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November 16, 2011

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*Sent via e-mail: [BDO@USBR.GOV](mailto:BDO@USBR.GOV)*

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**Subject: Sacramento Regional County Sanitation Comments Regarding Bay Delta Conservation Plan Memorandum of Agreement**

The Sacramento Regional County Sanitation District (District) provides wastewater collection and treatment services to 1.3 million residents of the greater Sacramento area. We take our role as environmental stewards very seriously. The BDCP and the associated EIR are of keen interest to the District and we have provided numerous written comments to the various BDCP committees, workgroups, and sub-work groups over the past several years. We appreciate the opportunity to offer comments on the First Amendment to the Bay Delta Conservation Plan (BDCP) Memorandum of Agreement signed by the federal and state agencies and south of the Delta water export contractors.

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Clearly, resolving the Delta's issues requires a comprehensive and long-term solution that weighs all impacts and outcomes against the intended benefits. However, for this to be accomplished successfully there must be a broad representation of affected stakeholders and technical experts in the process - a common theme we have continued to advocate.

We recognize that Habitat Conservation Plans (HCPs) are typically driven and funded by applicants and understand the need for the applicants to review *initial draft documents* prior to public release. However, the scale and nature of this project requires a more transparent and meaningful stakeholder driven process to ensure its success. The need for openness takes on added importance because of the fact the project applicants do not live in or represent the geographic region in which the project will be constructed. To that end, we would encourage that the BDCP implement a process to solicit robust input and expertise early on, rather than wait until an EIR is prepared. *Minimal* meaningful dialogue has occurred to date.

- Stan Dean  
District Engineer
- Ruben Robles  
Director of Operations
- Prabhakar Somavarapu  
Director of Policy & Planning
- Karen Stoyanowski  
Director of Internal Services
- Joseph Maestretti  
Chief Financial Officer
- Claudia Goss  
Public Affairs Manager

The BDCP "Effects Analysis" is an example of a critical document that needs early review by stakeholders so that they understand the scientific assumptions and modeling results that will be relied upon for the BDCP and its EIR. Over the last several years, the District has attempted on numerous occasions to meet with BDCP agencies and water contractors, as well as their scientists and consultants on this issue, only to have our requests denied. Recent pledges by BDCP entities to be more approachable have again not come to fruition. Since August 2011, we have again attempted to meet with BDCP consultants on the "Effects Analysis," only to have the meeting cancelled or delayed multiple times.

The District strongly believes that in order for the BDCP process to be effective, there must be a broad representation of technical experts that include backgrounds in water quality monitoring and wastewater processes, such as POTWs and the State and Regional Water Boards. The District can provide expertise on a variety of water quality issues such as modeling, toxicology, and fate and transport of various constituents. The magnitude of this long-term water and habitat management plan warrants the inclusion of affected stakeholders and their experts throughout the planning process so that robust evaluations and critical dialogue can occur to ensure the plan's success.

The District appreciates your consideration of our comments and looks forward to your response and assistance in facilitating meaningful dialogue and the ability, at a minimum, to engage in the early review of the BDCP's "Effects Analysis". If you have any questions regarding our comments, please contact Terrie Mitchell, the District's Legislative and Regulatory Affairs Manager at (916) 876-6092 or [mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com).

Sincerely,



Stan Dean  
District Engineer

cc: Congressman John Garamendi  
Congressman Dan Lungren  
Congresswoman Doris Matsui  
Commissioner Michael Connor, USBR  
Don Glaser, Regional Director, Mid-Pacific Region, USBR  
Dr. Jerry Meral, Deputy Secretary, California Natural Resources Agency  
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