



COUNTY OF YOLO

Office of the County Administrator

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Randy Fiorini, Chair
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Chair Fiorini:

Thank you for the opportunity to comment on the Delta Stewardship Council's proposed revised performance measures for the Delta Plan, last presented to the Council on December 17, 2015. Yolo County is supportive of many of the existing performance measures, such as those related to emergency response and legacy communities, and is grateful for new measures related to value-added crop processing and Delta recreation and tourism trends. We have significant concerns, however, about the new Yolo Bypass performance measure (Reference No. 4.31).

The Yolo Bypass performance measure replaces an existing performance measure related to documenting "progress toward restoring in-Delta flows to more natural functional flow patterns to support a healthy estuary." The new measure is specific to the Yolo Bypass as follows:

Performance Measure: Progress toward restoring more natural functional flow patterns to support ecological floodplain processes in the Yolo Bypass. Progress will likely require modifications to infrastructure and/or water management protocols that increase floodplain connectivity.

Yolo County supports the language of the performance measure, but has significant concern with the metrics associated with this performance measure, in particular the following:

Metric: Frequency of achieving >17,000 acres of inundation for 14 or more consecutive days in the Yolo Bypass

Target: >17,000 acres of Yolo Bypass inundation for 14 or more consecutive days between December and March in at least two out of three years.

As you know, 17,000 acres is a figure that appears in the Reasonable and Prudent Alternative for the Biological Opinion for Long-Term Operations of the Central Valley Project and State Water Project. Despite this, Yolo County does not believe it is necessary or appropriate at the present time to identify 17,000 acres as the target figure for inundation that contributes to the recovery of spring-run and winter-run salmon in the Delta Plan. In consultation with professional fish biologists, Yolo County is working on a Technical Memorandum that, based on a review of scientific literature, identifies significant uncertainties associated with proposed acreage targets. Yolo County instead supports working collaboratively to develop an initial acreage target, based on the scientific literature, as well as a robust adaptive management process to allow for changes if necessary to support recovery of these important fish species.

While Yolo County is appreciative of the goal to cease inundation by the end of March, Yolo

County growers and wetlands managers have consistently informed the County that early to mid-March is the latest flooding can cease to minimize impacts on agriculture and wetlands management. Agriculture is not only important to the County's economy; it continues to be critical to the maintenance of flood capacity in the Yolo Bypass. Also, as you may know, the state and federal government have spent millions of dollars to build and maintain wetlands in the Yolo Bypass and they continue to be of significant value to many important species.

Rice fields and wetlands in the Yolo Bypass also provide important habitat to the endangered giant garter snake. Yolo County is a member of the Yolo Habitat Conservancy, which will complete a countywide Habitat Conservation Plan and Natural Community Conservation Plan (HCP/NCCP) by 2017 that focuses on the Yolo Bypass for conservation of this species. While the County believes it is possible to conserve habitat for both salmon and the giant garter snake, a collaborative process to develop the appropriate conservation strategies for all species is essential. The proposed metrics will limit this collaboration.

Yolo County also does not believe it is technically possible, based on the hydrology of the river and data provided by the state, to achieve 17,000 acres of inundation in two out of every three years. Based on a review of the hydrologic data from October 1929 through July 2008, the state concluded in 2009 that the potential for flows through a notch in the Fremont Weir exceeding 3,000 cubic feet per second (cfs) is approximately 45 percent, or less than one out of every two years. The 3,000 cfs threshold was established by the state because lower flows remain within the Toe Drain and do not inundate lands in the Yolo Bypass (*Technical Study #2: Evaluation of North Delta Migration Corridors: Yolo Bypass; Prepared for Bay Delta Conservation Plan by the Integration Team, Updated April 2009, pg. 29*).

We also note that Yolo County was not contacted for input on a performance measure related to projects that affect a large portion of the County, although Yolo County has been working collaboratively with the state and federal government for over five years to reach a mutually agreeable outcome in the Yolo Bypass. These efforts culminated recently in the establishment of the Yolo Bypass Partnership, an effort that will serve as a forum for local, state and federal agencies to promote the discussion, prioritization, and resolution of policy issues critical to the successful implementation of the region's various planning efforts. Yolo County respectfully requests that the Council either remove the specific quantitative targets from the proposed performance measure or, alternatively, that the County coordinate with the Yolo County Board of Supervisors and the Yolo Bypass Partnership to revise this performance measure before its formal adoption.

Thank you for your consideration of these comments. If you have any questions, please contact Phil Pogledich at (530) 666-8275.

Sincerely,



Patrick Blacklock
County Administrator

cc. Kris Tjernell, Resources Agency
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