May 14, 2009

Ms. Delores Brown, Chief
Office of Compliance
Department of Water Resources
P.O. Box 924836
Sacramento, CA 94236

Re: Bay-Delta Conservation Plan Scoping Document Comments

Dear Ms. Brown:

In August 2008, Butte County submitted comments to the Delta Vision Blue Ribbon Panel on the Delta Vision Strategic Plan. In those comments Butte County voiced support for the restoration of the Delta ecosystem through the Bay Delta Conservation Plan (BDCP). We continue to support the BDCP process but remain concerned over the lack of project specifics, scientific uncertainty of the options and a disregard for assuring protections throughout the Delta watershed.

Butte County and the entire northern Sacramento Valley region is a critical component of the Delta watershed and the Area of Origin for much of the water that flows through the Delta. Our surface water resources include the crown jewel of the State Water Project (SWP) located at Lake Oroville, the headwaters of the Central Valley Project (CVP) located at Lake Shasta, as well as a network of creeks and rivers that are tributary to the great Sacramento River which feeds into the Delta. In addition, much of our local water supply comes from the various groundwater basins throughout the region that are recharged through these creek and rivers.

Our water resources are more than the source of water for the Delta. They provide the lifeblood for our agricultural-based communities, economy and environment. The delicate balance of our natural resources comes from the care and planning of local governments, private landholders and water agencies. For these reasons, local governments within our region have a vested interest in the overall health and stewardship of the Delta as well as
assuring the sustainability of water resources in our region.

The BDCP scoping document focuses primarily on options to address ecosystem issues within the Delta estuary. However, many of the options could result in depletion of water resources in the upstream area of the Delta watershed. Unfortunately, the BDCP neither references nor considers potential impacts to the Delta watershed. The ecological sensitivity of the upstream portion of the Delta watershed are worthy of protection. For example, Butte Creek is home to one of the last remaining wild sources of spring run Chinook salmon. Ignoring the ecological sensitivity of the Delta watershed could end one of the few remaining wild runs of a threatened species.

In pursuing options to protect the Delta ecosystem, we recommend that the BDCP recognize and provide for equal protection for the upstream portion of the Delta watershed. The BDCP will be a failure if it focuses solely on protections of the Delta estuary while relegating assessment of potential impacts to the greater Delta watershed to the end of the process. Such an approach would likely result in redirecting impacts to the upstream Delta watershed and be counterproductive to the ecosystem goals of the BDCP.

We look forward to continue working with you on a scientifically and ecologically sound way to restore the Delta. Please feel free to contact Paul Gosselin, Director, Butte County Director of Water and Resource Conservation in this regard.

Sincerely,

Bill Connelly

Bill Connelly,
Chair,
Butte County Board of Supervisors