



Delta Counties Coalition

Contra Costa County · Sacramento County · San Joaquin County · Solano County · Yolo County

"Working together on water and Delta issues"

November 14, 2011

Bureau of Reclamation
Bay-Delta Area Office
801 I Street, Se. 140
Sacramento, CA 95814

Re: Delta Counties Coalition Comments on the Bay Delta Conservation Plan Memorandum of Agreement

To Whom It May Concern:

The Sacramento-San Joaquin Delta Counties Coalition (DCC) is a consortium of Contra Costa, Sacramento, San Joaquin, Solano and Yolo counties formed to speak with one voice on our collective concerns regarding the protection, restoration and enhancement of the Sacramento-San Joaquin Delta (Delta). The DCC appreciates the opportunity to comment on the First Amendment to the Bay Delta Conservation Plan (BDCP) Memorandum of Agreement (MOA) signed by federal and state agencies and south-of-Delta water export contractors. However, the DCC believes the comment period on this significant MOA is much too short for complete analysis and comment, and recommends the Department of the Interior, through the Bureau of Reclamation (Reclamation), retract its support for the MOA and allow at minimum 45 days for complete public comments to be submitted for consideration.

The DCC understands that Habitat Conservation Plans (HCPs) are typically driven by applicants, but the process has been developed and funded by applicants and agencies that do not represent the specific geographic area of the Delta that will be most impacted. The changes to the Delta region contemplated in the BDCP process will significantly and profoundly impact the lives and livelihoods of the residents of the Delta who we represent. The DCC cannot allow an MOA developed by agencies that do not represent the Delta region to control the future of our counties and negatively affect our constituents, especially while we have not been a part of these discussions and negotiations.

The DCC appreciates the recent outreach from the state and federal agencies to meet with our county officials and inviting our participation in the BDCP process. However, we have not been satisfied with such overtures in the past. Previous pledges for outreach, transparency, and collaboration have resulted in little change or follow through by the BDCP agencies involved. We remain constant in our request for sustained, substantive, and meaningful consultation and participation for the DCC in the BDCP process. To this end, we respectfully request that the Department of the Interior and Reclamation retract support for the MOA, extend the public comment period, and develop a BDCP process that is fair, inclusive, and transparent. As Secretary

Salazar publicly stated a few months ago, the BDCP is “the most important – and most complex – long-term water and habitat management plan ever undertaken.” The DCC believes such an effort requires nothing less than full inclusion of affected entities.

Several of our counties plan to file additional individual comments on the MOA in the next few days. The DCC appreciates your attention to our comments and looks forward to your response.

Sincerely,



Mary Nejedly Piepho
Supervisor, Contra Costa County



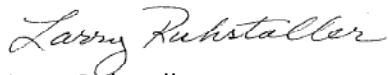
Michael J. Reagan
Supervisor, Solano County



Don Nottoli
Supervisor, Sacramento County



Mike McGowan
Supervisor, Yolo County



Larry Ruhstaller
Supervisor, San Joaquin County

cc: Delta Counties Coalition’s Federal and State Delegation