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Knightsen Town Community Services District P.O. Box 763 Knightsen, CA 94548



February 13, 2020

Board of Directors & Executive Officer Campbell Ingram Sacramento-San Joaquin Delta Conservancy 1450 Halyard Drive, Suite 6 West Sacramento, Ca 95691

Dear Board of Directors and Mr. Ingram:

On February 6, 2020, the Board of Directors of the Knightsen Town Community Services District (KTCSD) adopted Resolution 2020-1 ("Resolution"). Among other things, this Resolution rejects and nullifies a draft Storm Water Resources Plan (SWRP) that was prepared for the District. The scope of the SWRP included a drainage plan for the community of Knightsen which would direct run off towards a proposed wetlands project named the Knightsen Wetland Restoration and Flood Protection Project ("Proposed Project"). The Proposed Project involves the East Contra Costa County Habitat Conservancy (ECCCHC), East Bay Regional Parks District (EBBRPD), and Contra Costa Public Works Department – Flood Control District.

Pursuant to the Resolution, KTCSD determined that these drainage projects routing run off towards the Proposed Project will not be implemented.

ECCCHC has used purported drainage and flood control benefits for the small community of Knightsen as a significant justification for the Proposed Project and may continue to use these purported benefits as justification to be awarded future grant funding for the Proposed Project.

We do not believe the Proposed Project benefits the Knightsen community with regard to flood control and drainage. In fact, the Proposed Project may increase the flood hazard for many Knightsen residents. Therefore, any assertion that the Proposed Project provides multi-benefits with regard to drainage and flood control is highly questionable at best.

The KTCSD Board and community members who have attended KTCSD meetings, as well as outreach meetings sponsored by ECCCHC/EBRPD on May 2, 2018 and July 11, 2019, have expressed many questions and concerns about the Proposed Project. Many of these questions and concerns were delineated in a letter KTCSD sent to ECCCHC on September 11, 2019 (enclosed).

Paramount among these concerns is fear that the Proposed Project will impact shallow wells and septic systems of adjacent and nearby property owners and increase the flood risk for adjacent and nearby property owners. Consultants employed by ECCCHC agree that the Proposed Project could increase ground water tables and result in seepage and increased flood risk. In the "Knightsen Habitat Restoration Feasibility Study" prepared by Environmental Science Associates (ESA) dated 1/28/2013 they stated, "Potential constraints to neighbor properties may include a high ground water table and increased flood risk and seepage with restoration." As recently as last year, another consultant hired by ECCCHC, Balance Hydrologics, stated, "Overall the site is extremely well-suited for restoring tidal marsh but not without potential for increased seepage and flood risk to neighboring properties."

There is a proper place for wetlands restoration, however locating a wetlands adjacent to and in very close proximity to a significant number of residences is not the proper place.

To date, ECCCHC has not responded either verbally or in writing to the questions and concerns posed to them during the outreach meetings and in the September 11, 2019 letter from KTCSD. On October 29, 2019, KTCSD voted to take a position in opposition to the Proposed Project. Unless and until KTCSD receives responses sufficient to alleviate the community's concerns, KTCSD remains in opposition to the Proposed Project.

Sincerely,

Trish Bello-Kunkel, Chairperson

Knightsen Town Community Services District

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925-551-1410

Enclosure: KTCSD letter to East Contra Costa Habitat Conservancy, September 11, 2019

Cc: Barbara A. Brenner, Partner, Churchwell White LLP