



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

Chair and Members  
Delta Stewardship Council  
c/o Chris Knopp  
Executive Officer  
980 Ninth Street  
Suite 1500  
Sacramento, CA 95814

**Re: Final Draft Delta Plan, Rulemaking Package, Recirculated Draft Programmatic Environmental Impact Report (PEIR)**

Honorable Chair and Members:

On November, 30, 2012, the Final Draft Delta Plan, the Rulemaking Package, and the Recirculated Draft Programmatic Environmental Impact Report (PEIR) for the Delta Plan were released for public review and comment. The period provided for that review and comment presently ends on January 14, 2013.

The County Counsels for the five counties in which the Delta is situated, Contra Costa, Sacramento, San Joaquin, Solano and Yolo, urge that the comment period be extended for a minimum of an additional 90 days.

The Final Draft Delta Plan consists of over 650 pages. The Rulemaking Package consists of over 180 pages. The PEIR consists of about 825 pages. All of these documents, amounting to a combined length of nearly 1700 pages, are composed of technical, legal, fiscal and scientific analysis. As we previously stated in the last round of truncated review, all of these documents attempt to describe environmental impacts and mitigation within a region which, by definition, encompasses a fragile and interdependent ecosystem. Further, the potential impacts of the Delta Plan reach well beyond the defined Delta.

As we have noted previously, meaningful comments will require substantial review across an array of disciplines, requiring analysis by legal, economic, geo-technical, planning and public safety staff of our respective Counties. It will come as no surprise that our Counties' staff are limited in number and already encumbered by the usual press of County business with limited and dwindling resources.

With regard to the timing of the comment period, review and analysis of these documents posted on the DSC website for public review on November 30, 2012, will require more than the allotted 45 days for review and comment. Yet, the allotted comment period falls over the Christmas and New Year holiday periods, included periods during which some affected agencies will be without staff as the result of furloughs or other resource restrictions.

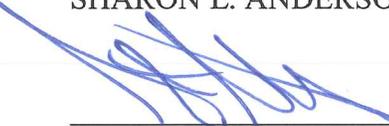
On behalf of the people who live and work within the five Delta Counties, our Counties desire to provide meaningful review of and comments on these documents. We are sure others do, as well. We do not believe that the current comment period will provide time for such review and comments.

We, therefore, reiterate our recommendation that the comment period be extended 90 days to the close of business April 15, 2013.

Sincerely,

Contra Costa County Counsel  
SHARON L. ANDERSON

Sacramento County Counsel  
JOHN F. WHISENHUNT



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By: Stephen M. Siptroth  
Deputy County Counsel

DAVID E. WOOTEN,  
San Joaquin County Counsel

DENNIS BUNTING,  
Solano County Counsel



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ROBYN TRUITT DRIVON,  
Yolo County Counsel

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By: Philip J. Pogledich  
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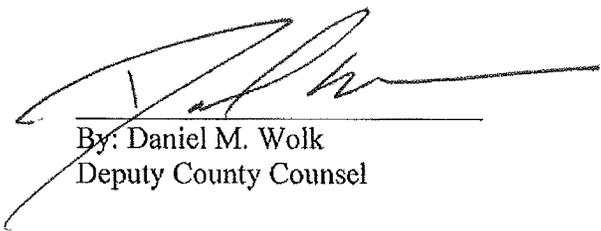
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