of Port Hueneme  
Mayor Andy Fox, City of Thousand Oaks  
Randy Record, Board Chair, Metropolitan Water District of Southern California  
Jeffrey Kightlinger, General Manager, Metropolitan Water District of Southern California