



Delta Counties Coalition

Contra Costa County · Sacramento County · San Joaquin County · Solano County · Yolo County
"Working together on water and Delta issues"

February 4, 2013

Secretary Ken Salazar
Department of the Interior
1849 C St, N.W.
Washington DC 20240

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

Commissioner Michael Connor
Bureau of Reclamation
1849 C Street NW
Washington DC 20240

Deputy Secretary Jerry Meral
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Secretary Salazar, Secretary Laird, Deputy Secretary Meral and Commissioner Connor:

The Sacramento-San Joaquin Delta Counties of Solano, Sacramento, San Joaquin, Contra Costa, and Yolo, working together as the Delta Counties Coalition (DCC), write to express our support for a thorough analysis of the "Portfolio-Based Conceptual Alternative" recently outlined by a coalition of environmental and business organizations, and its inclusion in the Bay-Delta Conservation Plan (BDCP). The DCC has always promoted analysis of a broader range of alternatives, including but not limited to additional non-diversion through-Delta alternatives. The DCC believes strongly that a successful BDCP process must contemplate comprehensive alternatives that include water conservation, reuse and recycling, levee system improvements, surface water and groundwater storage, and other means to improve water supply reliability, rather than simply focusing on water conveyance and habitat restoration, as is the case for current BDCP alternatives.

We all agree that the status quo is not sustainable. At the same time, we firmly believe that the failure to equally, transparently and fairly analyze the broad spectrum of alternatives referenced above is a recipe for failure of the BDCP. It will result in an outcome that lacks credibility and will waste limited public resources and ultimately fail to significantly advance the co-equal goals of restoring the Bay-Delta ecosystem and fisheries, and improving water supply reliability for California.

A thorough investigation of the Portfolio approach, and a full range of comprehensive alternatives is imperative if the BDCP environmental review process is to be consistent with the state's policy to "reduce reliance on the Delta in meeting California's future water supply needs through a

statewide strategy of investing in improved regional supplies, conservation and water use efficiency” (Water Code Section 85021). The DCC recognizes the importance of the co-equal goals set forth in California law (Water Code Section 85054); however, any means of achieving these goals, including but not limited to the BDCP, must be implemented in a manner that protects the Sacramento-San Joaquin Delta and its communities and fully mitigates all short- and long-term project-related impacts. To the degree that the state’s water supply challenges can be solved through water conservation, reuse and recycling, desalination, surface water and groundwater storage, or other means, the less likely the results of the BDCP will cause harm to the Delta.

We also believe the analysis must be based on the best available science and ultimately be affordable. The Delta Counties have repeatedly called for an independent peer-review of the scientific underpinnings of the BDCP, including a review of the development of flow criteria to preserve and enhance the Delta. Any BDCP must limit exports to water surplus to Delta needs, include water conservation and reuse measures, construct additional water storage facilities, respect and preserve the statutory protections established for the Delta, maintain the existing water rights priority system and area of origin rights, and not redirect water supply impacts upstream of the Delta.

The DCC also supports a transparent, independent, peer-reviewed, and economically sound cost-benefit analysis process that follows state and federal standards for benefit-cost assumptions and focus. Following the identification of viable alternatives, the BDCP should complete a detailed and comprehensive cost-benefit analysis of each alternative consistent with the requirements identified in DWR’s Cost-Benefit Analysis Handbook. As the DCC has said in the past, the analysis should include all foreseeable direct and indirect economic impacts on the Delta and on Delta counties, including the impacts of any new water infrastructure and habitat conservation projects.

Thank you for your consideration of our views. We look forward to continuing to look for ways to work with you to achieve our respective objectives.

Sincerely,



Mary Nejedly Piepho
Supervisor, Contra Costa County



Skip Thomson
Supervisor, Solano County



Don Nottoli
Supervisor, Sacramento County



Mike McGowan
Supervisor, Yolo County



Larry Ruhstaller
Supervisor, San Joaquin County