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**From:** Kathy Kerridge <kkerridge@sbcglobal.net>  
**Sent:** Friday, October 30, 2015 12:35 PM  
**To:** BDCPcomments  
**Subject:** Comments for EIR

The delta tunnels should not be built. They pose a real threat to the fish and wildlife of the delta and the Bay. I live in Benicia and we have already seen a change in the water in the straits by our town. It is increasingly salty. The tunnels will allow for even more salt water intrusion. If half of the water is diverted the delta and bay will suffer, particularly during a drought. When water is short the farmers are put first and the environment and fish suffer. With the tunnels you are putting central valley farmers ahead of delta farmers.

There are better, cheaper, and safer ways to increase our water supplies. Drop this project.

Kathy Kerridge  
771 West I Street  
Benicia, CA 94510

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**From:** Bruce Campbell <madroneweb@aol.com>  
**Sent:** Friday, October 30, 2015 1:26 PM  
**To:** BDCPcomments  
**Subject:** Comments on BDCP/WaterFix Partially Recirculated Draft EIR / Supplemental Draft EIS pertaining to the Tunnels

October 28 – 30, 2015

Bruce Campbell  
3520 Overland Ave. # A

Los Angeles, CA 90034

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BDCP / WaterFix Comments  
P.O. Box 1919  
Sacramento, CA 95812

To whom it may concern at the agencies and otherwise:

To begin with, I want to object to this undemocratic process which is desperately trying to avoid a statewide vote on the Governor's giant tunnels plan! I furthermore object to the name "WaterFix" since the proposal creates more problems than it solves. Stop your political spin and try basing your documents and decision on law and biology – rather than on political pressure!

I notice that the California Dept. of Fish and Wildlife website is encouraging applicants (those trying to sneak around wildlife laws) to get permits through an incidental take permit approach via 2081(b) – rather than to seek permits through the 2081.1 Consistency Determinations process. If an agency was interested in an environmental outcome, it would urge applicants to get a permit with as strong protections as possible for listed species. Instead under the 5 bullet points under "Common Difficulties for Applicants Seeking Consistency Determination", CDFW appears to be advising that applicants seek an approach that approves destruction of listed plants (by sneaking around CESA), that they proceed with their proposal despite not having adequate funds to successfully implement the required mitigation, and that they proceed with vaguer mitigation measures which are nowhere near as specific regulations get under CESA. Sadly, it appears that CDFW loves to pander to applicants rather than be the biologically-focused agency which you are supposed to be! No wonder you changed your name from what environmentalists often referred to as "Dept. of Squish and Maim" to DFW perhaps to confuse people between the two agencies of the same name (one at the state and one at the federal level).

I am confused in regards to this CDFW webpage which says, "If the Department determines that the federal statement/permit is not consistent with CESA, the applicant must apply for a incidental take permit under section 2081 subdivision (b) of the Fish and Game Code." What I cannot determine is whether the BDcp plan was determined to be inconsistent with CESA – and thus whether CDFW advised them (or they made their own decision) to seek end-run permits by going through section 2081(b). Has it been determined that the BDcp was inconsistent with CESA (and thus that may have been why the 2081(b) approach to regulatory permits is being attempted)?

Yet, it was rather bizarre that CDFW advises taking the 2081 (b) permitting route because basic common sense would lead to a conclusion that the Tunnels scheme clearly will not abide by the criteria indicated in Title 14 of the California Code of Regulations, Section 783.4 subdivisions (a) and (b). When one looks at points 1 through 5 (with # 3 having sub-points "a.", "b.", and "c.", one notices that of the 7 numbered or lettered points, it is clear that the Tunnels scheme does not meet 5 of those 7 criteria (I am counting 1, 2, 4, and 5 as one apiece, and then count #3 as 3 since it has three sub-points). For instance, due to the massive construction footprint and the massive diversion of freshwater upon completion (which will never even make it to the Delta), "the impacts of the authorized take" cannot be either minimized or fully mitigated. Also, there is no way that the alleged restoration can be "roughly proportional" to the massive construction disruption and the massive diversion of Sacramento River water. The odds of "successful implementation" of restoration to maintain listed species is basically zero. There is no way such a huge project at a hundred fifty foot depth can have enough restoration to keep the listed species going. Thus, no amount of funding is sufficient since such restoration cannot be successful. And then the catcher, "Issuance of the permit will not jeopardize the continued existence of a CESA-listed species." Clearly, if the permits are given for the Tunnels boondoggle, it will be a decision based on political pressure, since one cannot embark on such a massive project (when combined with already declining native fish populations) and claim a good chance of success in such regard.

Note that (except for on the mailing address portion of this page), I am using the term BDcp, rather than BDCP. This is because the "CP" part of BDCP is an afterthought desperately trying to justify a giant water conveyance system. I was appalled to discover that the Tunnels are planned at a depth of 150 feet. Thus there will be massive impacts on a huge number of species during the nearly three decades that it will take to build this boondoggle – besides major impacts on anadromous fish and other species from the "operation" of the BDcp Tunnels.

The recent effort to separate the Tunnels boondoggle from the so-called "restoration" as part of the BDcp is quite disturbing since it is pretty much presumed that the two will work hand-in-hand in order to try to maintain and restore habitat for a number of listed species of the Bay / Delta. Also, the recent butchering / significant reduction of the acreage planned for restoration is another indication that the project is the Tunnels boondoggle – rather than really focused on restoration. I understand that most of the area to be restored is land rather than aquatic environment. There needs to be great specificity as to how various efforts on land and in riparian and aquatic habitat will help to maintain populations of listed species. Also, you must identify which areas are to be restored – including identifying the owners of such land. Will a landowner have any options regarding such, or will some parcels be mandated to do some restoration? How many properties will be seized for the Tunnels boondoggle? Will some of these properties be seized for so-called restoration?

I notice on the CDFW webpage that, "No Section 2081 (b) permit may authorize the take of 'fully protected' species and 'specified birds' (Fish and Game Code Sections 3505, 3511, 4700, 5050, 5515, and 5517)." I notice that some of those species listed on the "fully protected" species list use the Bay/Delta for key habitat needs – such as the Pelican, the Sandhill Crane, and others. It is my understanding that NO TAKE of such species may occur. Please carefully examine which species are in which areas near the proposed giant Tunnels route, and estimate the likelihood of not only the killing, but the harassment or injury of such species during the likely over 25 years that it will take to build the Tunnels boondoggle. If such species are found in the fairly immediate area, what actions will be taken to seek to avoid "take" of such species? In the final upcoming document on BDcp, please list all "fully protected" species which are found in the Sacramento River and Delta region, and then mention their habitat needs, and which portions of the tunnels route are their preferred areas.

It is my understanding that the Kern County Water Agency claims the tunnels to not be economically viable unless there are illegal provisions such as taking Prop. 1 money to buy water (to be mostly destined for giant

agribusiness as well as fracking operations in Kern County) as well as give that agency as much water as they seek especially during springtime. So it sounds like your choice is to either pander to chemical agribusiness and give the billionaires what they want, or follow the law and reject this huge scheme which has no real chance of restoration success. Do you agree with the KCWA that the Tunnels are not economically feasible without all the basically corporate welfare which KCWA calls for in their comments? Does Proposition 1 allow for the taxpayers to buy water? That question must be answered whether or not the water is destined to KCWA and/or otherwise.

Also, I call for inclusion in the next formal documents on this matter of a clear delineation of what persons / companies / interests have contacted (and / or wined and dined) various CDFW, DWR, BoR, and USFWS personnel (including big-wigs) so that we can see clearly whether there is improper collusion, or whether there is any integrity left in agencies which tend to be taken over by those who they are supposed to be regulating.

Before I get to THE MOST ESSENTIAL POINT regarding the BDcp, I will discuss air emissions pertaining to the many decades-long “construction phase” of the proposed Tunnels boondoggle under 4A and some other alternatives. There are more than 40 known carcinogens in diesel smoke – and I would guess that most heavy equipment for decades of construction of the Tunnels would be spewing diesel fumes. How do such proposed emissions mesh with air quality regulations for the Central Valley? Besides the various carcinogens in diesel, people deserve to SEE A SPECIFIC PLAN TO CONTROL BLACK CARBON EMISSIONS IN THE CONSTRUCTION PHASE FOR THE TUNNELS.

THE CUMULATIVE IMPACT OF THE DECADES-LONG CONSTRUCTION PHASE OF THIS MASSIVE PROJECT BUILT AT A DEPTH OF 150 FEET COMBINED WITH THE DIVERSION OF MASSIVE AMOUNTS OF WATER WHICH WILL NOT BE AVAILABLE TO EVER ENTER THE DELTA WILL CLEARLY BE A FATAL BLOW TO ALL LISTED FISH SPECIES IN THE SACRAMENTO RIVER AND DELTA REGION – those being the Sacramento River winter-run Chinook salmon, Central Valley spring-run Chinook salmon, Central Valley Steelhead trout, southern Green Sturgeon, and the almost gone Delta Smelt. Each of this species needs more water in the river and delta system (at least during some of their life phases) to have a chance of surviving. The restoration plan was recently slashed considerably in acreage, and clearly cannot be successful in mitigating either the hugely destructive construction phase or the major ecological impacts from massive water diversions during the operational phase. Even if one had many tens of billions of dollars and could seize a lot of property and change lots of practices in the region, it still likely could not sufficiently mitigate for the drop in species populations due to the lengthy construction phase of the Tunnels scheme – let alone mitigate for that major phase ALONG WITH MITIGATING FOR THE MASSIVE DIVERSION OF FRESHWATER WHICH NEVER MAKES IT TO THE DELTA IN WHICH THERE ARE STRUGGLING LISTED SPECIES. (And do not forget the climate change – drought as the new normal – backdrop to which the huge Tunnels are planned. Yes, you must account for climate change in discussions of species survival, potential flow rates or guarantees of sufficient water to certain powerful water brokers, cumulative impacts, etc.)

While I see no chance for success in the alleged restoration, but let’s give them the benefit of the (not much) doubt and let’s say they embark on very robust and conscious restoration in various parts of the delta. So even if the restoration is a lot better than I expected, it will be a decades-long process. The listed species will not be able to maintain enough numbers and may well die out before the construction phase is over. The delta smelt could disappear entirely this decade, and the other listed fish species aren’t faring much better, and will be severely harassed / stressed by the lengthy construction phase digging to such a depth. And if a listed fish species happens to survive despite the Tunnels construction phase being very disruptive to their designated critical habitat, then they could well be finished off by the massive diversion of water which deprives their bathtub (so to speak) of a major amount of freshwater.

This reminds me of some EIR / EISs that point out how there will be a swell amount of habitat to the Marbled Murrelet's liking 40 years from now. Well, that is fine and dandy, but how are they supposed to survive in the meantime with continued logging, increase in corvid population, etc.? Try using a combination of biology and common sense as to whether you can massively alter designated critical habitat for listed fish species during the decades-long construction phase of the Tunnels and expect the species (during our contemporary drought as the new normal era) to survive the construction phase. The so-called "restoration" plan is vague and gets weaker by the month. And even if a restoration plan could still be successful, how will you keep these native fish species alive in sufficient numbers (if any at all) through the decades-long construction phase with climate change as a backdrop??? Even if the related agencies halt using their "emergency declarations" (seeking to skirt endangered species laws) which diverts more water to the south than is healthy for the local ecosystems.

One question: seeing that Sacramento River winter-run Chinook salmon need cool water to survive the summer in, how will the temperature be impacted by the decades-long construction phase for the Tunnels (keeping climate change in mind), and how will the temperature of the river and delta be impacted by the diversion of sometimes up to half of the Sacramento River water volume into the Tunnels primarily for major agribusiness in the southwestern San Joaquin Valley? (You may also keep in mind that 95% of fracking operations in California are in Kern County).

We need better estimates in the documents as to what biological damage would be caused at the specific intake areas for the tunnels DUE TO IMPINGEMENT AND ENTRAINMENT? Are there site-specific studies on species (water, ground, and air) near each intake area? And don't forget how much biological damage can be done building this boondoggle at a depth of 150 feet!

Please put me on your mailing list to receive e-mail documents on this important matter. Thank you.

Sincerely yours,

Bruce Campbell

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**From:** Paul Hughes <hughes7x@gmail.com>  
**Sent:** Thursday, October 29, 2015 7:23 PM  
**To:** BDCPcomments  
**Subject:** Comments on CA Water Fix (Alternative 4A)

I am writing to state my opposition to the Delta Tunnels / CA Water Fix.

**1. Delta water quality will degrade further under this plan, which will violate the Clean Water Act.**

The Delta ecosystem has long suffered from degraded water quality, even before the current drought. Lack of freshwater flows through the delta has created well-documented, catastrophic declines in listed fish species. Proponents claim that the CA Water Fix will improve habitat for fish and wildlife, and yet their own RDEIR/SDEIS shows that that the project will further degrade Delta water quality, even after mitigation.

RDEIR/SDEIS Table 31-1 states the following:

WQ-11: Effects on electrical conductivity concentrations resulting from facilities operations and maintenance.

“Significant and Unavoidable Adverse Impact” under CEQA and “Adverse Impact” under NEPA

WQ-32: Effects on Microcystis bloom formation resulting from facilities operations and maintenance (CMI)

“Significant and Unavoidable Adverse Impact” under CEQA and “Adverse Impact” under NEPA

WQ-33: Effects on Microcystis bloom formation resulting from facilities operations and maintenance (CM2-CM21)

“Significant and Unavoidable Adverse Impact” under CEQA and “Adverse Impact” under NEPA

Clearly, removing more water from the Delta – and even worse, taking it from the top of the Delta system – deprives the system of the freshwater flows needed to keep salinity and Microcystis blooms at bay. These are unacceptable impacts. Water needs to flow THROUGH the Delta, not be diverted around it.

**2. Reasonable alternatives to tunnels were not considered.**

There are many alternatives to the tunnels, yet none of these is considered in the RDEIR/SDEIS. One such alternative is the Delta-Tulare Water Plan, which would store water in the old Tulare lakebed. This plan could yield a minimum of a million acre feet of additional water for California, without damaging Delta farms or the Delta ecosystem, and at a fraction of the cost of tunnels. More information is at <http://northdeltacares.org/2015/10/05/the-delta-tulare-water-plan/>

Reclamation and DWR should prepare and circulate a new Draft EIR/EIS that will include alternatives that reduce water exports and increase Delta flows for consideration by the public and decision-makers. Please send these folks back to the drawing board.

Paul R Hughes

PO Box 360

Clarksburg, CA 95612

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**From:** Rick Bettis <rckbettis40@gmail.com>  
**Sent:** Friday, October 30, 2015 6:34 PM  
**To:** BDCPcomments  
**Subject:** Comments on California Water fix

As a former DWR employee who work on the Peripheral Canal I recognize the need to provide more certainty of a reliable water supply for all Californians.

Frankly I have not read much of the latest version of the DRIR/DEIS. However I would like to provide a few general comments for your consideration.

1. Given the increasing evidence regarding climate change every effort should be made to make this project climate neutral by including clean renewable energy as part of the project to offset any climate impacts based on "life cycle analyses" of aspects of the project from construction, including procurement of materials through operations.
2. It should be recognized that the delta was historically a marsh and estuary and that returning portions of it to those conditions should not be considered unreasonable. On a present value basis the cost of state and federal investment in maintaining the existing levee system have been extremely large and probably not economically justified.
3. Even though every effort should be made to intervene and minimize the effects of climate change it should be recognized that we may be too late to avoid significant sea level rise. The Delta facilities should be designed to accommodate a worse case scenario and defined by the studies of the IPCC and others.
4. It should be insured that the project will operate by gravity and pumping avoided.
5. The project should include funding support for mandatory water conservation measures even beyond those that are being implemented during the current drought.
6. Support should be given for the development of recycled water supply to minimize our reliance on new supplies, considering the uncertainties inherent under future conditions with climate change.
7. It should be recognized that the Delta facilities may not be justified unless adequate supplies can be insured. Under a potential and likely climate change we will need additional storage, both surface and groundwater along with the conservation and recycling measures noted above.

Thank you for your consideration.

Sincerely  
Rick Bettis  
1716 P Street  
Sacramento California, 95811

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**From:** Theresa Brady <terriebrady@gmail.com>  
**Sent:** Friday, October 30, 2015 10:13 PM  
**To:** BDCPcomments  
**Subject:** comments on eir bay delta tunnel

The need to maintain the water levels to protect endangered species in the Bay Delta area should take priority over new infrastructure to transport water to other regions of California. Greater efforts to conserve water should be made and required in both the agriculture sector and the urban sector, especially in landscape. While I want us to maintain available water for human use, there are so many common sense measures that have not been put in place. These water conservation measures would require transporting no water from already stressed areas of wild need for water. That is why I oppose this project and ask that you reject this project and require that more stringent conservation measures are undertaken. The bulk of my comments will specify many conservation measures that have been overlooked, or minimally implemented to this point.

The following is an incomplete list of measures that should be tried first.

Two major areas where water is being wasted still are urban areas and agriculture.

First I will address what agriculture should do:

Water conservation measures of farms: 1. water early in the day, never mid day. 2. Do not run water in furrows. 3. Use drip if possible. 4. If sprinklers are used do these two things: a. Avoid misting ( fogging) (over watering that leads to waste in evaporation). b. water at dewpoint if possible( sometimes this occurs at four in the morning, in summer sometimes it doesn't occur at all) 5. Do not grow foods that are heavily water intensive. ( no new plantings of almond trees for example) 6. commodities should not take precedence over local food supply. 7. water sensors should be installed: in the unlikely event that we get rain, water should not be applied.

Second in urban areas there are still many ways to reduce water use that would help if they were encouraged. Some of them are still banned in some localities. These include: 1. Composting toilets. 2. gray water installations for washers, sinks and showers.

There has been a lot of emphasis on water reduction in landscape.

There are a lot of people truly making an effort now. 3. There should be no new permits for pools on private property at this time. 4. many of the measures suggested for agriculture above also apply to landscaping: such as watering at dewpoint, and water sensors to avoid watering during rain. 5. The measures that have been put in place say what day to water but do not address the fact that watering in the early morning is much different that watering mid day.

These measures should be implemented before an energy intensive and environmentally destructive project like the tunnel should be considered.

thank you for considering my comments.

Sincerely, Theresa Brady  
21844 Corvo Way  
Topanga Ca 90290

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**From:** Theresa Brady <terriebrady@gmail.com>  
**Sent:** Friday, October 30, 2015 10:21 PM  
**To:** BDCPcomments  
**Subject:** Re: comments on eir bay delta tunnel

There is one other area I want to comment in which water should not be wasted. Fracking and other methods of extreme fossil fuel extraction should not be allowed to use water in our state at this time. There is too little of this precious resource of fresh water for us to allow it to be used to extract fossil fuel that is better left in the ground at this time due to the crisis of global warming.

please do not approve the tunnel, and do not allow any of the existing water supply to go to fracking and other extreme extraction methods.

Thank you.

Sincerely, Theresa Brady  
21844 corvo way  
Topanga, Ca 90290

On Fri, Oct 30, 2015 at 10:13 PM, Theresa Brady <terriebrady@gmail.com> wrote:

> The need to maintain the water levels to protect endangered species  
> in the Bay Delta area should take priority over new infrastructure to  
> transport water to other regions of California. Greater efforts to  
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>

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- > early morning is much different that watering mid day.
- >
- > These measures should be implemented before an energy intensive and
- > environmentally destructive project like the tunnel should be
- > considered.
- >
- > thank you for considering my comments.
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- > Sincerely, Theresa Brady
- > 21844 Corvo Way
- > Topanga Ca 90290

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**From:** Michael McCleery <mmccleery@sbcglobal.net>  
**Sent:** Friday, October 30, 2015 8:05 AM  
**To:** BDCPcomments  
**Subject:** Comments on Proposed BDCP

I am opposed to the proposed 37 mile tunnel project for the following reasons:

1. The California Water Fix bypasses the environmental protections provided by CEQA and NEQA. The California EcoRestore has been separated from the Water Fix. How can the California Water Fix with the potential to decimate the Delta legally proceed without the necessary EIR process? Furthermore, the California Water Fix does not meet the coequal goals required by the 2009 Delta Reform Act. There is no mitigation from the new damage that will be caused by the tunnel construction and the reduced Delta water flows that will result from the tunnels.
2. The comments from the Kern County Water Agency make it clear that they expect water even at the expense of the Delta estuary. The small Delta farmers, farming 500,000 acres of prime peat farm land rely on Delta water, which would become saline under the Kern County Water Agency's demands. This is not logical, but is indicative of the power of Big Agriculture. It takes twice as much water to irrigate the desert lands to the south, which in turn leach out selenium. What is the logic in ruining the Delta to irrigate the desert? Where are the real controls to protect the Delta farming, fishery, and recreation? The water agencies expect more water and could care less about the damage to the Delta.
3. The benefits do not match the cost. According to Dr. Jeff Michael, University of the Pacific, the estimated benefits for the project drop by \$10 billion without regulatory assurance for water deliveries so that costs EXCEED benefits by at least \$8 billion. This calculation uses California Water Fix estimates. The real cost will be much higher, e.g. the Oakland Bay Bridge project. The costs will be born by farmers and urban ratepayers with no net benefit.
4. Real water increases such as desalination and reuse have not been looked at. Significant progress is being made in desalination making it comparable in cost to the California Water Fix and actually produces more water without ruining the fragile Delta ecosystem. If Big Agriculture wants a reliable water supply, they should look to the ocean.
5. This project cleverly avoids a vote by tax payers and rate payers. This project is UnAmerican.
6. This project does not take into account Global Warming, which has already shown us less water available in the Sierra Nevada.
7. California has issued water rights many time greater than available water. Agriculture needs to be regulated and curtailed. Permanent crops like almonds and pistachios continue to be planted even during the worst drought in California recorded history. Why are more permanent crops allowed in a desert state with unreliable water supply?
8. The California WaterFix does not help reduce reliance on Delta imports as mandated by the 2009 Delta Reform Act.
9. The route selected is the worst alternative that could be selected since it does not protect Delta farm communities and Delta recreation as required by the 2009 Delta Reform Act. It is only the cheapest. A construction project through the heart of the Delta, through the sensitive estuary and loud pounding through bird habitats for years is not the way to protect the fish or fowl. Instead, the alternative to route the tunnels far east, by I-5, should replace the current route.
10. Construction plans include de-watering Delta farmers' wells for years, making farming and living in their homes not possible. Yet there is no provision to provide remuneration to them. Barges and construction for years through recreational waterways is not the way to protect Delta recreation. The route to save the estuary, would be to route the tunnels far east, by I-5.

RECIRC2757

Michael W. McCleery  
mmccleery@sbcglobal.net

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**From:** clara johnson <clara-a-johnson@sbcglobal.net>  
**Sent:** Friday, October 30, 2015 2:42 PM  
**To:** BDCPcomments  
**Subject:** Comments on the Delta Tunnels BDCP/California Water Fix

Dear Sir and Madam

We strongly object to the construction of these two tunnels for the following reasons:

We agree with Congresswoman Matsui that the diversion will take the majority of the Sacramento River flow at times when the impact of that action will damage the environment, perhaps, even destroy some ecosystems downriver.

We are very concerned about the tunnels impact on fish and wildlife. The Delta has been manipulated by humans so much that its existence as a healthy environment is in question. The tunnels truly are a 20th century solution that has more to do with putting people to work than fixing the water mess. There may have been 1 million hours of deliberation on this topic as the Governor claims. If people stopped listening and searching for a better solution years ago then the number of hours is not relevant.

Restore the delta.org has offered an alternative to achieve the goals without risking the environment of entire stretches of river, along with the economic and physical well being of people along the river. It is much cheaper and offers incremental steps. Please consider these ideas as a wiser choice.

The study and science of the use of waterways and wetlands has changed, technology has changed and our understanding of how, rivers, agriculture, wetlands, wildlife conservation, a changing climate and urban water use relate and intertwine has changed. Please give this new knowledge and understanding a chance to be included in the attempt to improve our methods of allocating and using water for all Californians and for our state's environment.

We all must live in a present of limited resources where the wise use and stewardship is essential for sustaining the future. These tunnels are not wise stewardship of the public trust.

Sincerely

Clara A. Johnson  
159 Lake St  
Brisbane Ca94005

Paul O. Johnson  
159 Lake St.  
Brisbane, CA 94005

Ph. 415-468-4195

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**From:** Peter Standish-Lee <peter.standish.lee@gmail.com>  
**Sent:** Friday, October 30, 2015 4:31 PM  
**To:** BDCPcomments  
**Subject:** Comments on the BDCP Plan for the Delta Fix

Unfortunately my comments are not based on a complete analysis. Despite the size and complexity of the documents and extra time allowed, medical conditions have not allowed me sufficient time to properly and completely review the documents. However, I would like to present some general thoughts on the whole subject of exporting water from northern California to the west and the south through the Delta for consideration. Most of my career was dedicated to finding a solution to this problem so I have a little background on the subject albeit dated.

First, the present method of exporting water through the Delta is untenable so finding a better solution for this incomplete and defective method is imperative for Project integrity in the face of potential earthquakes and sea level rise as well as the health of aquatic and estuarine habitats. While heading up an environmental and mathematical analyses of the problem and managing several subsequent consultant analyses during the eighties and nineties, we concluded that the Peripheral surface water canal was the best solution for transferring water across the Delta. However that solution was defeated by determined political and public campaigns to discredit it due to the perceived excessive expense to southern California and San Joaquin/Tulare Basin users, righteous indignation from Delta water users who felt they were entitled to the higher quality water that the SWP-CVP projects provided them (compared to what they received historically), and problematic environmental concerns even though the PC was still considered the best overall compromise.

Although the current preferred Plan is likely to solve many of the problems within the Delta, especially the preservation of most of the current farming practices in the Delta and the viability of the SWP-CVP, the fact remains that placing the water conveyance underground removes all of the habitat and recreational benefits that would have been derived from a broad, low velocity surface canal. On top of that, the gutting of the previously proposed and meticulously planned Delta habitat restoration plan removes most of the SWP-CVP export mitigation benefits from the Delta Conveyance Plan. This represents a huge loss to the environment and a breach of faith to those of us who believed that it was a vitally important component and spent much of our careers helping to formulate it.

Notwithstanding that, the events and scientific findings since those earlier studies were done throws the entire concept of the Water Projects into some degree of doubt. It is possible that with climate change unquestionably upon us and the current drought as a portend of future conditions there will be insufficient water left in the north at the times of need and opportunity to export it to justify continued efforts to maintain their viability. This will be especially true if water storage facilities are lacking (they were an essential component of the historical proposals contained in SB-200 and its predecessors but are absent from this Plan). Northern California counties in Areas of Origin are currently sacrificing their own water supplies to benefit and sustain water exports to the south and the Bay area. Water users in the north should be extremely concerned about the threat to their future well-being being placed upon them. It is especially disconcerting to see in the midst of the current drought, huge corporately owned orchards being sustained by exports from the Delta to the foothills on the west side of the San Joaquin Valley where they should not have been planted in the first place. Not only is this water denied to valley water users at lower elevations, but the agricultural drainage from these ill-conceived farms further contaminates the groundwater basins of the Valley, making them progressively unfit for irrigation and environmental uses in the historically rich bottomlands. These kinds of uses for Delta exports are unsustainable and unjustifiable and present further problems for the much needed management of agricultural drainage in the Valley.

Another concern related to climate change is that the many of the very aquatic and estuarine species/populations including fish, that we are trying to preserve with the Delta Project may well become unsustainable in this hydrologic system due to rising water temperatures caused by climate change and droughts. It may well be a hard fact of life in view of the general political reluctance to seriously address that impending problem that native and even hatchery

raised salmon, steelhead and other anadromous fish will die out in the Central Valley of California, a tragic but unavoidable loss if current climate trends continue. This risk factor should be considered and weighed carefully in the decisions to be made regarding the most appropriate targets for preservation.

Finally the need to provide adequate Delta outflows to the Bay and Pacific Ocean should be paramount. Regardless of the nature and identity of the species that ultimately survive man's modifications of the estuarine system and climate change, their viability and contribution to the vital productivity of these systems depend on the silt, water and their contained nutrients and minerals borne by the outflowing rivers. The utmost attention and care must be directed to making sure that adequate outflow remains after diversions to sustain these estuarine and oceanic processes. Even though desalination has its own inherent environmental impacts, the continued diversion of large quantities of water from inland waterways may be hard to justify while coastal communities make inadequate efforts to advance the opportunities available to them to make use of adjacent ocean waters for consumptive uses through the latest viable and cost-effective salt removal technologies.

Thank you for the opportunity to comment on this proposed Plan.

Submitted by Peter Standish-Lee  
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**From:** Janet McCleery <jmccleery@duckpondsoftware.com>  
**Sent:** Friday, October 30, 2015 3:59 PM  
**To:** BDCPcomments  
**Subject:** Comments on the California WaterFix

I oppose the California WaterFix project for many reasons. My concerns can be grouped into two categories: The Construction Phase and the Operational Phase.

### **CONSTRUCTION PHASE:**

“Assuming” the California WaterFix is approved regardless of the many reasons it should not be, as listed below, the construction years will cause the demise of the Delta as we know and love it.

1. I submitted comments on the prior BDCP EIR and was disappointed, to say the least, to see in the current California WaterFix version that the alignment choice continues to be through the heart of the Delta, where construction has the potential to do the most damage to the fragile estuary. The pounding noise, pollution, barges, and other construction impacts will not help save the salmon or the bird estuaries. The plan will not protect recreation. The mitigation listed is ridiculous and without merit or thought.
2. The impacts on boating and recreation are not seriously considered or adequately included in the California WaterFix documentation. The maps and documentation in the plan do not even name the primary anchorage for the South Delta, Mildred Island. The plans and maps do not identify where the primary sloughs are for recreational water skiing and wake boarding. Instead, those very sloughs are the target to be blocked off for years with barges and construction. The resulting impact to the boating communities’ economy is not included in the plan. The plan is completely lacking regarding economic impacts due to construction on boating and recreation. And as I commented before, it is ludicrous to say that closing the Twin Sloughs (Victoria Slough/Woodward Slough), a prime waterski/wakeboard area near Discovery Bay, is “mitigated” by “similar” sloughs in the north bay. Young boaters from Discovery Bay cannot even get to those sloughs. It wipes Discovery Bay off the map as being a prime recreational community.
3. Dewatering wells is not acceptable. That will ruin farms and dislocate farmers from their homes.
4. The problem of the muck ponds has not been addressed or resolved. The plan still leaves piles of muck (OK, “Reusable Tunnel Material”) piled throughout the estuary.

**CONCLUSION:** The only rational option is to move the alignment to the Eastern Alignment along the already industrial areas near I-5 and down Highway 4. Yes, that would be more expensive. But since the co-equal goals require protection of the estuary, that is the only viable option.

### **OPERATIONAL PHASE:**

The operational phase is the most worrisome part of the plan. We have watched with dismay the last four years as the State continues to mismanage water resources, by moving too much water from the North to the South at the start of the drought, leaving insufficient water in Shasta and other reservoirs to protect the salmon, and now they are nearly decimated. The actions taken this year to try to save them were too little and too late. Now the farmers are complaining that the actions should not have been taken and claim it’s an issue of the farmers versus the fish. Nothing is further from the truth. The issue is that too much water has been promised, too much “paper water,” which does not exist, causing farmers to plant based on unrealistic expectations

1. The plan needs to identify the amount of water available for export, using the 2009 Delta Flows document. Then the state can allocate the available water reliably, instead of this hodge-podge, erroneous model used now.

2. The state need to start asking questions about how many crops we can support, and on what land, and stop the “paper water” overcommitment of resources. It is the expansion of farming beyond the available water resources that has brought California to this brink of disaster. The state needs to identify the water requirements, as the Legislature dictated in 2009, before moving ahead. This project currently is illegal.
3. The Independent Science Board correctly pointed out that the “Adaptive Management” model in the plan is woefully insufficient. The state has shown the inability to manage the system. There is no adequate structure identified in the plan that gives the populace any assurance that a real adaptive management model will work. Without that, we know that too much water will continue to be exported, as it has been for the past 10-20 years, and Northern California will continue to be impacted.
4. Removing too much water will allow too much salt water to intrude, affecting Delta farms - the richest, most fertile farmland in the country. We are giving up rich peat soil, which requires little water, for tainted, ruined desert lands. This makes no sense at all.
5. For the past 10-20 years, the Corporate Agribusinesses and LA Developers have ruled how the water is managed in the state. Once the tunnels are in, there will be no way to restrict the water they want to obtain, since there is no real “adaptive management” process documented in the plan. It is all hand-waving.
6. The cost analysis is lacking and not realistic.

CONCLUSION: Building the tunnels is guaranteed to destroy Northern California farms, salmon runs, and communities. And it will ultimately impact the water quality further downstream including the San Francisco Bay.

It is incomprehensible that this horrible project is still moving forward, after the EPA panned it back when it had an environmental component, as did the Independent Science Board more recently.

Jan McCleery  
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**From:** Jim Gibson <thinfilmguy@hotmail.com>  
**Sent:** Friday, October 30, 2015 5:45 PM  
**To:** BDCPcomments  
**Subject:** Comments on the proposed Tunnel

From: R. James Gibson

Dear Sirs,

I am told this is where I voice my opinion on the proposed tunnel project, created to siphon fresh water from the Sacramento river and send it south into the canal and onto to Southern California.

First, I am a retired CEO out of the Silicon Valley microelectronics industry, and have been a visitor and recreational boater in the Delta for most of my life. The Delta is a very fragile ecosystem and one of the largest and most beautiful fresh water estuaries and wild life habitats in the US. Please do not think for a second that it will survive if the tunnel is put in. All of the arguments have been put on the table so there's not much use in rehashing them but I would like to make a few comments.

About 2 weeks ago I was sitting on the bow of my boat in the Georgianna Slough and saw something very frightening. It was evening just before sunset, and as I looked into the water, I noticed a floating leaf, and it was not moving. It is the first time in my life I have ever seen the Georgianna slough not flowing to the sea. At slack tide, it always slows, but I had never seen it stop. The leaf did not move for at least 30 minutes and I fully understand that this was the result of our 4 year drought and minimal water flow, but it almost made me cry when I realized that if the tunnel is put in, the river will actually start to flow backwards as the water is siphoned up stream. Also unique was the Egeria that was now growing around our dock which has never been there before. This plant will take root whenever the water flow is slow, and it has never been this slow before. This plant and a few others have taken over and clogged countless marinas, open sloughs, and large bodies of water because of the lack of moving water, and it will get so much worse if the tunnel is put in.

We all know the Delta is connected to the ocean, and without the fresh water flowing to keep it at bay, salt water will continue to move up into what has historically been fresh water. The natural vegetation will die, the trees will fall and the levies will break. The pro tunnel people talk about putting in dikes and gates to keep the salt water out, but that is simply ridiculous, and will make the spread of unwanted aquatic plants even worse.

Bottom line is it all about money, big money. Big agribusiness bought millions of acres of desert for cheap along the canal and have made millions over the past 40 years. They paid little for the "desert" back then, but with an almost endless supply of cheap water, were able to make big money. It is a sorry fact, but there simply is not enough water to keep feeding the water thirsty desert, and sacrificing the Delta is simply not right. This thirst for water has killed several other big lakes, the mighty Colorado River, and I am appalled that people even consider this an option.

There are billions of tons of food that go to waste in the US every year, so I don't think I could ever be convinced that we "the people" will suffer if we either shut down many of the more wasteful farms, or we end up paying a bit more for food because they have to put in a desalinization plant and create their own water. Desalinization of what is 80% already fresh water entering the canal, only when it is needed, will certainly cost

money, but I bet the farmers if they are paying for their water the same as everyone else, the demand will drop.

I beg you, face the reality that big agribusiness in desert has either run its course or they need to find another solution like desalinization, moving to an area where there is water, becoming very efficient and living with what is available in a water supply, or something, but destroying one of our most beautiful natural wonders is just so wrong on so many levels.

I just heard big agribusiness is buying up islands and tracts of land to get more water rights. Are we so consumed with lawyers and money that we are actually letting this happen?

If God were making the decision, what would he say?

Thank You

R. James Gibson  
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