

**From:** Earthjustice <action@earthjustice.org> on behalf of Carla Babrick  
<info@earthjustice.org>  
**Sent:** Friday, October 23, 2015 10:07 AM  
**To:** BDCPcomments  
**Subject:** Oppose the Delta Tunnels/"California Water Fix" (Alternative 4A)

Oct 23, 2015

Bay Delta Conservation Plan  
CA

Dear Conservation Plan,

Let's not do the Delta Tunnels Project. I live in Missouri and I love almonds, but I no longer buy them, given the drought in your state and the other misuses of water occurring there (eg, Nestlé's continual taking of water from the state when some of its citizens have none). We don't need to ruin the land for private interests.

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

The deceptively named "California Water Fix" does not address the multitude of adverse environmental, public health, and economic impacts the proposed Delta tunnels project would cause. Further, the plan ignores alternatives that would save California tax- and ratepayers billions of dollars, while investing in jobs and local water sources that build sustainability, instead of severely damaging the Delta and Bay ecosystems.

I urge you not to permit the Delta Tunnels/California Water Fix (Alternative 4A) project to move forward.

Sincerely,

Ms. Carla Babrick  
1311 N 3rd St Apt B  
Saint Charles, MO 63301-2111  
carlajeanbabrick@outlook.com

**RECIRC LTR #** 2095

- ☒ Unused — form
- ☐ Duplicate of \_\_\_\_\_
- ☐ Out of Scope
- ☐ Other:

(replace original)

---

**From:** John Ehmen <jehmen66@gmail.com>  
**Sent:** Friday, October 23, 2015 12:43 PM  
**To:** BDCPcomments  
**Subject:** twin tunnels

my name is john ehmen. i am a resident of ripon ca. im at 1296 w4th street. i have a boat and spend a lot of time on the dela. i am very opposed to the twin tunnel project. delta has enough problems. i will not support a candidate in favor of the tunnels

**From:** CLIVESNEDKER@comcast.net  
**Sent:** Friday, October 23, 2015 12:45 PM  
**To:** BDCPcomments  
**Subject:** Bay Delta Conservation Plan

Dear Sirs,

The Bay Delta Conservation Plan (the "Delta Tunnels") is a badly thought out plan that will decimate the fish and destroy the California Delta and as such, I would like this e-mail registered as a firm "NO" against the plan.

Yours faithfully

Clive J, Snedker  
2306 Pepper Tree Lane  
Manteca, CA 95336

**From:** Kathleen Threlfall <kathleenthrelfall@gmail.com>  
**Sent:** Friday, October 23, 2015 8:49 AM  
**To:** BDCPcomments  
**Subject:** I oppose the Delta Tunnels/California Water Fix plan

I live and work on a five generation family farm outside of Rio Vista, Ca.  
I am an avid stand-up paddler on local waters.

Please consider the many viable and economically responsible alternatives to the seriously flawed, outmoded, and destructive Delta Tunnels/California Water Fix Plan. I strongly oppose this insanely expensive, environmentally catastrophic plan. I support the principles of the Delta Reform Act, this plan does not.

Kathleen Threlfall  
2915 Azevedo Rd  
Rio Vista, CA 94571

**From:** k etcheberry <kerryetcheberry@gmail.com>  
**Sent:** Friday, October 23, 2015 11:42 AM  
**To:** BDCPcomments  
**Subject:** Delta Tunnels

I am a lifelong resident of San Joaquin County. I cherish the Sacramento-San Joaquin Delta. I know how important the Delta is to our local economy. The Delta's integrity cannot withstand the current proposed project. If the current project is implemented, it will be detrimental for all of the residents of San Joaquin County and the environment. I was an intern in then Senator John Garamendi's office in 1982. I became well versed on the proposed Peripheral Canal. The concerns then remain the same to this day. There has to be a better compromise to send water to Southern CA without forever changing a unique and important part of the state of California. I urge the Governor, the DWR and the US Bureau of Reclamation to shelve the current "Water Fix" proposal and find a more reasonable solution for water diversion.

Thank you for your consideration,  
Kerry E. Etcheberry

**From:** Lindsay Anderson <landerson@ocbc.org>  
**Sent:** Friday, October 23, 2015 11:35 AM  
**To:** BDCPcomments; governor@governor.ca.gov  
**Subject:** Comment Letter - CA Water Fix  
**Attachments:** CA Water Fix docx.pdf

Please see the attached comment letter.

**Lindsay Anderson**

Legislative Analyst  
Orange County Business Council

2 Park Plaza, Suite 100 | Irvine, CA 92614  
Tel: 949.794.7218  
Fax: 949.476.9240  
Cell: 949.241.9447  
[landerson@ocbc.org](mailto:landerson@ocbc.org)



Join the Leading Voice of Business in Orange County...  
[www.ocbc.org](http://www.ocbc.org)



ORANGE COUNTY  
BUSINESS COUNCIL

2 Park Plaza, Suite 100 | Irvine, CA 92614 | P 949.476.2242 | F 949.476.0043 |

October 23, 2015

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

cc: Governor Jerry Brown

**RE: SUPPORT ALTERNATIVE 4A OF CALIFORNIA WATER FIX**

Dear BDCP/Water Fix Comments:

**On behalf of Orange County Business Council, 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 restore 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  $\frac{2}{3}$  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.

October 23, 2015

Page 2 of 2

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,

A handwritten signature in black ink, appearing to read 'B. Starr', with a stylized flourish at the end.

Bryan Starr  
Senior Vice President Government Affairs

**From:** rogerjackyoung@reagan.com  
**Sent:** Friday, October 23, 2015 3:27 PM  
**To:** BDCPcomments

please email info

**From:** Mendoza, Tiffany  
**Sent:** Friday, October 23, 2015 3:11 PM  
**To:** BDCPcomments  
**Subject:** Fwd: Contact information for comment letter

Sent from my iPhone

Begin forwarded message:

**From:** Brett Storey <[BStorey@placer.ca.gov](mailto:BStorey@placer.ca.gov)>  
**Date:** October 23, 2015 at 5:23:19 PM EDT  
**To:** "[info@BayDeltaConservationPlan.com](mailto:info@BayDeltaConservationPlan.com)" <[info@BayDeltaConservationPlan.com](mailto:info@BayDeltaConservationPlan.com)>  
**Subject:** **Contact information for comment letter**

We at Placer County would prefer to list an individual on our letter for comments, is that possible and whom would we address it to? Thank you for your consideration.

Sent from my iPhone

---

**From:** Rita <sorrenti@velociter.net>  
**Sent:** Friday, October 23, 2015 2:07 PM  
**To:** BDCPcomments  
**Subject:** waterfix

The Waterfix you suggest is not the correct "fix" for the Sacramento-San Joaquin region. Your so called "fix" will destroy, not help this region of Northern California. Not only will you destroy the Sac.-San Joaquin Delta by allowing even more salt water to infiltrate our waterways, it will also impact our areas wells and irrigation systems. Farms in this area contribute \$2 Billion to California's economy and those are the farmers who keep your food source readily available and reasonably priced. Just think about paying \$10.00 for a gallon of milk or \$4.00 for a single apple. Don't cut your own throats. Plus, and this is a big issue, we do not use herbicides and pesticides that sicken and sometimes kill. Foreign countries use those and are not held accountable. Those types of chemicals are not allowed in the USA. I do not want to be at another country's mercy FOR OUR FOOD SUPPLY.

The tunnels we already have and all the water that has been sent through them to date has done untold damage to our farmland and wells. They already are contaminated with salt infiltration.

It is now time for Southern Cal and all it's big money to build their own water source. S. CAL gets much more rain than we do but what are they doing to capture it? NOTHING. Build some dams and fill them..... You've got an ocean to draw from build a few desalination plants now, not later.....

Regards,  
Nella Sorrenti  
Bill Sorrenti  
Rita Sorrenti                      All farmers  
Craig Sorrenti  
Amy Sorrenti-Thomas

---

**From:** Scott D. Miller <miller.scott.biochem@gene.com>  
**Sent:** Friday, October 23, 2015 3:33 PM  
**To:** BDCPcomments  
**Subject:** BDCP/WaterFix Comment

I am very strongly opposed to spending tax payer billions of dollars on building the twin tunnels when this expenditure will consume a high proportion of the states financial resources without increasing capacity in any way.

As the snow pack continues to subside in the next decade the vast majority of our funding should be spent NOW on additional storage capacity that will be coming on line over the next ten and twenty years.

I guarantee you that if the State of CA spends twenty billion dollars on twin tunnels and when the snow pack disappears and there has been no development of storage capacity and taxpayers will still be paying for the **twin tunnels to no where** and they will not support the funding needed for new water storage.

The agricultural corporations will not survive the dry years and with the time it takes to build dams, with the success of dam funding dependent entirely on an increasingly unpredictable climate, the Central Valley will be the next dust bowl.

Recalculate the path forward after this years 2015/2016 rain. With record breaking rain during very short periods of time, survival 2050 will be a different game plan.

Good luck

Scott D. Miller

**From:** Barbara Folger <therrac@gmail.com>  
**Sent:** Friday, October 23, 2015 4:14 PM  
**To:** BDCPcomments  
**Subject:** I am against the Delta Water Tunnels - California Water Fix -BDCP

The California Water Fix is subtitled "reliable clean water." But less "reliable clean water" would flow through the Delta and the San Francisco Bay than ever before if the Governor's Delta tunnels are built. I urge that the Delta tunnels project be abandoned. Taking water away from the largest estuary on the Pacific coast of both American continents would lead to a catastrophic change to that ecosystem's sustainability. Diverting water from one apart of California to benefit another is not a statewide solution to providing "reliable clean water" to all Californians.

As a resident of San Francisco, I urge you to protect the entire San Francisco Bay watershed and preserve clean, fresh water for drinking, recreation, fishing, industry, and agriculture. Both habitat and endangered species would be affected adversely if the Delta tunnels are built. Without increased, not decreased, fresh water flows, the San Francisco Bay Delta ecosystem will continue to degrade.

For millions of years the water from the Sacramento River flowed through the Delta and the Bay out to nourish the ocean. This ecosystem was quickly degraded because of large-scale water diversions as early as 1933 when the Central Valley Project began. It was further degraded by even more water diversions with the building of the California State Water Project in 1963. These projects put many iconic species on the endangered list and more are being added to the "watch" list each year. The Delta tunnels would have the capacity to capture up to 100% of the average flow of the Sacramento River above the Delta and divert this water southward to the state and federal aqueducts. If even greater amounts of water are diverted, as planned, those species already on the brink of collapse will collapse. Letting this happen would violate the Clean Water Act, the Endangered Species Act, the Fish and Wildlife Coordination Act and to meet trust obligations to Native Americans.

Clearly California has a serious water issue, but building an exorbitantly expensive, one-size-fits-all project will not solve the state's water supply problem. Our water supply issues should be solved locally, just as many international water experts have suggested. Moreover, this state imposed solution, which all Californians would have to pay for but not benefit from, would cause divisiveness between water districts, towns and cities. Funds currently allocated to build the tunnels should be used instead to repair existing leaky water delivery systems and promote lower water use. This part of the Water Fix I can support. We Californians have reduced our water use by about 33% just this year. There is more we can do without adding new, expensive infrastructure. Please, do not OK the building of one of the most expensive projects in California's history. There are far better and less costly solutions to providing a reliable water supply to ALL Californians. Please, do not support the Delta tunnels.

*Barbara Folger*  
[therrac@gmail.com](mailto:therrac@gmail.com)

---

**From:** Doug Wilhoit <Doug@stocktonchamber.org>  
**Sent:** Friday, October 23, 2015 2:02 PM  
**To:** exsec@ios.doi.gov; thesec@doc.gov; McCarthy.Gina@epa.gov;  
kimberly.goncalves@resources.ca.gov; Mark.cowin@water.ca.gov; dmurillo@usbr.gov;  
BDCPcomments  
**Cc:** Barbara Barrigan-Parrilla; michael.machado@ymail.com; larryruhstaller@gmail.com;  
Robert Ferguson K.; coover@recordnet.com; Daly, Tim; Bill Wells; Abajian, Shelly  
(Feinstein); Alva, Alisa; cgalgiani@gmail.com; Susan Eggman  
(Susan\_eggman@yahoo.com); kmiller@sjgov.org  
**Subject:** FW: Send data from MFP07859122 10/23/2015 12:21 (GREATER STOCKTON CHAMBER  
OF COMMERCE COMMENTS ON RDEIR/SDEIS RE: "CALIFORNIA WATER FIX" AKA-  
TUNNELS  
**Attachments:** Stockton Chamber of Commerce Comments on Tunnels.pdf  
**Importance:** High

LADIES AND GENTLEMEN: WE ANTICIPATE YOU WILL TAKE THE TIME TO PERSONALLY READ AND ACT ON THE ATTACHED COMMENTS OF THE 114 YEAR OLD GREATER STOCKTON CHAMBER OF COMMERCE IN REGARDS TO THIS MOST IMPORTANT AND THIS ABSOLUTE DEVASTING STATEWIDE DISASTER BEING PROPOSED FOR REASONS OTHER THAN GOOD GOVERNMENT, GOOD PUBLIC POLICY AND MOST CERTAINLY NOT TO THE BENEFIT OF ALL BUT JUST A FEW!

ALSO, ORIGINAL SIGNED COPIES DELIVERED TO USPS TODAY!

VERY TRULY YOURS,

DOUGLASS W. WILHOIT, JR.  
AS CEO OF AND ON BEHALF OF THE GREATER STOCKTON CHAMBER OF COMMERCE



October 23, 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](mailto:exsec@ios.doi.gov)

John Laird, Secretary  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
[Kimberly.goncalves@resources.ca.gov](mailto:Kimberly.goncalves@resources.ca.gov)

The Honorable Penny Pritzker  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, D.C. 20230  
[thesecc@doc.gov](mailto:thesecc@doc.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](mailto:Mark.cowin@water.ca.gov)

The Honorable Gina McCarthy, Administrator  
U.S. Environmental Protection Agency  
WJC North, Room 3,000 1101A  
Washington, D.C. 20460  
[McCarthy.Gina@epa.gov](mailto:McCarthy.Gina@epa.gov)

David Murillo, Regional Director  
U.S. Bureau of Reclamation  
2800 Cottage Way  
Sacramento, CA 95825  
[dmurillo@usbr.gov](mailto:dmurillo@usbr.gov)

[BDCPComments@icfi.com](mailto:BDCPComments@icfi.com)

**RE: RDEIR/SDEIS Comments and Request for BDCP Agencies to comply with California Water Code regarding economic mitigation for communities impacted by construction and operation of BDCP/ "California Water Fix" tunnels.**

### Summary

The Greater Stockton Chamber of Commerce has been a force in Stockton, San Joaquin County and the Central Valley since 1901 and has been at the forefront of many issues, good and bad for all, and this proposal of the "Legacy Tunnels" ranks up there as one of the worst ideas ever presented by anyone in the State's history. The Greater Stockton Chamber of Commerce represents not only our actual paid membership of over 1000 businesses of all sizes but also the entire business community, their employees and families (who are all voters also) and strongly opposes the so called "Water Fix!"

The Greater Stockton Chamber of Commerce staff and membership works to aggressively develop and promote an economically vibrant business community in San Joaquin County. San Joaquin County is one of the five Delta counties and geographically contains 40% of the Sacramento-San Joaquin Delta, the interior of the San Francisco Bay-Delta Estuary. This area of the Delta falls into what was defined under the Delta Protection Act as the Primary Zone of the Sacramento-San Joaquin Delta and is made up mostly of prime farmland, as defined by the California Department of Agriculture. Moreover, approximately 50% of the 62.1 square miles of



ATHENA



PORTOCALL





the City of Stockton falls in the Secondary Zone of the Delta, defined as the surrounding urban periphery of the interior Delta.<sup>1</sup>

According to the Bureau of Economic Analysis, the Stockton metropolitan area gross domestic product at year-end 2012 was \$385 million.<sup>2</sup> The San Joaquin County Annual Crop report for 2013 indicates that farm revenues for that same period were over \$2,893,000,000.<sup>3</sup> Furthermore, the Delta Protection Commission's Economic Sustainability Report documents the value of the Delta regional agricultural economy at \$5.2 billion annually, Delta recreation at \$750,000,000 annually, industries found within the 40% geographical sector in San Joaquin County. This report also indicates there are three critical clusters for the Delta economy in both the Primary and Secondary Zones of the Delta: agriculture; transportation; warehousing and utilities; construction, housing, and real estate.<sup>4</sup>



PORTOCALL



The Stockton and San Joaquin County economies and gross domestic products are tied directly to water dependent industries such as agriculture and recreation. Furthermore, significant sectors of the Stockton transportation and warehousing industries are tied to the distribution, packing, and processing of agricultural products. Within Stockton, urban industries including recreation, retail, construction, housing and real estate are not only tied directly to Delta agricultural production within San Joaquin County, but are also dependent directly on Delta water quality and quantity for present revenues and projected future business growth.

The Greater Stockton Chamber of Commerce objects to the adverse economic impacts that would/will occur under the Bay Delta Conservation Plan (BDCP)/California Water Fix/Water Tunnels project (Water Tunnels project). Under the BDCP, three large new intakes would divert vast amounts of water from the Sacramento River between Clarksburg and Courtland through two tunnels roughly 35 miles south for export from the Central Valley and State Water Projects' pumping plants. As a result of this massive new diversion ("Water Tunnels project"), enormous quantities of freshwater which now flow through the Sacramento-San Joaquin Delta before being diverted would never even reach the Delta. Furthermore, a number of the 56 significant and adverse impacts would be experienced by San Joaquin County businesses during the 14-year construction period causing a ripple effect on the area economy.

The BDCP Delta Water Tunnels plan, RDEIR/RDEIS does not contain a description of adequate compensation for the five Delta counties, Delta cities and towns, and dozens of reclamation districts to offset the property tax and revenue declines resulting from construction and operation of the project. Without adequate analysis for full economic mitigation for the

<sup>1</sup> <http://www.delta.ca.gov/res/docs/Delta%20Map%20Exhibit.pdf>  
[http://www.delta.ca.gov/res/docs/ESP/ESP\\_P2\\_FINAL.pdf](http://www.delta.ca.gov/res/docs/ESP/ESP_P2_FINAL.pdf) Geographical and economic data provided by Delta Protection Commission.

<sup>2</sup> [https://www.quandl.com/data/BEA/GMP44700\\_GDP\\_INFORMATION\\_STOCKTONCA-GDP-Information-Stockton-CA](https://www.quandl.com/data/BEA/GMP44700_GDP_INFORMATION_STOCKTONCA-GDP-Information-Stockton-CA).

<sup>3</sup> <http://www.sjgov.org/WorkArea/DownloadAsset.aspx?id=17738>. 2013 Annual Agricultural Report, San Joaquin County. Page 2.

<sup>4</sup> [http://www.delta.ca.gov/res/docs/ESP/ESP\\_P2\\_FINAL.pdf](http://www.delta.ca.gov/res/docs/ESP/ESP_P2_FINAL.pdf). Economic Sustainability Plan for the Sacramento-San Joaquin Delta. Page 34.



greater Stockton area and San Joaquin County, the plan fails to protect the Delta as placed under the Delta Reform Act.<sup>5</sup>

### Analysis

Neither the Bay Delta Conservation Plan, Chapter 8 of the draft EIR/S of the BDCP, nor the draft REIR/S of California Water Fix contain a discussion of economic mitigation for the Primary or Secondary Zones of the Sacramento-San Joaquin Delta.

As discussed, the Sacramento-San Joaquin Delta supports a \$5.2 billion annual agricultural industry, and 40 percent of those farms are in San Joaquin County. These farms are diversified, sustainable, family farms dating back six generations, and the economic contributions from these families to our local economy are significant. Delivering fresh food to San Francisco and beyond is why Stockton originally developed a port. The Port of Stockton is California's third largest port and in 2012 supported 4,500 jobs and \$4.9 million in local tax funds.<sup>6</sup>

Delta farmers buy farming machinery, trucking services, seed, fuel, pumps, hardware, fertilizer, and insurance. Their profits are spent at local restaurants, retail outlets, and entertainment venues. Many of their children and grandchildren buy homes locally. They bank locally. And they make significant contributions to local charities that support a broad spectrum of causes that make our community better.

The Delta also is home to a \$750 million recreational economy that includes water skiing, sailing, sport fishing, and pleasure boating. Marinas from downtown Stockton to the interior of the Delta are dependent on clean water, as are waterside eateries, bars, bait and tackle shops, boating clubs, and event venues.

The Delta tunnels will make the Stockton Delta water intake project inoperable because the Delta water supply will become too salty. Municipal utilities (Stockton, Lodi, Tracy) won't be able to discharge wastewater without violating federal water laws. Residents will be paying for these new problems through higher water bills. Future business growth will become increasingly difficult with a diminished supply of clean water. (For reference to the water quality impacts as a result of the operation of the tunnels, please refer to the Restore the Delta/Joint letter on RDEIR/SDEIS Comments and Request for BDCP Agencies to Comply with the federal Clean Water Act by protecting designated/beneficial uses, meeting and exceeding water 1 quality criteria, and preventing degradation of San Francisco Bay-Delta Estuary water quality, dated October 6, 2015. We incorporate by reference their comments into this letter.)

Even worse, if Delta farms could survive the impacts of a 14-year construction project that will run seven days a week, 24-hours per day, they will not be able to farm with saltwater, as the goal of the tunnels project is to move Sacramento River freshwater quickly past Stockton, to the federal and state water project intakes near Tracy. Marinas will be left high and dry, and increased concentration of pollutants will make Delta recreation non-existent. Their contributing revenues spent at local businesses will dry up.

<sup>5</sup> Water Code 12220 defines the Delta as place as part of the 2009 Delta Reform Act.

[http://leginfo.ca.gov/faces/codes\\_displayText.xhtml?lawCode=WAT&division=6.&title=&part=4.5.&chapter=2.&article](http://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=WAT&division=6.&title=&part=4.5.&chapter=2.&article)

<sup>6</sup> [https://en.wikipedia.org/wiki/Port\\_of\\_Stockton](https://en.wikipedia.org/wiki/Port_of_Stockton)



ATHENA



PORTOCALL





Stockton's and San Joaquin County's present and future economy, and entire way of life, are tied to adequate water quality and quantity in the Delta. The Delta tunnels will destroy access to that water supply that this city needs to prosper and will have a detrimental effect on Stockton's recovery from bankruptcy, as well as Stockton's \$385 million plus annual gross domestic product.

Additionally, within the BDCP Chapter 8, financing plan, there is only a discussion of how environmental mitigation costs are accounted for (or not) and possible sources of funds for environmental mitigation costs.

The one limited exception within the Bay Delta Conservation Plan is "property tax and revenue assessment replacement" mitigation. Section 8.2.3.23 of Chapter 8 in BDCP refers to California Water Code Section of 85089 requiring:

New Delta conveyance facilities are required to offset loss of local property tax and assessment revenues resulting from location, construction, mitigation, or operation of water conveyance facilities [and] must be offset by the Implementation Office.

This Water Code Section is from the Delta Reform Act. The language of 85089 is not tied to a "Bay Delta Conservation Plan" but to "new Delta conveyance facilities" so it follows that by statute, property tax/assessments revenue "replacement" must still be part of Alternative 4A, the new preferred alternative, under California Water Fix.

Table 8-41, pages 8-75 of Chapter 8, shows that there would be no capital costs associated with Water Code 85089 compliance, but there would \$226.0 million of operational costs for the BDCP version of the tunnels project. Of this, only 43.3 percent would be paid by the water contractors, the beneficiaries of the project, for a total of \$97.7 million over 50 years. That is just under \$2 million (i.e., about \$1.95 million) in property tax and revenue offsets per year to Delta counties, cities and special districts affected by the project. That is a pittance, when one considers that these revenue subventions (i.e., replacements) may be about 1.5 to 2 percent of the total value of the lands directly and indirectly affected by the project, and that there are 5 Delta counties, large cities like Stockton, small towns, and literally dozens of reclamation and other special districts within the Delta that would be forced to split that replaced revenue. This proposed property tax/revenue "replacement" fund will allocate tax revenue scraps to the greater Stockton metropolitan area and San Joaquin County.

Equally problematic, Appendix 8A of the BDCP noted that there would be some \$248 million in "incremental costs for EIR/EIS mitigation measures" not elsewhere counted by conservation measures. The items that they counted included mitigations for agricultural land, air quality, biological resources, and cultural resources. However, air quality accounted for nearly \$212 million of these costs over ten years (part of the construction period), where they would pay about \$21.17 million per year. See Table 8.A-62, p. 8.A-172. This would leave only \$36 million for mitigation to damage to agricultural lands within the five Delta counties, an insignificant mitigation fund for the damage that would be inflicted on Stockton and the greater San Joaquin County agricultural industry. There is no further discussion of these mitigation costs in the DREIR/S for California Water Fix. Consequently, this appendix not only reveals that air quality impacts experienced by the Delta will require significant mitigation, but that little funding will be left for construction mitigation of family farming businesses that are the primary driving force for the region's economy.



ATHENA



PORTOCALL





## Summary

Such an erosion of current property tax revenues, in addition to the lost direct and indirect economic activity and related revenues, would make the residents of Stockton and San Joaquin County the economic losers with construction and operation of the project. Because the water code as written does not require a broader economic calculation of impacts resulting from the construction and operation of the Delta Tunnels, this analysis has been all together left out of the EIR/S and DREIR/S.

However, when one considers that Stockton and San Joaquin County's primary industries are agriculture, transportation, Port of Stockton operations, and construction, and that all these industries are tied to sufficient Delta water quality and quantity, it becomes clear that the economic impacts will be significant. In fact, it is not hyperbole when one recognizes that the primary beneficiaries of Delta water exports are a limited number of growers on the west side of the San Joaquin Valley and that this project may very well end up facilitating not only the transfer of water at unsustainable levels, but middle class wealth from one region to solve the unquenchable economic demands of large-scale corporate farms in the San Joaquin Valley.

The people of Stockton and San Joaquin County area businesses depend on good water quality in the Delta for their livelihoods and quality of life. A significant portion of 300,000 Stockton and 700,000 San Joaquin County residents depend on the Delta as their primary drinking water supply. To protect this area's economic and water supply ties to the Delta, protecting and enhancing the Delta's water quality is essential. Therefore, we request state and federal rejection of the proposed Delta Water Tunnels Project, as Stockton and San Joaquin County would experience a disproportionate and unjust portion of the significant and adverse economic and environmental impacts resulting from the project.

Sincerely,

Judith Buethe  
President 2015-16  
Greater Stockton Chamber of Commerce

Douglass W. Wilhoit Jr.  
CEO  
Greater Stockton Chamber of Commerce



ATHENA



PORTOCALL



**From:** Joseph\_Rizzi <Joseph\_Rizzi@sbcglobal.net>  
**Sent:** Sunday, October 25, 2015 5:55 PM  
**To:** BDCPcomments  
**Subject:** Fish Filter vs ZeeWeed  
**Attachments:** Fish Filter vs ZeeWeed.doc  
  
**Importance:** High

See attached comment and backup documentation.

I look forward to seeing the feedback, and hopefully we will use a ZeeWeed type of product instead of fish screens.

Thanks

Joseph Rizzi  
707-208-4508

# Fish Filter or ZeeWeed

REC1RC2107

## Best available technology?

By Joseph Rizzi 707-208-4508 Joseph\_Rizzi@sbcglobal.net

**ZeeWeed (Ultra Filtration)** is an example of the “Best Available Technology (BAT)” for the environment and for the project of exporting large quantities of clean water. Co-Equal Goals as required by law.

**Comment:** Why is Ultra Filtration not being considered instead of the very poor “State of the Art” fish screens for the exporting of water? If costs, then we now know the cost of the environmental health, but a documented study should be done, so we know a better cost estimate for the cost of our environment verses the cost of water for export.

I will use the term ZeeWeed as an example of Ultra Filtration in this document, but there are many manufactures of Ultra Filtration Membranes. I am retired and do not sell ZeeWeed, but I do love the product and what it does.

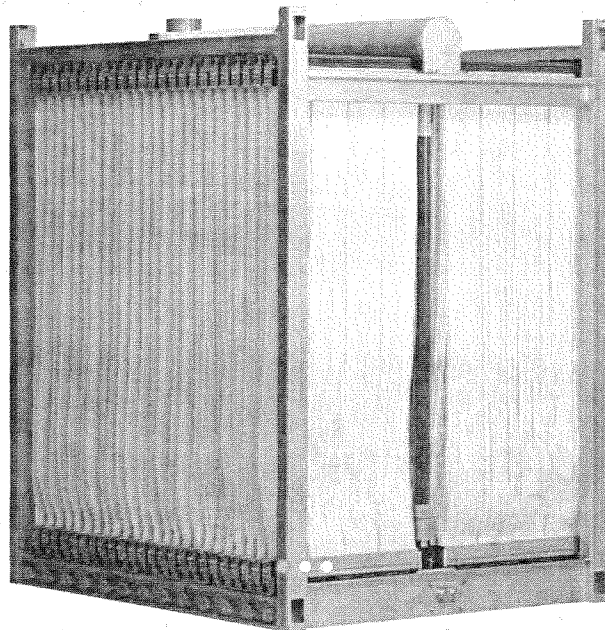
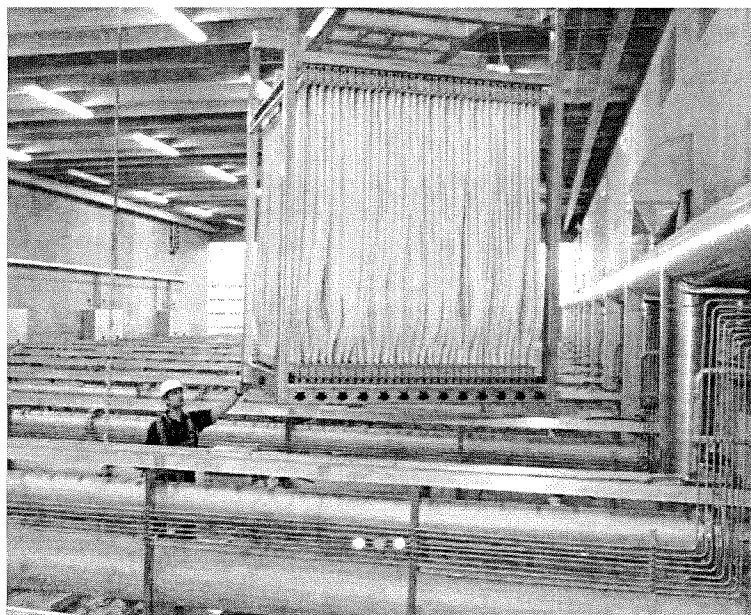
### Pros and Cons:

- **Costs** — ZeeWeed 500 is modular and can be installed at one site to extract all the water needed without settling ponds. One or more troughs can be created to allow the water to flow in and around the open water hollow fiber ZeeWeed membranes to extract only the water (not the nutrients, fish food and other environmental features that make up the surrounding water). Higher upfront cost for ZeeWeed Hollow Fibers, but less infrastructure costs makes ZeeWeed a less costly choice. Fish Screens proposed requires large settling pond, pumps for mixing and the ponds have to be regularly maintained, so it will have a higher cost of construction with 3 to 5 sites proposed and maintenance of screens, ponds and pumps.
- **Pre-Screens** - ZeeWeed would require a pre-screen like the great fish screens that are being looked at, but I would recommend something more like the screens that we all use for windows and patio doors, just enough to keep out larger fish. It can be installed in a zig-zag motion like a car's oil or air filter if the rate of flow through the screen material is needed and modular like 5 foot sections that can be easily taken out and replaced as needed. Proposed Fish screens do not need prescreens, but should be made modular for maintenance purposes and installed in a zig-zag pattern to reduce the speed of water flow through the screens.
- **Environment** — ZeeWeed causes Zero harm to the environment and is actually helpful because it will concentrates the fish food at a location for the fish to thrive without harming any aquatic life. Fish Screens KILL aquatic life and the setup with the settling ponds takes the nutrients and other small life in the water food chain.
- **Food Chain** — ZeeWeed does not kill fish or any part of the Aquatic food chain, whereas Fish Screens and settling ponds kill parts of the food chain and removes it from the water ways and the Delta.
- **Energy** — ZeeWeed can run using Nature to power it (which would be Zero energy) but then you would have to lift the clean water, which would be better to lift the water in a water tower to get better flow to it's destination since the trace pumps and all sites considered are at about the same elevation and the higher pressure means smaller pipes are need, leading to lower project costs. ZeeWeed need AIR bubbles and reverse flow to quickly and easily clean the hollow fibers. Fish screens need Zero energy, but there is power needed for settling ponds and pumps. Good analyst should crunch the numbers and get the comparison, so we all know the true facts in the comparison.
- **Endangered Species** — ZeeWeed cannot kill any because the pores are too small and not enough pressure to trap fish or any organism. Whereas Fish Screens can, have and will continue to killed endangered Species so long at they are being used directly and indirectly.

# ZeeWeed 500 Features

REC1R2107

- Highest solids tolerance of any hollow-fiber membrane
- Works through virtually any raw water quality change or upset
- Outside-in flow path provides a more robust system
- **Fully automated** for simplified design and operation
- Outstanding technology for virtually all wastewater treatment applications - from greenfield plants to retrofits to water reclamation projects



## ZeeWeed\* 500D Module

Immersed Hollow-Fiber Ultrafiltration Technology



Module Type	WW	DW
Application	Membrane Bioreactor	All Other Applications
Nominal Membrane Surface Area	340 ft <sup>2</sup> (31.6 m <sup>2</sup> )	340 ft <sup>2</sup> (31.6 m <sup>2</sup> ) 440 ft <sup>2</sup> (40.9 m <sup>2</sup> )
Module Dimensions		
Height	2,198 mm (86.4")	
Width	844 mm (33.2")	
Depth	49 mm (1.9")	
Module Weight		
Max. Shipping Weight (unrated)	26 kg (58 lb)	28 kg (62 lb)
Lifting Weight (exceeds with solids accumulation)	26 – 74 kg (58 -163 lb)	30 – 74 kg (66 -163 lb)
Membrane Properties		
Material	PVDF	
Nominal Pore Size	0.04 micron	
Surface Properties	Non-Ionic & Hydrophilic	
Fiber Diameter	1.9 mm OD / 0.8 mm ID	
Flow Path	Outside-In	
Operating Specifications		
TMP Range	- 55 to 55 kPa (- 8 to 8 psi)	-90 to 90 kPa (-13 to 13 psi)
Max. Operating Temperature	40°C (104°F)	
Operating pH Range	5.0 – 9.5	
Cleaning Specifications		
Max. Cleaning Temperature	40°C (104°F)	
Cleaning pH Range	2.0 – 10.5	
Max. Cl <sub>2</sub> Concentration	1,000 ppm	

# Fish Filter or ZeeWeed

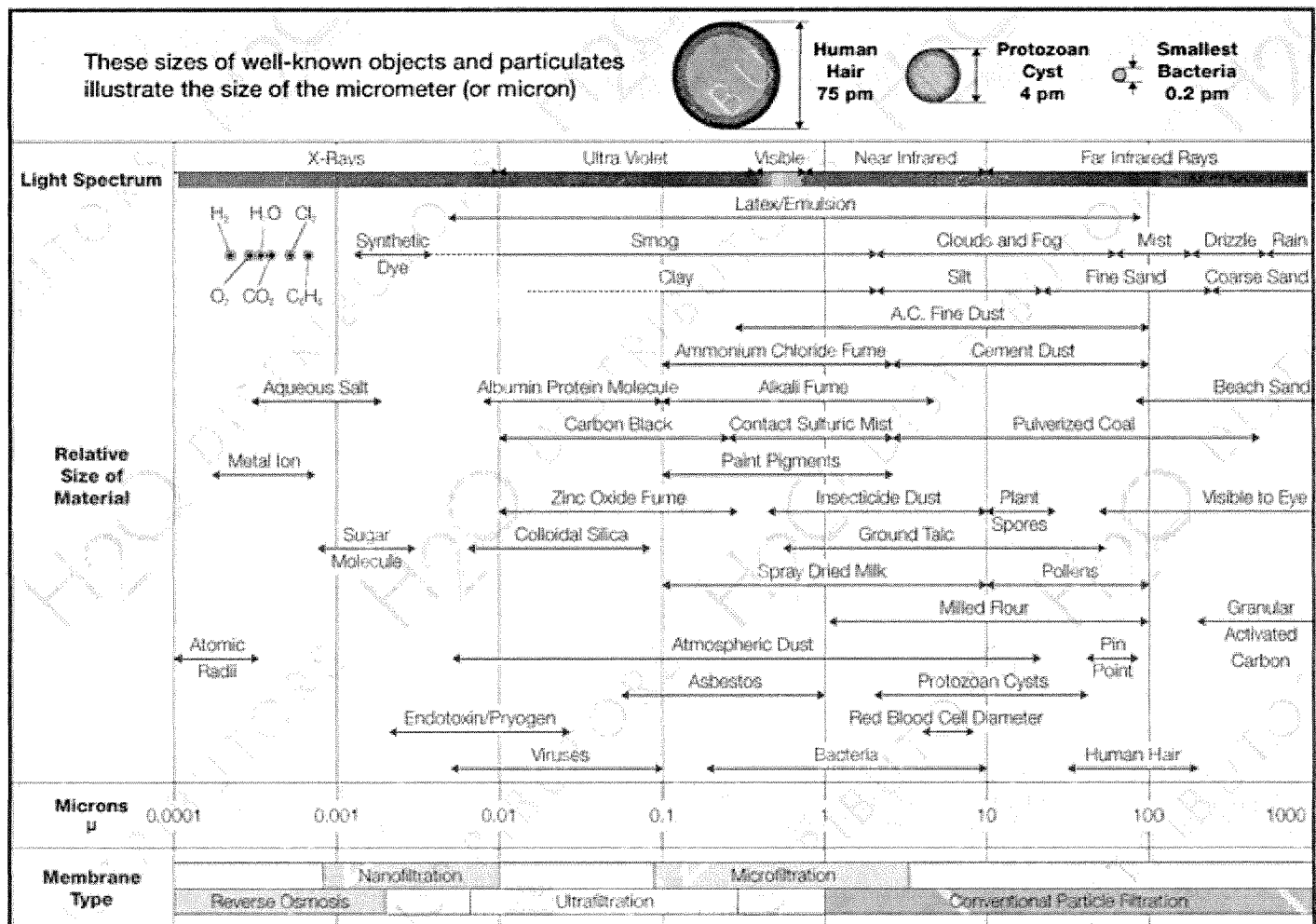
Where does the so called "State of the Art" Fish screens fall on the following chart?

Look where ZeeWeed is on the chart – You can find it on the bottom of the chart marked in **YELLOW** showing that all items above maybe filtered out and everything to the right cannot make it through the pores.

Keep in mind that the cleaner the water is that is extracted the better quality of water that it is delivered, as well as keeping the environment that the water is taken from healthier.

CO-Equal GOALS ← is what is required by law, but it makes since too.

## Particle Size Chart

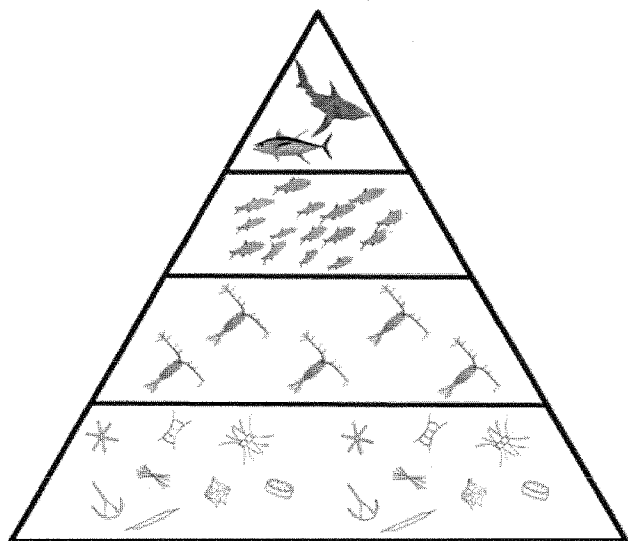


Source: "Water Processing: Third Edition", Wes McGowan, Water Quality Association, 2001

<https://www.h2odistributors.com/chart-particle-sizes.asp> ← Link to WEB page for above chart.

# Fish Filter or ZeeWeed

**Food WEB** → [http://teachoceanscience.net/teaching\\_resources/education\\_modules/aquatic\\_food\\_webs/learn/](http://teachoceanscience.net/teaching_resources/education_modules/aquatic_food_webs/learn/)



What should be screened out, just endangered fish (like Delta Smelt) or also the smaller organisms that the fish and other smaller forms of life feed on? Check out the WEB link for more information on the WEB of life.

**NOAA Education** → [http://www.education.noaa.gov/Marine\\_Life/Aquatic\\_Food\\_Webs.html](http://www.education.noaa.gov/Marine_Life/Aquatic_Food_Webs.html)

**Per NOAA's Web site:** Big fish eat little fish; that's how the food cycle works. Of course, there's more to it than that. A whirlwind spiral up an aquatic food chain goes like this: Phytoplankton feed the zooplankton that feed the small fish and crustaceans that feed the larger fish that feed the even bigger fish that feed us.

## Links from NOAA, for those wanting more details:

- [Interactive Chesapeake Bay Food Web](#)
- [Phytoplankton: The Base of the Food Web](#)
- [Phytoplankton](#)
- [Plankton: Why are they Important?](#)
- [A Food Web Mystery](#)
- [The Game of Life](#)
- [Estuary Food Pyramid](#)

**From:** Ciera Wilbur <cierawilbur@gmail.com>  
**Sent:** Sunday, October 25, 2015 9:11 PM  
**To:** BDCPcomments  
**Subject:** bay delta conservation plan  
**Attachments:** bay delta conservation letter.docx

To whom it may concern,

As a millennial that was raised in Sacramento and plans to remain a California citizen for years to come, the Bay Delta Conservation Project contradicts my ideals of a more efficient and sustainable future California. I have noticed that a majority of my neighbors, peers and relatives are opposed to this plan and are concerned for the health of an imperative ecological service those who are not upset are simply ignorant to this proposed project. The politics behind water rights in California and the private interest fundraising involved in this project dispute the very essence of state government working for the constituents and citizens that will be impacted by these decisions the most. It is because I feel so strongly about the perpetuity of this imperative northern California resource that I will outline and discuss the flaws I felt were important in the revisions made to the plan and posted July 9, 2015.

#### Habitat Conservation Plan mitigation

The creations of "state of the art fish screens" in the new pumps are not enough to protect the endangered delta species. The new proposed separate restoration project is far too small and not adequate compared to the enormous scope of this project.

We should be concerned about the state of our levees and it is my opinion that large scale restoration projects across the state would be more efficient at preserving water levels. Tunnels while seemingly suitable methods of transportation often cause problems of their own. Leaking pipes will cause water loss and the size of the proposed pipes are simply inappropriate in consideration to habitat needs.

Restoring Sacramento floodplains and investing in levee infrastructure and the restoration of channels across the state would in my eyes be a better option for "fixing" our current water transport dilemma.

#### New Conveyance Facilities

I agree that updating or replacing the current pumps in the Southern Delta is important to protect the water supply from becoming salinized. I do not agree that we should build more conveyance facilities to help pump an increasing amount of water away from the watershed it should remain in, to places that are essentially deserts and did not have efficient urban planning to begin with.

I refuse to have my community resource exploited by a demand that needs to be halted in its tracks.

The urban sprawl of all southern California is the biggest joke to a realistic approach to development and urban design. I think that instead of stealing water from the place it originates the state government needs to find a way to centralize water collection in the South.

"it is the intent of the Legislature to provide for the sustainable management of the Sacramento-San Joaquin Delta ecosystem, to provide for a more reliable water supply for the state, to protect and enhance the quality of water supply from the Delta, and to establish a governance structure that will direct efforts across state agencies to develop a legally enforceable Delta Plan." (California Water Code, Section 85001, subd. [c]).

If the goal of any government is to provide sustainable management of a watershed I believe this government is not upholding its promise to constituents.

We cannot revert back from the knowledge we have discovered about human impact and our past management mistakes. In a day and age where we have so many new options to choose from I find it inconceivable how any group of people could, in good standing with themselves, propose the expansion of a project that is already clearly inefficient.

Do we want California to remain a top player in global economy? Then we need to run towards the future and embrace emerging renewable technologies.

For the sake of conserving the Golden State I hope this project never passes any of the NEPA standards, I hope that individuals more savvy in law will find the flaws in this plan proving it to be in violation of environmental law.

I appeal to California Legislatures to completely discard the project or change the objective from a tunnel project to a desalination plan or another inventive way to alleviate the water shortage, because the livelihood of this globally unique resource is of far greater importance than money could ever be.

Ciera Wilbur

**From:** Walt White <firstcoolbreeze@gmail.com>  
**Sent:** Sunday, October 25, 2015 8:44 AM  
**To:** BDCPcomments  
**Subject:** Delta Tunnels / Water Fix Comments  
**Attachments:** WaterFixComments.pdf

See attached.

Walt White

October 22, 2015

BDCP/California Water Fix Comments  
PO Box 1919  
Sacramento CA 95812

Subj: **We Oppose the Delta Tunnels & California Water Fix**

To Whom It May Concern:

We are writing to express our opposition to the Delta Tunnels Plan.

The health and safety of the Delta has been given almost no consideration in the ongoing water grab that had great and noble intentions fifty years ago but has been subverted by large agricultural businesses.

The cities of Southern California and their water agencies have done an admirable job of being stewards of a precious resource. If the Delta Tunnels budget were applied to water recycling, levee upgrades, groundwater recharging, and other efficiency programs statewide, there would be ample water for cities and the true "family farms" in California.

The recent proposed Federal settlement with Westlands Water District shows the inevitable outcome when unforeseen events impinge on big agri-businesses: they convince government that they are too big to fail, and their business risks are now entitlements that are to be paid for by the rest of us.

The Department of Water Resources needs to prepare alternatives to the Delta Tunnels that show the people of California ways that their taxes and water bills can be used to enrich all of us, not just some of us.

Walt & Cate White  
2394 Nutwood Place  
Manteca CA 95336

**From:** Ron Nass <captainronn@sbcglobal.net>  
**Sent:** Monday, October 26, 2015 7:53 AM  
**To:** BDCPcomments  
**Subject:** Delta Tunnels

I am completely against the delta tunnels. These tunnels would destroy the delta by not letting the natural flows go through the delta. This change would disrupt and destroy fisheries.

Captain Ron Nass