

Municipal Services Agency
Paul Hahn
Agency Administrator



County Executive
Terry Schutten

County of Sacramento

October 22, 2008

Bay-Delta Conservation Plan – Other Stressors Workgroup
Ms. Karen Scarborough, Undersecretary
Mr. John McCamman, Co-chair, BDCP Other Stressors Workgroup
Mr. Brent Walthall, Co-chair, BDCP Other Stressors Workgroup
c/o Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, California 95814

Re: Comments of the County of Sacramento on the Second Draft of the Conservation Measures Proposed by BDCP's Other Stressors Workgroup (October 17, 2008)

Dear Ms. Scarborough, Mr. McCamman, and Mr. Walthall:

The County of Sacramento appreciates the opportunity to provide comments on the recommended *Other Stressors Conservation Measures* (OSCMs) as set forth in the second draft that was presented to the Bay Delta Conservation Plan (BDCP) steering committee on October 17, 2008. We have reviewed the revised OSCMs as well as the recommendations from the Other Stressors Working Group (OSWG) and provide the following comments:

1. With regard to Non-Native Invasive Species conservation measures, the County expresses concerns with the OSWG's recommendations. It appears that the OSWG has recommended one conservation measure to address non-native invasive species. Considering the potential impact that non-native invasive species may have on the ecological health of the Delta, and potential impacts on covered species, the County recommends that the BDCP Steering Committee consider adopting additional conservation measures to address non-native invasive species.

2. Conservation measure TOC07, *Reduce the Loads of Toxic Contaminants in Stormwater Pollution and Urban Runoff by Working with Existing Efforts in the Delta*, applies directly to the County as the County is a primary partner in the Sacramento Stormwater Quality Partnership. While the County appreciates the need to address potential impacts on covered species that may be caused by urban stormwater runoff, the County is concerned with this conservation measure as revised. In particular, the conservation measure indicates that the BDCP Implementing Entity, along with the Fishery Agencies, would develop annual work plans that specify stormwater pollution load reduction activities that would be implemented by the agencies voluntarily agreeing to the Memoranda of Agreement (MOA) between the various entities. Because this conservation measure relies on voluntary agreements between agencies subject to municipal stormwater permits and the BDCP Implementing Entity, we suggest that annual work plans be prepared in a collaborative manner that includes the stormwater agencies.

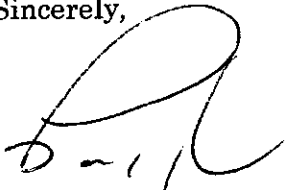
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As drafted, it appears that the stormwater agencies would not have input on the annual work plans but would be required to implement such work plans. We recommend that if the BDCP steering committee selects conservation measure TOCO7 for inclusion in the BDCP, the measure should be revised to reflect that the preparation of annual work plans would be a collaborative process that includes the stormwater agencies volunteering to participate in this effort.

Further, this conservation measure would require the stormwater agencies to be responsible for monitoring the effectiveness of agricultural contaminant reduction measures. We contend that it is not appropriate, or within our jurisdiction, to be responsible for monitoring the effectiveness agricultural contaminant reduction measures. We recommend that this reference be removed from conservation measure TOCO7.

In summary, the County encourages the BDCP steering committee to expand the scope of recommended measures to address non-native invasive species, and recommends that the conservation measure addressing urban stormwater be revised in the manner as suggested above. Thank you for your consideration of these comments.

Sincerely,



Paul J. Hahn
Agency Administrator

cc: Sacramento County Board of Supervisors
Terry Schutten, County Executive
Delta Task Force – (internal)

JTB/PJH/ds