



April 15, 2014

Sent by email to:

Mr. Oscar Biondi
Water Quality Certification Program, Division of Water Rights
State Water Resources Control Board
Oscar.Biondi@Waterboards.ca.gov

Zachary Simmons
USACE, Sacramento Division
Zachary.M.Simmons@usace.army.mil

Paul Marshall
DWR Bay Delta Office
marshall@water.ca.gov

RE: City of Antioch Comments Regarding DWR Proposed Emergency Drought Barriers Project

Dear Mr. Biondi, Mr. Simmons and Mr. Marshall:

The City of Antioch has certain concerns regarding the proposed temporary barriers within the Delta. While the City understands the stated purpose of the barriers during the current drought conditions, Antioch is concerned about potential long term impacts to the City's water supply and about the potential that such barriers could become permanent.¹

The Department of Water Resources (DWR) has in the past proposed various projects involving permanent barriers within the Delta (including False River and Three Mile Slough). All of these previously proposed barrier projects posed potential significant adverse impacts on Antioch's water quality in non-severe drought years. Antioch is also concerned about whether a cumulative impact analysis has been done for the proposed temporary barriers in conjunction with other projects, including proposed projects, to fully understand the scope of potential adverse impacts, including impacts to the City's water supply.

Antioch provides domestic and municipal water supply to a population of over 100,000 persons in Contra Costa County. Its water rights are superior to those of DWR and its contractors. Antioch has a short term water quality compensation agreement with DWR. Antioch's long term water quality and supply could be jeopardized by permanent barriers, and in conjunction with other projects, including the BDCP. The barriers alone, and/or in conjunction with the BDCP

¹ Since around the turn of the prior century, Antioch has relied on the Sacramento River's tributary flow to the San Joaquin via Georgiana and Three Mile Sloughs for its freshwater during late spring through late fall. Interference with such flows adversely impacts Antioch's water quality.

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project could potentially eliminate Antioch's ability to pump its own supply from the Delta. Further, the increased salinity from any permanent barriers could transform the environment near Antioch, impacting local recreation and aesthetics as well as transforming Antioch's legacy as a freshwater Delta town. Therefore, Antioch requests assurances in writing from DWR:

- That any barriers, relocations, or relaxation of D1641 or other water quality compliance standards will be only temporary, as designated under drought emergency conditions for the current year,
- That any barriers, relocations, or relaxation of D1641 or other water quality compliance standards will not become permanent or long-term under any condition without:
a) discussions with the City in advance to discuss impacts; and b) full mitigation is provided to the City for adverse impacts to water quality and supply.
- That a cumulative impact analysis for the proposed temporary barriers is provided to the City, that incorporates other projects, including proposed projects, to fully understand the scope of potential adverse impacts to the City's water supply.

Thank you for your consideration of the City of Antioch's comments on the proposed Emergency Drought Barriers project. Please feel free to contact me with any questions.

Sincerely,



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C: Steve Duran, City Manager
Lynn Tracy-Nerland, City Attorney