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July 28, 2014

HAND DELIVERED

Ryan Wulff
National Marine Fisheries Service (NMFS) *
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

VIA U.S. MAIL

The Honorable John Laird, Secretary
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

The Honorable Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240



Re: Sacramento County Comments on the Draft Bay Delta Conservation Plan (BDCP), EIR/EIS, and Implementing Agreement

Dear Secretaries Jewell and Laird, and Mr. Wulff:

The County of Sacramento and the Sacramento County Water Agency (hereinafter collectively referred to as "County" or "Sacramento County") provides the attached detailed comments and accompanying documentation on the public review draft of the Bay Delta Conservation Plan (BDCP) and associated draft environmental impact report/environmental impact statement (DEIR/EIS), as released on December 13, 2013.

The County's comments are representative of a holistic review of the massive volume of BDCP-related materials. It has become abundantly clear over the course of the eight-year BDCP planning process that future implementation of the Plan's proposed Conservation Measures (CMs) will irreversibly alter and, in many cases, permanently destroy the generation-old socioeconomic fabric and physical landscape of the Delta. As a result, the County has devoted countless hours of subject matter staff and legal counsel (both at significant cost) to the review of the draft documents and preparation of written comments. These comments focus on a wide range of near- and long-term water operations, flood control, water supply, land use, agricultural sustainability, socioeconomic effects, and governance issues and impacts.

As you know, based on comments prepared in response to previously released "administrative draft" environmental documents (i.e., in 2012 and 2013), Sacramento County repeatedly has expressed concern about the BDCP in general, and more specifically on the Plan's most invasive and impactful Conservation Measure (CM), CM-1 (Water Facilities and Operation).

Under the preferred alternative (Alternative #4), CM-1 will include three (3) 3,000 cfs, water intakes, pumping stations, forebay, isolated conveyance facilities, and thousands of acres of habitat restoration. It is both poor public policy and an unacceptable outcome for the State and federal governments to pursue a water operations project/habitat conservation plan of this scale when it will result in close to 50 significant unavoidable impacts and irreversible alteration of the physical, cultural, and socioeconomic landscape of the Delta community.

The County remains staunch in its position that: (1) the BDCP's proposed governance framework, described in Chapter 7 of the draft Plan, unacceptably relegates local governments to the decision-making sidelines, (2) the BDCP will not produce additional water for an ecosystem that is obviously dependent on a permanent and high quality source of water, nor will it aid in the recovery of Federal and State listed aquatic and terrestrial species, (3) the draft BDCP is based on flawed hydrologic modeling, and erroneous and biased scientific analysis, and (4) residents and communities of Sacramento County will bear a disproportionate burden of the impacts that will result from implementation of the Plan's CMs, that, in turn, will disproportionately serve/benefit agricultural and urban water users south of the Delta.

Notwithstanding the County's concerns about the Plan and the process the project proponents have undertaken in pursuing it, Sacramento County, along with its Delta Counties Coalition (DCC) partner counties (Contra Costa, San Joaquin, Solano and Yolo), will continue to advocate for reasonable, collaborative, and solution-based actions and alternatives that will preserve and enhance the Delta's unique and irreplaceable environs, while also addressing the statutory coequal goals mandate. The County remains committed to staying engaged as subsequent draft plans are released for comment and input. Should you have any questions regarding our initial comments, please contact Michael Peterson, Director, Department of Water Resources at (916) 874-8913 or Don Thomas, Senior Planner, Department of Water Resources at (916) 874-5140.

Sincerely,



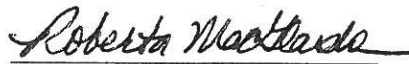
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District 1



Susan Peters
Board Member, District 3



Roberta MacGlashan
Board Member, District 4

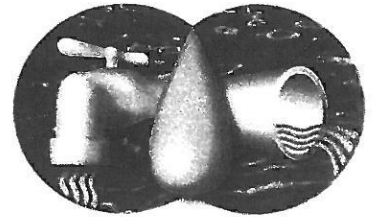


Don Nottoli
Board Member, District 5



COUNTY OF SACRAMENTO

Water Resources



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Sacramento County Comments on the Draft Bay Delta Conservation Plan (BDCP), EIR/EIS, and Implementing Agreement

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