



COUNTY OF YOLO

Board of Supervisors

District 1, **Oscar Villegas**
District 2, **Lucas Frerichs**
District 3, **Mary Vixie Sandy**
District 4, **Sheila Allen**
District 5, **Angel Barajas**

625 Court Street, Room 204 ▪ Woodland, CA 95695
(530) 666-8195 ▪ FAX (530) 666-8193
www.yolocounty.gov

Interim County Administrator, **Dirk Brazil**
Sr. Deputy Clerk of the Board, **Julie Dachtler**
Email: clerkoftheboard@yolocounty.gov

February 11, 2025

Kevin Harper
Chief, Environmental Resources Branch
Planning Division
U. S. Army Corps of Engineers, Sacramento District
marshall.k.harper@usace.army.mil

Re: Request to Participate as a Cooperating Agency—Comprehensive Study of the Sacramento River, Yolo Bypass System (Yolo Bypass Comprehensive Study)

Dear Mr. Harper:

On behalf of the Yolo County Board of Supervisors, this letter requests cooperating agency status in connection with the above-referenced study. The County of Yolo (County) has previously served as a cooperating agency under the National Environmental Policy Act (NEPA) for other major projects affecting the Yolo Bypass and surrounding areas, including the Yolo Bypass Salmonid Habitat Restoration and Fish Passage Project (2013) and the Bay-Delta Conservation Plan (2010). Similar to the County's participation as a cooperating agency in those efforts, the County's qualifications under 40 CFR § 1501.8 to participate as a cooperating agency for the Comprehensive Study include:

- Potential jurisdiction over implementation of the project to the extent aspects of it may be carried out by private entities or by government agencies (e.g., other local government entities) that are subject to County regulation;
- Legal responsibility under the state constitution for most land use and environmental matters within the unincorporated area, including matters of public health, safety, and welfare not specifically reserved to (or exercised by) the state government;
- Close knowledge of issues relevant to the adequacy of the NEPA process, including extensive experience and familiarity with agricultural activities within the Yolo Bypass, the operation of the Yolo Bypass Wildlife Area, flood protection, public utilities and infrastructure, and habitat for terrestrial species (including migratory waterfowl);
- Experience evaluating the potential economic impact of proposals to restore floodplain habitat in the Yolo Bypass on existing agricultural operations, as evidenced in the April 2013 publication of a study entitled "Agricultural and Economic Impacts of Yolo Bypass Fish Habitat Proposals." With the County's permission, the Bureau of Reclamation later retained the authors of this study (through a contract with CDM Smith) to perform related analyses in connection

with the Yolo Bypass Salmonid Habitat Restoration and Fish Passage project and its Environmental Impact Statement;

- Experience conducting other relevant studies pertaining to hydrodynamic modeling, waterfowl impacts, fisheries habitat restoration, and drainage and infrastructure improvements within the Yolo Bypass (please see the studies and information in the Yolo County “Delta eLibrary” at the link included below)¹;
- Through participation with the Sacramento Area Flood Control Agency in initial outreach to local residents and growers for the study, extensive familiarity with the perspectives of those likely to be affected by implementation of any projects in the Upper Elkhorn Basin as a result of the study; and
- Ongoing participation in a number of related efforts involving flood protection, habitat restoration, and other efforts in and near the Yolo Bypass, including the Yolo Bypass Cache Slough Partnership, Lower Elkhorn Basin Levee Setback Project, implementation of the Yolo Bypass Salmonid Habitat Restoration and Fish Passage project (including participation on the Fisheries Enhancement Technical Team, development of the Adaptive Management Plan, and multi-agency Coordinated Operations Plan), and serving as a member agency of the Lower Sacramento/Delta North Regional Flood Management Program Team.

We are happy to provide additional information on our qualifications upon request. The County staff expected to devote time to cooperating agency work include the following:

Staff Name and Title	Hourly Rate
Alex Tengolics, Director of Strategic Operations County Administrator’s Office	\$148.16
Sabrina Snyder, Senior Management Analyst County Administrator’s Office	\$101.60
Other Associate Management Analyst Staff County Administrator’s Office	\$75.25
Phil Pogledich, County Counsel	\$200.00

Presently, we expect Sabrina Snyder, Senior Management Analyst, will serve as the County lead on cooperating agency work with potential support from the other County staff identified above.

The County understands that cooperating agencies may not typically receive any funding support from the lead agency, and we are prepared to devote County funding to support our participation. That said, the County has a limited general fund and—unlike many other agencies that typically serve as cooperating agencies under NEPA, the County does not receive any federal or state funding to specifically support the full range of work of the nature we expect could be required in a cooperating agency role, which may require the dedication of additional staff resources. For these reasons, any funding support the Corps can provide would be appreciated and helpful to ensure that we can devote

¹ <https://www.yolocounty.gov/government/general-government-departments/county-administrator/county-administrator-divisions/intergovernmental-affairs/delta-elibrary>

Kevin Harper
Page 3 of 3
February 11, 2025

adequate staff resources to this effort. We observe that the Corps has provided substantial funding in match to the Non-Federal Sponsors that are actively engaged in the study effort, including the Sacramento Area Flood Control Agency, the California Department of Water Resources, and the Central Valley Flood Protection Board.

In conclusion, as the local government entity with many years of experience in relevant environmental, land use, and economic policy issues relevant to the study, the County respectfully believes it is qualified to serve as a cooperating agency under NEPA. We further believe that our knowledge of the affected area and relationships with those that work, live, and own property there further adds to our qualifications as a cooperating agency. We look forward to your response to this letter and any questions regarding this request may be directed to Sabrina Snyder, Senior Management Analyst, at (916) 477-5188 or via email to sabrina.snyder@yolocounty.gov.

Sincerely,

Mary Vixie Sandy
Chair, Yolo County Board of Supervisors