
From: Robert Smith <rwsmithbob@yahoo.com>
Sent: Saturday, September 05, 2015 7:33 AM
To: BDCPcomments
Subject: Delta Tunnels

The plan to build 2 (more?) tunnels to divert Delta water to the south is a disgusting travesty and must stop!

The agencies involved have conducted meetings in secret, the state government hides its intentions and the private entities involved are outright deceitful. It is a bad plan and will harm the Delta ecosystem not help it. I have read several lengthy sections of the so-called report. It is poorly done, obtuse and in many areas inaccurate or flawed(perhaps on purpose).

Governor Brown and his associates should be ashamed to promote and support this. It will be stopped!

Respectfully,
Robert W Smith
Willowest Harbor
Bethel Island

From: fredrinne@monkeybrains.net
Sent: Saturday, September 05, 2015 7:59 AM
To: BDCPcomments
Subject: [Fwd:]

----- Original Message -----

Subject:
From: fredrinne@monkeybrains.net
Date: Sat, September 5, 2015 7:57 am
To: BDCPComments@icfi.com.

To whom it may concern:

I oppose the Delta Tunnels Plan involved with "California Water Fix" for the following reasons:

-It does nothing for the Bay Delta ecosystem but deplete farther the fresh water that is its lifeblood, leading to increases in algae blooms, concentration of pollutants and increased salinity incursion to water tables.

-The plan ignores any and all alternatives to urban sprawl and agribusiness and oil development which want more water all the time.

- Fish and wildlife will be exterminated by this alternative, some to total extinction.

-Water recycling, greywater pipelines, urban and agricultural water conservation innovation and investment are totally missing.

Thank you for your time,
Fred Rinne
San Francisco, CA

From: Frances Brewster <FBrewster@valleywater.org>
Sent: Wednesday, September 16, 2015 11:48 AM
To: BDCPcomments
Subject: Please Add Me to E-Mailing List

Thank You!

Frances Brewster
Senior Water Resources Specialist

Santa Clara Valley Water District
5750 Almaden Expressway | San Jose, CA 95118
Office: 408.630.2723 | Mobile: 831.539.9568
fbrewster@valleywater.org

Congress of the United States
Washington, DC 20515

September 11, 2015

The Honorable Governor Jerry Brown
 State Capitol, Suite 1173
 Sacramento, CA 95814

John Laird, Secretary
 California Natural Resources Agency
 1416 Ninth Street, Suite 1311
 Sacramento, CA 95814

The Honorable Sarah "Sally" Jewell, Secretary
 United States Department of the Interior
 1849 C Street, NW, Room 6156
 Washington, D.C. 20240

The Honorable Penny S. Pritzker, Secretary
 United States Department of Commerce
 1401 Constitution Avenue, NW
 Washington, D.C. 20230

The Honorable Regina A. McCarthy, Administrator
 United States Environmental Protection Agency
 1200 Pennsylvania Avenue, NW, Room 3000
 Washington, D.C. 20460

Dear Governor Brown, Secretaries Laird, Jewell and Pritzker, and Administrator McCarthy:

We write to thank you for providing a 60-day extension to October 30, 2015 to the comment period on the recently released Bay-Delta Conservation Plan (BDCP)/California "WaterFix" and the partially Recirculated Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) and to urge that you provide an additional 60-day extension to December 29, 2015.

As you know, the RDEIR/SDEIS contains substantial changes from the initial public draft and amounts to nearly 8,000 pages of additional documentation. Given the size and complexity of the documents, particularly in light of the 40,000 pages associated with the original draft EIR/EIS which provides the context and foundation for this latest proposal, we believe the current public comment period is inadequate and an additional 60 days beyond the current review period is warranted.

Thank you for your consideration.

Sincerely,



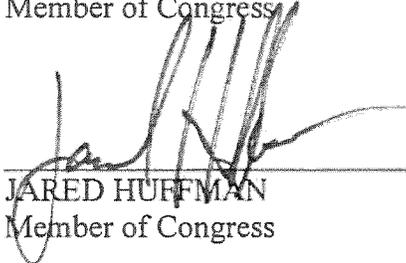
 JEFF DENHAM
 Member of Congress



 JOHN GARAMENDI
 Member of Congress



 DOUG LAMALFA
 Member of Congress



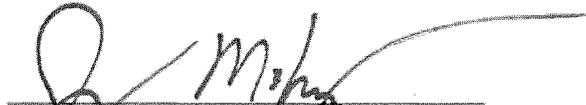
 JARED HUFFMAN
 Member of Congress


TOM MCCLINTOCK
Member of Congress


MIKE THOMPSON
Member of Congress


DORIS MATSUI
Member of Congress


AMI BERA
Member of Congress


JERRY MCNERNEY
Member of Congress


MARK DESAULNIER
Member of Congress


ERIC SWALWELL
Member of Congress

From: Banonis, Michelle <mbanonis@usbr.gov>
Sent: Wednesday, September 16, 2015 9:44 AM
To: BDCPcomments
Cc: Marcus Yee
Subject: Congressional Letter on DHCCP EIR/EIS
Attachments: 09112015 - CA Delta Delegation ltr re RDEIR-SDEIS Comment Period Extension.pdf

Please see attached.

--

Michelle Banonis, Bay Delta Conservation Plan Program Manager
Bureau of Reclamation
650 Capitol Mall, 5th Floor
Sacramento, CA 95814
(916) 930-5676 (office)
(916) 397-4914 (cell)

From: James Volb <jamesvolb@yahoo.com>
Sent: Sunday, July 12, 2015 8:09 AM
To: BDCPcomments
Subject: Waterfix

The new waterfix is only a downgraded version of the the BDCP. It still is only a water grab for Agriculture in areas of poor soil and dry conditions. It will not provide any additional water for the high cost of the project. It also will affect the water quality of communities along the lower delta by drawing water further up river and allowing salt water intrusion to move further upriver. Water mismanagement during the drought and declines in salmon, delta smelt and other fish populations shows that the system can not handle continued pumping at the expense of the delta. Furthermore the rate payers and tax payers should not have to pay for a project that will provide water for the agricultural areas mentioned above that keep expanding while and demanding more water while other communities along the Sacramento and San Joaquin Rivers are required to cut back water use.

The threat of earthquakes claimed as one reason for the project are minimal at best. Other alternatives were not seriously considered. Strengthen the levees and look at water capture and reuse to use the current system. It is time that California look at salt water desal plants to provide water for almond and other crops that require high volumes of water. Since those crops provide very little to California's economy and started after the CVP was completed it should not have the serious affect on the delta that it has from providing 80 percent of the water pumped out of the delta for those owners to profit only.

Thanks You,
James Volberding
Antioch, CA

From: Chan, Teresa
Sent: Tuesday, September 01, 2015 10:38 AM
To: BDCPcomments
Subject: FW: Western & TANC 2014 Comments - BDCP EIS
Attachments: TANC_BDCP_EIR-EIS_Comments Submitted July 28 2014.pdf; Western Comments on Draft EIS-EIR 6-25-14.docx

Team,

Can we check on this?

Thanks,
Teresa

From: Bradbury, Mike@DWR [mailto:Mike.Bradbury@water.ca.gov]
Sent: Tuesday, September 01, 2015 10:27 AM
To: Chan, Teresa <Teresa.Chan@icfi.com>
Cc: Yee, Marcus@DWR <Marcus.Yee@water.ca.gov>; Enos, Cassandra@DWR <Cassandra.Enos@water.ca.gov>
Subject: FW: Western & TANC 2014 Comments - BDCP EIS

Hi Teresa,
Western Power and TANC asked me to make sure their comments had been received. These were on the draft EIR, and I'm sure you have them, but I told them I would submit them again.
Mike

Michael Bradbury
Program Manager II, CalWaterFix Permitting
Department of Water Resources
901 P Street, Suite 411b, Sacramento, CA 95814
Cell (916) 207-0803
Office (916) 651-2987

From: Robbins, Gerald [mailto:GRobbins@WAPA.GOV]
Sent: Monday, August 31, 2015 4:39 PM
To: Yee, Marcus@DWR
Cc: Bradbury, Mike@DWR
Subject: FW: Western & TANC 2014 Comments - BDCP EIS

Here are the comments we discussed. I think these were submitted earlier but thought I would send them just in case.

Thanks
Jerry

Gerald (Jerry) Robbins RG | Natural Resource Supervisor
Western Area Power Administration | Sierra Nevada Region
(O) 916.353.4032 | (M) 916.847.5312 | grobbs@wapa.gov

From: Don Wagenet [<mailto:dwagenet@tanc.us>]
Sent: Wednesday, August 26, 2015 10:38 AM
To: Robbins, Gerald; Lash, Donald
Subject: Western & TANC 2014 Comments - BDCP EIS

Jerry & Don:

As per my discussions with you recently, please see the attached comments submitted by Western and TANC during the 2014 public comment period for the BDCP EIS/EIR.

Understanding that both Russell Knight and Heidi Miller are out, I may also follow up with additional information to familiarize you with our positions as expressed in the 2014 communications with DWR and others on the BDCP team.

We look forward to the meeting Monday at 1:30 between Western and TANC.

Regards,
Don

CALIFORNIA ENVIRONMENTAL QUALITY ACT COMMENTS
FROM THE TRANSMISSION AGENCY OF NORTHERN CALIFORNIA AND CALIFORNIA-OREGON
TRANSMISSION PROJECT REGARDING THE PROPOSED BAY-DELTA CONSERVATION PLAN AND
ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

INTRODUCTION

The Transmission Agency of Northern California (TANC) presents the following comments in the interest of assuring that the construction, operation, and maintenance of the alternative selected for implementation of the Bay-Delta Conservation Plan (BDCP) will minimize or entirely avoid potential hazards that could adversely affect the operation and maintenance of the California-Oregon Transmission Project (COTP).

TANC, the COTP, and Easement Provisions Protecting Against Uses That May Interfere with the Safe Operation and Maintenance of the COTP Facilities.

TANC is a joint exercise of powers agency organized under Chapter 5, Division 7, Title 1 of the California Government Code, and a Joint Powers Agreement, dated as of December 10, 1984, among the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara and Ukiah, the Modesto Irrigation District (MID), the Sacramento Municipal Utility District (SMUD), and the Turlock Irrigation District (TID), as members, and Plumas-Sierra Rural Electric Cooperative, as an associate member.

TANC is the Project Manager of the COTP, which is an existing 339-mile long, 1,600-megawatt, 500 kilovolt (kV) transmission project between the California-Oregon border and Central California (Figure 1). The COTP is critical to the delivery of electricity to California. The Western Area Power Administration (Western) has minority ownership interest in the COTP, transmission entitlement rights, certain lands rights, and provides O&M services to TANC for the COTP.

The following comments clarify certain references to TANC and the COTP.

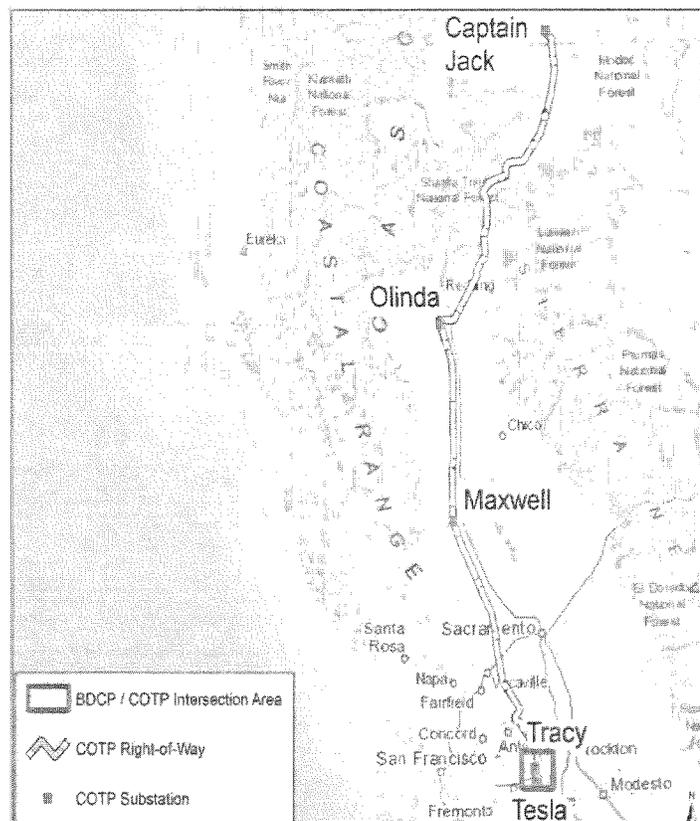


Figure 1. COTP ROW and BDCP Area of Concern

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Comment 1. Draft EIR/EIS Page 20-7, lines 16-18. The referenced sentence should be changed to read as follows (with italicized language inserted):

“Electricity within the Plan Area is transmitted by power lines owned variously by the participants in the California-Oregon Transmission Project (COTP) (which include the Transmission Agency of Northern California (TANC), the Western Area Power Administration (Western), Pacific Gas & Electric (PG&E), the City of Redding, the Carmichael Water District and the San Juan Water District), Western Area Power Administration (Western) and the Transmission Agency of Northern California (jointly own the California-Oregon Transmission Project), PG&E, SMUD and MID.”

Comment 2. Draft EIR/EIS Page 20-67, lines 23-24. The referenced sentence should be changed to read as follows (with italicized language inserted):

“The alignment of the canal and other conveyance facilities constructed under this alternative would cross power transmission lines owned variously by the participants in the California-Oregon Transmission Project (which include TANC, Western, PG&E, the City of Redding, the Carmichael Water District and the San Juan Water District), PG&E-Pacific Gas & Electric, Western and SMUD.

Comment 3. The easements comprising the portions of COTP right of way (ROW) of concern are held by the United States and administered by the Western Area Power Administration (Western), a federal agency under the Department of Energy, acting as TANC Operations and Maintenance Agent, for the benefit of all of the COTP participants (which include TANC, Western, the Pacific Gas and Electric Company (PG&E), the City of Redding, the Carmichael Water District and the San Juan Water District). Those easements include provisions to protect against any additional uses affecting the COTP ROW that could interfere with the safe operation and maintenance of the COTP facilities.

Please see the BDCP EIR/EIS comments submitted under separate cover by Western. Those comments are hereby incorporated by reference to the extent that Western’s interests and abilities to fulfill its contractual and other obligations to TANC on behalf of the COTP and its members and participants are in any way affected by the BDCP.

Comment 4. TANC’s comments herein are not intended, and shall not be construed, as authorization of, or acquiescence in, any particular uses of the COTP ROW for the purposes of implementing the BDCP.

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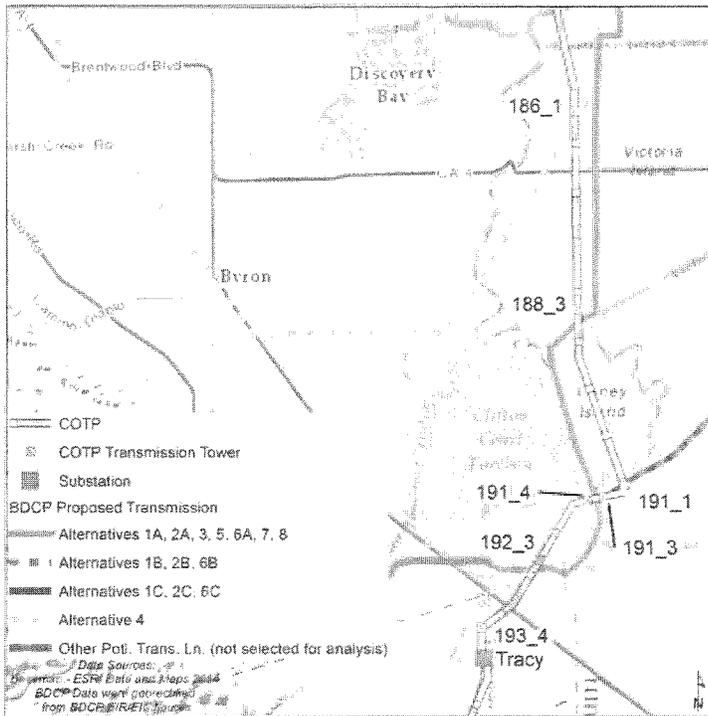


Figure 2. BDCP Alternatives Near the COTP

Potential BDCP Physical Impacts to the COTP

Certain Bay Delta Conservation Plan (BDCP) alternatives have the potential to adversely affect access to the COTP and its O&M. Figure 2 indicates the extent of the area where the BDCP alternatives would affect COTP O&M activities.

Several types of construction activities are planned to be conducted within or adjacent to the COTP ROW, including:

- Expansion of the Clifton Court Forebay/Byron Tract Forebay Across the COTP ROW;
- Permanent and Temporary Transmission Line Crossings of the COTP ROW;
- Permanent Water Conveyance Facility Crossings of the COTP ROW; and
- Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW.

Each of these types of construction activities, and the long-term operation and maintenance of the resulting BDCP facilities are of concern to TANC. The Draft BDCP EIR/EIS does not provide site-specific, detailed information regarding the methods and equipment to be used in the construction of the conveyance and transmission facilities as they cross the COTP ROW.

The following comments address TANC's concerns regarding the need for advance notification and coordination with TANC, and ongoing engineering and safety planning and practices that will need to be implemented as the BDCP proceeds.

Comment 5. The Draft BDCP EIR/EIS does not adequately acknowledge the public health and safety risks associated with construction activity in proximity to high voltage transmission lines. Indeed, Chapter 25 of the Draft BDCP EIR/EIS, which addresses "issues related to human health and safety that could potentially be affected by implementation of the BDCP alternatives,"

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(Draft BDCP EIR/EIS, p. 25-1, lines 3-4) makes no mention of the these concerns and, correspondingly, does not identify any mitigation measures to address these concerns.

Comment 6. Crane and pipeline work under the COTP would be inherently hazardous, even with the best safety plan and supervision. The risks here are not just damaging and deadly harm to the equipment, facilities, and people involved in the construction and operation of the Project, but also harm to the population in general and the economy of the Western region. Uninterrupted power supplies are central to public safety, health, medical care, vehicle and air traffic control, information exchange, the storage and provision of safe foodstuffs, fresh water production and sanitary waste disposal; in fact, virtually every facet of modern life depends on grid reliability.

Expansion of the Clifton Court Forebay/Byron Tract Forebay Across the COTP ROW

Comment 7. BDCP Alternatives 1A, 1B, 2A, 2B, 3, 5, 6A, 6B, 7, and 8 propose the development of the Byron Tract Forebay to be located immediately south of and adjacent to the existing Clifton Court Forebay. We understand that approximately 14 million cubic yards of earth would be excavated to create the Bryon Tract Forebay, and that the forebay would be used to provide storage of approximately 4,300 acre-feet of water with a surface area of approximately 600 acres.

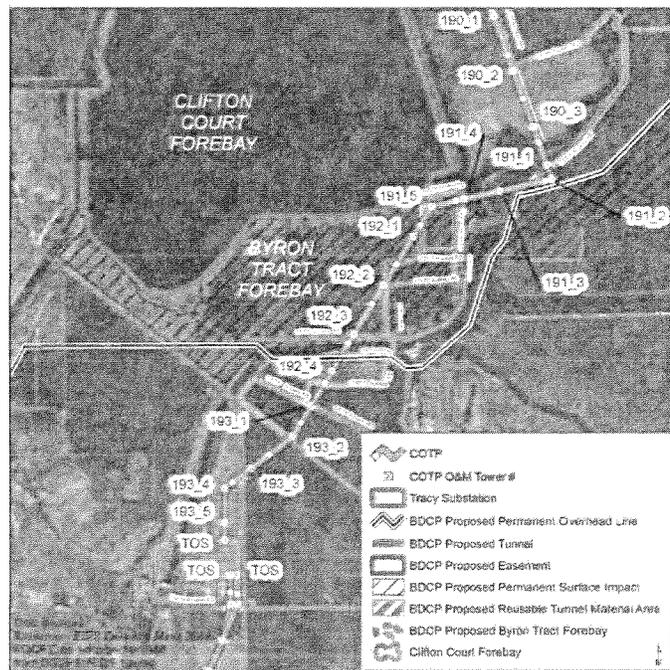


Figure 3. Byron Tract Forebay Expansion Across the COTP ROW

We understand that the Forebay would remain permanently flooded consistent with its purpose. Figure 3 shows the area where the forebay expansions would cross the COTP ROW. Forebay expansion across the COTP ROW would significantly and adversely affect the COTP facilities and ROW. Tower footings were not designed to withstand constant flooding and the reductions in stability that would result from permanent inundation. Specifically, the following adverse physical impacts would occur:

- Excavation within 100 feet of transmission tower footings during construction would threaten the integrity of tower footings and risk the collapse of the towers.
- Forebay flooding would severely reduce the integrity of the transmission tower footings, and likely result in tower failure.

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- The structural stability of five or more 500-kV COTP transmission towers would be threatened by excavation and subsequent flooding of the expanded forebay.
- The cumulative impacts of excavation and flooding would almost certainly result in one or more transmission tower failures over time.

The proposed location of the forebay expansion is therefore unacceptable to TANC. Forebay expansion needs to be relocated away from the COTP ROW. The excavation, flooding, and protective levees need to be located no less than 500 feet west of the existing COTP ROW to ensure continued integrity of the COTP transmission towers.

Comment 8. If the alternative selected for BDCP implementation includes expansion of the Clifton Court/Byron Tract Forebay complex such that it would inundate any part of the COTP ROW, the BDCP proponent agencies will be responsible for all additional and/or replacement right of way that may need to be acquired for relocation of the existing COTP towers. The BDCP proponent agencies would also be responsible for all costs for the design and construction of any new transmission towers that will be needed to maintain COTP service levels as the COTP is relocated to new ROW. The BDCP proponent agencies would be required to procure the new ROW with rights fully equivalent in all respects to the current rights. Full ownership and transmission entitlements associated with those rights will need to be vested completely to TANC and the COTP participants. The BDCP proponent agencies would also be responsible for full funding of all environmental studies, permit applications, and all other regulatory compliance requirements needed for relocating the COTP ROW, and the design, construction and commissioning of the replacement 500-kV line of equal or greater capacity. The BDCP agencies would also be responsible for payment of all lost revenues resulting from outages needed for relocation, replacement interconnection, and for all associated litigation costs.

Permanent and Temporary Transmission Line Crossings of the COTP ROW

Draft BDCP EIR/EIS Figures 3-25, 24-6, 25-2, and others indicate that proposed temporary and permanent transmission lines needed for BDCP power could cross the COTP ROW. The proposed COTP ROW crossings could occur at COTP towers 156/4, 186/1, 188/3, 191/3, 193/1 and 193/4. The following comments apply to any and all permanent and temporary transmission and distribution line crossings of the COTP ROW proposed as part of the BDCP.

Because these crossings pose potential construction, operation, and related safety hazards, the following construction practices will be required to be undertaken as standard precautions in the design and installation of transmission crossings of the COTP ROW.

Comment 9. TANC requests that written notification be provided to itself and Western of all locations where temporary or permanent BDCP transmission lines will be crossing the COTP ROW, to be provided no fewer than 180 days prior to the initiation of construction.

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Comment 10. Access to the COTP facilities for inspection and maintenance, including access for heavy equipment, shall be required at all times during BDCP transmission facilities planning, construction and operation. All COTP ROW access roads must be available at all times for emergency and routine O&M activities.

Comment 11. No transmission line crossings of the COTP ROW will be authorized to be sited in a manner that would place new transmission towers within the COTP ROW.

Comment 12. At all locations where proposed transmission or distribution lines to deliver power to the BDCP cross the COTP ROW, they shall cross under the COTP conductors. Further, these crossings shall satisfy National Electricity Safety Code and/or California General Order 95 requirements (whichever is more restrictive) for the COTP line under its maximum sag conditions.

Comment 13. TANC requires that it be consulted prior to and during the installation of temporary clearance markers to indicate the closest safe distances from the conductors.

Comment 14. Permanent markers indicating the proximity of energized high-voltage power line conductors shall be required to be furnished and installed on BDCP electric transmission facilities before the completion of construction according to standard industry practices for such marker installations.

Permanent Water Conveyance Facility Crossings of the COTP ROW and Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW

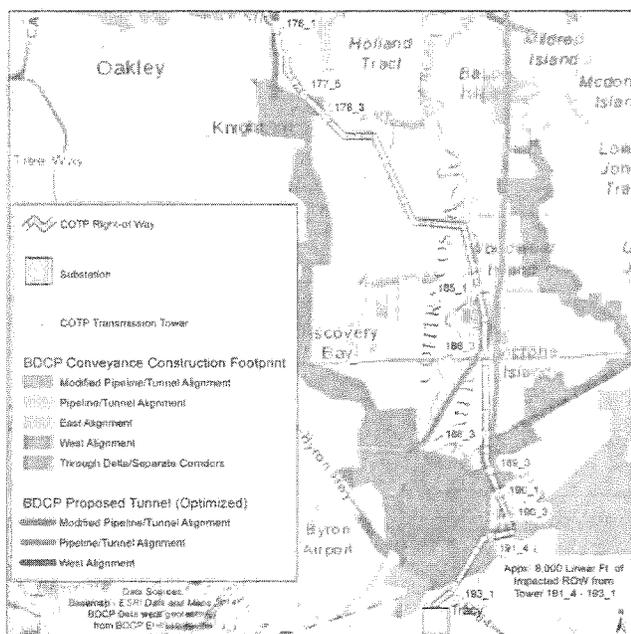


Figure 4. BDCP Proposed Crossings of the COTP ROW

BDCP EIR/EIS Figures 24-6, 25-2, and others indicate that Modified Pipeline/Tunnel Alignment, Pipeline/Tunnel Alignment, Western Alignment, and Through Delta/Separate Corridors conveyance alternatives could cross the COTP ROW. Figure 4 indicates the proposed locations of these crossings near COTP transmission towers.

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BDCP excavation, construction, operation, and maintenance activities have the potential to adversely affect the physical conditions supporting the structural integrity of the COTP, ROW access, and O&M activities. **The following comments therefore apply to any and all construction near or adjacent to the COTP ROW.**

Comment 15. TANC requests an electronic copy of each draft version of any Project safety plan applicable to those construction activities within or adjacent to the COTP ROW be provided to itself and Western no fewer than 180 days prior to the approval of the plan for implementation.

Comment 16. TANC requires advance written notice of at least 180 days prior to any construction activity to take place within the COTP ROW.

Comment 17. TANC will require that the BDCP provide detailed, site-specific information regarding the construction practices that will be occurring within the COTP ROW, and within 500 feet of the COTP ROW that includes, but is not limited to:

- Construction equipment;
- Construction crew sizes;
- The extent to which cranes will be used in installing the conveyance facilities;
- Maintenance of clearance distances to COTP conductors;
- The duration of all construction activities within the COTP ROW;
- Excavation practices within or adjacent to the COTP ROW and transmission towers; and
- Excavated materials transport and placement locations.

Comment 18. TANC requires that a TANC representative be on site at times when construction work is conducted within or adjacent to the COTP ROW for any and all BDCP construction activities.

Comment 19. TANC will require the development of a Compensation Agreement for the time needed for on-site representation of TANC's interests.

Comment 20. TANC requests that all communications to TANC provided as requested in these Comments be transmitted in both electronic and hard copy formats to the following TANC staff:

Email:
info@tanc.us
psanchez@tanc.us
dwagenet@tanc.us

Regular Mail:
 Transmission Agency of Northern California
 P.O. Box 15129
 Sacramento CA 95851-0129
 Attention: General Manager

CALIFORNIA ENVIRONMENTAL QUALITY ACT COMMENTS
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Comment 21. BDCP should coordinate closely with Western consistent with those comments submitted under separate cover by Western to ensure that the BDCP does not cause any unsafe construction or operating conditions.

Comment 22. All temporary earthwork within or adjacent to the COTP ROW shall be designed and implemented in a manner that results in drainage away from COTP transmission tower footings.

Comment 23. No cut or fill or cofferdam construction and/or dewatering activities will be authorized that could affect the stability of the COTP transmission tower footings consistent with all applicable government codes. Excavations will not be authorized within 100 feet of COTP transmission tower footings.

Comment 24. Residual Tunnel Material and any and all other excavated soil, spoils, or other materials will not be allowed to be placed within the COTP ROW.

TANC appreciates the opportunity to comment on the Draft BDCP EIR/EIS. We look forward to coordinating with the BDCP proponent agencies regarding the responses to these comments and the importance of maintaining the safety, reliability, and integrity of the COTP throughout BDCP planning, design, construction, operation, and maintenance.

Please call Don Wagenet at 916.852.1673 if you have any questions regarding these comments.

Sincerely,



Bryan W. Griess
General Manager
Transmission Agency of Northern California

Enclosures

From: Chan, Teresa
Sent: Tuesday, September 01, 2015 10:38 AM
To: BDCPcomments
Subject: FW: Western & TANC 2014 Comments - BDCP EIS
Attachments: TANC_BDCP_EIR-EIS_Comments Submitted July 28 2014.pdf; Western Comments on Draft EIS-EIR 6-25-14.docx

Team,

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Sent: Tuesday, September 01, 2015 10:27 AM
To: Chan, Teresa <Teresa.Chan@icfi.com>
Cc: Yee, Marcus@DWR <Marcus.Yee@water.ca.gov>; Enos, Cassandra@DWR <Cassandra.Enos@water.ca.gov>
Subject: FW: Western & TANC 2014 Comments - BDCP EIS

Hi Teresa,
Western Power and TANC asked me to make sure their comments had been received. These were on the draft EIR, and I'm sure you have them, but I told them I would submit them again.
Mike

Michael Bradbury
Program Manager II, CalWaterFix Permitting
Department of Water Resources
901 P Street, Suite 411b, Sacramento, CA 95814
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We look forward to the meeting Monday at 1:30 between Western and TANC.

Regards,
Don

DRAFT

**Western Area Power Administration, Sierra Nevada Region (Western)
Additional Preliminary Comments on the Bay Delta Conservation Plan (BDCP)
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)**

In addition to the comments provided by Western under cover letter dated May 19, 2014, Western hereby submits the following preliminary comments on the BDCP Draft EIR/EIS as they relate to the evaluation of impacts to the Western transmission system as set forth in Chapters 20 and 21.

1. The proposed expansion of the Clifton Court Forebay will directly impact Western's existing Hurley-Tracy No. 1 and 2 double circuit 230-kilovolt (kV) transmission line (HUR-TRY 1&2), Tracy-Contra Costa/Tracy-Los Vaqueros 69-kV transmission lines (TRY-CC/LV Lines) and the Transmission Agency of Northern California's (TANC) Olinda-Tracy 500-kV transmission line (TANC Line) as part of the California-Oregon Transmission Project. Western operates, maintains, and holds the land easement rights for this impacted segment of the TANC Line. When developing new transmission corridors, Western selects alignments that avoid crossing over or through open bodies of water unless required in order to span over rivers and/or canals. Reasonable access to maintain these transmission lines is critical to the operational reliability of Western's electric network and the TANC Line. An alignment of a Western transmission line over/through the proposed Clifton Court Forebay expansion is unacceptable to Western.

If the proposed expansion of the Clifton Court Forebay is necessary as part of the BDCP, then the HUR-TRY 1&2, TRY-CC/LV Lines and TANC Line will need to be relocated/rerouted as required by Western and TANC. As these lines are part of the bulk electric system and critical to the reliability of the network, it should be noted that acquiring the necessary outages to relocate these lines may be limited or restricted under certain system operating conditions. The BDCP will enter into an agreement with Western which will include terms and conditions for advance funding and payment of all of Western's costs to relocate/reroute Western transmission lines.

2. For the proposed temporary and permanent transmission lines necessary to serve the BDCP temporary construction activities and ongoing BDCP pumping loads when the tunnels are placed in-service, Western recommends an increase to the width of the proposed transmission line corridors from 150 feet to not less than 300 feet. Evaluating a wider corridor will allow for engineering flexibility during design and final

alignment of the temporary construction and permanent easements that are expected to range between 100 and 150 feet for the 230-kV transmission line segments.

3. Western expects the lead federal agency for the EIS will be the lead federal agency for Section 106 National Historic Preservation Act compliance and all other consultation requirements required by the National Historic Preservation Act and all other laws, orders, and legislation regarding Native American consultation, including appropriate Government-to-Government consultation with federally recognized tribes. The lead agency for Section 106 requirements would be responsible for all appropriate consultation with California State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation, and any other agency requirements. Western recommends that it be a signatory on any Programmatic Agreement and/or other appropriate agreements regarding Section 106 compliance for the BDCP. Western would review all cultural resource documents to ensure adequacy for Western's requirements as appropriate.
4. Western recommends that the transmission line portion of the BDCP be included in the project Endangered Species Act (ESA) and Section 106 (NHPA) consultation and mitigation. If the transmission portion of the project is not sufficiently covered under the project ESA or NHPA consultation and mitigation, then it could cause delays and Western will need to complete additional ESA and NHPA consultation. If Western needs to relocate/reroute existing transmission lines to support the BDCP project, it is likely that Western would need to arrange for a separate ESA and NHPA consultation.
5. One of the BDCP proposed soil spoils area is located in the vicinity of Western's TRY-CC/LV Lines, towers 4/1 through 5/2, west of Clifton Court Forebay. Typically, the Western easement agreement restricts the landowner from piling or placing materials within the easement area. This restriction is needed to insure ground to conductor clearance of not less than 35 feet for the 69-kV circuits. In addition, 30 feet of unobstructed maintenance access is required around the towers.
6. In general, plans for all tunnel crossings, spoil areas and any other use of Western's rights-of-way or easements shall be reviewed and approved by Western during the design phase and prior to construction.
7. Western requires an entity working in or around Western electrical power lines to abide and comply with the National Electric Safety Code and Occupational Safety and Health Administration (OSHA) standards. Equipment within a Western

easement area shall not exceed (14) feet in height when the transmission line is energized.

8. During construction activities, BDCP must prevent or minimize the proliferation of dust from contaminating and building up on insulators of nearby Western transmission lines.
9. Abide by Western's General Guidelines for the Use of Electric Transmission Line Rights-of-Way (copy attached).

Western recommends it participate in the BDCP environmental review as a federal Cooperating Agency. As a Cooperating Agency under an appropriate agreement, Western will likely not need to supplement the BDCP NEPA documents, provided the BDCP EIR/EIS addresses Western's requirements. If Western does not become a Cooperating Agency, Western could adopt the BDCP EIR/EIS and then, at a minimum, submit comments on the Draft EIR/EIS and recirculate the document, or prepare its own NEPA document.

Whether Western is a federal Cooperating Agency or not, coordination with Western throughout the NEPA process is appropriate and necessary to ensure that any action taken by Western to construct, remove, replace, install, acquire land, acquire easements, perform environmental reviews, etc. associated with the Western transmission system in support of the BDCP project is covered under the BDCP NEPA documentation (including required mitigation).

From: Anthony Edwards <atedwards@sbcglobal.net>
Sent: Monday, September 21, 2015 8:45 PM
To: BDCPcomments
Subject: Bay Delta Conservation Play

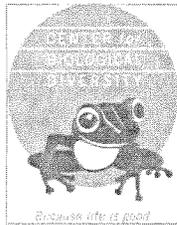
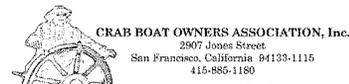
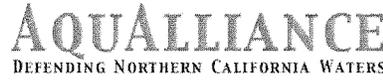
Dear Sir or Madam:

Years ago I opposed the Peripheral Canal as a boondoggle subsidizing primarily corporate agriculture. Now that we are in the throes of climate change, this Peripheral Canal redivivus launches beyond boondoggle subsidies into the realm of fantasy. The opportunity costs for the billions to be spent on this project are immense. The damage it will do to the bay and delta concerned is immense. It's time for this project's proponents to recognize that the age of reshaping the environment through massive civil engineering solutions has passed. It's time to recognize that environmental changes well under weigh will make this stupid project obsolete probably before it can be completed. It will do more harm than good by a wide margin. I oppose it.

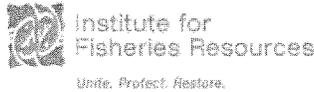
Sincerely,

Anthony T. Edwards

ENVIRONMENTAL WATER CAUCUS REQUESTS 60-DAY EXTENSION OF COMMENT PERIOD ON TUNNELS PROJECT ENVIRONMENTAL DOCUMENTS



CA Save Our Streams Council



September 18, 2015

Via Email and U.S. Mail

The Honorable Sally Jewell
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240
exsec@ios.doi.gov

David Murillo, Regional Director
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825
dmurillo@usbr.gov

John Laird, Secretary
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Kinberly.goncalves@resources.ca.gov

Mark W. Cowin, Director,
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001
Mark.cowin@water.ca.gov

BDPCComments@icfi.com

Re: Request for 60-day Extension of Comment Deadline for Delta Water Tunnels Diversion--BDPC/California Water Fix RDEIR/SDEIS Comments

Dear Secretary Jewell, Regional Director Murillo, Secretary Laird, Director Cowin and Federal and California Agencies, Officers, and Staff Members Carrying out the BDPC/DHCCP/Delta Water Tunnels Diversion:

The Environmental Water Caucus (EWC) (a coalition of over 30 nonprofit environmental and community organizations and California Indian Tribes) request an extension of 60 days for submitting public comments on the more than 48,000 pages, constituting the Bay Delta Conservation Plan (BDPC)/California Water Fix Partially Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) for the BDPC Draft EIR/EIS.¹

This Request is for an extension of time to comment on the subject documents. This Request is necessary because of the extraordinary volume of the technical and scientific material to be read, understood, researched, and then commented upon.

Further, this request is made to provide the lead agencies time to remedy fundamental flaws identified by the State of California Delta Independent Science Board on September 14, 2016, wherein they found the existing documents, that unless fixed, preclude meaningful comment and analysis. We submit for consideration a summary of their conclusions outlining serious flaws in the environmental analysis that preclude meaningful review or decisions based on these flawed documents:

"The Current Draft falls short, however, as a basis for weighty decisions about natural resources. It leaves environmental impacts and underlying science unclear by deferring content to the Final EIR/EIS ("the Final Report") and by neglecting a number of problems inherited from the Previous Draft. The gaps include:

- 1. Details on the adaptive management process, collaborative science, monitoring, and the resources that these efforts will require;*
- 2. Due regard for landscape-scale restoration, restoration timing and funding, and the strategy of avoiding damage to existing wetlands;*

¹ <http://baydeltaconservationplan.com/Home.aspx>

Request for 60-day Extension of Comment Deadline
September 18, 2015

3. *Analysis of how levee failures would affect water operations, and how the implemented project would affect the economics of levee maintenance;*
4. *Deficiencies concerning: uncertainties and their consequences; linkages among species, landscapes, and management actions; effects of climate change on the proposed project; and effects of changed water availability on agricultural practices in the San Joaquin Valley.*
5. *Concise and clear summaries—crisp yet analytical, and integrated with graphics—particularly comparing the alternatives in their expected major impacts.*

*Environmental impacts of California WaterFix need to be assessed more completely and clearly."*²

We would add to the list the failure of the documents to include the biological assessments or endangered species consultations for fish, wildlife and aquatic and plant species that are facing extinction or threatened with extinction. Lacking these critical documents the public and decision makers are precluded from accurately assessing and understanding how these species will be further harmed by dredging, blasting, road construction, power lines, barge traffic, noise, and diversion of water supplies essential to habitat and aquatic food sources..

Thank you for your consideration of this request.

Sincerely,

*Conner Everts
Facilitator
Environmental Water Caucus
Executive Director
Southern California Watershed Alliance*

*Jeff Miller
Conservation Advocate
Center for Biological Diversity*

*Tim Sloane
President
Pacific Coast Federation of Fisherman's
Associations*

*Eric Wesselman
Executive Director
Friends of the River*

*Bill Jennings
Executive Director
California Sportfishing Protection Alliance*

*Carolee Krieger
Executive Director
California Water Impact Network*

*Jonas Minton
Senior Water Policy Advisor
Planning and Conservation League*

*Colin Bailey
Executive Director
Environmental Justice Coalition for Water*

² <http://deltacouncil.ca.gov/docs/delta-isb-s-review-rdeirsdeis-bdpcalifornia-waterfix>

Larry Collins
President
S.F. Crab Boat Owners Association

Pietro Parravano
President
Institute for Fisheries Resources

Lloyd Carter
President
California Save Our Streams Council

Chief Caleen Sisk
Spiritual Leader
Winnemen Wintu Tribe

Kathryn Phillips
Director
Sierra Club California

Stephen Green
President
Save the American River Association

Adam Scow
California Campaign Director
Food and Water Watch

Barbara Vlamis
Executive Director
AquAlliance

Barbara Barrigan-Parrilla
Executive Director
Restore the Delta

Huey D. Johnson
Founder and President
Resource Renewal Institute

Additional Addressees, all via email:

Maria Rea, Assistant Regional Administrator
National Marine Fisheries Service

Michael Tucker, Fishery Biologist
National Marine Fisheries Service

Larry Rabin, Acting, Field Supervisor, S.F. Bay-Delta
U.S. Fish and Wildlife Service

Lori Rinek
U.S. Fish and Wildlife Service

Mary Lee Knecht, Program Manager
U.S. Bureau of Reclamation

Patty Idloff
U.S. Bureau of Reclamation

Deanna Harwood
NOAA Office of General Counsel

Request for 60-day Extension of Comment Deadline
September 18, 2015

Kaylee Allen
Department of Interior Solicitor's Office

Jared Blumenfeld, Regional Administrator (regular mail)
U.S. EPA, Region IX

Tom Hagler
U.S. EPA General Counsel Office

Tim Vendlinski, Bay Delta Program Manager, Water Division
U.S. EPA, Region IX

Stephanie Skophammer, Program Manager
U.S. EPA, Region IX

Erin Foresman, Bay Delta Coordinator
U.S. EPA
Sacramento, CA

Lisa Clay, Assistant District Counsel
U.S. Army Corps of Engineers

Michael Nepstad
U.S. Army Corps of Engineers

Diane Riddle, Environmental Program Manager
State Water Resources Control Board

From: Tim Stroshane <spillwayguy@gmail.com>
Sent: Friday, September 18, 2015 3:31 PM
To: Sally Jewell; David Murrillo; John Laird; Mark W. Cowin; BDCPcomments
Cc: Maria Rea; Michael Tucker; Larry Rabin; Lori Rinek; Mary Lee Knecht; Patty Idloff; Deanna Harwood; Amy L. Aufdemberge Esq.; Jared Blumenfeld; Tom Hagler; Tim Vendlinski; Stephanie Skophammer; Erin Foresman; Lisa Clay; Michael Nepstad; Diane Riddle; Zachary M. Simmons
Subject: Request for 60-day extension of comment deadline for Delta Water Tunnels RDEIR/SDEIS Comments
Attachments: 9-18-15 EWC comment time extension request.pdf

Letter attached, thanks for your understanding.

Honorable Sally Jewell, Honorable John Laird, Mr. Murrillo and Mr. Cowin:

On behalf of the facilitator Conner Everts of the Environmental Water Caucus, attached please find a letter from members of the Caucus requesting a 60-day extension for submitting comments on the Recirculated Draft EIR/Supplemental Draft EIS on the "California WaterFix" or Delta Water Tunnels Project.

We hope you will consider carefully granting this request, and we look forward to your decision in the matter.

Regards,

Tim Stroshane
Consultant
Environmental Water Caucus.

From: Tim Stroshane <spillwayguy@gmail.com>
Sent: Friday, September 18, 2015 3:26 PM
To: Sally Jewell; David Murrillo; John Laird; Mark W. Cowin; BDCPcomments
Cc: Maria Rea; Michael Tucker; Larry Rabin; Lori Rinek; Mary Lee Knecht; Patty Idloff; Deanna Harwood; Kaylee Allen; Jared Blumenfeld; Tom Hagler; Tim Vendlinski; Stephanie Skophammer; Erin Foresman; Lisa Clay; Michael Nepstad; Diane Riddle; Zachary M. Simmons
Subject: Request for 60-day extension of comment deadline for Delta Water Tunnels RDEIR/SDEIS Comments

Honorable Sally Jewell, Honorable John Laird, Mr. Murrillo and Mr. Cowin:

On behalf of the facilitator Conner Everts of the Environmental Water Caucus, attached please find a letter from members of the Caucus requesting a 60-day extension for submitting comments on the Recirculated Draft EIR/Supplemental Draft EIS on the "California WaterFix" or Delta Water Tunnels Project.

We hope you will consider carefully granting this request, and we look forward to your decision in the matter.

Regards,

Tim Stroshane
Consultant
Environmental Water Caucus.

From: Patricia Schifferle <pacificadvocates@hotmail.com>
Sent: Friday, September 18, 2015 8:56 PM
To: 'Sally Jewell'
Cc: 'Maria Rea'; 'Michael Tucker'; 'Larry Rabin'; 'Lori Rinek'; 'David Murrillo'; 'Mary Lee Knecht'; 'Patty Idloff'; 'Deanna Harwood'; 'Amy L. Aufdemberge Esq.'; 'John Laird'; 'Jared Blumenfeld'; 'Tom Hagler'; 'Tim Vendlinski'; 'Stephanie Skophammer'; 'Erin Foresman'; 'Lisa Clay'; 'Mark W. Cowin'; 'Michael Nepstad'; 'Diane Riddle'; 'Zachary M. Simmons'; BDCPcomments
Subject: Please Accept the Invitation to Visit the Delta Estuary and San Francisco Bay Before Deciding on the Delta Tunnels Export Plan
Attachments: Sally Jewell Ltr Reject Tunnels Too Risky.pdf

Dear Madam Secretary,

Attached is a letter from groups representing hundreds of thousands of individuals and communities who will be impacted by the massive Delta Tunnels Water export plan.

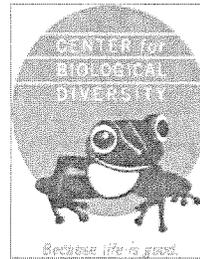
Please, before making a decision regarding the environmental impacts to the one of the United States most important estuaries, hopefully you will visit this nursery and ecosystem that is so important to the entire California region along with Oregon, Washington and Alaska. The estuary and San Francisco Bay fed by these remaining freshwater river flows is a nursery and breeding grounds for more than the 27 or more endangered species. The health of this estuary and its nursery waters are essential to the economies of the surrounding Bay Area and these states.

Attached you will find their comments and invitation.

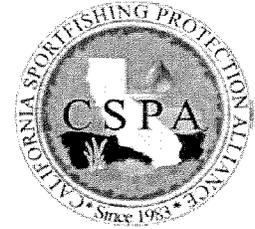
Regards,

Patty Schifferle
530 550 0219

ENVIRONMENTAL, MUNICIPAL, BUSINESS, FISHING & AGRICULTURAL GROUPS URGE REJECTION OF DELTA WATER TUNNELS--TOO RISKY



Santa Clarita Organization of Planning and the Environment (SCOPE)



NORTH COAST RIVERS ALLIANCE



CRAB BOAT OWNERS ASSOCIATION, Inc.
2907 Jones Street
San Francisco, California 94133-1115
415-885-1180



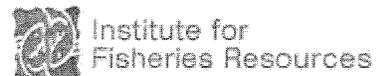
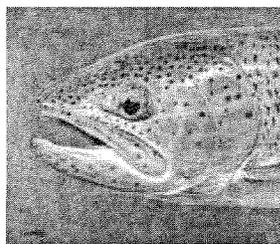
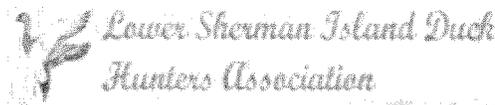
NORTHERN CALIFORNIA COUNCIL



FEDERATION OF FLY FISHERS



Catch More Fish.



Unite. Protect. Restore.

September 16, 2015

The Honorable Sally Jewell
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240
exsec@ios.doi.gov

Re: Reject California's Proposed Delta Tunnels Project--Too Risky and Not Justified.

Dear Madam Secretary:

The State of California is accelerating a water tunnels project to divert Sacramento River flows under the San Francisco Bay Delta Estuary. At stake is destruction of the West Coast's largest estuary, a nursery for fish and wildlife that feeds the Pacific Flyway (from Mexico to Alaska), commercial fishing operations in three states, a thriving tourist economy and vibrant farm community, drinking water for 5 million people in the San Francisco Bay Area, and essential natural water hub for recreation and community enjoyment.

Taking this water for export before it reaches the estuary and bay will lead to decades of public dissension and box the federal government into a corner replete with huge costs and obstacles to meeting its statutory and legal obligations. Independent state scientists recently testified that the project is legally deficient and not justifiable.ⁱ The proposed Delta Water Tunnels will not solve current or future droughts because they create no new water supply.ⁱⁱ Moreover, they are so large they could easily drain the Delta Estuary of essential freshwater. Before saddling taxpayers with a multi-billion dollar mortgage, years of confusion and a legacy of conflict, more cost effective water supply alternatives must be considered and implemented. This multibillion-dollar tunnels plan hinders real statewide water solutions for California. Policy analysis of the proposed project fails to consider more cost-effective water conservation alternatives that produce more water now in comparison to waiting the decades it will take to construct these experimental tunnels before determining if the investment was worth it.ⁱⁱⁱ

By the end of 2015, state and federal officials plan to have the Delta Water Tunnels project record of decision on your desk for approval. This may be one of the most important decisions you make as Interior Secretary and we, along with our representative citizen members, strongly urge you to make this decision your highest priority, give it thoughtful consideration, and reject the Delta Water Tunnels project. For decades freshwater diversions from the San Francisco Bay Delta estuary have been a highly contentious issue within the electorate, courts and regulatory agencies because of the potential damage to one of the largest estuaries on the west coast of North America and the impacts to surrounding watersheds, communities and water dependent industries. Past efforts to build similar water export projects were rejected by voters, and with good reason.

As currently proposed, the State of California's water tunnels project does not comply with Federal law and it will prevent the Department of Interior and other agencies from meeting

their collective responsibilities to protect the San Francisco Bay Delta ecosystem. The water tunnels would serve both the federal Central Valley Project (CVP) and the California State Water Project (SWP). The CVP and SWP currently pump freshwater from the Bay-Delta after it has flowed through the estuary from the Sacramento and San Joaquin Rivers. The State of California and USBR have now unilaterally proposed that the new tunnels would take much of the freshwater flow of the Sacramento River before it reaches the Bay-Delta and divert it underneath the estuary through two massive tunnels to CVP pumps near Tracy.^{iv} An engineering undertaking of this magnitude has never been attempted. More importantly, it would have devastating impacts on the Delta ecosystem, and inhibit your agency's ability to comply with the Clean Water Act, Endangered Species Act, Fish and Wildlife Coordination Act and to meet your trust obligations to Native Americans, especially those on the North Coast that depend on waters from the Trinity River Division. The resulting federal confusion will lead to decades of legal and political conflict, not a good legacy for the Department of Interior. All of this can be avoided if you show bold leadership and foresight by rejecting this project.

Diverting the highest quality freshwater inflow from the Bay-Delta system would lead to unprecedented change in the ecosystem character and sustainability. As for habitat and endangered species, they will be permanently, detrimentally affected. Impact studies on flow restrictions to San Francisco Bay have been largely excluded from public review and the resulting effect of years of flow restrictions omitted. Impacts to water dependent industries that count on a healthy bay and estuary have been ignored or brushed aside. Drinking and recreational contact water quality impacts, including flow related toxic harmful algae blooms will impact millions of people who depend on a healthy estuary to live, play, work, farm and fish. The public comment review for this multi-billion-dollar Delta Water Tunnels Project ends October 30, 2015.

Madame Secretary, the Department of the Interior needs to speak with one voice in clear opposition to this project. Please listen to all your experts. Serious and potentially catastrophic issues have been raised by Fish and Wildlife Services' red flag memos,^v USGS has expressed concerns about pollution emanating from exporting more Delta water to irrigate toxic San Joaquin Valley west side soils,^{vi} and an Interior commissioned National Academy of Sciences (NRC Report) report concluded the water tunnels approach "contains critical scientific gaps."^{vii} These experts, along with National Marine Fisheries and the U.S. Environmental Protection Agency have rung alarm bells, informing you that if approved, you won't be able to meet your legal duties.^{viii} USBR has failed to look at alternative operations that will not have such devastating impacts on fish and wildlife.^{ix}

Just recently, prior to your decision to proceed, USBR jumped the gun to file a water rights application for new points of diversion for the tunnels with the State Water Resources Control Board, assuming that the project complies with all applicable federal laws and regulations.^x On the contrary, compliance is highly doubtful. We have a classic case in which different agencies within the Department go in different directions BEFORE you, Madam Secretary, have given unambiguous policy direction, let alone approved any Record of Decision (ROD) on the water tunnels project. In addition to the water rights filing, USBR petitioned the Army Corps of Engineers for permission to perform dredge and fill construction activities for the water tunnels long before the project has received other necessary approvals. This heightens the

public's fears that USBR and the State are trying to force the project through administrative channels without proper review. On the other hand, their inaction with regard to Section 7 consultation with the fisheries agencies compounds the public's fears that realistic and prudent alternatives are being ignored and avoided. Their actions with the State Water Board and the Corps of Engineers are premature given their inaction on Section 7 consultation, and should be withdrawn. Embedded in this rush to act before safeguards are approved and analysis is completed, is the notion of building a project without operating plans. Building it now and learning to operate it later is not a recipe for success.

Madam Secretary, the Delta Water Tunnels Project is a massive experiment that has not been adequately thought through and presents unprecedented environmental and economic risks. The CVP and SWP already have a lengthy history of not meeting conservation objectives. For almost a decade, the projects' coordinated operations have made little or no progress in meeting required mitigation measures including the required purchase of 27,000 acres of endangered species habitat.^{xi} Populations of listed fish species have declined to dangerous levels in this period. There should be no rush to make decisions that would hasten their extinction.

Prior to any decision on this contentious, expensive and risky project, please meet with us. Such a meeting is essential to understanding the impacts from the proposed tunnels project as it proposes to pick one region of the state over another, creating needless dissension and destruction of the one of the United States' most vibrant estuaries. The San Francisco Sacramento-San Joaquin River Delta and San Francisco Bay serve as a nursery and breeding grounds for iconic species on the brink of becoming extinct, such as salmon that, if lost, will set in motion an ecological chain reaction extinguishing orcas (*Orcinus orca*) and along with support for over 750 species. Please protect this national treasure and stand firm in the defense of our legal and environmental protections, put in place to defend the economic viability and natural resources owned by the people, of the United States of America.

Respectfully submitted, with regard,

Conner Everts
Facilitator
Environmental Water Caucus
Executive Director
Southern California Watershed Alliance

Eric Wesselman
Executive Director
Friends of the River
Eric@friendsoftheriver.org

Jeff Miller
Conservation Advocate
Center for Biological Diversity

Barbara Barrigan-Parrilla
Executive Director
Restore the Delta

Tim Sloane
President
Pacific Coast Federation of Fisherman's
Associations

Jim Cox
President
California Striped Bass Association

*Bill Jennings
Executive Director
California Sportfishing Protection Alliance
deltakeep@me.com*

*Jonas Minton
Senior Water Policy Advisor
Planning and Conservation League
jminton@pcl.org*

*Kathryn Phillips
Director
Sierra Club California
kathryn.phillips@sierraclub.org*

*Lloyd Carter
President
California Save Our Streams Council*

*Siobahn Dolan
Director
Desal Response Group*

*Diana Jacobs
Chair, Board of Directors
Sacramento River Preservation Trust*

*Larry Collins
President
S.F. Crab Boat Owners Association*

*Lynne Plambeck
Executive Director
Santa Clarita Organization for Planning and
the Environment*

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*Carolee Krieger
Executive Director
California Water Impact Network
caroleekrieger7@gmail.com*

*Colin Bailey
Executive Director
Environmental Justice Coalition for Water
colin@ejcw.org*

*Robyn DiFalco
Executive Director
Butte Environmental Council*

*Chief Caleen Sisk
Spiritual Leader
Winnemen Wintu Tribe*

*Pietro Parravano
President
Institute for Fisheries Resources*

*Lowell Ashbaugh
Vice President, Conservation
Northern California Council Federation of
Fly Fishers*

*Roger Mammon
President
Lower Sherman Island Duck Club*

*Dan Bacher
Editor
Fish Sniffer*

*Alan Levine
Director
Coast Action Group*

*Stephen Green
President
Save the American River Association*

Michael Martin, Ph.D.
Director
Merced River Conservation Committee

George Wendt
President
O.A.R.S. Companies, Inc.

John McManus
Executive Director
Golden Gate Salmon Association

Larry Hanson
Manager
California River Watch

Dick Pool
President
Water4Fish

Frank Egger
President
North Coast Rivers Alliance

John C Hooper
Co-Founder
Protect Our Water

Jim Martin
Conservation Director
Berkley Conservation Institute, Pure Fishing

Huey D. Johnson
Founder and President
Resource Renewal Institute

Bill Wells Executive Director California
Delta Chambers & Visitors Bureau

Roger Thomas
President
The Golden Gate Fishermen's Association

Endnotes

ⁱ See: Delta Independent Science Board testimony: <http://deltacouncil.ca.gov/docs/delta-isb-s-review-rdeirsdeis-bdcp-california-waterfix>

ⁱⁱ See: <http://bavdeltaconservationplan.com/Home.aspx>

ⁱⁱⁱ See: <http://www.ewccalifornia.org/reports/ewcwaterplan9-1-2015.pdf>

^{iv} The legal authorization for this unilateral federal action is not clear, especially given Congressional limitations imposed on the CVP coordinating operations with the State Water Project and mandated compliance with provisions of the San Luis Act CVP operations. The San Luis Act (P.L. 86-488) requires USBR to construct and operate the CVP's San Luis Unit in accordance with the 1956 Feasibility Report where US Fish and Wildlife indicated the San Luis Project is "risky" for fish and wildlife. And thus, they retained jurisdiction under the Fish and Wildlife Coordination Act.

<http://cdm15911.contentdm.oclc.org/cdm/ref/collection/p15911coll10/id/2106>

^v See: <http://www.allonewater.com/WM/WMArticles/Letter From Friends of the River About Fatal Flaws 21910.aspx>

<http://www.epa.gov/region9/nepa/letters/ca/bay-delta-conservation-plan-deis.pdf>

^{vi} See: <http://pubs.usgs.gov/fs/2004/3091/> and

<http://water.usgs.gov/nrp/publications.php?PID=528d1de3e4b0c629af455a32&sciName=Theresa%20S%20Presser>

^{vii} See: <http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/bay-delta-report-brief-final.pdf>

^{viii} See: http://www.friendsoftheriver.org/site/DocServer/8-26-14_EPA_Cmmnt_on_BDCP.pdf?docID=9539;

http://www.friendsoftheriver.org/site/DocServer/7_16_14_Corps_cmts.pdf?docID=9701

http://www.friendsoftheriver.org/site/DocServer/9_9_15_BDCP_final_ltr.pdf?docID=10384

^{ix} See <http://www.essexpartnership.com/bdcp/summary-of-fish-scenario-modeling/>

^x http://www.waterboards.ca.gov/waterrights/water_issues/programs/applications/petitions/2007/20245usbr_petition.pdf

<http://restoredhethdelta.org/blog/delta-tunnel-news-ca-water-board-gets-fixed-application-to-take-water/>

See also the permit application to the Army Corps:

https://s3.amazonaws.com/californiawater/pdfs/5n2mg_Complete_Final_CA_Water_Fix_USACE_404_Permit_Application.pdf

^{xi} http://deltacouncil.ca.gov/sites/default/files/documents/files/Final_RPA_Matrix_for_Annual-Review_10_1_13.pdf

<http://www.water.ca.gov/environmentalservices/frpa.cfm>

http://www.fws.gov/sfbaydelta/documents/delta_smelt_water_projects_bo_briefing_jan_23-24-2013.pdf

From: Olga Lampkin <olampkin@chspa.com>
Sent: Monday, September 21, 2015 5:05 AM
To: BDCPcomments
Subject: removal from mailing list

Please remove me from the mailing list. Thank you.

Olga Lampkin
136 Bee Tree Ln
Franklin, NC 28734-3980

The numbers 10417697L appear to the right of the bar code below my address.



CITY OF EL MONTE
PUBLIC WORKS DEPARTMENT
ENGINEERING DIVISION

September 21, 2015

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

cc: Governor Jerry Brown

Subject: Support Alternative 4A of California Water Fix

Dear BDCP/Water Fix Comments:

On behalf of City of El Monte, we are writing to express our strong support for the California Water Fix (Alternative 4A). The California Water Fix represents a thoroughly vetted, viable plan to fix California's aging water distribution system that supplies water to 25 million Californians and 3 million acres of farmland, while also protecting the natural environment in the Delta.

The recirculated documents are the culmination of nearly a decade of extensive expert review, planning and scientific and environmental analysis by the state's leading water experts, engineers and conservationists, and unprecedented public comment and participation. The California Water Fix (Alternative 4A) reflects significant changes and improvements to the plan to address comments from the state and federal governments and other stakeholders.

We urge the Department of Water Resources and the Administration to move forward to bring the California Water Fix to fruition.

Our State's system of aging dirt levees, aqueducts and pipes that brings water from the Sierra Nevada Mountains to 2/3 of the State is outdated and at risk of collapse in the event of a major earthquake or flood. Problems with this aging system have already resulted in significant water supply cutbacks and shortages for people, farms and businesses, as well as damage to fish, wildlife and the environment.

The California Water Fix will improve our water delivery infrastructure to allow us to responsibly capture and move water during wet years, so that we have a greater water supply during future droughts. The current drought has demonstrated that California's aging water infrastructure is not equipped to handle the regular boom and bust cycles of our

climate. With above average rains predicted in the near future, we must move forward with improved infrastructure to capture the water when it's available.

The California Water Fix (Alternative 4A) will:

- Protect water supplies by delivering them through a modern water pipeline rather than relying solely on today's deteriorating dirt levee system.
- Build a water delivery system that is able to protect our water supplies from earthquakes, floods and natural disasters.
- Improve the ability to move water to storage facilities throughout the state so we can capture it for use in dry years.
- Restore more natural water flows above ground in rivers and streams in order to reduce impacts on endangered fish and other wildlife.
- Protect and restore wildlife and the environment of the Sacramento-San Joaquin Delta.

Getting to this point has been a long and thorough process. Now is the time to act and move forward to protect California's water security.

For these reasons, we support the California Water Fix (Alternative 4A).

Sincerely,



Jesus M. Gomez
City Manager
City of El Monte

REC1RC61Z

From: Leticia Aguilar <laguilar@ci.el-monte.ca.us>
Sent: Monday, September 21, 2015 5:31 PM
To: BDCPcomments
Cc: governo@governor.ca.gov; Jesus M. Gomez; ejeng@ci.el-monte.ca.us; Theresa Mendez; Michelle Solorzano
Subject: Support Letter - Alternative 4A California Water Fix
Attachments: Support Alternative 4A of California Water Fix.pdf

To All:

Attached please find the letter of Support for Alternative 4A of California Water Fix, from the City of El Monte, California.

Respectfully,

Leticia M. Aguilar
City of El Monte
Public Works Department
Engineering Division
11333 Valley Boulevard
El Monte, CA 91731
626-580-2058
laguilar@elmonte.gov

From: Ellen Carlson <ECARLSON@egwd.org>
Sent: Monday, September 21, 2015 12:33 PM
To: BDCPcomments
Subject: DVD request

I request a DVD copy of the RDEIR/SDEIS documents. Please send it to the Elk Grove Water District, 9257 Elk Grove Blvd., Elk Grove, CA 95624.

Thank you,

Ellen R Carlson
Management Analyst
Elk Grove Water District
916-685-3556 T
916-685-5376 F
ecarlson@egwd.org

From: Cecille Chan <gosiokbe@gmail.com>
Sent: Monday, September 21, 2015 8:33 AM
To: BDCPcomments
Subject: Water Conservation

I received a card supposedly informing me of this public review and comment period. I have been commenting via social media since I know the controllers have no interest in what I have to say. I am far from naive. I happen to be one of the awake ones.

The Illuminati minion, Governor Brown, wants everyone to water- conserve (we never waste anything), yet allows Walmart and Nestle to drain our water supply so they can bottle them to sell back to us IF we can afford to buy them. This is a waste of my time since I know this communication is going nowhere.

If you guys know nothing about the NWO, it is time you wake up as they are slowly phasing it in.....and then we are toast.

Go to educateyourself.org and learn many things your propaganda-addled brain may not know about.

Yours sincerely

C

From: Mendoza, Tiffany
Sent: Tuesday, September 22, 2015 1:26 PM
To: BDCPcomments
Subject: FW: Save our Salmon

-----Original Message-----

From: Charlene Woodcock [mailto:charlene@woodynet.net]
Sent: Monday, September 21, 2015 3:18 PM
To: info@waterboards.ca.gov; governor@governor.ca.gov; Secretary@Resources.ca.gov; Director@dfg.ca.gov; Rod.Mcinnis@noaa.gov
Cc: CALIFORNIA NATURAL RESOURCES AGENCY
Subject: Save our Salmon

Dear Governor Brown and State Water Board Members:

It is unacceptable that the moguls of California industrial agriculture should attempt to shape California State water policy. What an outrage that the abundantly profitable almond industry alone uses 10% of our fresh water, to the huge detriment of California's salmon and other fisheries that contribute to California's economy much more widely than the almond business. New almond orchards have been planted in the past two years, well after it was apparent we'd be suffering an ongoing drought. Central Valley industrial agriculture's profit drive and disproportionate and careless use of our valuable and limited fresh water must be curbed. The hugely costly, wasteful, and environmentally destructive twin tunnels must NOT be permitted.

In addition, it is shameful that California and federal government officials would choose to drown more of the Winnemum Wintu traditional lands, most already taken, by raising the Shasta Dam. Underground water storage is much less destructive and more effective. It is unconscionable to propose to flood Indian lands in order to ensure profits for growers who choose to plant year-round water-needy almond orchards instead of growing seasonal crops appropriate to California's limited and overdrawn water.

Please deny Reclamation's petition to weaken the dissolved oxygen standard on the Stanislaus River in order to protect fall- and spring-run San Joaquin River Chinook salmon; please reconsider your approval of current Shasta Reservoir operations in order to avoid loss of the 2015 year class of both the fall and winter Sacramento River Chinook salmon runs; and please act more aggressively to assert your authority to ensure that Reclamation and other water agencies do not sacrifice the estuary's unique fish populations for short-term deliveries to irrigators.

Sincerely,

Charlene M. Woodcock
2355 Virginia Street
Berkeley CA 94709

From: Jennifer Wheeler <kismet52@msn.com>
Sent: Tuesday, September 22, 2015 9:50 AM
To: BDCPcomments
Subject: No Delta Tunnels, Save our Delta and Bay

I volunteer with two wildlife organizations and see firsthand the death of wildlife due to humans over use of resources. California, and for that matter, the world needs the fresh water to flow into the bay not to be shipped to some special interests who stand to profit from our water.

And I want to ask - Where are the Salmon?

The Delta used to have massive numbers of Salmon. These should be designated a National Treasure but we are going to gut the river and delta even more to further reduce salmon numbers. Instead we should be going in the opposite direction to restore these fish to their historic numbers. We have determined that agriculture wins over wildlife and I believe that is a mistake and a catastrophic mistake. Please, do not approve this massive water grab by special interests.

Thank you,

Jennifer Wheeler

740 Elm Dr.

Petaluma, California

I am writing to express my strong opposition to the 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.

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.
- 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 seems to ignore 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.”

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.
- 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.

Alternatives to Water Exports Ignored

Far 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.

Our tax and ratepayer dollars would be much better spent on:

- More aggressive water efficiency program statewide that would apply to both urban and agricultural users.

- Funding water recycling and groundwater recharging 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 and pollution generating farmlands in the 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 between \$2 to \$4 billion and is orders of-magnitude less expensive than 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.

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.

From: mbaxamusa@gmail.com on behalf of Dr. Murtaza Baxamusa
<Murtaza@MiddleClassTaxpayers.org>
Sent: Wednesday, September 16, 2015 7:56 PM
To: BDCPcomments
Cc: governor@governor.ca.gov
Subject: Comment in taxpayer support for California WaterFix (Alternative 4A)

Thank you for the extended opportunity to comment on the Bay Delta Conservation Plan/ California WaterFix. The Middle Class Taxpayers Association is a nonprofit social welfare organization that advocates for public policies that grow and sustain the middle class tax base.

On behalf of the Middle Class Taxpayers Association, we are writing to express our strong support for the California WaterFix (Alternative 4A). In conjunction with California EcoRestore, the California Water Fix represents a thoroughly vetted, viable plan to fix California's aging water distribution system that supplies water to 25 million Californians and 3 million acres of farmland, while also protecting the natural environment in the Delta.

As a taxpayer group, we are concerned that our dirt levees, aqueducts and pipes that bring water south from the Sierra Nevada Mountains is deteriorating and at risk of collapse in the event of a natural disaster. As the system ages, it is not a question of "if" but "when" the failure will occur. Once it fails, the restoration and compensation costs will be of the order of multiple times that which will be incurred if a modern pipeline is built with adequate mitigation against these natural disasters. This is an insurance policy for taxpayers, that comes with added benefits of restoring natural flows to protect fish and wildlife.

Water supply is critical to replenishing the tax base, from economic activity of farms, factories and businesses. By capturing water efficiently, and moving it safely to where it is needed, this project generates the best value for our tax dollars. It is both fiscally prudent as well as necessary to invest in a stronger middle-class, that this project will serve. We therefore urge the Department of Water Resources and Governor Jerry Brown's Administration to build the California WaterFix and the California EcoRestore.

Sincerely,

Murtaza H. Baxamusa, PhD, AICP

Secretary-Treasurer,

Middle Class Taxpayers Association



MIDDLE CLASS
TAXPAYERS ASSOCIATION

From: Terry Poplawski <tpop@pacific.net>
Sent: Tuesday, September 22, 2015 8:24 PM
To: BDCPcomments
Subject: Bay Delta Conversation Plan

I am opposed to this plan. Though it is proposed to be a conservation plan for the Delta and Bay, I feel it is a scheme to bypass the will of the citizens of this state who have at least twice defeated at the polls initiatives which would have constructed a peripheral canal to route water from north of the Delta to the Westlands agricultural interests in the desert central valley for their profits. It will not be conserving the states fisheries or the lands of Native Americans in the north of the state.

Terry Poplawski
612 Walnut Avenue
Ukiah, CA 95482-4239
tpop@pacific.net

From: Philip Ratcliff <skazz999W@hotmail.com>
Sent: Monday, September 21, 2015 8:50 PM
To: BDCPcomments
Subject: Bay Delta Conservation Plan/California Water Fix

To Whom It May Concern:

I lived in California for most of my life. Now I'm following California's water dilemma and drought from Oregon. Most of Oregon's counties, by the way, have declared a drought emergency.

I remember the proposal, in the early 1980s, to build a peripheral canal. This canal would have been constructed on the periphery of the Bay/Delta area in Northern California, and transported water to the south. This proposal was defeated in an election, by voters from all parts of the state.

Governor Brown's idea to build a big pipeline to transport water from north to south, is reminiscent of the peripheral canal. I hope that his idea goes down in flames.

California is reducing water use among residents. Many have responded admirably. Perhaps other sectors of the state have not sacrificed as has the residential portion. Most of California's water is used by agriculture. I hope that the projected El Nino this winter dumps lots of rain on your state. I hope that the Sierra Nevada range gets a nice snowpack. It is grim to think about another drought year in California. I wish you the best.

Philip Ratcliff
4665 Tragen Ct. SE
Salem OR 97302

From: jack schafer <jschafer0414@sbcglobal.net>
Sent: Tuesday, September 22, 2015 5:55 PM
To: BDCPcomments
Subject: Bay Delta Conservation Plan Comments
Attachments: SRCD BDCP DEIR-EIS final comment letter.pdf

As a long time owner/manager of land on Grizzly Island in the Suisun Marsh and Chairman of Schafer-Pintail Reclamation District 2112, I believe the comments in Tony Vaccarella's letter speak volumes against the Bay Delta Conservation Plan.

Please accept the attached letter as encompassing my comments.

Sincerely,
Jack Schafer
Schafer Farms
County Road 456
Grizzly Island
Solano County CA
916.966.9851



July 25th, 2014

Mr. Ryan Wulff
National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, California 95814

Subject: Suisun Resource Conservation District Comments on the Draft Bay Delta Conservation Plan (BDCP) and associated Draft Environmental Impact Report and Environmental Impact Statement (DEIR/EIS)

Dear Mr. Wulff:

The Suisun Resource Conservation District (SRCD) is a special district created by the California Legislature as a legal subdivision of the State of California (Public Resources Code, §§ 9003, 9960 et seq.). SRCD has the primary local responsibility for promoting wetland conservation of the Suisun Marsh through improvements in water management practices on private lands within the primary management area of the Suisun Marsh (*Id.* at § 9962.). As a resource conservation district, SRCD is empowered to coordinate resource management efforts for purposes of watershed restoration and enhancement (*Id.* at §§ 9001(b)(1) and (3)).

Historically, SRCD has taken the leadership role to ensure adequate water quality in the Suisun Marsh – a condition necessary to promote a diversity of productive waterfowl habitat, enhance the wetland resource values through appropriate management practices, and ensure the wetland and wildlife values of the Suisun Marsh are sustained and protected. This fact makes SRCD and its staff of professional wildlife biologists uniquely qualified to evaluate the adequacy of the BDCP and DEIR/EIS effects analysis and Project impacts on Suisun Marsh managed wetlands from increased salinity and direct habitat conversion.

The Suisun Marsh landowners and SRCD have been stewards of these wetland and wildlife resources for over a century. They advocated for passage of the 1977 Suisun Marsh Preservation Act to protect these wetland resources from development and degradation associated with salinity intrusion from reduced upstream freshwater flows. Additionally, SRCD is a signatory to the 1987 Suisun Marsh Preservation Agreement (a contractual framework for implementing the 1984 Plan of Protection – see SWRCB D-1641, p. 50) and the subsequent Revised Suisun Marsh Preservation Monitoring, and Mitigation Agreements (RSMMPA). The primary objective of the RSMMPA is, “to assure that Department of Water Resources (DWR) and the United States Bureau of Reclamation (USBR) maintain a dependable water supply of adequate quantity and quality within the Marsh”

Directors

Tony Vaccarella, President
Terry Connolly
Arnold Lenk
Mike Lewis
Jim Waters

Associate Directors

Dennis Becker
Kurt Black
Bill Brush
H. Kent Hansen

Directors Emeritus

James Bancroft
Dr. William Coon
Paul Crapuchettes
Timothy Egan
Leland Lehman
Ray Lewis
Gregory Palamountain

Staff

Steven Chappell
Executive Director
Bruce Wickland
Operations Manager
Kelli Perez
Office Supervisor
Tim Edmunds
Water Manager/Biologist
Jeff Taylor
Water Manager/Biologist
Mark Abraham
Water Manager/Biologist
Steve Witherspoon
LJI Resident Caretaker

**SUISUN RESOURCE
CONSERVATION DISTRICT**

2544 Grizzly Island Road
Suisun, CA 94585-9539
(707) 425-9302
(707) 425-4402 FAX
srcd@suisunrcd.org
www.suisunrcd.org

to mitigate the adverse effects on the Suisun Marsh of the Central Valley Project (CVP) and State Water Project (SWP) and a portion of adverse effects of other upstream diversions". To achieve this objective, DWR and USBR implemented the 1981 Plan of Protection for the Suisun Marsh and continue to operate and maintain DWR's initial facilities, the Suisun Marsh Salinity Control Structure, and water quality monitoring and compliance stations throughout the Suisun Marsh.

SRCD has reviewed the BDCP, DEIR/EIS, and has evaluated the proposed Project's future significant and unavoidable negative impacts to the wetland and wildlife resources of the Suisun Marsh from habitat conversion and further degradation of water quality conditions in the Suisun Marsh. The SRCD Board of Directors, which represents the private landowners of Suisun Marsh, cannot support and strongly opposes the proposed BDCP project. The Project proposes extensive future "mitigation" in the Suisun Marsh, which will result in the direct conversion and loss of existing managed wetland values and functions, and the degradation of the water quality conditions for the management of tens of thousands of acres of waterfowl and wildlife habitat on publicly and privately owned managed wetlands in the Suisun Marsh. The Project's "mitigation" will highly alter and increase the Suisun Marsh salinity regime, dampen the tidal stage, redirect tidal energy, and modify the existing ecological characteristics of over 58,000 acres of tidal and managed wetlands in the Suisun Marsh. It hardly seems accurate to describe the BDCP actions in the Suisun Marsh as "mitigation" – a term that connotes beneficial action.

The implementation of the BDCP Project and required mitigation measures are inconsistent with the 1977 Suisun Marsh Preservation Act's provision, "to preserve the integrity and assure continued wildlife use of the Suisun Marsh, including the preservation of its waterfowl-carrying capacity and retention of the diversity of its flora and fauna". To achieve the objectives of the 1977 Suisun Marsh Preservation Act, the Bay Conservation and Development Commission (BCDC) established policies and regulations in the Suisun Marsh Protection Plan, and the Department of Water Resources (DWR) also developed the 1981 Plan of Protection for the Suisun Marsh to mitigate the effects of the Federal Central Valley Project (CVP) and the State Water Project (SWP) on the Suisun Marsh. To protect Fish and Wildlife Beneficial Uses in the Eastern and Western Suisun Marsh, the State Water Resources Control Board established and has maintained numeric salinity standards for the Suisun Marsh in Water Rights Decision 1485, Order 95-6, and Decision 1641 (D1641). These salinity standards were further reinforced with execution of the Suisun Marsh Preservation Agreement (SMPA) and RSMMPA by and between DWR, USBR, Department of Fish and Wildlife (DFW) and SRCD. Any action of BDCP that reduces existing Delta outflow, increases tidal mixing of salts into the Suisun Marsh, or causes an exceedance of the D1641 or RSMMPA salinity standards would be detrimental to the existing ecological values of the Marsh and a violation of D1641 and the RSMMPA salinity standards.

With this in mind, SRCD submits the following specific comments.

A. BDCP Will Result in Unacceptable Increases in Western Delta and Suisun Marsh Salinities, and Neither the BDCP Nor Supporting Environmental Documentation Accurately Reflect Nor Mitigate for Those Increases.

The BDCP and supporting DEIR/EIS don't define future Project operations and impacts on existing Delta outflows. Instead a potential range of operational scenarios with a "decision tree" is presented, but the analysis does not quantify the duration and extent of the degradation of Suisun Marsh water quality and long term impacts to existing tidal and managed wetland habitats. The effects analysis repeatedly acknowledges increases in Suisun Marsh salinities from existing baseline conditions. This will result in a direct violation of the RSMMPA Agreement and D1641 Suisun Marsh salinity standards.

The BDCP DEIR/EIS is inadequate because it fails to disclose the impacts of the proposed Project on the salinity of water diverted into Suisun Marsh managed wetlands. In brackish and freshwater tidal marshes, changes in salinity of a few parts per thousand will have considerable effects because the growth, productivity, and survival of most species are highly sensitive to any salinity (Parker 2011). Small changes in salinity could significantly affect the diversity and composition of these wetlands. Increases in soil salinity and inundation will differentially affect germination and the physiological limits of species (Parker 2011). A primary effect of salinity is that it delays germination and seedling development. Plant loss during this seedling stage can reduce the plant population density to suboptimal levels and significantly reduce yields (Mass 1993). The BDCP modeling presents salinity as the average monthly salinities (as represented by electrical conductivity [EC]). This provides a very coarse level of evaluation, which is inadequate to assess daily, monthly and seasonal impacts of the proposed Project operations on the Suisun Marsh salinities and water users. Fall flooding and seasonal irrigations of Suisun Marsh managed wetlands occur during high tide. At high tide, water flows by gravity into the managed wetland through water control structures from the adjacent tidal slough channels. (Water Rights D1641 - Table 3.) Water Quality Objectives For Fish and Wildlife Beneficial Uses measures Suisun Marsh salinity objectives compliance as the, "maximum monthly average of both daily high tide EC values." The reason D1641 requires measuring salinity compliance at high tide is because this is the period when channel water salinities are the highest and when managed wetlands are diverting water (by gravity) for habitat management and performing leaching cycles to reduce soil salinities during the spring growing season. In most regions of the Suisun Marsh the channel water salinity is lowest at low tide, with highest salinities at high tide. Therefore, impact analysis using daily average salinity (EC) under represents impacts of the proposed BDCP Project on Suisun Marsh water users and habitat management capabilities.

Note that the BDCP DEIR/EIS only simulated Delta water quality for the period 1976-1991 and only used data for a single drought period, water years 1987-1991, when disclosing drought year impacts. (DEIR/EIS page 8-135, line 23) The DEIR/EIS fails to disclose the impacts on water quality during other drought periods such as 1928-1934 and 1976-1977. The drought that started in 1987 did not end until 1993 (which was an above normal year) and 1993 was followed by another critical water year. The modeled period

of 1987-1991 doesn't represent the full extent of the 1987-1992 or 1987-1994 drought conditions or potential impact on Suisun Marsh salinities.

Figure 1 presents daily EC data for Montezuma Slough at Beldon's Landing for the period October 1976 through October 1983. The data are from four computer model simulations performed for the BDCP using DWR's DSM2 water quality model. The four simulations are:

- No Action Alternative at Late Long Term
- Proposed Project Alternative 4, Low Outflow Scenario (H1) at Early Long Term
- Proposed Project Alternative 4, High Outflow Scenario (H4) at Late Long Term
- Proposed Project Alternative 4, Low Outflow Scenario (H1) at Late Long Term

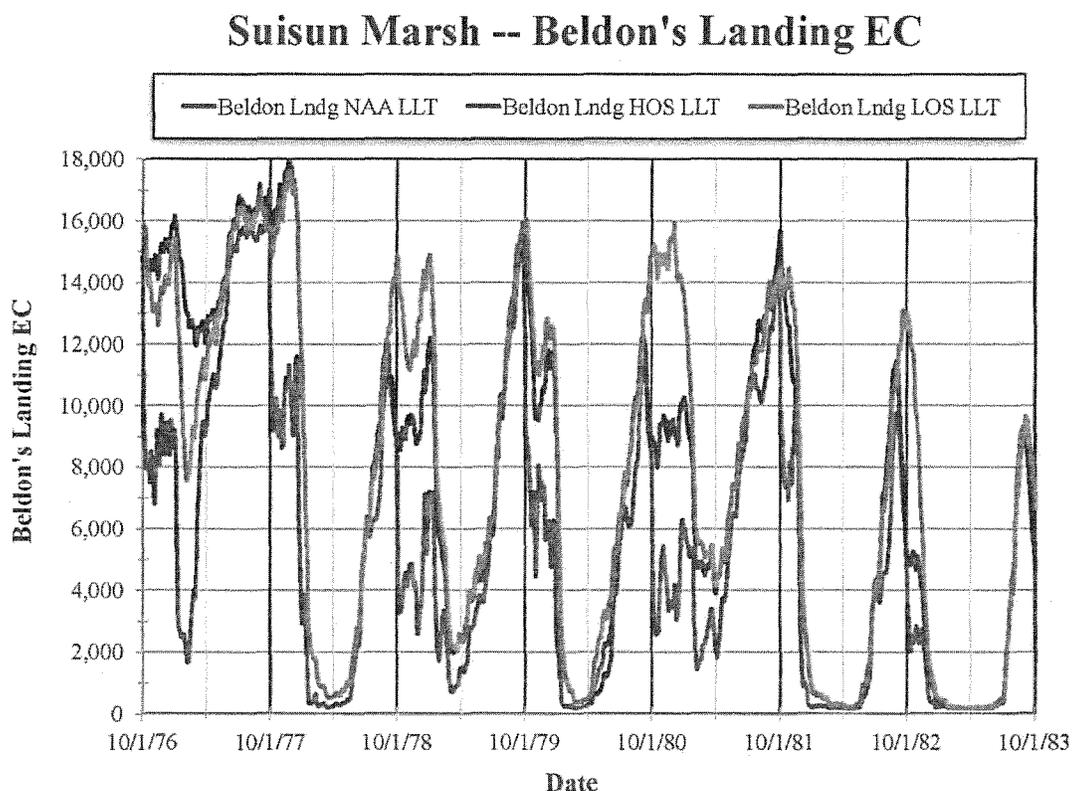


Figure 1: Variation in daily EC data for the Montezuma Slough at Beldon's Landing from October 1976 to October 1983 from the BDCP water quality modeling. Three simulations are shown; No Action at late long term, proposed project Low Outflow Scenario at LLT, and proposed project High Outflow Scenario at LLT. This plot was prepared by Richard Denton, consultant to Solano County, from BDCP modeling data supplied by DWR.

The DEIR/EIS is inadequate because it only assesses Suisun Marsh EC qualitatively, using average EC for the entire period modeled (1976–1991) – see Chapter 8 at page 8-157. Even so, the 16-year averages suggest that the BDCP proposed project would substantially increase salinities in Montezuma Slough at Beldon's Landing - i.e.,

more than doubling of salinity concentration in December through February. (Appendix 8G, Figure C1-8.) This will seriously impair the ability of Suisun Marsh landowners to effectively manage wetland habitats, will adversely impact fish and wildlife beneficial uses, and reduce wetland diversity and habitat conditions. Small changes in salinity could significantly affect the diversity and composition of these wetlands (Parker 2011). The quality of water plants are exposed to has a direct impact on their survival, growth, and overall health. This is particularly true in regard to salinity. (Warrance and Bauder.)

However, the 16-year averages used in the DEIR/EIS do not disclose sufficient detail about the timing and magnitude of the salinity changes for individual months of different years and water year types.

These BDCP simulations also show that there are significant adverse impacts to salinity from the proposed Project for both the Low Outflow and High Outflow scenarios. The largest increases in salinity occur primarily in the fall. The impacts are greatest for the Low Outflow scenario which assumes there will not be any Fall X2 requirements.

Figure 2, based upon DWR's BDCP DEIR/EIS modeling data shows the corresponding Beldon's Landing salinity data (EC) for the period October 1984 through October 1991.

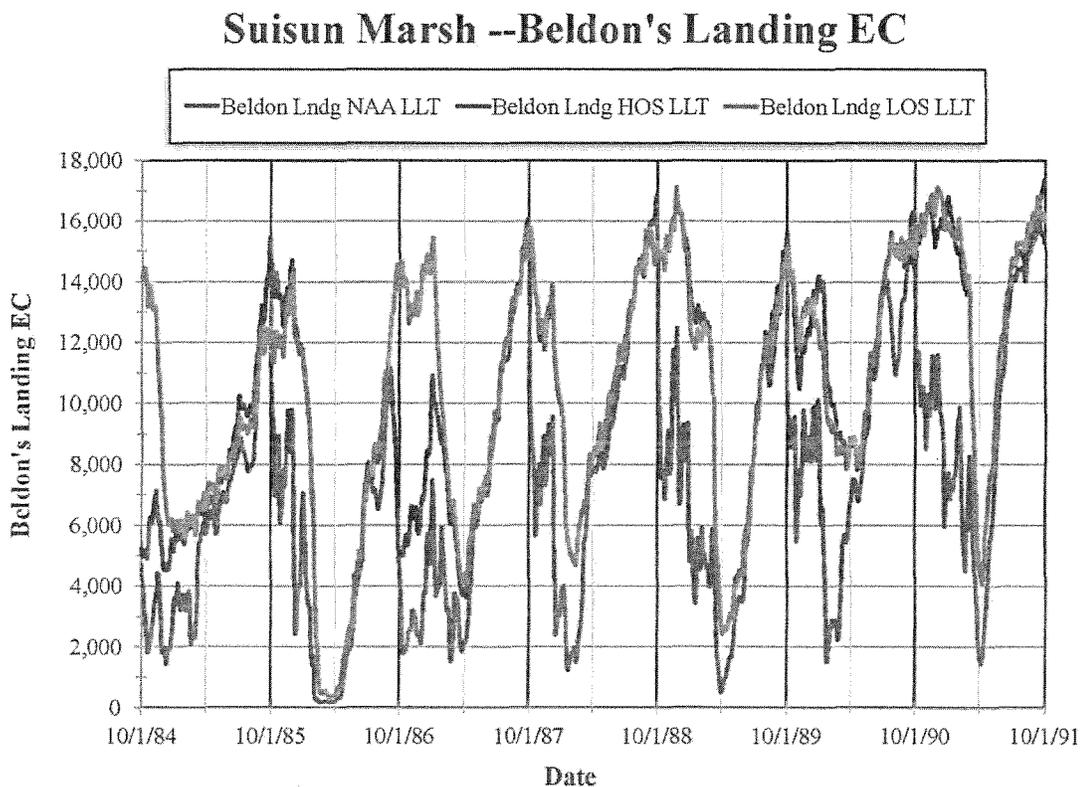


Figure 2: Variation in daily EC data for the Montezuma Slough at Beldon's Landing from October 1984 to October 1991 from the BDCP water quality modeling. Three simulations are shown; No Action at late long term, proposed project Low Outflow Scenario at LLT, and proposed project High Outflow Scenario at LLT. This plot was prepared by Richard Denton, consultant to Solano County, from BDCP modeling data supplied by DWR.

The increased EC levels in Suisun Marsh (shown in Figure 2) are substantial, especially during October through March, and will have adverse impacts on Marsh beneficial uses and wetland habitat conditions. The most likely effects of salinity on plants is a general stunting of growth. (Mass 1993) Increased salinity requires plants to expend more energy to obtain water from the soil, thereby reducing the amount of energy available for growth. (Mass 1993) At high levels, salinity can cause physical damage and mortality. (Mass 1993) Plant loss during this seedling stage can reduce the plant population density to suboptimal levels and significantly reduce yields. (Mass 1993) These impacts must be disclosed and mitigated. Any increase in salinity or modification of Delta outflow that increases Suisun Marsh channel water salinity would be detrimental and result in unmitigated impacts to existing beneficial uses and Suisun Marsh wetland habitats.

A new DEIR/EIS must be prepared that fully discloses the significant adverse impacts on salinity in the Suisun Marsh channels. Averaging over the meager 16-year record masks and fails to disclose significant salinity increases in individual months and on individual days. Large salinity increases in a given year cannot be offset by possible reductions in salinity many years later. These salinity increases must be avoided or fully mitigated by the Project proponents. The DEIR/EIS must be revised and released again for public review and comment.

B. BDCP Will Result In Unacceptable Losses of Suisun Marsh Managed Wetlands, In Conflict With the Suisun Marsh Plan and SMPA

The BDCP implementation of the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) goal of 65,000 acres of restoration of tidal natural communities will result in significant and unavoidable impacts to Suisun Marsh from the direct loss and conversion of existing managed wetland habitats, loss of existing wildlife resources, degradation of water quality (increased salinity), and unmitigated impacts to the remaining managed wetlands management capabilities and habitat conditions rendering them unable to support existing wintering waterfowl populations.

The BDCP and supporting DEIR/EIS do not identify the significant and unavoidable impacts to the wetland and wildlife resources of the Suisun Marsh or future degradation of water quality conditions in the Suisun Marsh from implementing a significant portion of the BDCP (NCCP/HCP) Goal of 65,000 acres of restoration of tidal natural communities within the Suisun Marsh.

BDCP Chapter 3, Part 2, Conservation Measure 1 (CM1) *Water Facilities and Operations* states that CM1 will implement changes to flow management in the Suisun Marsh by modifying the operation of the Suisun Marsh Salinity Control Structure (SMSCS) via adaptive management or “discontinuing the operation or elimination of the SMSCS” as part of Conservation Measure 4 (CM4) *Tidal Natural Communities Restoration*. Implementation of this action would result in a direct violation of Water Rights D1641 Water Quality Objectives For Fish and Wildlife Beneficial Uses - Suisun Marsh numeric salinity standards, the Suisun Marsh Preservation Act, the 1981 Plan of Protection for the Suisun Marsh, and the RSMMPA. The BDCP description of the SMSCS

purpose and the operational constraints to fish passage is factually inaccurate and fundamentally flawed. In this regard, SRCD has the following comments on specific sections of the BDCP and DEIR/EIS:

BDCP Section 3.4.1.2.2. The statement that “The Suisun Marsh is currently managed largely to provide seasonal freshwater wetlands, primarily to support waterfowl habitat and recreation” is a factually inaccurate depiction of the brackish nature of the Suisun Marsh tidal and managed wetlands. The Suisun Marsh is a brackish wetland complex, geographically located in the estuary where the fresh water flows of the Delta mix with the salt water of the San Francisco Bay. Brackish wetlands are floristically distinctive and *contain a greater diversity of plant species* than either the salt marshes of San Francisco Bay or the freshwater wetlands of the Sacramento–San Joaquin Delta (Byrne 2001). This location provides significant seasonal salinity variability and precludes fresh water wetlands from persisting in the Suisun Marsh. This fact makes the Suisun Marsh ecologically rich, diverse, and currently provides significant habitat for many of the targeted native species in the BDCP conservation strategies. Since 1978, the SWRCB has maintained Suisun Marsh salinity objectives to “provide water of sufficient quality to the managed wetlands to achieve soil water salinities capable of supporting the plants characteristic of a brackish marsh.” (SWRCB D1641 Section 7, p. 40). It has been shown that, at all sampling scales, the more saline San Pablo Bay sites contained significantly fewer species than the Suisun–Delta sites. San Pablo Bay sites contained approximately half the number of species as Suisun–Delta sites. While the greatest contrast in species richness occurs between San Pablo Bay and the Suisun–Delta (Vasey 2012). Additionally, the RSMMPA contractual agreements were signed to protect the brackish characteristics of the Suisun Marsh from increased salinities from the CVP and SWP and other upstream diverters.

This section of the BDCP also skillfully omits the fact that the SMSCS was constructed by DWR as part of the 1984 Plan of Protection for the Suisun Marsh and is operated to mitigate for the adverse effects of increased salinities caused by the existing CVP and SWP operations and a portion of adverse effects of other upstream diversions. The operation of this facility is necessary to mitigate for the current and ongoing impacts of the SWP and CVP operations and is needed to meet RSMMPA Salinity Standards and SWRCB D-1614 Water Quality Objective for Fish and Wildlife Beneficial Uses for Suisun Marsh numeric narrative salinity standards.

BDCP Section 3.4.1.3.4. This section of the BDCP claims that the SMSCS, “can impede the migration and passage of various fish species when operated (Fujimura et al 2000)” This statement and conclusion are inaccurate. Subsequent studies completed by Department of Fish and Wildlife (DFW) in 2001, 2002, 2003, and 2004 (www.water.ca.gov/suisun/dataReports/, Vincik, R.F. 2002. and Vincik, R.F. et al. 2003) evaluated the use of the existing SMSCS boat locks to improve fish passage. The results of these studies indicate that leaving the boat lock open during the control season when the flashboards are in place at the SMSCS and the radial gates are tidally operated, provided a nearly equivalent fish passage to the non-control season configuration when the flashboards are out and the radial gates are open. The SMSCS has been operated in this configuration since 2005 to provide fish passage for Chinook salmon, steelhead, and

green sturgeon. In the future, the SMSCS will need to be operated more frequently to partially address the significant impacts of increased salinity for the BDCP operations and implementation of the NCCP/ HCP restoration of tidal natural communities' objectives.

This section's Delta Outflow/X2 states Delta Outflow criterion allows provision of sufficient outflow to maintain a desirable salinity regime downstream of Collinsville during the spring and fall. Any operations of the BDCP facilities, diversions (new and existing), and delta outflows upstream of the Suisun Marsh must consider and provide adequate outflow to meet the requirements of the Suisun Marsh salinity standards and required additional SMSCS operations.

BDCP Section 3.4.1.4.3. This section, entitled *Flow Constraints*, describes the seasonal flow constraints that have been used to estimate the biological effects of diversion operations. Operational flow constraints would be subject to real-time operations adjustments (Section 3.4.1.4.5), but would closely resemble the modeled constraints. All future BDCP facility operations must consider and comply with Water Rights D1641 Water Quality Objectives for Fish and Wildlife Beneficial Uses - Suisun Marsh numeric salinity standards and the RSMMPA numeric salinity standards (October through May of each water year).

BDCP Section 3.4.1.4.4. This section, entitled *Decision Trees*, describes the decision trees that would be used to set flow constraints with regard to two critical variables, spring outflow and fall outflow, and how they will be implemented. Fish and wildlife agencies will determine these outflow requirements at the time of the initial operations of a new facility, so the impacts of this proposed operation cannot currently be predicted. All future BDCP facility operations must consider and comply with Water Rights D1641 Water Quality Objectives for Fish and Wildlife Beneficial Uses - Suisun Marsh numeric salinity standards and the RSMMPA numeric salinity standards (October through May of each water year).

BDCP Chapter 3, Part 2, Conservation Measure 3 (CM3) *Natural Communities Protection and Restoration*. This section states "the Implementation Office will establish a system of protected lands in the Plan Area, called a reserve system, by acquiring lands for protection and, in some cases, restoration. The Implementation Office will secure reserve system lands through a variety of mechanisms that will include, but will not be limited to, the: purchase in fee-title, purchase or application of permanent conservation easements (on public or private lands), change of federal- or state-owned lands to more protective land use designation, and permanent agreements with state, federal, and local agencies (e.g., flood control agencies) that commit the parties to the restoration, enhancement, and management of public lands in the reserve system in a manner supporting the biological goals and objectives.... These commitments represent the extent of land that will be acquired to meet preservation requirements; the actual extent that will be acquired will likely be greater, because acquired parcels will include excess amounts of target and no target natural communities."

Table 3.4.3-1. Natural Community Siting and Reserve Design Requirements calls for:

- At least 7,000 acres of Tidal Natural Communities in Suisun ROA
- At least 8,100 acres of managed wetlands (1,500 SMHM) habitat in Suisun ROA
- At least 2,000 acres of grasslands in Suisun ROA
- A portion of 750 acres of vernal pool and alkali seasonal wetland.

At a minimum, CM3 will acquire or modify existing land use of 17,000 acres of existing private and public owned managed wetlands and upland areas in the Suisun Marsh (Conservation Zone 11). Today, the entire Suisun Marsh wetland and upland areas are protected by the 1977 Suisun Marsh Preservation Act and the policies and regulation of the BCDC Suisun Marsh Protection Plan. This proposed BDCP "protection" designation will not provide any new level of protection, but instead will result in the fragmentation and direct loss of a significant undisclosed amount of existing managed wetlands. This "Conservation Measure" focuses on the systematic removal of significant private ownership in the Marsh and promotes the conversion of existing diked managed waterfowl habitat into tidal wetland or ecological reserves for listed species. This proposed action will result in a significant portion of the existing private landowner constituents of SRCD being removed from ownership of waterfowl hunting clubs. Discussions also recommend focusing on publicly owned land first for habitat conversion. DFW - Grizzly Island Wildlife Area lands have predominantly been purchased with sportsman dollars and managed for waterfowl wintering habitat, hunting, fishing and public recreation. Many of these lands are dedicated as waterfowl sanctuaries.

CM3 describes neither protection nor restoration for the Suisun Marsh. The Suisun Marsh is already protected under existing Legislation and Suisun Marsh Protection Plan policies. Instead, the proposed actions under CM3 and CM4 will result in fundamental and negative changes in the existing land use, and result in the systematic elimination of the Suisun Marsh wetland conservation community that has conserved and protected these wetland resources for the past century.

The BDCP proposal, from a simple land use perspective, will yield the conversion/direct loss of thousands of acres of existing managed wetlands and result in the reduction of waterfowl carrying capacity in the Suisun Marsh. These actions will reach a tipping point when the remaining managed wetland habitats can no longer support adequate waterfowl populations nor maintain suitable habitat conditions due to impacts of the Project. Once waterfowl hunting is no longer sustainable because of the impacts of the Proposed Project, the remaining landowners will cease investment in managed wetland operations and maintenance. The loss in critical mass of quality managed wetland habitat from land use change and existing habitat fragmentation will significantly reduce wintering waterfowl populations and effectively eliminate SRCD and the private duck clubs. These effects of BDCP habitat conservation strategy, future location, and acreage are not disclosed nor mitigated for in the BDCP or the DEIR/EIS.

BDCP Plan Chapter 3, Part 2, Conservation Measure 4 (CM4) Tidal Natural Communities Restoration, Section 3.4.1.3.4. This section claims, "As levees are breached for tidal restoration under CM4, salinity levels may increase through much of Suisun Marsh." BDCP's tidal restoration objectives in Conservation Measure 4 (CM4) Tidal Natural Communities Restoration will have significant and unavoidable negative impacts on the existing Suisun Marsh wetlands and wildlife resources and habitat conditions. SRCD has grave concerns with the extent of the acreage objectives, without identifying where or when most of this activity will occur in the Suisun Marsh. The proposed habitat restoration objectives are identified at a general level over the next 40 years in BDCP and the HCP/NCCP documents. Without defining the site specific locations and acreages of proposed habitat restoration projects in Conservation Zone 11 (Suisun Marsh), it is impossible to identify and evaluate the site specific, regional and cumulative impacts of proposed actions.

BDCP is calling for at least 7,000 acres (14% of existing managed wetlands) to be restored to tidal wetland in Suisun Marsh. This objective is consistent with the high end of the Suisun Marsh Habitat Management, Preservation and Restoration Plan (SMP) restoration targets of 5,000 to 7,000 acres over the next 30 years. Any tidal restoration acreage over that 7,000 target should be completed in years 31 to 50 of the BDCP program. The Suisun Marsh Plan also requires that tidal restoration projects must be regionally distributed (See Table 2-4 SMP 2011 page 2-17) with strict assurances, detailed environmental commitments, avoidance and minimization measures to be implemented, and salinity modeling to be completed as part of the project development and post construction verification. BDCP makes no commitment to complete post restoration water quality monitoring to verify if the pre-project modeling results are accurate and if appropriate mitigation to address these unanticipated impacts has been adequately addressed on adjacent lands. If BDCP moves forward, SRCD requests a commitment from BDCP to comply with the SMP objectives, procedures, guidelines, regional distribution of tidal restoration and agreement to the SMP management structure, including the SMP Principals Management Group and Adaptive Management Advisory Team.

BDCP significantly diverges from the SMP in its enhancement objectives. The SMP's objective is also to enhance 44,000 to 46,000 acres of managed wetlands concurrently with the tidal restoration activities. This approach allows phased implementation and balances existing resource protection and management needs with future tidal restoration. Instead, BDCP omits the fact that tidal restoration will directly impact existing wetlands and wildlife resources, and has provided no commitment to offset these losses or enhance the remained managed wetland habitats in the Suisun Marsh. CM3 lists an objective to establish a reserve of at least 8,100 acres of managed wetlands (1,500 for salt marsh harvest mouse) habitat in the Suisun Restoration Opportunity Area, but fails to describe the habitat management objective of this acreage and future long-term commitment to maintain it. BDCP must commit to invest in all the remaining managed wetlands, not just a hand full. In this regard, all Suisun Marsh managed wetlands are dependent on exterior levee integrity. The existing managed wetlands are islands, protected by exterior levees. If an exterior levee fails, then all of the adjacent managed wetlands on that island will be lost, including any of the 8,100 acres of

the BDCP managed wetlands "conservation areas". Additionally, exterior levee failure in the Suisun Marsh would result in unplanned tidal restoration, likely in a poor location, causing detrimental ecological conditions for targeted fish species.

Tidal restoration projects will have significant and undisclosed impacts to adjacent managed wetlands operations and habitat conditions. These impacts may include increased salinity of applied water for habitat management, decreased life expectancy of adjacent managed wetland water management infrastructure, and attenuated tidal stage reducing existing gravity drainage capacity of adjacent managed wetlands. Tidal restoration projects will cause increased channel velocities (causing scour of channel depths), thereby undermining and destabilizing existing managed wetlands exterior levee foundations, and increasing exterior levee maintenance costs. Managed wetlands in the vicinity of a tidal restoration project could be subjected to all of the impacts on facilities and management capabilities listed above. BDCP should establish a significant long term funding source to facilitate needed future intensive wetland management activities as a result of any increase in salinity from existing baseline conditions. Wetland management objectives should be focused on completion of multiple spring leach cycles, preventing elevation of soil salinities, optimizing water management infrastructure, and offsetting increased pumping costs from dampened tidal stage. None of these impacts are adequately addressed in the BDCP DEIR/EIS, nor is there adequate mitigation proposed to address these site specific or regional impacts on managed wetlands. Any BDCP restoration objective that exceeds the SMP tidal restoration objectives will have significant incremental and cumulative impacts on decreasing the managed wetlands acres in the Marsh. This will further reduce waterfowl carrying capacity, managed wetland management capabilities, and fragmentation of existing waterfowl habitat. Local and regional salinity impacts from tidal restoration projects can be significantly influenced by breach location, size, depth, and salinity gradient in the adjacent slough at the breach location. The programmatic nature of the DEIR/EIS fails to disclose these impacts and the cumulative impacts from other habitat restorations action occurring concurrently in other Delta Restoration Opportunity Areas.

BDCP CM4 has a long-term tidal restoration target of 11,500 acres or more (22% of existing managed wetlands) of Suisun Marsh managed wetlands. CM4 also calls for the conservation of an additional 8,100 acres of existing managed wetlands protected habitats for covered species like the salt marsh harvest mouse. This could effectively reduce private ownership in the Marsh by up to 50%, and modify or eliminate existing waterfowl management activities on the remaining Suisun Marsh managed wetlands.

BDCP currently has no metric nor method of evaluating the existing wetland resource values and offsetting these direct and indirect losses from tidal restoration of managed wetlands and waterfowl habitats in Suisun Marsh. To address this deficiency during BDCP development, Ducks Unlimited, in partnership with the Central Valley Joint Venture, U.C. Davis, Oregon State University, U.S. Geological Service, and SRCD proposed to BDCP management the following scientific study: "*Restoring Tidal Flow to Managed Wetlands in Suisun Marsh: Implications for Wintering Waterfowl and Non-Tidal Wetland Management*". This study would provide detailed information on waterfowl food production in tidal and managed wetland habitats and is needed to

address the following critical uncertainties in meeting BDCP goals, but was never considered by BDCP managers for implementation:

- (1) What is the carrying capacity of the Suisun Marsh for waterfowl during winter, based on current habitat conditions?
- (2) How may future tidal restoration activities influence waterfowl carrying capacity?
- (3) How do management activities influence food production in diked wetlands, and consequently how can they be enhanced to increase carrying capacity?

In conclusion, SRCD requests that DWR not pursue the BDCP Project, but at a minimum revise and recirculate the DEIR/EIS to address the issues and inadequacies that SRCD has identified in this comment letter. Throughout the BDCP DEIR/EIS review period and at public informational meetings over the past few months, it has been repeatedly stated that BDCP implementation (the construction of a new point of diversion, required mitigation, and habitat conservation actions) would continue to comply with existing D-1641 water quality standards. As SRCD has identified in the detailed comments listed above, the BDCP DEIR/EIS modeling results and effects analysis states that, "salinity levels in the Suisun Marsh will increase", which is in direct contradiction with the claim that water quality objectives will continue to be met under D1641 or the Revised Suisun Marsh Preservation Agreement. Implementing a project that systematically degrades and reduces the existing Suisun Marsh managed wetland habitats, functions, values and water quality is unthinkable and unsupportable by SRCD.

Sincerely,

Tony Vaccarella,
President, SRCD Board of Directors

Reference:

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- Parker VT, Callaway JC, Schile LM, Vasey MC, Herbert ER. 2011. Climate change and San Francisco Bay-Delta tidal wetlands. *San Francisco Estuary and Watershed Science*.
- Revised Suisun Marsh Preservation Agreement, Signed June 20, 2005. By USBR, DWR, DFW, and SRCD
- Suisun Marsh Habitat Management, Preservation and Restoration Plan Final EIR/EIS, November 2011. Prepared by USBR, DWR, and DFW
- SWRCB D-1641. State Water Resources Control Board Revised Water Rights Decision 1641, Revised March 15, 2000 in accordance with Order WR2000-02. 49-56 and 183.
- Vasey MC, Parker VT, Callaway JC, Herbert ER, Schile LC. 2012. Tidal wetland vegetation in the San Francisco Bay-Delta estuary. *San Francisco Estuary and Watershed Science*. 5-6.
- Vincik, R.F. 2002. *Adult salmon migration monitoring at the Suisun Marsh Salinity Control Gates, Sept.-Nov. 2001*. Interagency Ecological Program for the San Francisco Estuary Newsletter 15:45-48.
- Vincik, R.F., G.W. Edwards, G.A. Aasen, and R.W. Fujimura. 2003. *Suisun Marsh Salinity Control Gates adult salmon passage monitoring, 1998-1999*. Technical Report (unpublished), Interagency Ecological Program for the San Francisco Bay/Delta Estuary. 27pp.
- Warrance NJ, Bauder J, Pearson KE. Salinity, Sodicity, and Flooding Tolerances of selected Plant Species of the Northern Cheyenne Reservation. Montana-State University Bozeman. Page 6-8.

From: Lorene Warren <lwarren@golyon.com>
Sent: Wednesday, September 02, 2015 8:06 AM
To: BDCPcomments
Subject: California water fix project comment

I oppose the project and request that alternative ideas for the water conveyance be considered.

The Sacramento Delta is the closest natural wildlife area near Sacramento, a short 5 mile drive to the Delta gives people an outlet to do all the outdoor activities, fishing, boating, swimming, wine tasting, and spring and summer drives through our great Delta. Finally we have a lovely area for all to enjoy. Coming alive by families and people working and living in the delta. How can this be ignored and not a major component in the thinking of approving this project.

Alternatives to Water Exports Ignored

Far 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.

Our tax and ratepayer dollars would be much better spent on:

- More aggressive water efficiency program statewide that would apply to both urban and agricultural users.
- Funding water recycling and groundwater recharging 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 and pollution generating farmlands in the 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 between \$2 to \$4 billion and is orders of-magnitude less expensive than 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.

Lorene Warren

Delta Resident

From: Friends of the River <info@friendsoftheriver.org> on behalf of Glenn McWilliams <info@friendsoftheriver.org>
Sent: Tuesday, August 18, 2015 8:22 AM
To: BDCPcomments
Subject: I oppose all alternatives in the Revised BDCP that propose construction of new diversions and tunnels under the Delta

Aug 18, 2015

BDCP Comments

Dear Comments,

Thank you for receiving public comments in response to the Recirculated Draft BDCP Plan and Draft EIR/EIS.

I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta. I oppose the project because:

It is too costly (up to \$54 billion with interest and other hidden costs) and the general public should not have to cover any of this outrageous, including habitat restoration costs. These should be paid by those who receive the water (since the Delta diversions degraded the habitat in the first place).

Operation of the diversions and tunnels threaten to dewater major upstream reservoirs in northern California and reduce downstream river flows, to the detriment of fish, wildlife, recreation, and other public trust values.

Diversion and tunnel facilities would adversely impact too much Delta farmland and habitat, harm Brannan Island State Park, infringe on the Stone Lakes National Wildlife Refuge, and degrade other essential conservation lands.

You cannot restore Delta habitat without first determining how much fresh water the Delta needs to survive and thrive. Restoration of fresh water flows from the San Joaquin River in the south Delta are particularly important.

The tunnels will need more upstream storage facilities to feed fresh water into them. These include raising Shasta Dam, building the Sites Reservoir, and possibly reviving the Auburn Dam on the American River and the Dos Rios Dam on the Eel. The environmental, cultural, and financial impacts of these controversial projects are a significant foreseeable but ignored impact of the BDCP.

.In 32 years in Sacramento I have watched our rivers silt in, islands form in the middle of what was once wild scenic rivers due to controlled and reduced flows. The tunnels can serve no other purpose than to supply more of our precious river water to Central and Southern California money interests. Jerry Brown is lining his pockets and building an ego project so that he can leave a legacy bigger than his Father's.

Stop the tunnel project!

I believe that the Revised BDCP should have included, and I would support, an alternative that significantly reduces Delta exports and focuses instead on restoring habitat and threatened and endangered species in the Delta, improves Delta water quality by providing sufficient fresh water inflow from both the Sacramento and San Joaquin Rivers, and that includes a pragmatic plan to sustainably meeting California's water needs. This can be done by increasing agricultural and urban water use efficiency, capturing and treating storm water, recycling urban waste water, cleaning up polluted

groundwater, and reducing irrigation of desert lands in the southern Central Valley with severe drainage problems. We don't need to build more dams or tunnels.

Thank you for considering my comments.

Sincerely,

Mr. Glenn McWilliams
1180 Jacob Ln
Carmichael, CA 95608-6270
glenn@paksources.com

From: Friends of the River <info@friendsoftheriver.org> on behalf of Cheri Osborn <info@friendsoftheriver.org>
Sent: Monday, August 17, 2015 10:17 AM
To: BDCPcomments
Subject: I oppose all alternatives in the Revised BDCP that propose construction of new diversions and tunnels under the Delta

Aug 17, 2015

BDCP Comments

Dear Comments,

Thank you for receiving public comments in response to the Recirculated Draft BDCP Plan and Draft EIR/EIS.

I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta. I oppose the project because:

It is too costly (up to \$54 billion with interest and other hidden costs) and the general public should not have to cover any of this outrageous, including habitat restoration costs. These should be paid by those who receive the water (since the Delta diversions degraded the habitat in the first place).

Operation of the diversions and tunnels threaten to dewater major upstream reservoirs in northern California and reduce downstream river flows, to the detriment of fish, wildlife, recreation, and other public trust values.

Diversion and tunnel facilities would adversely impact too much Delta farmland and habitat, harm Brannan Island State Park, infringe on the Stone Lakes National Wildlife Refuge, and degrade other essential conservation lands.

You cannot restore Delta habitat without first determining how much fresh water the Delta needs to survive and thrive. Restoration of fresh water flows from the San Joaquin River in the south Delta are particularly important.

The tunnels will need more upstream storage facilities to feed fresh water into them. These include raising Shasta Dam, building the Sites Reservoir, and possibly reviving the Auburn Dam on the American River and the Dos Rios Dam on the Eel. The environmental, cultural, and financial impacts of these controversial projects are a significant foreseeable but ignored impact of the BDCP.

I live in Tracy Ca and I don't want the tunnels!

Please leave water where it flows naturally! We are in the situations we are in now because we keep messing with nature. Damaging and manipulating it the way we want it to be never thinking nature knows best, it's been around long before our genetics ever started to be. We need to go back to how nature intended the water and growing things to be- without manipulation or redirecting. Our world was better off before us because it was how it was suppose to be. That's why it was such a hospitable environment, please restore our hospitable environment and end the destruction. We need to come up with local solutions to local issues not take water from areas that shouldn't be taken. It's not suppose to be there otherwise nature would put it there. Leave water where it naturally occurs don't steal water, it's damaging those it's stolen from...

I believe that the Revised BDCP should have included, and I would support, an alternative that significantly reduces Delta exports and focuses instead on restoring habitat and threatened and endangered species in the Delta, improves Delta water quality by providing sufficient fresh water inflow from both the Sacramento and San Joaquin Rivers, and that

includes a pragmatic plan to sustainably meeting California's water needs. This can be done by increasing agricultural and urban water use efficiency, capturing and treating storm water, recycling urban waste water, cleaning up polluted groundwater, and reducing irrigation of desert lands in the southern Central Valley with severe drainage problems. We don't need to build more dams or tunnels.

Thank you for considering my comments.

Sincerely,

Mrs. Cheri Osborn
1256 Tony Stuiitt Ct
Tracy, CA 95377-8980
(209) 229-1910
cherirosborn@gmail.com

From: Judi Reinking <judi2read@icloud.com>
Sent: Wednesday, September 23, 2015 9:29 AM
To: BDCPcomments
Subject: Delta Tunnels = Disaster

Do not move forward with this project! The Delta is a natural wonder in its self... Do not do a "man made fix" that will destroy it! This will not fix CA water issues.

I have not heard one person that I have spoken to say they want this project

Judi 🌹

Sent from my iPhone

From: Friends of the River <info@friendsoftheriver.org> on behalf of Matt Richardson, DPT <info@friendsoftheriver.org>
Sent: Wednesday, September 23, 2015 10:09 AM
To: BDCPcomments
Subject: I oppose all alternatives in the Revised BDCP that propose construction of new diversions and tunnels under the Delta

Sep 23, 2015

BDCP Comments

Dear Comments,

Thank you for receiving public comments in response to the Recirculated Draft BDCP Plan and Draft EIR/EIS.

I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta. I oppose the project because:

It is too costly (up to \$54 billion with interest and other hidden costs) and the general public should not have to cover any of this outrageous, including habitat restoration costs. These should be paid by those who receive the water (since the Delta diversions degraded the habitat in the first place).

Operation of the diversions and tunnels threaten to dewater major upstream reservoirs in northern California and reduce downstream river flows, to the detriment of fish, wildlife, recreation, and other public trust values.

Diversion and tunnel facilities would adversely impact too much Delta farmland and habitat, harm Brannan Island State Park, infringe on the Stone Lakes National Wildlife Refuge, and degrade other essential conservation lands.

You cannot restore Delta habitat without first determining how much fresh water the Delta needs to survive and thrive. Restoration of fresh water flows from the San Joaquin River in the south Delta are particularly important.

The tunnels will need more upstream storage facilities to feed fresh water into them. These include raising Shasta Dam, building the Sites Reservoir, and possibly reviving the Auburn Dam on the American River and the Dos Rios Dam on the Eel. The environmental, cultural, and financial impacts of these controversial projects are a significant foreseeable but ignored impact of the BDCP.

3 of my 4 grandparents were farmers. We are lucky to have the produce we get from the Central Valley.

However - I do not agree AT ALL with the delta tunnels.

We are using more water than we have!

I believe that the Revised BDCP should have included, and I would support, an alternative that significantly reduces Delta exports and focuses instead on restoring habitat and threatened and endangered species in the Delta, improves Delta water quality by providing sufficient fresh water inflow from both the Sacramento and San Joaquin Rivers, and that includes a pragmatic plan to sustainably meeting California's water needs. This can be done by increasing agricultural and urban water use efficiency, capturing and treating storm water, recycling urban waste water, cleaning up polluted groundwater, and reducing irrigation of desert lands in the southern Central Valley with severe drainage problems. We don't need to build more dams or tunnels.

Thank you for considering my comments.

Sincerely,

Mr. Matt Richardson, DPT
1855 Green St
San Francisco, CA 94123-4921
(415) 577-7080
richardson034@gmail.com

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

4 September 2015

Cassandra Enos
Department of Water Resources
901 P Street
Sacramento, CA 95814

CERTIFIED MAIL
7014 1200 0000 7154 4233

COMMENTS TO REQUEST FOR REVIEW FOR THE RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT/SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT, BAY DELTA CONSERVATION PLAN/CALIFORNIA WATER FIX PROJECT, SCH# 2008032062, CONTRA COSTA, SACRAMENTO, SAN JOAQUIN, SOLANO, AND YOLO COUNTIES

Pursuant to the State Clearinghouse's 7 August 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Recirculated Draft Environment Impact Report/Supplemental Draft Environmental Impact Statement* for the Bay Delta Conservation Plan/California Water Fix Project, located in Contra Costa, Sacramento, San Joaquin, Solano, and Yolo Counties.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements – Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering

Bay Delta Conservation Plan/
California Water Fix Project
Contra Costa, Sacramento, San Joaquin,
Solano, and Yolo Counties

- 5 -

4 September 2015

discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4684 or tleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

From: Enos, Cassandra@DWR <Cassandra.Enos@water.ca.gov>
Sent: Wednesday, September 23, 2015 10:33 AM
To: BDCPcomments
Subject: CVRWQCB comment letter
Attachments: CVRWQCB RDEIR_S comments.pdf

Cassandra Enos-Nobriga
Program Manager
Executive Program Office
Department of Water Resources
901 P Street, Sacramento, CA 95814
Office: (916) 651-0178
Mobile: (916) 835-6981

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0012
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Assembly
California Legislature

DISTRICT OFFICE
3719 TULLY ROAD, SUITE C
MODESTO, CA 95356
(209) 576-6425
FAX (209) 576-6426



KRISTIN OLSEN
ASSEMBLY REPUBLICAN LEADER
ASSEMBLYMEMBER, TWELFTH DISTRICT

August 17, 2015

The Honorable Governor Jerry
Brown State Capitol, Suite 1173
Sacramento, CA 95814

John Laird, Secretary
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

The Honorable Sarah "Sally" Jewell, Secretary
United States Department of the Interior
1849 C Street, NW, Room 6156
Washington, D.C. 20240

The Honorable Penny S. Pritzker, Secretary
United States Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

The Honorable Regina A. McCarthy, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW, Room 3000
Washington, D.C. 20460

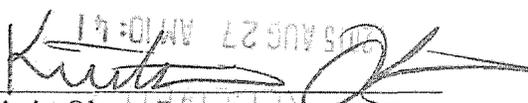
Dear Governor Brown, Secretaries Laird, Jewell and Pritzker, and Administrator McCarthy:

We write to thank you for providing a 60-day extension to October 30, 2015 to the comment period on the recently released Bay-Delta Conservation Plan (BDGP)/California "WaterFix" and the partially Recirculated Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) and to urge that you provide an additional 60-day extension to December 29, 2015.

As you know, the RDEIR/SDEIS contains substantial changes from the initial public draft. The RDEIR/SDEIS amounts to nearly 8,000 pages of additional documentation. Given the size and complexity of the documents, particularly in light of the 40,000 pages associated with the original draft EIR/EIS, which provide the context and foundation for this latest proposal, we strongly believe the current public comment period is inadequate. Affording an additional 60 days, beyond the current review period, is clearly warranted and justified.

Thank you for your consideration.

Sincerely,


Kristin Olsen
Assembly Republican Leader, 12th District


90806 AD 3

Jim Jones AD11

Wm R R (73)

Brian Doherty AD2

Ken McCarty AD7

Cats O'Brien AD16

[Signature] AD13

Bill Codd AD04

Susan A Bonilla AD14

Jim Ceper AD9

Ken Cooley AD8

[Signature] AD2

[Empty lined area for additional entries]

From: Rieker, Jeffrey <jrieker@usbr.gov>
Sent: Wednesday, September 23, 2015 12:24 PM
To: BDCPcomments
Cc: Theresa Olson; Michelle Banonis; Janet Sierzputowski; Lisa Navarro; Kristin Kaggerud
Subject: BDCP/CWF Correspondence to Secretary of the Interior
Attachments: McCleery CWF.pdf; SJCOG CWF.pdf; CA Assembly CWF.pdf; RTD CWF.pdf

Greetings,

Attached are pieces of correspondence received by the Department of the Interior pertaining to BDCP/California Water Fix. Note that the DVD associated with the letter from "Restore the Delta" is being mailed to Reclamation's Bay-Delta Office for processing.

Please let me know if you have questions or need additional info.

Thanks,
Jeff

Jeffrey Rieker
Mid-Pacific Regional Liaison
Bureau of Reclamation
Office: 202-513-0669; Mobile: 916-214-7555
jrieker@usbr.gov



10100 Trinity Parkway Suite 120
 Stockton, CA 95219
 (209) 475-9550
www.RestoretheDelta.org

August 13, 2015

Secretary Sally Jewell
 Department of the Interior
 1849 C Street, N.W.
 Washington DC 20240

cc: President Barack Obama

Subject: DVD of Public Comments Regarding Opposition to the Delta Tunnels/California Water Fix (Alternative 4A)

Dear Secretary Jewel,

Enclosed is a video made by Restore the Delta for you and President Obama. Restore the Delta, a grassroots organization of 25,000 members, advocates for restoring the San Francisco Bay-Delta estuary for our children and future generations. It is our hope that by watching the video you will see and hear what people from our region and throughout the state think about the project.

The revised draft EIR/EIS for California Water Fix stated in its executive summary that two public hearings would be held regarding the proposed Delta tunnels project. These hearings, however, were transformed by California state officials into public house events, held science fair style with boards and table displays. This format did not allow for public comments or questions to be addressed in a transparent manner. Even more disturbing, Delta residents were given answers to questions by project consultants regarding water quality and quantity for export through the tunnels that completely contradicts our findings in the DEIR/DEIS and in a presentation given the same day by staff at the Metropolitan Water District in Los Angeles. Officials told our members that there would be no water quality impacts and that no additional water would be taken from the Delta, which contradicts the DEIR/DEIS and the MWD Bay-Delta presentation to its board of July 28, 2015.

You will find in the video that our members understand fully the biological underpinnings of how the estuary functions, and what it needs for successful restoration. Our supporters understand equally the politics behind California water management. Their knowledge of the impacts of the project and their strong opposition is made clear in the video.

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

The Delta Tunnels/California Water Fix does not meet the Delta restoration half of the Act's goals; it is simply a plan to export more water out of the San Francisco Bay-Delta estuary. The Delta Tunnels/California Water Fix will also fail to provide a more reliable water supply fifty percent of the time because the Delta watershed will not have enough flow during dry periods.

Our objections to the tunnels are as follows:

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.

Our 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.
- 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 seems to ignore 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."

Our public health concerns with the plan are:

- The tunnels will cause increased contamination of municipal water, discharge systems 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.

Our 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.
- 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 water ways 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.

Alternatives to Water Exports Ignored

Perhaps our biggest objection to the Delta Tunnels plan is that far less expensive and less environmentally destructive alternatives 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.

Our tax and ratepayer dollars would be much better spent on:

- More aggressive water efficiency program statewide that would apply to both urban and agricultural users.
- Funding water recycling and groundwater recharging 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 project move communities towards water sustainability.
- Retiring thousands of acres of impaired and pollution generating farmlands in the 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 between \$2 to \$4 billion and is orders of-magnitude less expensive than 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.

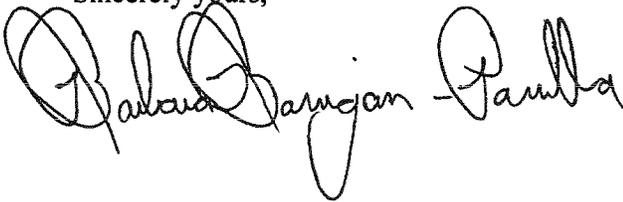
In Summary

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 our above stated concerns. That is why we 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 yours,

A handwritten signature in black ink, appearing to read "Barbara Barrigan-Parrilla". The signature is fluid and cursive, with the first name being the most prominent.

Barbara Barrigan-Parrilla
Executive Director
Restore the Delta

From: Rieker, Jeffrey <jrieker@usbr.gov>
Sent: Wednesday, September 23, 2015 12:24 PM
To: BDCPcomments
Cc: Theresa Olson; Michelle Banonis; Janet Sierzputowski; Lisa Navarro; Kristin Kaggerud
Subject: BDCP/CWF Correspondence to Secretary of the Interior
Attachments: McCleery CWF.pdf; SJCOG CWF.pdf; CA Assembly CWF.pdf; RTD CWF.pdf

Greetings,

Attached are pieces of correspondence received by the Department of the Interior pertaining to BDCP/California Water Fix. Note that the DVD associated with the letter from "Restore the Delta" is being mailed to Reclamation's Bay-Delta Office for processing.

Please let me know if you have questions or need additional info.

Thanks,
Jeff

Jeffrey Rieker
Mid-Pacific Regional Liaison
Bureau of Reclamation
Office: 202-513-0669; Mobile: 916-214-7555
jrieker@usbr.gov

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Sept 13, 2015

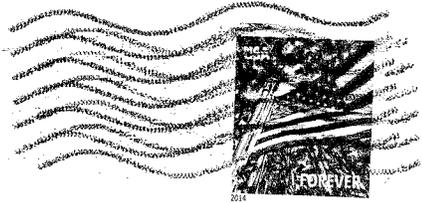
To whom it may concern

This is my letter to inform you of my opposition to the twin tunnel project. As a voter of over fifty years I think this is a costly mistake for us seniors and other voters. We need to be thinking about more dams for our state and to continue our water conservation without penalties.

Thank you
Bobbie Howey
118 Almanor Ct.
Yuba City Ca 95687

B. Hokey
118 Alameda Dr.
Vacaville, Ca 95687

SAN DIEGO, CA 921
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BDCP/Water Fix Comments

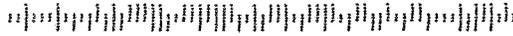
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P.O. 1919

Sacramento, Ca

95812

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September 20, 2015

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

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

Dear Sirs/Madams:

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

The Delta Reform Act of 2009 mandated co-equal goals for 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.

All of my concerns have to do with the issues brought forth by the prestigious National Academy of Sciences report of four years ago. Their comprehensive analysis of the twin tunnel plan was declared riddled with holes and inconsistencies.

On September 16, 2015 the Delta Independent Science Board report on the California Water Fix and Eco Restore was similarly critical in their analysis of and the EIR/EIS indicating it has found gaping holes in the plan and that it "falls short as a basis for weighty decisions about natural resources". Their analysis can be found at: <http://deltacouncil.ca.gov/docs/delta-isb-s-review-rdeirsdeis-bdcp-california-waterfix>

The Twin Tunnel plan is one of the most expensive public works project ever proposed. Why hasn't there been a full cost benefit analysis on this project?

The plan does not cover the negative impacts to the San Francisco Bay Delta estuary, it's fish and wildlife, the lives of over 4 million Californians that call the 5 Delta counties their home, Delta agriculture, tourism, recreation and boating. How will the recommended Delta outflows to the SWRCB be met if the EIR/EIS does not address a reduction of Delta exports?

Why are there no benefits for Northern California while Southern California reaps all of the benefits, especially private interest corporate agriculture that use 70% of exported water to grow nuts that are then exported?

The Delta has over 500,000 acres of federally designated prime farm land. Many of the farms are family owned and operated for over 150 years. It defies common sense to eminent domain 300 Delta farms and properties to irrigate toxic desert soil found in the south San Joaquin Valley. Could it be that the California Water Fix envisions salinity intrusion will ruin the Delta's rich soils and the property will be worthless anyway?

How will the drinking water supply of Delta residents be affected? What damage will salt water intrusion have upon the aquifers and wells used by Delta residents? The diversion of water at the proposed sights steals the freshest water before it reaches the Delta. Who will mitigate the additional costs of treating the contaminated water that is left in the Delta?

The Contra Costa County Water District stated that BDCP failed to model for potential increases of carcinogens and other formation of byproducts that would cause cancer and other serious health effects. Rural towns such as Hood and Byron will have to relocate due to exposure to cancer causing contaminants during construction. Why hasn't this issue been addressed?

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.

A Very Concerned Delta Resident,



Roger S. Mammion
4720 Oak Forest Avenue
Oakley, California 94561

Roger S. Mammon
4720 Oak Forest Avenue
Oakley, CA 94561

OAKLAND CA 945

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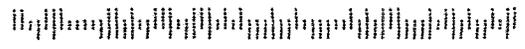


SEP 23 2015

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

REC'D 530

95812191919



Dear People of California and Representatives of the State:

The Bay Delta Conservation Plan BDCP/
California Water Fix or water tunnels
continues to be pushed by Governor Jerry
Brown, Department of Water Resources, Westlands,
Kern, + Metropolitan Water Districts, Big Agri-
business and Oil Frackers. Despite widespread
criticism by California Residents, many environ-
mental groups, and Environmental Protection
Agency, the water tunnels are being forced
on California and if approved, construction
could begin as early as 2016. Why are the
tunnels a mistake? Two 40ft diameter
tunnels dug 150 feet below the Sacramento
River, 35 miles long pumping water
south spells disaster and ruin for
the Sacramento-San Joaquin Delta and
San Francisco Bay Estuary. We already
^{are} sending water south from the Delta via
2 California aqueducts. The new system
would give Westlands, Kern, and Metropolitan
Water Districts in conjunction with Big
Agribusiness and Big Oil Frackers a mono-
poly on California water to control and
make enormous profit from this

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precious natural resource which belongs to all Californians. The BDCP/Water Fix is a water grabbing thievery by the State of California to sell Sacramento River water, a product of many rivers, to a few individuals who will control and make enormous profit. If allowed, the water tunnels will destroy the Delta and San Francisco Bay. Construction would take many years and cost billions and billions of dollars, to be paid, in the end, by California taxpayers for generations to come. Restore and maintain the present water distribution system with better regulation by the state. No water tunnels, no water blunders!

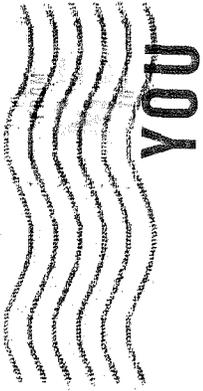
John Minnehan
541 S. Rose St.
Lodi, CA 95240
781 301-1802

P.S. I am praying the BDCP/California Water Fix is struck down once and for all. Let us focus on projects which are logical, doable, and beneficial for the whole State now and in the future. Please do not undertake this ill-conceived project with common sense, which would destroy California's large and vital inland waterway.

John Minneham
541 S. Rose St.
Lodi, CA 95240

SACRAMENTO CA 957

21 SEP 2015 PM 6 L

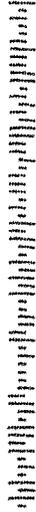


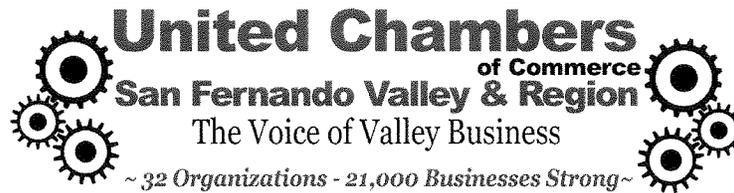
BDCP/WaterFix Comments
P.O. Box 1919
Sacramento, CA 95812

SEP 23 2015

REC1RC531

95812191919



FORM
MASTER
#8

5121 Van Nuys Blvd., Suite 203 * Sherman Oaks, CA 91403 * Tel: (818) 981-4491 * Fax: (818) 981-4256
www.unitedchambers.org * E-mail: marian@unitedchambers.org

Les Himes
Chairman of the Board
Marian E. Jocz
Executive Director

September 18, 2015

RECEIVED
SEP 23 2015**Member Chambers**

Calabasas
CalPilipino & Entrepreneurship
Canoga Park~ West Hills
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Encino
Filipino American of Greater LA
Granada Hills
Pacoima
Regional Black
Sherman Oaks
Studio City
Sun Valley
Sunland Tujunga
Toluca Lake
Universal City ~ North Hollywood
Winnetka
West Valley ~ Warner Center

Affiliate Members

Southland Regional Assoc of Realtors
Thomas Soule, CPA

Strategic Partners

California Chamber of Commerce
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Los Angeles Area Chamber
Los Angeles County Business Federation
Valley Economic Development Center
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Corefit
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Empower Group of Companies
Filipino American of Greater LA
Gelb Group, a Family of Companies
Horace Heidt Magnolia Estates
illi Commercial Real Estate
Law Office of Mark Levinson
Law Office of Savin Bursk
Lewitt Hackman
Parker Brown, Inc.
Phillipp & Associates
SCV Recycling
Universal City-No Hollywood Chamber
Westfield

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

Dear BDCP / California WaterFix:

On behalf of the United Chambers of Commerce, I would like to provide the following comments on the Bay Delta Conservation Plan/California WaterFix (BDCP / WaterFix) and its recirculated draft environmental impact statement/report released on July 10, 2015.

California WaterFix represents the efforts of federal and state agencies for the past nine years to find a lasting water system/ecosystem solution for the Sacramento-San Joaquin Delta. Water supplies originating in the Sierra Nevada pass through the Delta and must be reliably captured and transported in order to sustain the California economy and directly provide supplies to two-thirds of the state's residents and 3 million acres of the most productive farmland in the nation.

Our understanding is that the preferred alternative, as detailed in Alternative 4a within the recirculated documents, is largely consistent with the proposal in the public draft documents released in December 2013. Three new intakes would be constructed in the northern Delta along the Sacramento River, with the supply transported via a twin tunnel pipeline system to the existing aqueducts in the southern Delta for the State Water Project and Central Valley Project. The reliability of supplies would be shored up in average rain years, with higher supplies available than now in wetter years. This remains a workable framework

California WaterFix remains a work in progress, with plans for a final plan and funding decisions by public water agencies sometime next year. The importance of this water supply for Southern California and all of the state, however, is clear and beyond dispute. Southern California's drought survival strategy depends on capturing adequate State Water Project supplies in wet periods and to store them in reservoirs and groundwater basins for dry years. The existing decades-old water systems in the Delta can no longer reliably perform this vital function and is also at risk of prolonged outages due to seismic events along with Delta levee collapse. California WaterFix would re-establish the ability to capture water for drought cycles and protect the supply from natural disasters.

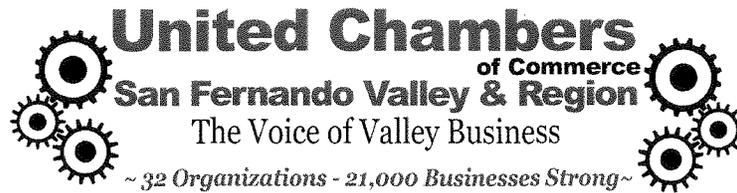
Platinum Investor: Wells Fargo

Gold Investors - Metropolitan Water District * Providence Tarzana Medical Center * Providence Holy Cross Medical Center
Providence Saint Joseph's Medical Center

Silver Investors - Alperstein, Simon, Farkas, Gillin & Scott * SoCalGas

Bronze Investors - California Lutheran University * Valley Presbyterian Hospital

Copper Investor ~ Van Nuys Los Angeles World Airports



5121 Van Nuys Blvd., Suite 203 * Sherman Oaks, CA 91403 * Tel: (818) 981-4491 * Fax: (818) 981-4256
 www.unitedchambers.org * E-mail: marian@unitedchambers.org

Les Himes
 Chairman of the Board
 Marian E. Jocz
 Executive Director

Member Chambers

Calabasas
 CalPilipino & Entrepreneurship
 Canoga Park~ West Hills
 Chatsworth ~ Porter Ranch
 Encino
 Filipino American of Greater LA
 Granada Hills
 Pacoima
 Regional Black
 Sherman Oaks
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 Sun Valley
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 Toluca Lake
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 Winnetka
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Affiliate Members

Southland Regional Assoc of Realtors
 Thomas Soule, CPA

Strategic Partners

California Chamber of Commerce
 Economic Alliance of SFV
 Los Angeles Area Chamber
 Los Angeles County Business Federation
 Valley Economic Development Center
 Valley Industry & Commerce Association
 U. S. Chamber of Commerce

Chairman's Circle

C & M Printing
 Corefit
 Dilbeck Estates
 Empower Group of Companies
 Filipino American of Greater LA
 Gelb Group, a Family of Companies
 Horace Heidt Magnolia Estates
 illi Commercial Real Estate
 Law Office of Mark Levinson
 Law Office of Savin Bursk
 Lewitt Hackman
 Parker Brown, Inc.
 Phillipp & Associates
 SCV Recycling
 Universal City-No Hollywood Chamber
 Westfield

Page (2) continued

We embrace the "all of the above" approach to maintaining a reliable water system in Southern California. Our region needs enhanced conservation and more local supplies such as recycling to meet the challenges of population growth and shifting climate patterns. Yet this robust portfolio approach can only succeed with a reliable supply from the State Water Project. Its high source quality is essential for recycling the supply. It is an essential baseline. And it is the stored supplies for drought cycles.

Public water agencies such as the Metropolitan Water District of Southern California will need to a solid business case when assessing the final proposal to make this historic investment. Given the length of this historic process and the limited duration of the current federal administration, time is of the essence to make all necessary decisions to craft a final plan by next year. We hope our comments are helpful in making the final California WaterFix plan a historic achievement for the state environment and economy.

If you have any questions please feel free to contact our office.

Sincerely,

Leslie T. Himes
 Chairman of the Board

Platinum Investor: Wells Fargo
 Gold Investors - Metropolitan Water District * Providence Tarzana Medical Center * Providence Holy Cross Medical Center
 Providence Saint Joseph's Medical Center
 Silver Investors - Alperstein, Simon, Farkas, Gillin & Scott * SoCalGas
 Bronze Investors - California Lutheran University * Valley Presbyterian Hospital
 Copper Investor ~ Van Nuys Los Angeles World Airports



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CHAMBERS of
COMMERCE

5121 Van Nuys Boulevard, Suite 2013
Sherman Oaks, California 91403

SANTA CLARITA, CA 913

18 SEP 2015 7:41 1



SEP 23 2015

BOCP / California Water Fix Comments
P.O. Box 1919
Sacramento, Ca 95812

REC 12532

95812191919



Mark D. Edwards
1201 1st Ave.
Walnut Grove, CA 95690

RECEIVED
SEP 23 2015

August 26, 2015

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

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.

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:

I have lived on the banks of Steamboat Slough on Ryer Island since 1962, and have witnessed the continuing degradation of the Delta and its unique ecosystem. It is plain to all, that there is not enough water in the Sacramento/San Joaquin River system to support existing and future water demands, while also providing for the natural habitat and ecosystem.

In recent years the Delta has become infested with non-native aquatic weeds that are choking channels and impacting water quality. It is my belief that the dramatic increase in undesirable non-native vegetation has been caused, in part, by the lack of stream flow – in recent times the rivers ran vigorously during the winter months, thereby flushing out much of the unwanted growth. Today, Steamboat Slough acts as a tidal slough year round – where in past years it flowed in one direction (towards the ocean) for ½ of the year. Drought and increased demands (and diversions) are the likely culprit.

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.

- 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.

- 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 seems to ignore 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.”

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.

- 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.

The EIR/EIS fails to adequately assess the economic and environmental impacts to the Delta region caused by the construction project. Local communities such as Hood, Courtland, and Walnut Grove will experience extensive and extended impacts caused by ongoing construction – spanning many years.

- 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 EIR/EIS Ignores Alternatives to Water Export:

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.

Our tax and ratepayer dollars would be much better spent on:

- More aggressive water efficiency program statewide that would apply to both urban and agricultural users.
- Funding water recycling and groundwater recharging 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.
- Improving Delta levees in order to address potential earthquake, flooding, and future sea level rise concerns at a cost between \$2 to \$4 billion and is orders of-magnitude less expensive than 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.

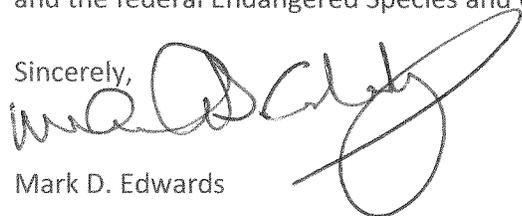
In Summary

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

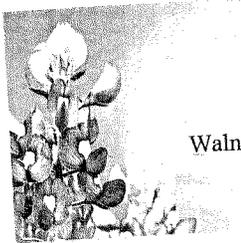
The new EIR/EIS has not adequately addressed my above stated concerns. That is why I oppose the Delta Tunnels/California Water Fix (Alternative 4A).

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,



Mark D. Edwards



Mark Edwards
1201 1st Ave
Walnut Grove, CA 95690-9754

SACRAMENTO CA 957

25 SEP 2015 PM 11



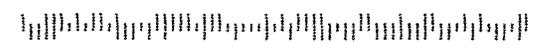
Liberty
FOREVER

SEP 23 2015

BDCP/WATER FIX COMMENTS
P.O. BOX 1919
SACRAMENTO, CA. 95812

RECI 2533

95812191910



RECIRC LTR # 534

- Unused – pure form
- Duplicate of _____
- Out of Scope
- Other:

(replace original)

From: Kristen Sparkes <ksparkes@raymorgan.com>
Sent: Friday, September 18, 2015 11:06 AM
To: BDCPcomments
Subject: STOP THE TUNNELS!!!!

PLEASE STOP THE TWIN TUNNELS!!!!

My family has a home on the river just south of Isleton and the effects of this will be horrible to the delta, ecosystem, fish, wildlife and the Sacramento Delta's existence!!

I grew up on this delta, my kids are now growing up and the water flow is already changing with the lack of rainfall – DO NOT DISRRUPT NATURE!!!

As a resident and registered voter of California, **I demand that the Twin Tunnels plan be rejected.** We need instead to bring together experts in all relevant fields to develop a plan that really does address California's water problems going forward, and does so in ways that conserve our financial resources and protect our wildlife, water quality, and environment.

The Twin Tunnels will cost the public about \$40-\$50 Billion and not create any new water.

- The original version of the Twin Tunnels plan--the Bay Delta Conservation Plan--was rejected last fall by the National Academy of Sciences, the U.S. Fish and Wildlife Service, and the Environmental Protection Agency. These and other federal agencies criticized the application's faulty science and fuzzy economics. Instead of modifying the plan, the Governor has stripped out almost all funds for mitigation of damage and has re-submitted the same Twin Tunnels plan under a new name.
- The Twin Tunnels will have the capacity to take in more than 100% of the current average flow of the Sacramento River, potentially stopping all freshwater flow into San Francisco Bay. Most of the diverted water will be delivered to unsustainable orchards in southern San Joaquin County.
- The Twin Tunnels will have the capacity to take in more than 100% of the current average flow of the Sacramento River, potentially stopping all freshwater flow into San Francisco Bay. Most of the diverted water will be delivered to unsustainable orchards in southern San Joaquin County.
- Likely environmental results of the Twin Tunnels project are the collapse of the Sacramento-San Joaquin-San Francisco Bay ecosystem, elimination of salmon and most other native fish species, reduction of endangered bird populations, periodic toxicity of shellfish, massive fish kills in San Francisco Bay, weeds and stagnant water along shorelines, and permanent disruption of offshore ecology.
- Predictable economic outcomes include severe effects on San Francisco's tourist and convention industries; a loss of appeal for the Bay Area as a site for new business location; a reduction of property values in communities near waterways; and an end to farming, sport fishing, and seasonal work in the Delta, Stockton, and adjacent areas of the Sacramento Valley.

Please Please Please Please Please – DO NOT PUT THE TUNNELS IN!!!!



Kristen Sparkes 

Senior Account Manager

Pleasanton

Office: 925-400-4164

Cell: 925-984-9256

Fax: 530-781-1042

www.raymorgan.com



From: Erik <ez_mail1@comcast.net>
Sent: Tuesday, September 22, 2015 11:53 PM
To: BDCPcomments
Subject: Opposition to the proposed Delta Tunnels

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

I am a licensed civil engineer so I know a little bit about project environmental impacts as well as the effects of stream and river flows on the surrounding areas. My family and I also happen to frequent the delta region for the past 20 years specifically Sherman Island so we have a pretty good sense of the changes over these last 20 years. We have seen firsthand what the drought is doing to this region with the reduction of fresh water flows through the delta rivers and streams. The Delta Tunnels project will clearly do nothing to help the current situation and most surely exacerbate it.

It is a project that will have significant short and long term detrimental environmental effects on a significant portion of the San Francisco Bay Delta. We have already seen significant changes over time due to reduced fresh water flows including the water having more salinity along with more salt water fish, less clarity, occurrences of toxic blue-green algae as well as population explosions of hyacinth in the water further impacting water quality, habitat and health.

With the tunnels, water flow through the delta is further reduced thus increasing these already harmful consequences of reduced fresh water flows. Two fish releases are being constructed in this vicinity which will too be further negatively impacted, reducing the chances of fresh water fish survival. These observations can be verified by the county park hosts as well as the multitude of water enthusiasts that frequent the Sacramento county park known as the Sherman Island fishing access located just south of Rio Vista California.

The Tunnel project does nothing to preserve and protect the levees that currently move the water supply while preserving the current eco system. The tunnel project also does nothing remotely to address sustainability but rather the opposite. What happens when more water is needed, longer, bigger and more tunnels? It has been mentioned that the tunnels will ensure the delivery of water in case of an earthquake where the levees may not hold however, it would be far less expensive and have less negative environmental impacts to reinforce existing levees as we are currently doing. More funding can too go into water conversation education & incentives promoting a much more sustainable approach to water management.

Furthermore, short term impacts of a construction project this size would require a significant amount of environmental mitigation because of the destruction of sensitive lands to accommodate the tunnel along its path as well as for other impacted areas for construction staging as well as places to deposit the massive amounts of dirt to accommodate the tunnels. These costs are often underestimated in the planning stages. And on large projects such as this, costs are underestimated even more since there are usually unforeseen environmentally and culturally sensitive discoveries during construction. This will require not only additional attention and resources to address, but more importantly they cause significant delays as well as increased (unbudgeted) capital costs for added mitigation.

It is not only surprising but frustrating, that our current governor, who promotes pro environmental efforts such as initiatives to reduce greenhouse gases, is also supporting the tunnel plan that has so many significant detrimental environmental effects.

Water is a finite resource. Please consider solutions to our water problems that are sustainable, more environmentally prudent and less destructive and costly.

Sincerely,

Erik Zechlin

1329 Freswick Drive.
Folsom CA, 95630

RECIRC536

From: Randy Pilgrim <rlpilgrim@pacbell.net>
Sent: Wednesday, September 23, 2015 2:10 PM
To: BDCPcomments
Subject: Delta Conservation

I would like to respectfully suggest that instead of thinking up new ways to divert Bay Delta Waters, or improving existing delivery systems, more time and effort should be spent on developing desalination projects up and down the California coast.

Desalination is the only NEW SOURCE of fresh water available to the state.

Improving the current aqueduct system or building new dams and reservoirs is not developing new sources, and in fact continues to rely on snow and rainfall that we are not getting.

I fully realize that desalination is not a perfect solution, but when you think about the consequences of running out of fresh water, it looks pretty good.

Sincerely

Randall Pilgrim
Foster City, Ca. 94404

From: Wendy Smith <wsmith022@gmail.com>
Sent: Wednesday, September 23, 2015 6:42 PM
To: BDCPcomments
Subject: Request DVD of Bay Delta Conservation Plan

To whom it may concern,

Please send a DVD of the Bay Delta Conservation Plan to my attention at the following address:

119 Granada Avenue
Long Beach, CA 90803

Thank you,

Wendy Smith
(650) 450-3372

From: Michelle MacKenzie <michellehmackenzie@gmail.com>
Sent: Wednesday, September 23, 2015 8:30 PM
To: BDCPcomments
Subject: I oppose the Delta Tunnels

I write because I am strongly against the Delta Tunnels plan. I am extremely concerned by the negative impact these tunnels would have on native wildlife that depend on the Delta's freshwater and migrating species (chinook, salmon, etc) that will be harmed by reduced water flow in the Delta. These migrating species, in turn, are important food sources for marine wildlife, including South Pacific Puget Sound Orcas. This in turn will damage California's fishing industry and wildlife/bird watching in the Delta. Instead of spending billions on these ill-conceived tunnels, we should work to, among other things, conserve more water, fund water recycling and groundwater recharging projects and retire damaged or polluted farmland in the south San Joaquin Valley. We must learn from Australia's drought - which citizens beat with conservation and low-tech methods, not pricey infrastructure projects or high tech fixes. Please reject the Delta Tunnels plan.

Sincerely,

Michelle MacKenzie
2607 Graceland Ave
San Carlos, CA 94070

From: Lloyd Gronning <lgronning@cpgms.com>
Sent: Thursday, September 24, 2015 9:33 AM
To: BDCPcomments
Subject: please add me to the e-mail update list

Lloyd J. Gronning, President

CPgMS

Capital Program Management Services, LLC

24506 E. Ottawa Ave.

Aurora, CO 80016

(720) 216-4383

lgronning@cpgms.com

From: Mendoza, Tiffany
Sent: Sunday, September 27, 2015 12:48 PM
To: BDCPcomments
Subject: FW: Comprehensive Water Plan for California/op-ed/open letter to Governor
Attachments: 20150917-Folsom Dam.jpg; Dr. Ali.jpg; Comprehensive Water Plan-For OP-ED- 2015-final.pdf; Comprehensive Water Plan For Press-Urging Governor-2015-exec summary.pdf; Dr. Ali-Senior Engineer-qualifications.pdf

From: Dr. Ali [mailto:prohomes@gmail.com]
Sent: Friday, September 25, 2015 4:09 PM
To: info@BayDeltaConservationPlan.com
Cc: Reviewing Board
Subject: Fwd: Comprehensive Water Plan for California/op-ed/open letter to Governor

Dear BayDeltaConservationPlan,

I appreciate all you do! <http://baydeltaconservationplan.com/ContactUs/ContactUs.aspx>

I am expert in this specific issue as a retired Senior Engineer from the State of California Department of Water Resources 25-year tenure at the Divisions of Planning, Engineering, and Flood Management.

Long story short, I have a far more environmentally friendly, comprehensive, and cost-effective plan that matches your assessment. I have been trying to get this published with the Sacramento Bee.

I can discuss over the phone if easier as I am a strong believer in garnering as many view points as possible before I bring it forward to my former colleagues.

Sincerely,
Dr. Ali

Ali Ghorbanzadeh, PhD, P.E, G.C.
Retired Senior Engineer, Department of Water Resources
25-year tenure at the Divisions of Planning, Engineering, and Flood Management

44431 S. El Macero Dr.
El Macero, CA. 95618
(530) 848-1100
Prohomes@gmail.com

----- Forwarded message -----

From: Reviewing Board <reviewingboard@gmail.com>
Date: Fri, Sep 25, 2015 at 12:29 PM
Subject: NOTICE TO PERFORM: Comprehensive Water Plan for California/op-ed/open letter to Governor
To: viewpoints@sacbee.com
Cc: "Dr. Ali" <prohomes@gmail.com>

Sent via e-mail only

RECIRC541

To: Sacramento Bee Staff
CC: Dr. Ali Ghorbanzadhe, PhD, P.E, G.C.

Attached is a photo of Folsom Dam as of September 17th, 2015. It may already be too late to save our water supply. We need to get moving fast and need your help and support.

Please send the costs to have this published if needed.

Very truly yours,
Sean Gorban
Assistant to Dr. Ali
UC Berkeley, Haas School of Business
CPA Candidate
510-684-4170

On Mon, Sep 14, 2015 at 12:36 PM, Dr. Ali <prohomes@gmail.com> wrote:
Dear Mr. Morain,

I emailed the following letter long with the accompanying attachments for your review and publication on the Sacramento Bee. I have left a few messages with no luck in receiving any reply. I believe that this proposed water plan and the professional critique of the Twin Tunnel , under ground Peripheral Canal, are quite important for the public to know.

I will be willing to pay the cost for publishing these critically important items that will benefit California immensely.

Your timely response is appreciated.

Dr. Ali
530-848-1100
Dr. Ali <prohomes@gmail.com>

Dear editorial Authority,

I worked for the State Department of Water Resources, DWR, for 25 years as a Senior Engineer and an expert in water issues. Took early retirement 10 years ago and have been doing private engineering consulting. Have been working on an alternative water plan that would increase the State's water supply by nearly 2 million acre-ft per year and has many other important advantages that are explained in the attached files to be published at the Bee.

I have attached an open letter to the Governor for considering this water plan rather than the Twin Tunnels and an Op-ed

Subject/News headline:

More fresh water, Better quality, Safer for environment, and fraction of time and cost to build (compared to the Twin Tunnels).

Please confirm receiving these items and the timeline for publication. I will be sending these to other press after I hear from you.

Sincerely,
Dr. Ali

REC1RC541

----- Forwarded message -----

From: **Reviewing Board** <reviewingboard@gmail.com>

Date: Monday, September 7, 2015

Subject: (ON BEHALF OF DR. ALI) Comprehensive Water Plan for California/op-ed/open letter to Governor

To: viewpoints@sacbee.com, dkasler@sacbee.com, Metro@sacbee.com, jpaquette@sacbee.com, dkunken@sacbee.com, jvillegas@sacbee.com, preese@sacbee.com, rsabalow@sacbee.com, RBenton@sacbee.com, dsiders@sacbee.com

Cc: "Dr. Ali Ghorbanzadeh" <prohomes@gmail.com>

Dr. Ali can be available to discuss or refine for publication if needed.

Thanks,

Sean

Assistant to Dr. Ali

====

Dear Sacramento Bee,
Subject/News Headline:

Adjustable hydraulic structure proposal near Carquinez Bridge is California's lifeline prevention from a Water Armageddon

Read More: Constricting the mouth of the Delta will bring in approximately 250% (two-and-half times) the current State Water Project allocation of fresh water, bring more consistency and reliability to our water supply, increased water quality, safer for the environment, and a fraction of the time and cost to build compared to the Twin Tunnels.

Background:

I worked for the State Department of Water Resources (DWR) for 25 years as a Senior Engineer and an expert in water issues. Took early retirement 10 years ago and have been doing private engineering and consulting. This alternative proposal to the Twin Tunnels water plan will increase the State's water supply by approximately 2,000,000 (two-million) acre-ft/year or 250% two-and-half times more than the current State Water Project allocation of 840,000 acre-ft fresh water for all Californians that was increased March 2, 2015. Many other important advantages are explained in the attached files to be published by the Sacramento Bee.

I have additionally attached an open letter to the Governor for considering this water plan rather than the Twin Tunnels and an Op-ed.

Please confirm receiving these items and the timeline for publication. I will be sending these to other press but prefer to publish with you first.

Sincerely,
Dr. Ali

Ali Ghorbanzadeh, PhD, P.E, G.C.
Retired Senior Engineer, Department of Water Resources
25-year tenure at the Divisions of Planning, Engineering, and Flood Management

44431 S. El Macero Dr.
El Macero, CA. 95618
(530) 848-1100
Prohomes@gmail.com

EXECUTIVE SUMMARY:

Comprehensive Water Plan for California:

An adjustable hydraulic structures designed to be installed at the mouth of Delta, in the vicinity of Carquinez Bridge, in order to constrict the waterway from over 3,300 feet in width to 100 feet opening connecting the Delta to the Bay during the extreme droughts such as the one that California has been experiencing for the past four years now. This would save outflow of freshwater (Net Delta Outflow) by 80% and reduce the advance of salty seawater into the Sacramento-San Joaquin Delta by the resulting restriction in the tidal actions. It is proposed to provide a combination of control gates that are operated to allow navigation of the boats and a continuously open section of 100 ft wide and to the full depth of the channel to allow continuous passage of all fish for freely migrating both seaward and landward. The open section is designed to allow establishment of the gradual salt, density, and temperature gradients essential for the fish to adjust and pass freely seaward as well as landward through the continuous opening. The gates designed to constrict the channel to be operated during boats and ship passages except for a few hours prior to the Lower Low Tide and an hour in advance of the High Low Tide. During those four hours of no navigation period, the difference in water levels on the landward and seaward of the hydraulic barrier gates is estimated to be the highest and up to a couple of feet.

The State Water Project (SWP) built in the 1960's by Governor Brown's father, Governor Pat Brown, is delivering only 20 percent as of March 2, 2015 of its promised allotment of over 4.2 million acre-ft. This proposal plan, *Comprehensive Water Plan for California*, will compliment the SWP by producing an additional approximately 2 million acre-ft of freshwater per year during the multiple years of drought and critical water-years such as what California is experiencing now and will surely in the future. This is equivalent to more than twice the capacity of Folsom Lake or nearly 50% additional water of the full allotment promised by the SWP. Keeping all of the upstream inflows into the Delta the same as the base condition, implementing this proposal for an adjustable hydraulic structure, we would have an additional of approximately 2 million acre-ft of freshwater readily available for allotment to the in Delta use as well as the SWP and CVP contractors by implementing this proposal. This will again augment California's water supply by more than twice the full capacity of Folsom Lake during the most needed and critical drought years.

The U.S. government's Central Valley Project (CVP) has been making no deliveries for the second straight year to many of its south-of-Delta customers, including Westlands and other districts in the San Luis & Delta-Mendota territory. This proposal will provide the additional fresh water critically needed here and now.

It is become a scientific fact that the sea level is rising due to climate change. The State Department of Water Resources is projecting a one foot rise in the see level by the year 2040 which would require an additional 200,000 acre-ft of fresh water that we do not currently have. For all the reasons described above and in the more detailed correspondence with Paul A. Marshall, California Department of Water Resources Chief of Bay Delta Office, who I have been engaged with for the past few months, I strongly encourage the Director of Department of Water Resources to consider this proposal more viable due to the fact that there has not been a better and more practical plan proposed thus far. Again, this proposal will produce approximately two million acre-ft of fresh water per year by simply saving the fresh water being currently wasted into the sea, provide security measures protecting against any potential island levee failure, and prevent degradation of the Delta water quality due to the sea level rising. The sea level rising

due to climate change is a certainty, demand for additional water supply is a certainty, protecting and enhancing the Delta water quality that improves the Delta environment is certainly essential, and providing a reliable water supply is certainly a core goal for the department and need of all Californians. This Comprehensive Water Plan for California will accomplish all of these vital elements with a far less adverse environmental impact as described below and far less costly than any other proposal introduced thus far.

Having worked with DWR for twenty-five years in a variety of capacities and retiring as a Senior Engineer being directly involved in development and application of the DWR's mathematical models to simulate every proposed hydraulic structure within the Delta to assess its viability, I am convinced that working together with the DWR staff, my former colleagues, that have great technical knowledge of the Delta hydrodynamics and effects of tidal actions on the Delta, we can best serve people of California by solving this water crisis and preventing a Water Armageddon.

Together, we can refine and examine different options and variations of the plan by using the mathematical models to create a hydraulically tighter communication between the Delta estuaries and the sea during low flow season while preserving the environmentally vital aspects of the connectivity between freshwater and seawater with again a minimum environmental adverse impact yet receiving paramount results.

Open letter to Governor Brown:**Description of the Comprehensive Water Plan for California**

I am proposing a “Comprehensive Water Plan for Californians (all inclusive)” that will provide an environmentally sound solution for the Sacramento-San Joaquin Delta which will accomplish the following objectives at a cost far less than the currently proposed Twin Tunnels Plan. The objective here is to only focus on the alternative proposal that will serve all Californians including the Delta environmental habitat and will:

1. Vastly augment the water supply via savings of the major amount of freshwater with a Total Dissolved Solids (TDS) in the amount less than 100 mg/lit (or 100 parts per million, PPM) being currently wasted into the sea by creating hydraulic barrier against salty seawater with a the TDS amounts nearly 40,000 mg/lit. The TDS amounts mentioned above (30,000 mg/lit and 200 mg/lit) of the freshwater saving during dry and critical water years (such as the current condition) is estimated to be nearly 2 millions acre-ft per year (equivalent of more than twice the total capacity of Folsom Lake or more than 50% the full capacity of the SWP’s total yield during wet years. This study is based on the DWR data and estimates of the Net Delta Outflow of 267,683 acre-ft and Sacramento River flow of 427,327 acre-ft during the period covering May 20, 2015 through June 18, 2015.
2. Prevent water quality degradation by reducing the amount of seawater intrusion into the Delta via adjusting the size of the opening channel right at the source, mouth of Delta, that will transfer the saltwater and freshwater mixing zone westward towards the Bay while preserving a healthy transition from freshwater to saltwater vital for the fish life and migration and Delta environment.
3. Increase water levels adjacent to the proposed hydraulic structures at the Delta side to prevent seawater intrusion into the Delta due to projected sea level rises.
4. Increase safety controls during catastrophic events such as earth quakes that can cause levee breaks or tsunamis which would create inundation of major part of the Delta by saltwater that could damage the Delta and indefinitely interrupt the water supply for most of Californians.

This proposal for a Comprehensive Water Plan for Californians is based on installing a set of hydraulic structures of different and adjustable openings at the mouth of Delta, vicinity of Carquinez Bridge, that will:

1. Provide freely and continuous fish travel but controlled and adjustable water flow in either direction, seaward and landward, through adjustable openings within the proposed hydraulic gates.
2. Include controlled passage for ships and navigation in either direction.
3. Cost far less than the \$15.5 billion estimated cost for the 30 miles of Twin Tunnels.
4. Totally unrestricted flow of water and navigation in either direction during the wet season or any time deemed necessary.

I have the expertise and calling to work together with my previous colleagues at DWR, so I can further refine and test the viability of my Comprehensive Water Plan proposal. This issue, as you know, is of paramount importance to the people of California whom I owe a lot of my great success both educationally and financially after being a part of this great nation for more than four decades now. While my time is much more valuable to managing my personal investments, I am offering my expertise to give back to the state and people of California at this time of need for absolutely no compensation.

I have a proven track record of success by rising from the lowest 1% of the worldwide socioeconomic status to the upper 1% by obtaining a top quality education, working tirelessly, and always putting ethics above profit. I fully believe this is possible only in the wonderful United States of America and I'm fortunate to be a part of this great nation of immigrants! I have no need for any personal gain and I do remember watching YOU (a young, handsome, idealistic, and energetic Jerry Brown) speaking to a crowd at UC Davis back in 1975 that inspired me very much. It was eye-opening for me to see you choosing to live in a small, humble apartment and accept a very small monthly pay as the Governor of the 7th largest economy in the world rather than living lavishly like so many in your position in the past have done.

I strongly urge you, Governor Brown, to reconsider the Twin Tunnel idea and allow me to present my idea of fixing the Delta and saving ALL Californians both from the Southern and Northern part of the State both environmentally and financially.

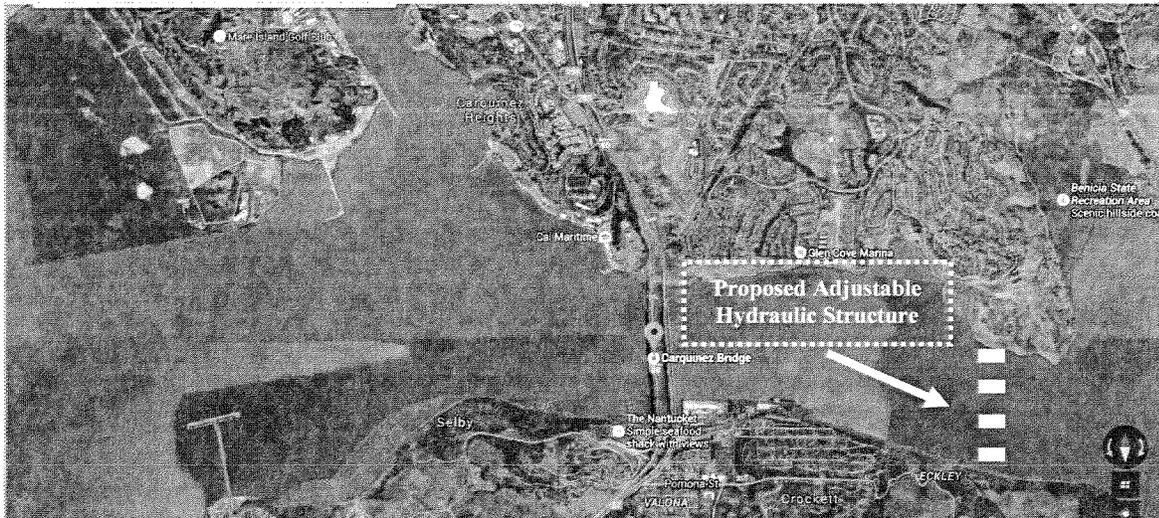
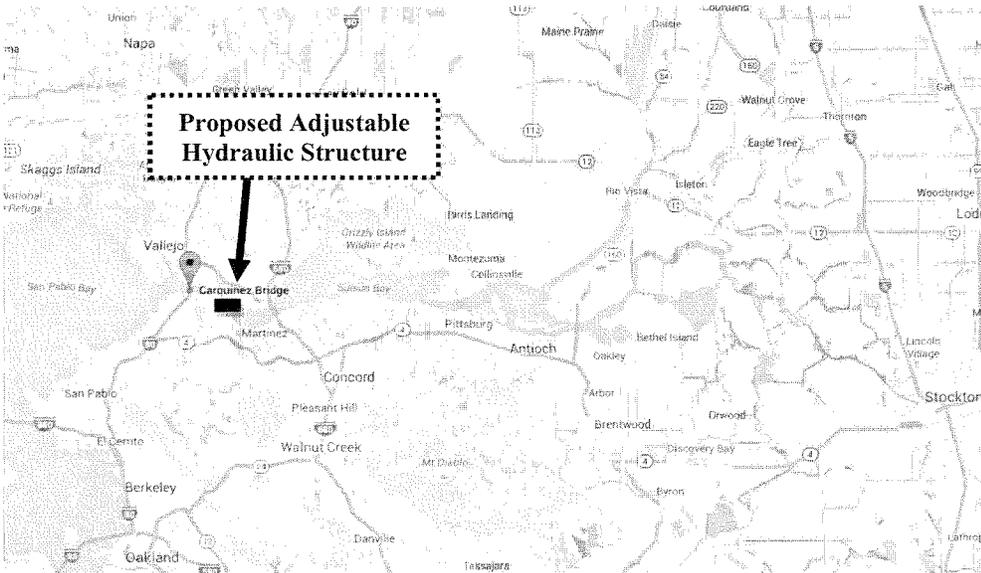
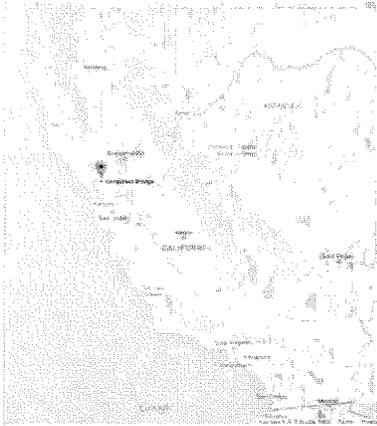
Respectfully,

Dr. Ali

Ali Ghorbanzadeh, PhD, P.E., G.C.

Retired Senior Engineer, Department of Water Resources

25-year tenure at the Divisions of Planning, Engineering, and Flood Management



Source: Google Maps

Summary of Qualifications

Ali Ghorbanzadeh (Alan Gorban), Ph.D., P.E.

POSITION: Senior Engineer, W.R.

EDUCATION: B.S., (cum laude) Ag. Engineering, Irrigation and Reclamation, 1973
M.S. Water Science & Irrigation Engineering, Univ. of Calif. Davis, 1976
Ph.D. Civil Eng., Groundwater Hydraulics, Univ. of Calif. Davis, 1980
(Minors in soil mechanics and Water Science)

REGISTRATION: Registered Civil Engineer, State of Calif. No. 34694

EXPERIENCE: **June 2005 to Present: Private Consultant**

After the temporary retirement from my job as a Senior Engineer with DWR, I established my own Engineering Consulting Company that is focused on providing Hydrodynamics and Water Quality solutions for the Sacramento-San Joaquin Delta estuaries and Flood Management issues of the North Delta through the NETWORK/DWOPER model that I have developed. General Engineering tasks such as structural calculations for single family dwellings, site plan developments for new subdivisions maps, erosion controls, design and construction of small earth dams, and seepage analyses and drainage problems have been covered. As part of the other activities, my firm has been involved in Real Estate developments and investments.

Planning, leading, organizing, and managing various groups of subcontractors and individual employees and dealing with the clients and customers to perform the tasks accomplished by my firm, has been an invaluable and challenging experience and seasoned me quite well.

June 1986 through December 2004: Division of Planning, Department of Water Resources

While working as an Associate Eng., Senior Eng. (supervisor), and technical Senior Engineer (E-48) for the Division of Planning, I gained extensive knowledge of the functions and operations of SWP, CVP, and was directly involved in development and application of mathematical models to analyze hydrodynamics and water quality in the Sacramento-San Joaquin Delta estuaries congruent with the State and Federal projects pumping operations. I was responsible for planning and conducting the mathematical model runs in support of the South Delta, North Delta, and West Delta Water Management Programs.

In addition to the technical work, I was assigned the task of budgeting, the Budget Change Proposals, BCP, and negotiating and processing Program Cost Assignments (DWR 1498 agreements) for the section.

In collaboration with the U.S. Army Corps of Engineers staff and the National Hydrologic Center, I developed the transient flood modeling capability by using DWOPER/NETWORK to analyze the North Delta flooding, which was an essential part of the North Delta Water Management Program.

I Developed the Agricultural Drainage Return Quality Model, which was applied to the Delta and used in the DWRDSM Model.

I developed the mathematical equations for the existing 4 culverts and 6 new over the levee siphons at Tome Pane Sl., the Temporary (seasonal) Barriers at Grant Line Canal and Middle River, and dredging of different reaches of these estuaries to raise the water levels for irrigation and to enhance water quality in South Delta. Made frequent field visits to the areas for designing these hydraulic structures and proper dredging so that the slope stabilities of the levees were not compromised.

June 1981 – May 1986: Division of Engineering, Department of Water Resources

During five years, while working with the Civil Design Section of the D.O.E, I was involved in design of earth dams (levees), canals, and geothermal power plants. I was assigned from DOE to lead the research at the Hydraulics Laboratory of U.C.D. for designing and running the experiments for the Intake Structure of the Peripheral Canal. The results were presented to DWR as three reports co-authored with the faculty of UCD.

I worked on the dredging and levee maintenance of Barker and Lindsey Sloughs involving the North Bay Aqueduct pumping station at Barker Sl.

June 1979 – May 1981: Division of Flood Management, Department of Water Resources

I applied my theoretical knowledge of Flood modeling and Flood forecasting while working with the Flood forecasting Section. That included understanding of the Precipitation/Runoff relationships and the infiltration characteristics of different media. Making field trips for the flooded areas and threaten levees was as part of the job.

September 25th, 2015

Ali Ghorbanzadeh, PhD, P.E, G.C.
 44431 S. El Macero Dr.
 El Macero, CA. 95618
 (530) 848-1100
Prohomes@gmail.com

Subject/News Headline:

Adjustable hydraulic structure proposal near Carquinez Bridge is California's lifeline prevention from a Water Armageddon

Read More: Constricting the mouth of the Delta will bring in approximately 250% (two-and-half times) the current State Water Project allocation of fresh water, bring more consistency and reliability to our water supply, increased water quality, safer for the environment, and a fraction of the time and cost to build compared to the Twin Tunnels.

This Op-ed is to strongly urge the support of All Californians to contact your legislature and Governor Brown, to reconsider the Twin Tunnel idea and support this proposal for an adjustable hydraulic structure near the Carquinez Bridge to bring a comprehensive water plan for all Californians. This proposal compares itself to the Twin Tunnels proposal. The facts of this Comprehensive Water Plan for all Californians proposal are:

- Provides more freshwater supply, approximately 2,000,000 (two-million) acre-ft/year or 250% two-and-half times more than the current State Water Project allocation of 840,000 acre-ft fresh water for all Californians that was increased March 2, 2015. Engineering analysis is done based on the Hydrology Data published by the State Department of Water Resources, DWR, for the period of May 20, 2015 through June 18, 2015.
 - This is equivalent of providing more than twice the full capacity of Folsom Lake to become available every year for the Delta, State Water Project (SWP), and Central Valley Project (CVP) by reducing the outflow of fresh water into the ocean by 80% via constricting with the adjustable hydraulic structure controlling at the mouth of the Delta near the Carquinez Bridge during extreme droughts.
- Provides increased safety, water supply reliability and water quality improvement that will prevent the Delta against salt water inundation during levee breaks and/or earthquakes with the ability to close the adjustable hydraulic structure.
- Far less costly: A fraction of the cost of Twin Tunnels and the proposal will save the State of California tens of billions dollars that can be reallocated to other projects.
 - This plan would have provided or saved nearly eight million acre-ft of freshwater, or the equivalent of over ten times the full capacity of Folsom Lake, during the past four years of this drought. Using an estimate at \$125.00 per acre-ft, in contrast to desalinization costs of approximately \$3,000.00 per acre-ft, all of the cost of this proposal would have more than paid for itself.
- Far easier to build: Only need to build one adjustable hydraulic structure at one location. This proposal can be implemented now before it is too late and there is Water Armageddon.

- Far more environmentally sound: Allows continuous passage for all fish migration through a proposed 100 feet wide opening to the full depth of channel at the hydraulic control location. This will provide a gradual change in water quality, salinity, temperature, and density gradient essential for fish life to adjust to the water changes.
- Improves water quality in the Delta as a result of up to 80% reduction in tidal exchange of the salty ocean water (containing the Total Dissolved Solids, TDS, of 30,000-40,000 mg/lit) with the fresh water (containing TDS values of 100-200 mg/lit) created by the proposed hydraulic constriction at the mouth of the Delta. By keeping the upstream Delta inflows unchanged it eliminates any environmental impacts upstream, while improving water quality within the Delta.
- Allows controlling passage for navigation of ships during extreme droughts. During droughts, the Department of Water Resources may consider limiting the navigation period to 20 (twenty) hours per day with the proposed adjustable hydraulic structure that is designed to reduce the width of channel near Carquinez Bridge from approximately 3,300 feet to 100 feet of continuous opening for fish passage. Unrestricted flow of water and navigation in either direction during the wet season, high flow, or any time deemed necessary.
- Protects the Delta from climate change with the hydraulic barrier against sea level rising. The State Department of Water Resources is projecting a one foot rise in the sea level by year 2040 which would require additional 200,000 acre-ft of fresh water (that we do not have) just to keep the same water supply situation as it is now.

The Twin Tunnels proposal is far too costly (both financially and environmentally), will take too long to build, provide no additional water supply or protection against levee/earthquake breaks or sea level rise due to climate change that will inundate the Delta by salty Ocean water.

Additionally, the Twin Tunnels proposal will leave more than one billion pounds of salt per year within the Delta by transferring fresher water directly from Sacramento River for the water users south of SWP and CVP pumps. It is estimated that the water flowing into the Twin Tunnels (to be transferred out of the Delta and to the South) would contain approximately 100 mg/lit less salts than what is being currently transported after mixing that occurs in the Delta. Transporting nearly 4 million acre-ft per year of source water at 100 mg/lit less in salts would amount to an additional nearly one billion pounds of salt per year accumulated in the Delta. Naturally, the remaining water mixed in the Delta would be degraded in quality and it would impact the productivity of the Delta farmlands and all the Delta water users.

It does not need to be a zero-sum game, and we can actually raise the water supply level to help all Californians so all boats float higher. Now you know the facts that will help ALL of California. Go get everyone on the same page and I am here to make sure this is done right and timely so we all can continue to enjoy the California Sun and Water.

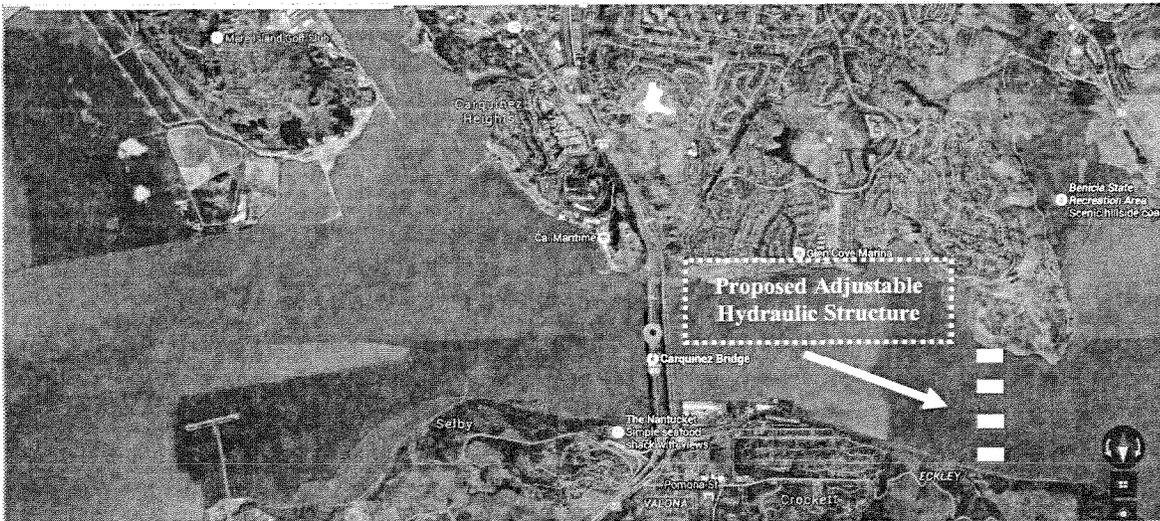
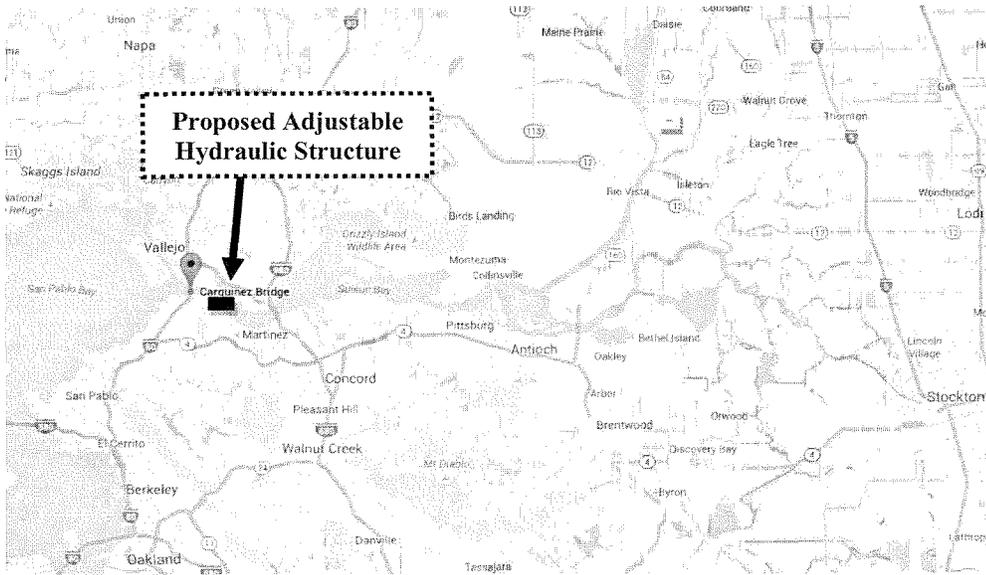
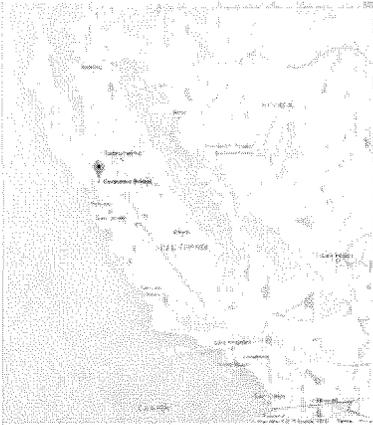
Pass me a full glass of water,

Dr. Ali

Ali Ghorbanzadeh, PhD, P.E., G.C.

Retired Senior Engineer, Department of Water Resources

25-year tenure at the Divisions of Planning, Engineering, and Flood Management



Source: Google Maps

RECIRC541



From: Mendoza, Tiffany
Sent: Monday, September 28, 2015 7:31 AM
To: BDCPcomments
Subject: FW: Comprehensive Water Plan for California/op-ed/open letter to Governor
Attachments: Screenshot_2015-09-27-19-37-41-1.png; Screenshot_2015-09-27-20-00-55.png; 20150917-Folsom Dam.jpg

From: Reviewing Board [mailto:reviewingboard@gmail.com]
Sent: Monday, September 28, 2015 12:17 AM
To: Dr. Ali
Cc: info@baydeltaconservationplan.com
Subject: Re: Comprehensive Water Plan for California/op-ed/open letter to Governor

You may have seen this horrible article reprinted in the Sacbee on Friday about Wall Street wanting to own our water.

<http://www.sacbee.com/news/article36520809.html> **Investors mine for water, the next hot commodity**

Attached is a photo of Folsom Dam as of September 22nd and 17th, 2015. 18% current water level. <http://cdec.water.ca.gov/cdecapp/resapp/resDetailOrig.action?resid=FOL>

On Friday, September 25, 2015, Dr. Ali <prohomes@gmail.com> wrote:
Dear BayDeltaConservationPlan,

I appreciate all you do! <http://baydeltaconservationplan.com/ContactUs/ContactUs.aspx>

I am expert in this specific issue as a retired Senior Engineer from the State of California Department of Water Resources 25-year tenure at the Divisions of Planning, Engineering, and Flood Management.

Long story short, I have a far more environmentally friendly, comprehensive, and cost-effective plan that matches your assessment. I have been trying to get this published with the Sacramento Bee.

I can discuss over the phone if easier as I am a strong believer in garnering as many view points as possible before I bring it forward to my former colleagues.

Sincerely,
Dr. Ali

Ali Ghorbanzadeh, PhD, P.E, G.C.
Retired Senior Engineer, Department of Water Resources
25-year tenure at the Divisions of Planning, Engineering, and Flood Management

44431 S. El Macero Dr.
El Macero, CA. 95618
(530) 848-1100
Prohomes@gmail.com

REGTRC542

----- Forwarded message -----

From: **Reviewing Board** <reviewingboard@gmail.com>

Date: Fri, Sep 25, 2015 at 12:29 PM

Subject: NOTICE TO PERFORM: Comprehensive Water Plan for California/op-ed/open letter to Governor

To: viewpoints@sacbee.com

Cc: "Dr. Ali" <prohomes@gmail.com>

Sent via e-mail only

To: Sacramento Bee Staff

CC: Dr. Ali Ghorbanzadhe, PhD, P.E, G.C.

Attached is a photo of Folsom Dam as of September 17th, 2015. It may already be too late to save our water supply. We need to get moving fast and need your help and support.

Please send the costs to have this published if needed.

Very truly yours,

Sean Gorban

Assistant to Dr. Ali

UC Berkeley, Haas School of Business

CPA Candidate

510-684-4170

On Mon, Sep 14, 2015 at 12:36 PM, Dr. Ali <prohomes@gmail.com> wrote:

Dear Mr. Morain,

I emailed the following letter long with the accompanying attachments for your review and publication on the Sacramento Bee. I have left a few messages with no luck in receiving any reply. I believe that this proposed water plan and the professional critique of the Twin Tunnel , under ground Peripheral Canal, are quite important for the public to know.

I will be willing to pay the cost for publishing these critically important items that will benefit California immensely.

Your timely response is appreciated.

Dr. Ali

530-848-1100

Dr. Ali <prohomes@gmail.com>

Dear editorial Authority,

I worked for the State Department of Water Resources, DWR, for 25 years as a Senior Engineer and an expert in water issues. Took early retirement 10 years ago and have been doing private engineering consulting. Have been working on an alternative water plan that would increase the State's water supply by nearly 2 million acre-ft per year and has many other important advantages that are explained in the attached files to be published at the Bee.

I have attached an open letter to the Governor for considering this water plan rather than the Twin Tunnels and an Op-ed

Subject/News headline:

More fresh water, Better quality, Safer for environment, and fraction of time and cost to build (compared to the Twin Tunnels).

RECIRC542

Please confirm receiving these items and the timeline for publication. I will be sending these to other press after I hear from you.

Sincerely,
Dr. Ali

----- Forwarded message -----

From: **Reviewing Board** <reviewingboard@gmail.com>

Date: Monday, September 7, 2015

Subject: (ON BEHALF OF DR. ALI) Comprehensive Water Plan for California/op-ed/open letter to Governor

To: viewpoints@sacbee.com, dkasler@sacbee.com, Metro@sacbee.com, jpaquette@sacbee.com, dkunken@sacbee.com, jvillegas@sacbee.com, preese@sacbee.com, rsabalow@sacbee.com, RBenton@sacbee.com, dsiders@sacbee.com

Cc: "Dr. Ali Ghorbanzadeh" <prohomes@gmail.com>

Dr. Ali can be available to discuss or refine for publication if needed.

Thanks,

Sean

Assistant to Dr. Ali

====

Dear Sacramento Bee,
Subject/News Headline:

Adjustable hydraulic structure proposal near Carquinez Bridge is California's lifeline prevention from a Water Armageddon

Read More: Constricting the mouth of the Delta will bring in approximately 250% (two-and-half times) the current State Water Project allocation of fresh water, bring more consistency and reliability to our water supply, increased water quality, safer for the environment, and a fraction of the time and cost to build compared to the Twin Tunnels.

Background:

I worked for the State Department of Water Resources (DWR) for 25 years as a Senior Engineer and an expert in water issues. Took early retirement 10 years ago and have been doing private engineering and consulting. This alternative proposal to the Twin Tunnels water plan will increase the State's water supply by approximately 2,000,000 (two-million) acre-ft/year or 250% two-and-half times more than the current State Water Project allocation of 840,000 acre-ft fresh water for all Californians that was increased March 2, 2015. Many other important advantages are explained in the attached files to be published by the Sacramento Bee.

I have additionally attached an open letter to the Governor for considering this water plan rather than the Twin Tunnels and an Op-ed.

Please confirm receiving these items and the timeline for publication. I will be sending these to other press but prefer to publish with you first.

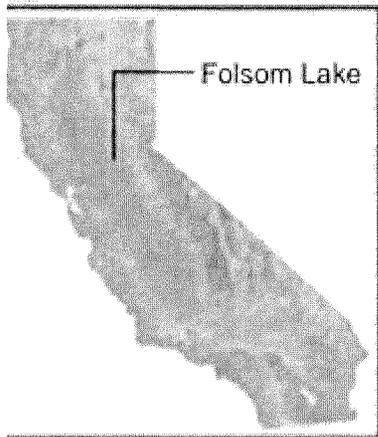
Sincerely,
Dr. Ali

Ali Ghorbanzadeh, PhD, P.E, G.C.
Retired Senior Engineer, Department of Water Resources
25-year tenure at the Divisions of Planning, Engineering, and Flood Management

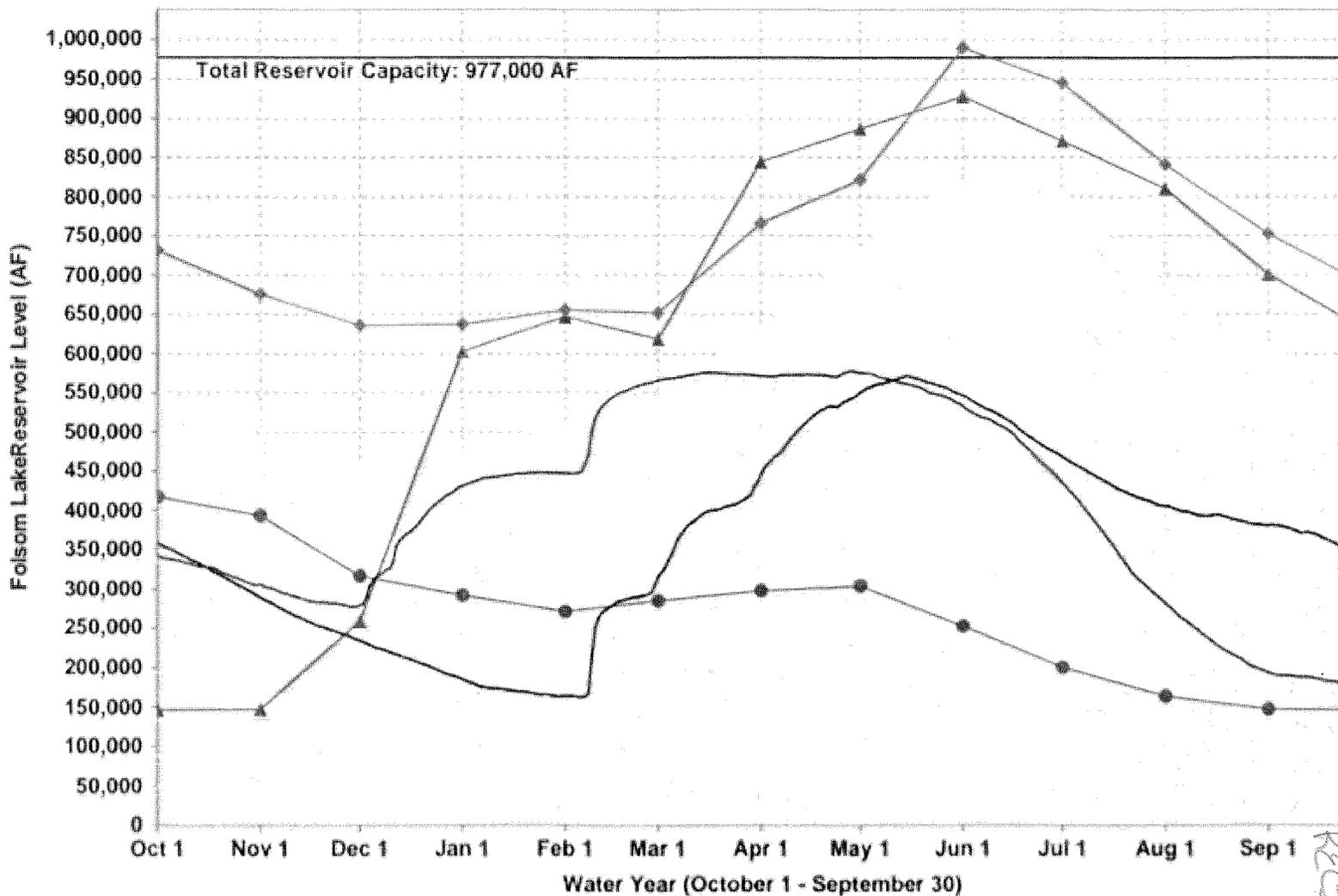
44431 S. El Macero Dr.
El Macero, CA. 95618
(530) 848-1100
Prohomes@gmail.com



Reservoir Conditions - Folsom Lake

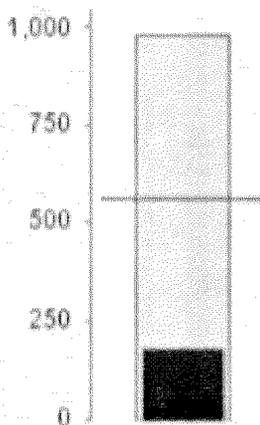


Folsom Lake Levels: Various Past Water Years and Current Water Year, Ending At Midnight September 26, 2015



Folsom Lake Conditions

(as of Midnight - September 26, 2015)



Current Level: 177,469 AF

18% (Total Capacity) | 32% (Historical Avg.)

Historical Average — Total Reservoir Capacity ● 1976-1977 (Driest) ▲ 1977-1978 ◆ 1982-1983 (Wettest) — 2013-2014
 — Current: 2014-2015

RECIRC542



RECIRC 542



From: Barbara Landis <minniedaisys@sbcglobal.net>
Sent: Friday, September 25, 2015 2:50 PM
To: BDCPcomments
Subject: Delta Tunnels

Please do not let this happen. I am totally against it.

From: Patricia Cunningham <cpwc@att.net>
Sent: Sunday, September 27, 2015 6:08 PM
To: BDCPcomments
Subject: Delta tunnels

State of California,

We want to state our disapproval and vote against the Delta tunnels. This would be a giant and irreversible mistake for the State to pursue. Our continued manipulation of the environment only shows that humans are clever, not intelligent. We must protect this Earth.

Thank you,

Charlie & Patricia Cunningham

From: Jim Nelson <nelsonj27@sbcglobal.net>
Sent: Friday, September 25, 2015 2:20 PM
To: BDCPcomments
Subject: Bay Delta Conservation Plan

Hello,

I think the Bay Delta Conservation Plan should not go forward as it will divert even more water from the delta and cause even more environmental harm. Too much water is already being diverted from our rivers and delta and salmon populations are crashing and the delta has salt water intrusion. Conservation and much more efficient use of agricultural water is a much better and much cheaper option.

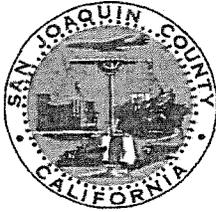
Thank You,

Jim Nelson
3532 Dutch Way
Carmichael, CA 95608

L # 546

- Unused
- Duplicate of 465
- Out of Scope
- Other: _____

(replace original)



BOARD OF SUPERVISORS

44 NORTH SAN JOAQUIN STREET, SUITE 627
STOCKTON, CALIFORNIA 95202
TELEPHONE: 209/468-3113
FAX: 209/468-3694

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Fifth District

August 24, 2015

The Honorable Governor Jerry Brown
State Capitol, Suite 1173
Sacramento, CA 95814

John Laird, Secretary
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

The Honorable Sarah "Sally" Jewell, Secretary
United States Department of the Interior
1849 C Street, NW, Room 6156
Washington, D.C. 20240

The Honorable Penny S. Pritzker, Secretary
United States Department of Commerce 1401
Constitution Avenue, NW Washington, D.C.
20230

The Honorable Regina A. McCarthy, Administrator
United States Environmental Protection Agency 1200
Pennsylvania Avenue, NW, Room 3000
Washington, D.C. 20460

755845

Dear Governor Brown, Secretaries Laird, Jewell and Pritzker, and Administrator McCarthy:

We write to urge you to provide an additional 60-day extension to the comment period on the recently released Bay-Delta Conservation Plan (BDGP)/California "WaterFix" and the partially Recirculated Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) to December 29, 2015.

We appreciate the recent 60-day extension to October 30, 2015, but as you know, the RDEIR/SDEIS contains substantial changes from the initial public draft. The RDEIR/SDEIS amounts to nearly 8,000 pages of additional documentation. Additionally, we have been informed that the responsible agency will not consider any of our previous comments applicable to the new alternatives, despite the many similarities. As a result we are faced with cross-referencing all of the previous comments to ensure that the responsible agency is fully aware of all of our concerns.

Given the size and complexity of the documents, particularly in light of the 40,000 pages associated with the original draft EIR/EIS, and the need to cross-reference previously submitted comments, we strongly believe the current public comment period is inadequate. Affording an additional 60 days, beyond the current review period, is clearly warranted and justified.

Thank you for your consideration.

Sincerely,

Katherine Miller, Chair
San Joaquin County Board of Supervisors

From: Rieker, Jeffrey <jrieker@usbr.gov>
Sent: Wednesday, September 30, 2015 8:07 AM
To: BDCPcomments
Cc: Theresa Olson; Michelle Banonis; Lisa Navarro; Janet Sierzputowski; Kristin Kaggerud
Subject: BDCP/CWF Correspondence to Interior
Attachments: DOC007.pdf

Greetings,

Attached is correspondence received by the Department of the Interior pertaining to BDCP/California Water Fix.

Please let me know if you have questions or need additional info.

Thanks,
Jef

Jeffrey Rieker
Mid-Pacific Regional Liaison
Bureau of Reclamation
Office: 202-513-0669; Mobile: 916-214-7555
jrieker@usbr.gov

From: Rick Mick <rmick@biologicaldiversity.org>
Sent: Tuesday, September 29, 2015 12:01 PM
To: BDCPcomments
Subject: Oppose the Delta Tunnels (California WaterFix, Alternative 4A)

FORM
MASTER
#6

Dear BDCP Officials,

[CENTER FOR
BIOLOGICAL DIVERSITY]

I am writing to express my strong opposition to the Delta Tunnels plan. The so-called "California WaterFix" will not produce more water, create more reliable supplies or improve environmental conditions in the delta. Instead it will unacceptably jeopardize the existence of endangered salmon runs and other native fish populations in the Sacramento River and Bay-Delta estuary.

The WaterFix fails to meet the restoration goals of 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 the state while protecting and restoring the delta's cultural, recreational, natural resource and agricultural values. The WaterFix is simply a plan to export more water out of the Bay-Delta estuary. The Delta Tunnels will not provide more reliable water because the delta watershed is already oversubscribed by five times in normal water years.

Far less expensive and less environmentally destructive alternatives to the Delta Tunnels were largely ignored -- alternatives that would save taxpayers billions of dollars, while investing in the jobs and local water sources that build sustainability. The plan does not seriously consider any alternatives other than new, upstream conveyance. And the decision-making process has tilted in favor of increasing delta water exports. For all these reasons, I urge you to reject this harmful project.

Sincerely,

Rick Mick
224 S 3rd Ave
Tucson, AZ 85701
US

From: Barbara Moore <Barbara.Moore@longbeach.gov>
Sent: Wednesday, September 30, 2015 2:26 PM
To: BDCPcomments
Subject: Contact Update
Attachments: FullSizeRender.jpg

Hello,

We just received a postcard addressed to Councilman Patrick O'Donnell. He is no longer the councilmember for the 4th District of Long Beach, Daryl Supernaw is the current councilman. Can you please update your mailing list to reflect the change.

Thanks for the help!

Go Fourth!

Barbara Moore

Field Deputy
Office of Councilman Daryl Supernaw
Fourth District, City of Long Beach
333 W. Ocean Blvd., 14th Floor
Long Beach, CA 90802
Phone: 562-570-4444



From: Sean <sean.gorban@gmail.com>
Sent: Tuesday, September 29, 2015 4:03 PM
To: BDCPcomments
Subject: Sign up for email update

Please sign me up for updates.