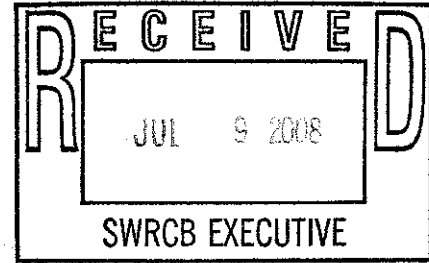


Public Comment
Bay-Delta Strategic Workplan
Deadline: 7/9/08 by 12 p.m.

July 8, 2008



Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812

Re: Bay-Delta Strategic Work Plan

Dear Ms. Townsend:

The City of Antioch appreciates the opportunity to provide comments on the State Water Resources Control Board's ("SWRCB") Bay-Delta Strategic Work plan ("Plan"). 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 become more involved in the Delta and supports many of the goals and actions set forth in the Plan. In particular, Antioch supports the following goals and actions set forth in the Plan:

1. Improving water quality in the Delta.
2. Protecting in-Delta beneficial uses, including in-Delta municipal uses.
3. Protecting the western Delta from increased salt water intrusion. This is a critical component to protecting water quality in the Delta. Historically, freshwater extended much farther to the west than it does presently.
4. Increasing the SWRCB's involvement in the various Bay-Delta proceedings such as the Delta Vision and the Bay-Delta Conservation Plan ("BDCP"). Antioch is concerned that in-Delta beneficial uses may not presently be adequately considered and protected in these processes.
5. Protecting and potentially increasing Delta outflows.
6. Protecting fish and wildlife within the Delta. Antioch is the gateway to the Delta and protecting the natural environment of the Delta is a high priority for Antioch.

July 8, 2008

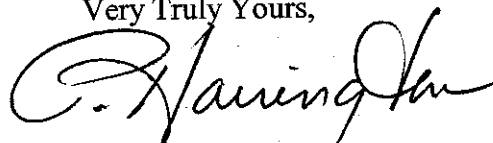
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Some of Antioch's concerns include the following:

1. Antioch's review of some of the modeling associated with an out-of-Delta conveyance facility indicates potentially increased salinity levels in the area of Antioch and the western Delta. Municipal supplies should be considered when examining allowable salinity levels within the Delta. Historically, the Delta contained greater freshwater outflow than presently exists.
2. The SWRCB should examine whether projected future increases in San Joaquin River flows will adversely impact downstream Delta water quality. Some studies have suggested that increased San Joaquin River flows downstream of the South Delta may result in higher salinity levels than presently exist if fresher Sacramento River flows are reduced due to an upstream out of Delta conveyance facility.
3. 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 primary problem is not interception of abandoned or return flows; rather it is the diversion of water out of the Delta by exporters and reduced Delta outflow.
4. The Delta Vision process is considering increased Delta outflow as part of the overall solution to in-Delta water quality. Antioch supports this part of the Delta Vision. However, the SWRCB needs to work with the Delta Vision Blue Ribbon Task Force to determine where such increased Delta outflows will come from.
5. Protecting and restoring fish and wildlife within the Delta is complex and many factors have contributed to the decline in certain species. However, it is almost universally accepted that flow abundance is the primary factor in protecting and restoring fish and wildlife within the Delta. The SWRCB should make flow abundance in the western Delta a top priority to protecting beneficial uses and the environment.

Thank you for allowing Antioch the opportunity to provide comments on the proposed Plan. Please feel free to call me at (925) 779-7025 if you have any questions or would like any additional information.

Very Truly Yours,



Phillip Harrington

Director of Capital Improvements/Water Rights

C: Jim Jakel, City Manager
Lynn Tracy Nerland, City Attorney