

Lowell L. Ashbaugh  
677 Equador Place  
Davis, CA 95616

October 29, 2015

FORM MASTER  
#21

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

**ATTN:** Governor Jerry Brown

**Subject:** Oppose the Delta Tunnels/California Water Fix (Alternative 4A)

I am writing to express my strong opposition to the Delta Tunnels plan.

The Delta Reform Act of 2009, in which the California State Legislature committed to the "coequal goals" of providing a more reliable water supply for California AND protecting and restoring the cultural, recreational, natural resource, and agricultural values of the Delta, cannot be upheld if the Delta Tunnels come to pass.

The California Water Fix does not meet the restoration goals of the Delta Reform Act; it is simply a plan to export more water out of the San Francisco Bay-Delta estuary. The Delta Tunnels will also fail to provide more reliable water because the Delta watershed is already oversubscribed by five times in normal water years.

[As a fisherman I am extremely concerned about the effect of the Delta Tunnels on salmon and other pelagic fish that rely on the Delta.]

My objections to the tunnels are threefold. The California Water Fix does not address the environmental, public health or economic impacts of the proposed Delta tunnels project. Also, the plan ignores alternatives that would save California tax and ratepayers billions of dollars, while investing in the jobs and local water sources that build sustainability.

**My environmental concerns with the plan are:**

- The impact on wildlife and plant species in the Delta that depend on freshwater include the Delta smelt, chinook salmon, steelhead, San Joaquin kit fox, and tricolored blackbird, protected species already on the brink that will face decimation due to a diminishing food-web. [The recent decimation of two years of winter-run salmon has been caused in part by mismanagement of water, specifically by exporting too much water from north state reservoirs and leaving too little for the fish to survive. The Delta Tunnels would only allow more transfers, possibly resulting in the extinction of these magnificent fish.]
- At sea, even the ESA-listed South Pacific Puget Sound Orca Whales depend on migrating Delta species that will be harmed by less water flowing through the Delta.

- The tunnels plan ignores Section 7 of the Endangered Species Act which prohibits federal agency actions that are likely to jeopardize the continued existence of any endangered species or that “result in the destruction or adverse modification of [critical] habitat of [listed] species.” [As noted above, listed winter-run salmon (and Delta Smelt, as well) are already jeopardized without the tunnels. They would be placed in even greater jeopardy with the tunnels in place.]
- [Because the tunnels will take water around the Delta rather than through it, salt water intrusion will become more frequent. This is already affecting the Delta, but it will become worse and further degrade the Delta environment, rather than enhance it as the co-equal goals of the Delta Reform Act of 2009 require.]

**My public health concerns with the plan are:**

- The tunnels will cause increased contamination of municipal water and wells for the millions of rural and urban residents living in the five Delta counties.
- The tunnels plan fails to model for potential increases of carcinogens and other formation of byproducts that would cause cancer and other serious health effects.
- Environmental justice communities, who depend on subsistence fishing, will also face food and health insecurities as a result of increased contaminants, specifically mercury contamination, in fish and wildlife populations.

**My economic concerns with the plan are:**

- For large metropolitan cities such as Los Angeles and San Jose that depend on export water, water rates and/or property taxes will go up, but they will get no additional water.
- [The major benefit of the Tunnels would accrue to water districts and farmers in the west side of the San Joaquin Valley while the major costs to repair the environmental damage they would cause would fall to the taxpayers. This fundamental unfairness alone should cause you to remove your support of this disastrous plan.]
- No analysis has been done on how the lack of fresh water flows will impact San Francisco Bay tourism and recreation. These industries depend on Delta fresh water flows for their crab and salmon fisheries, wildlife sighting, boating, and their restaurant economy. This industry is worth billions annually.
- Salinity intrusion is already impacting the western Delta farms and removing Sacramento River freshwater from the system will make matters worse. Delta farmers cannot irrigate crops with salt water and they certainly cannot plant crops in contaminated soils. The Delta Ag economy, which consists of generations of family farms and farm workers, generates \$5.2 billion for the California economy, annually.
- California coastal fishing communities depend on thriving wildlife. This historic industry is worth billions annually, with the salmon industry worth \$1.5 billion annually alone. Thousands of jobs and livelihoods are tied to these industries.

- The operation and construction of the tunnels will obstruct and disable navigable waterways for boating, marinas and other types of leisure activities, in addition to creating conditions of low water flow that will foster invasive aquatic species, such as water hyacinth. Poor water quality also creates unsafe recreation. Recreation and tourism in the Delta generate \$750 million annually.

Far less expensive and less environmentally destructive alternatives to the Delta Tunnels were largely ignored. The plan does not seriously consider any alternatives other than new, upstream conveyance. The decision-making process (from the outset) has tilted in favor of increasing water exports from the Delta. [This is mostly due to the composition of the group that devised the Delta Tunnels plan. Delta residents and others with better ideas were not included in the planning. Once again, this fundamental inequity should cause you to remove your support of this plan.]

There are better alternatives that would provide more immediate results with a lower outlay of dollars. There are also better alternatives that would actually enhance the delta rather than destroy it. Our tax and ratepayer dollars would be much better spent on:

- More aggressive water efficiency programs statewide that would apply to both urban and agricultural users.
- Funding water recycling and groundwater recharge projects statewide that would be billions of dollars less expensive for rate payers than constructing a new version of the Peripheral Canal or major new surface storage dams. Meanwhile, these projects move communities towards water sustainability.
- Retiring thousands of acres of impaired farmlands that generate wastewater pollution in the western and southern San Joaquin Valley and using those lands for more sustainable and profitable uses, such as solar energy generation.
- Improving Delta levees in order to address potential earthquake, flooding, and future sea level rise concerns at a cost of \$2 to \$4 billion; this is orders of magnitude less expensive than the major conveyance projects that are currently being contemplated.
- Increasing freshwater flows through the Delta to reduce pollutants so ecosystems and wildlife can be restored.
- Installing fish screens at the south Delta pumps to reduce the current salvage of marine life.
- [Considering a through-Delta project that would transfer water through the delta before exporting it to farms in the San Joaquin Valley. This would automatically protect the delta by removing the incentive to export water when salinity intrusion extends too far, precisely with the delta needs protection from excessive transfers.]

### **In Summary**

The Delta has problems that need to be addressed, but the CA Water Fix tunnels are a 20th century idea that won't fix them. It won't produce more water, more reliable supplies, or improved conditions for the environment in the Delta.

The new EIR/EIS has not adequately addressed my above stated concerns. That is why I oppose the Delta Tunnels/California Water Fix (Alternative 4A).

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. Such alternatives have a far better chance of complying with the Delta Reform Act and the federal Endangered Species and Clean Water Acts.

Sincerely,

A handwritten signature in black ink, appearing to read "Lowell L. Ashbaugh". The signature is written in a cursive style with a large initial 'L'.

Lowell L. Ashbaugh

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**From:** Lowell Ashbaugh <ashbaugh.lowell@gmail.com>  
**Sent:** Thursday, October 29, 2015 4:50 PM  
**To:** BDCPcomments  
**Subject:** Comments on CA WaterFix  
**Attachments:** CA Water Fix Comments.pdf

I have attached my comments in opposition to the proposed Delta Tunnels in CA WaterFix.

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Lowell Ashbaugh  
677 Equador Place  
Davis, CA 95616