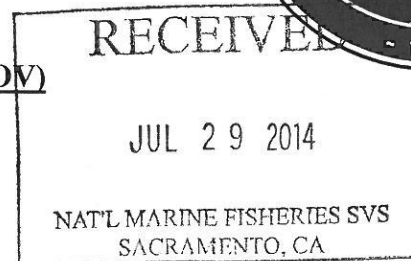




July 28, 2014

VIA E-MAIL (BDCP.COMMENTS@NOAA.GOV)

Mr. Ryan Wulff
National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814



Re: Comments on Public Review Draft of the Bay Delta Conservation Plan

Dear Mr. Wulff:

This letter presents Yuba County Water Agency's ("YCWA") comments on the draft Bay Delta Conservation Plan ("BDCP") and its related draft EIR/EIS ("DEIR/EIS").

YCWA has a well-deserved reputation as a responsible steward of its water supplies and has a proven conservation ethic that has led to repeated and successful collaborations with conservation groups and local, state and federal agencies, as well as agricultural and urban water interests. For example, the National Marine Fisheries Service and the BDCP's primary proponent, the California Department of Water Resources, both participated in developing the landmark Lower Yuba River Accord (Yuba Accord). This award-winning settlement agreement ended 20 years of controversy by addressing water-supply and fisheries needs in the lower Yuba River and has led to significant economic and environmental benefits for California. Among the Yuba Accord's many benefits include higher instream flows for Chinook salmon and steelhead, an unprecedented fisheries monitoring and evaluation program, reduced greenhouse gas emissions and one of California's most successful large-scale water transfer programs.

All of the local, state and federal agencies participating in the BDCP deserve credit for attempting to develop a large-scale, and dynamic, program to improve environmental conditions in California's Bay-Delta ecosystem while preserving our state's economic interests. Because of YCWA's leadership in water supply planning and fisheries restoration issues, we certainly appreciate the challenge of such an undertaking. Our review of the BDCP is limited, however, to whether the plan may impact YCWA's operations. As discussed further below, however, there is insufficient detail and analysis in the BDCP and DEIR/EIS for YCWA to determine the full extent of how the plan may affect YCWA or its operations. Specifically, YCWA requests that you provide additional information on the following:

1. Potential impacts to upstream CVP/SWP facilities;
2. Potential impacts to flow and temperature in the Sacramento River basin; and,
3. Detailed discussion and analysis of potential impacts to groundwater in the Sacramento Valley and, in particular, the Feather River basin.

One of the key areas for improvement in the BDCP is the description of how state and federal CVP/SWP facilities upstream of the Delta may operate in conjunction with the proposed new facilities (tunnels, intakes, and proposed conservation measures). Without additional description and analysis of how these facilities may operate under the combined effects of the BDCP and long-term climate change, YCWA cannot understand how the plan may affect flows and temperatures in the Sacramento River, which in turn may affect YCWA's fisheries restoration efforts in the lower Yuba River. The DEIR/EIS provides some analysis of flows and temperature for the late long-term (2060) timeframe. This analysis, however, lacks a detailed discussion of how the operations of upstream CVP/SWP facilities may change in response to climate change. Such changes could affect flows and temperatures in the Feather River, through which Yuba River salmon and steelhead must migrate before they reach the Sacramento River and ultimately the Bay-Delta.

The BDCP and DEIR/EIS should also include a more-detailed discussion of potential impacts to groundwater in the Sacramento Valley. Since the 1970's, YCWA and its member units (local irrigation districts) have responsibly managed and improved Yuba County's groundwater supplies. The DEIR/EIS states the BDCP will have negative impacts on groundwater supplies in portions of the Sacramento Valley, but it is unclear from the draft documents whether those negative impacts may affect Yuba County, or even more specifically, which parts of Yuba County and how often. It is also unclear whether any groundwater impacts from the BDCP may negatively affect YCWA's conjunctive use efforts in Yuba County.

In summary, additional information and revisions to the BDCP and DEIR/EIS are necessary to properly inform YCWA about potential impacts to its operations. YCWA appreciates your attention to these comments and looks forward to your response.

Very truly yours,



Curt Aikens
General Manager