

OCT 30 2015

Oct. 26, 2015

Being a former marina  
employee, owner of boats,  
and forever a lover of the  
Delta, I must oppose the  
proposed twin tunnels.

Mrs. Carrol Merry  
14 Rio Vista Dr.  
Lodi CA 95240



Carol Merry  
14 Rio Vista Dr  
Lodi, CA 95240

SACRAMENTO CA 957

27 OCT 2015 PM 5 L



BDCP/Water Fil Comments  
PO Box 1919  
Sacramento, CA 95812

RECIRC2548

95912191919



OCT 30 2015

27 October, 2015

BDCP/California WaterFix Comments

P.O. Box #1919

Sacramento, CA 95812

Gentlepersons:

These few lines are to inform you of my absolute opposition to Gov. Brown's ill-conceived delta tunnels plans. This is nothing more than the Peripheral Canal "wolf" in delta tunnel "sheeps" clothing. This should be stopped before irreparable damage is done to our precious Bay!

Thank you for your consideration of my opinion.

Yours very truly,



Robert G. Manette  
3782 - 26th Street  
San Francisco  
CA 94110

PS: I am a long-time resident of San Francisco and a property owner.

3782 - 26th Street  
San Francisco  
CA 94110

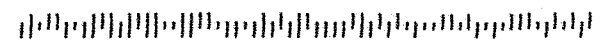
SAN FRANCISCO CA 9411

27 OCT 2015 PM 6 L



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

95812+1919



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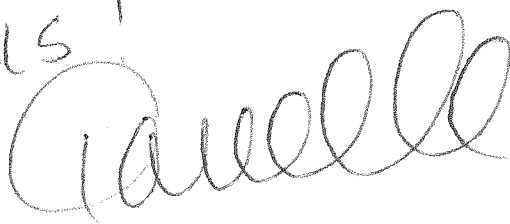
OCT 30 2015

DEAR MADAM/SIR:

I AM WRITING TO OPPOSE THE  
DELTA TUNNELS. THERE ARE MANY  
ENVIRONMENTAL & ECONOMIC REASONS  
WHY I BELIEVE THE DELTA DESERVES  
TO REMAIN AS IT IS & NOT  
BE OVER-SUBSCRIBED.  
PERSONALLY - WE ENJOY THE BEAUTY  
OF THE DELTA AS A GETAWAY  
FROM THE CITY.

THANK YOU FOR RECORDING  
MY VOTE IN OPPOSITION OF THE  
TUNNELS!

SINCERELY,

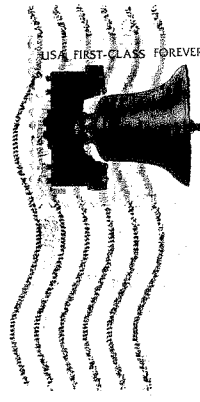


TAMAR HURWITE  
82 JERSEY ST.  
SAN FRANCISCO  
CA 94114

Tamar Hurwitz  
82 Jersey St  
San Francisco, CA 94114

SAN FRANCISCO CA 941

27 OCT 2015 PM 6 L



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

RECIRC 2550

95812+1919



OCT 30 2015

BDCP Water fix comments  
Post office Box 1919  
Sacramento, Ca. 95812

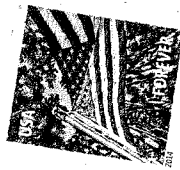
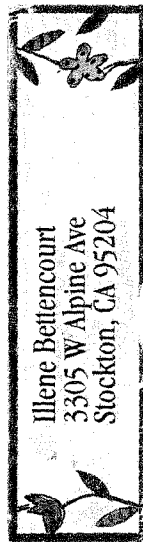
You will not build those  
tunnels and devastate the  
economy of my home.

A dog has died from  
drinking water from the  
Sacramento river due the the  
drought.

Cut back on new agribusiness  
grapes & almonds.

L.A. Can build their own  
dams. Get rid of golf courses  
in Palm Springs.

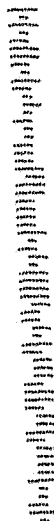
Sincerely Yours  
Dellene Bettinavut



RECIRC2551

DDP water for comments  
PO Box 1919  
Sacramento ca 95812

958121919





10/26/15

RECIRC2552.

OCT 30 2015

TO WHOM IT MAY CONCERN:

**NO!** TO THE TWIN TUNNEL PROJECT. TO BUILD IT WOULD BE A WASTE OF TIME, MONEY, AND A BEAUTIFUL AND FRAGILE NATURAL RESOURCE THAT IS LOVED AND ENJOYED BY ALL.

A BETTER SOLUTION TO THE LA WATER DILEMMA WOULD BE TO MAKE ITS CITIZENS CONSERVE WATER IN A MORE SERIOUS MANNER. AN LA-BASED CELEBRITY ON A RECENT RADIO SHOW DECLARED THAT HE WAS NOT AFFECTED BY THE DROUGHT AND HADN'T SEEN ANY SIGNS OF IT. IT SEEMS THAT FEW, IF ANY, IN SOUTHERN CALIFORNIA ARE PRACTICING ANY TYPE OF CONSERVING. THE WEST BASIN WATER DISTRICT HAS DONE A MARVELOUS JOB OBTAINING, STORING AND DISTRIBUTING WATER. WHY CAN'T OTHERS DO LIKEWISE?

RATHER THAN SPEND MONEY ON DIGGING BENEATH THE DELTA, USE IT TO BUILD WATER STORAGE FACILITIES IN SOCAL. THE RECENT FLOODS WERE A TRAGEDY AND A LOSS. A MISSED OPPORTUNITY TO CLAIM THE SAME VITAL RESOURCE THAT IS BEING THREATENED UP NORTH.

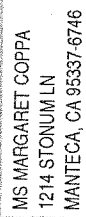
MY YARD IS BROWN AND DEAD, THE FEW BUSHES WATERED WITH RECLAIMED SHOWER AND SINK WATER, NO MORE LONG OR UNNECESSARY SHOWERS, NO MACHINE RUN UNLESS FULL. OUR WATER BILL BASE CHARGE IS \$17.00 AND OUR PERSONAL CHARGE \$1.76. WE DO ALL WE CAN TO SAVE WATER FOR ALL OF US. THAT DOES NOT INCLUDE SOUTHERN CALIFORNIA YARDS, WATER-WASHED DRIVEWAYS OR CONTRIBUTING TO THOSE WHO BUY ALL THEY WANT REGARDLESS OF THE EFFECT ON OTHERS. THIS IS OUR STATE DILEMMA AND EVERYONE SHOULD PARTICIPATE,

VERY TRULY



MARGARET W. COPPA

1214 STONUM LN  
MANTECA CA 95337



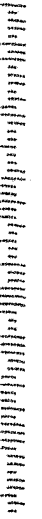
MANTECA, CA 95337-6746

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BDCP/WATER FIX COMMENTS  
Box 1919  
Sacramento CA 95812

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BAY DELTA CONSERVATION PLAN/CALIFORNIA WATER FIX  
PARTIALLY RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT/  
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT

## COMMENT CARD

OCT 30 2015

THE PUBLIC REVIEW AND COMMENT PERIOD IS JULY 10, 2015 THROUGH OCTOBER 30, 2015.

PLEASE PRINT

NAME: Kris Dixon DATE: Oct 27, 2015  
ORGANIZATION: self E-MAIL: kdix@aol.com  
ADDRESS: P O Box 536  
CITY: WALNUT GROVE STATE: CA ZIP: 95690

I think the far more important issue bearing down on this project is climate change.

What happens to the Delta as ocean levels rise?

How will the tunnels, levees, pumps, etc. fit into ocean levels rising which may not be too far in our future.

Please look back at the early 1900's and the plan to provide a dam at Carquinez. It was a serious and developed plan at the time - passed & funded by Congress in late 1920's - Depression disrupted it.

Seems to me our money would be much <sup>more</sup> wisely spent on a longer term solution.

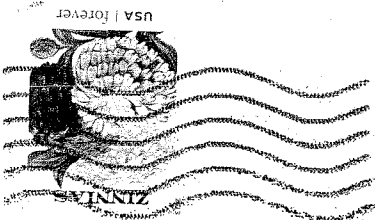
It would ~~also~~ also be a plan that would be much more understandable by the public.

48

95812191919  
TAPF HFRF

BAY DELTA CONSERVATION PLAN/  
CALIFORNIA WATER FIX  
RDEIR/SDEIS AVAILABLE FOR  
PUBLIC REVIEW AND COMMENT  
COMMENT PERIOD  
JULY 10 - OCTOBER 30, 2015

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



SACRAMENTO CA 957  
27 OCT 2015 PM 3 L

FOLD HERE

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

For more information, assistance in locating the documents or if you have special needs, contact 1-866-924-9955.

Para más información por favor llame al 1-866-924-9955

Để biết thêm thông tin, xin gọi số 1-866-924-9955

Para sa karagdagang impormasyon, mangyaring tumawag sa 1-866-924-9955

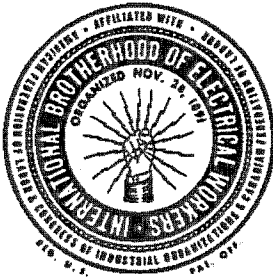
如欲瞭解更多資訊，請致電 1-866-924-9955

Kom tau lus qhia ntxiv, thov hu 1-866-924-9955

សំរាប់ព័ត៌មានបន្ថែម ទូរស័ព្ទ 1-866-924-9955

REC 1553

BAY DELTA CONSERVATION PLAN / CALIFORNIA WATER FIX



## INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL NO. 441

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909 N. Rampart Ste M  
Orange, CA 92868  
(714) 939-9191  
(714) 939-9192 Fax

Richard Samaniego  
Business Manager

October 30, 2015

BDCP/Water Fix Comments  
PO 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 the International Brotherhood of Electrical Workers Local Union 441, I am 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 three 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,



Richard Samaniego  
Business Manager  
IBEW Local Union 441

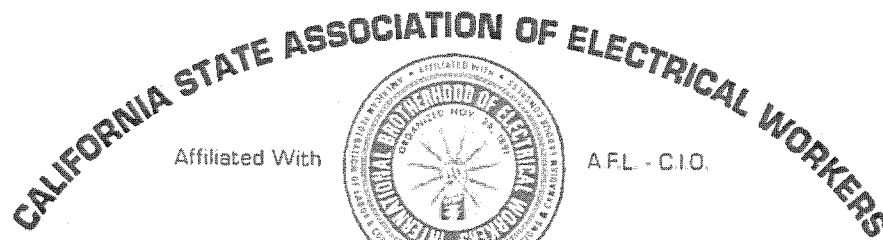
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2534

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**From:** Jaime <jaimeplubell441@gmail.com>  
**Sent:** Friday, October 30, 2015 11:05 AM  
**To:** BDCPcomments  
**Cc:** governor@governor.ca.gov  
**Subject:** IBEW 441 Supports CA Water Fix (Alternative 4A)  
**Attachments:** CA Water Fix IBEW.pdf

Please see the attached Letter of Support for the CA Water Fix (Alternative 4A) sent on behalf of the International Brotherhood of Electrical Workers, Local Union 441.

Jaime



*International Brotherhood of Electrical Workers*

October 30, 2015

BDCP/Water Fix Comments  
PO 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 the California State Association of Electrical Workers, I am 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 three 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.

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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



RECIRC 2555

Support Alternative 4A of California Water Fix cont.

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.
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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,



Richard Samaniego  
Secretary-Treasurer  
California State Association of Electrical Workers

REC-2555

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**From:** Jaime <jaimeplubell441@gmail.com>  
**Sent:** Friday, October 30, 2015 11:07 AM  
**To:** BDCPcomments  
**Cc:** governor@governor.ca.gov  
**Subject:** CSAEW Supports CA Water Fix (Alternative 4A)  
**Attachments:** CA Water Fix CSAEW.pdf

Please see the attached Letter of Support for the CA Water Fix (Alternative 4A) sent on behalf of the California State Association of Electrical Workers (CSAEW).

Jaime



PO Box 1526 • Sacramento, CA • 95812 • (916) 444-0022



October 30, 2015

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

*SENT VIA EMAIL to [bdcpccomments@icfi.com](mailto:bdcpccomments@icfi.com)*

**RE: Draft Bay Delta Conservation Plan/California WaterFix and Associated Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement**

Dear Lead Agencies:

These comments are submitted by the Environmental Council of Sacramento and Habitat 2020 on the proposed Bay Delta Conservation Plan ("BDCP")/California WaterFix ("Project" or the newly conceived "Alt. 4A") and associated public review Partially Recirculated/Supplemental Draft Environmental Impact Report/Statement ("RDEIR/S"). ECOS' mission is to achieve regional and community sustainability and a healthy environment for existing and future residents in the Sacramento region. ECOS' membership organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento (formerly known as Sacramento Old City Association), Resources for Independent Living, Inc. (RIL), Sacramento Audubon Society, Sacramento Housing Alliance (SHA), Sacramento Natural Foods Co-op, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes (SOS Cranes), Save the American River Association (SARA), SEIU Local 1000 (Environmental Committee), Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento.

Habitat 2020 (H2020) is a coalition of environmental organizations collaborating on common issues in and affecting, the Sacramento region. Members of Habitat 2020 include the Sacramento Audubon Society, California Native Plant Society, Friends of Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Mother Lode chapter – Sacramento group, Friends of Stone Lakes National Wildlife Refuge and the Sacramento Area Creeks Council.

Though ECOS has not previously commented on the Tunnels project, ECOS and H2020 have been very concerned about the amount and the severity of impacts to terrestrial biological resources from this Project in our immediate region. Because of this, members of ECOS and Habitat 2020 were very active in consulting with the Friends of Stone Lakes' board and attending working group meetings with the BDCP preparers and the regulatory agencies in an effort to improve mitigation and avoidance and minimization measures for impacts from tunnel construction in and around the Stone Lakes National Wildlife Refuge area. For instance, it was a member of ECOS and H2020 that sounded an early alarm that the construction planned on Staten Island was unacceptable given the potential impacts on greater sandhill cranes in their most significant population stronghold in our region.

The separation of the tunnels project from the NCCP/HCP of the BDCP effort heightens ECOS and H2020's concerns regarding the Tunnels project. A vast amount of impacts will be sustained in our region with no discernable environmental benefits. As it stands, the tunnel project is just another large environmentally damaging project, albeit the biggest and potentially most damaging single project our region has seen in decades, if ever. ECOS and H2020 are opposed to the construction of the twin tunnels because of the severe impacts to our region's biological resources and the project's failure to provide adequate mitigations to address those impacts. And, we share many of the concerns expressed by others about what these tunnels might portend for the environmentally sustainable use of our dwindling water resources in the state.

It should be noted that one of the constant rejoinders voiced by the Project proponents was that it was important for the environmental organizations to consider the specific impacts of the tunnel project in the context of the huge conservation effort contemplated in NCCP/HCP conservation strategy of the original BDCP. So, when concern was expressed that construction activities might cause abandonment of the northernmost roost site in the Delta of the greater sandhill crane, and even though the plan preparers attempted to incorporate suggestions that might help reduce that likelihood, there was still apprehension on our part that, though the threat of abandonment was definitely real, the efforts to avoid it, despite best good faith efforts, were experimental at best. The response to this, and all other concerns of this nature, was that we needed to look at the substantial benefits to the greater sandhill crane provided in the conservation strategy whereby the crane would "gain more than 7,000 acres of preserved habitat." But, as feared, the crane will be left having to endure the impacts of the hugely destructive construction project with NONE of the promised conservation benefits because they do not survive in the frail relic that survives of the attempt of a conservation strategy conceived in the BDCP.

#### **AGREEMENT WITH OTHER COMMENT LETTERS**

ECOS and Habitat 2020 want to go on the record as agreeing with the concerns and issues brought up in the Friends of Stone Lakes letters regarding the various iterations of the EIR/S (including the DEIR/DEIS and now the RDEIR/SDEIS). We are also in agreement with the

concerns expressed in the Delta Independent Science Board letter, dated September 30, 2015, that identified scientific deficiencies in the California Water fix recirculated DEIR/DEIS.

#### **BROAD COMMENTS ON THE CALIFORNIA WATERFIX RDEIR/SDEIS**

- 1.) The mitigation measures and the avoidance and mitigation measures developed in the BDCP, and maintained in the current environmental documents for California WaterFix, for fully protected species were conceived in the context of a much broader conservation effort, and separated from that context they are not adequately protective of those species. The scale of the project, both in terms of ground disturbance and the length of that disturbance, is so huge that just mitigating for the footprint of the land that was disturbed, with some consideration for the temporary impacts, does not fully address either the size of the project and its huge direct impacts and indirect impacts, or the fact that it will last for a decade or more causing long standing additional temporary direct and indirect impacts. There are no extant environmental documents that can be referred to that address impacts from a project of this size. The loss of nearly 800 acres of jurisdictional wetlands, alone, is likely unprecedented. The fact that the mitigation and avoidance measures are largely unchanged for fully protective species in the latest documents despite the loss of the NCCP/HCP is indicative of a considerable problem. The two examples that follow are not presented as either exhaustive or complete, but merely illustrative of a common problem in the environmental documents.
  - a. As an example, the greater sandhill cranes are at risk of a range reduction in the northern end of their Delta range because of a potential for roost site abandonment. Providing a temporary surrogate roost site in advance of disturbance, combined with "super charging" food sources in the vicinity is an intelligent attempt to hedge bets against that roost abandonment. But, it is not a field tested approach; it is an experimental one. What other efforts are contemplated to recoup lost range for the sandhill crane if this effort is not successful? There is no promise of an infusion of conserved habitat for the crane anymore for plan proponents to claim that we can fall back on as insurance that there will not be a lasting deleterious effect on the species.
  - b. As another example, it was clearly stated in the Project's 2013 analysis that the transmission lines to be erected for the project will result in "take" of greater sandhill cranes and potentially other fully protected species. There is no requirement that these lines be undergrounded. The proposed mitigation is to install flight diverters on powerlines in the Plan area in the hope that these will offset the loss of birds killed by the new powerlines. And yet birds will still be killed by the new powerlines. Fully protecting the species would necessitate undergrounding ANY new transmission lines AND providing flight diverters throughout the Plan area. The flight diverters can reasonably be seen as an important avoidance and minimization measure to protect cranes scared off of

their roost sites or their foraging grounds in the fog by construction related activities, only to fly into a transmission line they were too stressed to avoid.

- 2.) Provided mitigations are not adequately specific either in terms of geography or timing. These examples are not presented as either exhaustive or complete, but merely illustrative of a common problem in the environmental documents.

- a. As an example, the "take" of riparian habitat, stated as 47 acres of direct impacts and 31 acres of temporary impacts, will be mitigated by the restoration of 254 acres of riparian habitat and the preservation of 103 acres of riparian habitat (section 4.3.8 Terrestrial Biological Resource Impacts for Alternative 4.3.8). Where and exactly when this restoration work and preservation is to occur is not laid out in the environmental documents. It is not possible to analyze the adequacy of these mitigations without specific knowledge of where they are to occur, exactly when they are to occur, or exactly how they will occur. Removal of potential roost or nest sites for fully protected species would need to be replaced before they are needed by those species, but there appears to be no indication of how this important timing will play out. As well, it is stated that the new restorations will occur so that they are contiguous with extant riparian habitat such that a wider more viable stand will result, but there is no indication where this happen so there is no way to understand what other potential impacts might occur from this placement. What habitat will be removed for the increase in riparian stands and what impact will this have on the species that rely on that habitat? What contingency is there for mitigating the loss of potentially valuable habitat loss due to placement of more riparian habitat? And, will the potential cost of that additional mitigation result in a superior opportunity being avoided out of financial considerations? How will the relevant values of placement be balanced with the values of the habitat lost to allow for that placement? And since we are on the subject, what effect will much lower water tables have on the success of planting large native canopy trees that originally relied on their roots accessing year round groundwater; and can those trees survive long term after being taken off irrigation?

The fact that the majority of that riparian habitat will be taken out by the placement of the intakes along nearly a mile stretch of the east side of the Sacramento River brings up additional concerns about connectivity. Given that the intakes will be between highway 160 and the river, they will essentially cut off the east side of the river as a migration or dispersal corridor. The environmental documents state that this will have an effect on local dispersal, but that improvements in other Essential Connectivity Areas (ECA) will mitigate for this. These promised improvements are not defined for Alt. 4A. What about the effect of fracturing the riparian corridor along this stretch of river on north south migration of nonflying species as they need to adjust their range because of climate change? What is considered here as a corridor of local dispersal could

very well take on larger significance in the future as the need to seek higher ground or more northern latitudes increases with climate change. Given that the impacts on riparian habitat are largely on the east side of the river, what assurance is there that mitigations will occur on the east side of the river as well? Why is there not a plan to provide a substantial wildlife corridor on the east side of the intake facilities, and to the west of Highway 160, to maintain connectivity with the riparian habitat up and downstream of the intake facilities?

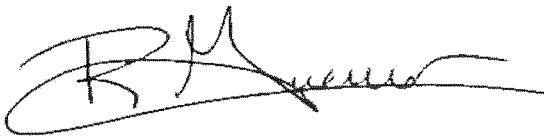
- b. And as another example, similarly, with the placement of new and or temporary roosting sites for greater sandhill cranes, what are the specific timings anticipated and how do these timings avoid additional impacts to the species, both in terms of being serviceable and available for usage in advance of their need, and in terms of the specific timing of their construction?
- 3.) Despite the huge scale of some of the impacts, there appears to be no effort to provide equivalently scaled, or for that matter even basic and adequate, analysis of the resources in question. The following example is not intended to be either exhaustive or complete, but merely illustrative of a common problem in the environmental document. The project proposes to put 15,022,645 cubic yards into jurisdictional waters of the United States. Beyond that astounding number, there will be permanent impacts to 596.3 acres and temporary impacts treated as permanent to 179 acres for a total of 775.3 acres of permanent impacts to jurisdictional wetlands, not to mention temporary impacts to another 1931 acres. Given the spectacular scale of impacts to jurisdictional waters, one would suppose that wetland delineations would be available for all wetlands to be impacted, and that the exact locations of all creation sites would be provided to allow for proper analysis of both the impacts as well as the mitigation. And for the compensatory mitigation, since there is no exact indication of where this would occur, there by definition cannot be complete analysis of the impacts of that creation, and therefore the reader does not have a full picture of the what the impacts are or how effective and appropriate the mitigations are. This kicking the can down the line is a common technique employed in private development efforts, whereby the project applicant leaves these crucial aspects unanswered until they acquire their wetland permits. We should expect more from a massive governmentally sanctioned undertaking like this project. This RDEIR/SDEIS should not be approved until the full impacts to jurisdictional wetlands are understood. This will require complete wetland delineations for all jurisdictional waters to be impacted and full impact analysis of all activity related to compensatory mitigation. Moreover, the Project should be designed to avoid wetland fill, prior to consideration of mitigation.
- 4.) Another recurring problem is that solutions are often are untested. And again, the following example is not intended to be either exhaustive or complete, but merely illustrative of a common problem in the environmental document

- a. The project proposes to use fish screens to exclude fish that are greater in size than 20 millimeters, but it is unclear if and how well these screens would work. What happens to fish or their eggs that happen to be smaller than 20 millimeters? Also, it would appear that Table 11-21 is out of date because even though some fish screens appear to have been installed, there is no specific data on how well those installed screens have worked. Despite this complete lack of evidence and data on whether the screen function as advertised, it is concluded that there will be no significant impact from using them (page 1-100 line 38). This is one example among many where measures are assumed to work as planned despite no evidence to support that assumption. This high level of certainty based on so little evidence is quite optimistic, and it is not clear if any or sufficient contingency plans are in place, or even contemplated, for an eventuality where these measures did not work out as planned. This unsupported optimism persists from the previous draft environmental documents.
- b. The surrogate roost pond/s and the "super charged" feeding for greater sandhill cranes mentioned already in this letter (section 1. a.) is another example of this optimism since this approach, though an innovative and seemingly reasonable approach, has never been field tested. Moreover, the RDEIR/S does not make clear the extent to which these measures from the Alt. 4 BDCP will be part of Alt. 4A.

#### IN CONCLUSION

This comment letter is not intended to be exhaustive as pertains the myriad of problems with the tunnels project now reborn as "California WaterFix," but rather it is intended for us to officially go on the record opposing this project because of the enormous deleterious environmental impacts in our region, and because of the inadequate analysis in the RDEIR/SDEIS as well as the inadequate avoidance, mitigation and minimization measures proposed to address those impacts.

Sincerely,



Richard Guerrero, President of the Environmental Council of Sacramento

Rob Burness, Co-chair of Habitat 2020

cc: David Murillo, Regional Director, Mid Pacific Region, U.S. Bureau of Reclamation  
(dmurillo@usbr.gov)  
Susan Fry, Manager, Bay-Delta Office, U.S. Bureau of Reclamation  
(bdo@usbr.gov)



**From:** ecos.sacramento@gmail.com on behalf of Alexandra Reagan  
<office@ecosacramento.net>  
**Sent:** Friday, October 30, 2015 11:22 AM  
**To:** BDCPcomments  
**Cc:** dmurillo@usbr.gov; bdo@usbr.gov; ren\_lohofener@fws.gov;  
chuck.bonham@wildlife.ca.gov; Bart\_mcdermott@fws.gov; claypoole@sbcglobal.net;  
Osha Meserve  
**Subject:** ECOS letter on BDCP  
**Attachments:** 2015 10 Oct 30 ECOS BDCP comment letter.pdf

Dear Lead Agencies,

Attached are comments are submitted by the Environmental Council of Sacramento and Habitat 2020 on the proposed Bay Delta Conservation Plan ("BDCP")/California WaterFix ("Project" or the newly conceived "Alt. 4A") and associated public review Partially Recirculated/Supplemental Draft Environmental Impact Report/Statement ("RDEIR/S").

Please do not hesitate to contact me with any questions that you may have.

Thank you,

**Alexandra Reagan**  
Director of Operations | ECOS  
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RECIRC2556

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OCT 30 2015

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

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

October 25, 2015

Re: Delta Tunnels/California WaterFix (Alternative 4A)

I grew up in Southern California, have been boating on San Francisco Bay and the Delta for 49 years and have lived on the Delta for 15 years. I believe I can understand water issues from several perspectives and empathize with many throughout the state.

I oppose the proposed tunnel project and the undemocratic way the process is being carried out. This project will destroy the Delta and produce NO new water.

A project this big and expensive deserves a public vote and better public input.

- Comments made by the public are not posted for the public to see.
- Hearings have been one way, with no public input, just sit and listen, yet the public is ultimately on the hook for the cost of the project.
- Better alternatives are available.

#### **Cost effectiveness**

- The EIR has failed to adequately analyze cost effectiveness for a project estimated to cost \$15 to \$50 billion.
- It does not accurately describe the amount of water available and the cost of that water.
- The amount of water the Delta needs to be viable must first be determined before the project can be considered.
- Water will be expensive. What happens if private water contractors, who have promised to pay for the project, fail to pay, as history shows they may. If they default, what recourse do ratepayers and taxpayer have?
- The project described in the EIR is not financially feasible and does not make financial sense to those paying for the tunnels. Continuing to focus on Alternative 4A simply diverts resources from consideration of better solutions.

#### **Scare tactics/ earthquake impact**

- Scare tactics are being used to raise unwarranted concerns about earthquake threats.
- If needed, levees could be reinforced for a fraction of the tunnel cost.
- What impact will 10-14 years of pile driving have on levees if they are so fragile?

### **Boating and recreation**

- The physical and economic impact on boating and recreation has not been carefully considered, particularly the impact on boating, fishing, waterskiing, etc. during the 10-14-year construction phase.

### **Water quality and quantity**

- Changes in water quality, quantity and levels caused by the tunnels have not been adequately explored.
- Two forty-foot wide tunnels have the capacity to divert up to half the flow of the Sacramento River.
- Toxic algae bloom is already a threat on the Sacramento River and near Big Break in Oakley. Any reduction in water flow could raise additional threats.
- The tunnels will not solve California's water problems. They will produce no new water.
- If water now flowing through the Delta is reduced, reduction of water flow threatens to increase salinity, resulting contamination to crops.

### **Economic impact**

- The economic impact on taxpayers and on ratepayers, who ultimately will pay for the limited but expensive water carried by the tunnels, has not been adequately analyzed.
- The economic impact on Delta farmers and businesses has not been adequately studied. Plans have already been announced to acquire as many as 300 farms in the Delta. What will happen when farmland is contaminated by increased salinity?
- The tunnel plan will decimate the Delta's \$5.2 billion annual agricultural economy and destroy family farms dating back to the 1850s.
- When salinity ruins Delta farmland, who will be standing by to convert that land into more housing?

### **There are better alternative solutions**

- Alternative solutions have not been seriously considered. Focus should be on boosting regional self-sufficiency across the state.
- Los Angeles, for example, should first repair its aging water main system to prevent more major leaks and wasted water.
- California WaterFix ignores technology that could solve our water shortages in a way beneficial to all, including desalination, reuse, recycling and better storage during wet years.

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- The future is not as predictable as some think: El Nino may bring more water to So Cal than North, making tunnels an even less viable solution to drought

#### **Water "Fix"**

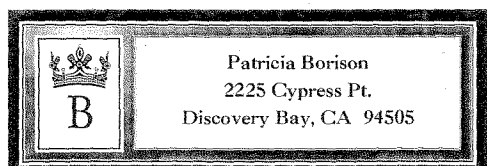
- The process as presented under WaterFix is compromised at the outset. For years this was always to be a dual plan, with twin goals of water sustainability and environmental protections. Suddenly, the environmental part has been dropped. Were we misled to all along? Why are we to trust promises now?
- What safe guards are there to prevent maximum use of the tunnels' capacity and diverting up to half of the river flow?
- This plan benefits a few corporate growers who wish to farm marginal land in the western San Joaquin Valley at the expense of multi-generation Delta farmers.
- The EIR comment period is not yet ended, yet permits are being taken and plans made, as if it is a done deal.... (the "Fix")

To quote our Congressman: "The tunnels are a repackaging of old ideas that waste billions of dollars and threaten the way of life for an entire region without creating a single new drop of water.

***"We should be using our resources to fund innovative, forward-thinking solutions that create new water and take pressure off the Delta by boosting regional self-sufficiency across the state."***

Pat Borison

Delta WaterFix letter 10-25-15.docx  
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Discovery Bay CA



OAKLAND, CA 946

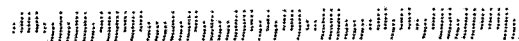
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OCT 30 2015

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

October 26, 2015

Re: The BDCP/WaterFix Process

**The process is fundamentally flawed. It is secretive, disingenuous, undemocratic and will not accomplish the implied goal "Water Fix."**

- The BDCP/WaterFix Project is one of California's largest public investments to date yet has no public vote – even for rate increases by water districts – for what could become a commitment of up to \$60 billion. Further with the States demonstrated inability to estimate costs (Eastern span of the Bay Bridge and the High Speed Rail) the total cost may reach 120 billion! The ratepayers in Southern California could not afford that, so the State is on the hook? Yet the Tunnels do not create one drop of new water.
- If water districts or other investors fail to make payments (as has happened in the past) public funds could become liable – with no vote. The financing costs are grossly under estimated; when the financial markets see the potential for default, the price will reflect this.
- No additional water is not a **"Water Fix!"** Adding additional storage capacity (Raise Shasta plus numerous smaller dams and water injection to refill the aquifers) would allow the State to meet the needs of all Californians.

**Reject the BDCP/WaterFix EIR because the goals have radically changed.**

- For years the discussions, debates and compromises surrounding the BDCP centered on a fundamental concept of dual goals: Both water sustainability and environmental protections were to be given equal consideration.
- After rejection of the BDCP plan by the Environmental Protection Agency (EPA), instead of fixing the problems, the Governor simply dropped the environmental leg of this two-legged stool, creating a major financial obligation on part of the State, with no vote!
- For years Governor Brown has promised that the BDCP (delta tunnels) would be a "habitat conservation plan" that would meet the highest standards for protection of the Delta by restoring tens of thousands of acres of marine habitat and restoring natural Delta flows. Now, suddenly, all that has been abandoned and the name has been changed to "water fix" with no habitat restoration or protections for the Delta...

**You can't change the rules at the last moment**

- Under the Endangered Species Act, federal agencies cannot adversely alter critical habitat. When the BDCP plan faced criticism, the Governor launched California WaterFix. But WaterFix will cost even more. It lacks the guarantee of water deliveries that made the BDCP plan attractive to funding water agencies. It's a bad plan.

**A project this big and expensive deserves a public vote.**

- The governor must begin the process all over again and consider real solutions to California water woes and the Delta's ecological decline.

This process has been dishonest from the beginning – a huge water grab disguised as a "save the Delta" plan... Water "fix" and all its negative connotations is appropriately named.

The only possible alternative discussed is "none" – and right now that is the most honest choice. We must work together to look at real solutions and put this dishonest water tunnel plan to rest.



Let's let the voters (and taxpayers and ratepayers) of California have a say. I urge you to reject the BDCP/WaterFix EIR.

Respectfully;

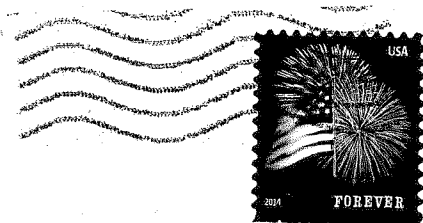
A handwritten signature in cursive script that reads "Robert A. Lee".

Robert A. Lee  
2225 Cypress Pt.  
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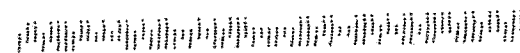
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Email: [BDCPComments@icfi.com](mailto:BDCPComments@icfi.com)

October 24, 2015

Re: The BDCP/WaterFix Process

I urge you to reject the BDCP/WaterFix EIR.

**The process is fundamentally flawed. It is secretive, disingenuous and undemocratic.**

- This proposed BDCP/WaterFix project is one of California's largest public investments to date, yet there is no public vote – even for rate increases by water districts – for what could become a commitment of up to \$60 billion
- If water districts or other investors fail to make payments (as has happened in the past) public funds could become liable – with no vote.

**Reject the BDCP/WaterFix EIR because the goals have radically changed.**

- For years the discussions, debates and compromises surrounding the BDCP centered on a fundamental concept of dual goals: Both water sustainability and environmental protections were to be given equal consideration.
- After rejection of the BDCP plan by the Environmental Protection Agency (EPA), instead of fixing the problems, the Governor simply dropped the environmental leg of this two-pronged project.
- For years Governor Brown promised that the BDCP (delta tunnels) would be a "habitat conservation plan" that would meet the highest standards for protection of the Delta by restoring tens of thousands of acres of marine habitat and restoring natural Delta flows. Now, suddenly, all that has been abandoned and the name has been changed to "water fix" with no habitat restoration or protections for the Delta.
- This process has been dishonest from the beginning – a huge water grab disguised as a "save the Delta" plan. Water "fix" and all its negative connotations is, unfortunately, appropriately named.
- The EIR comment period is not yet ended, yet permits are being taken and plans made to condemn farmland, as if it is a done deal.

**You can't change the rules at the last moment**

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- Under the Endangered Species Act, federal agencies cannot adversely alter critical habitat. When the BDCP plan faced criticism, the Governor launched California WaterFix.
- But WaterFix will cost even more and doesn't address habitat concerns.
- It lacks the guarantee of water deliveries that made the BDCP plan attractive to funding water agencies. It's a bad plan.

**A project this big and expensive deserves a public vote.**

- The governor must begin the process all over again and consider real solutions to California water woes and the Delta's ecological decline.
- Continued focus on this faulty plan diverts funds and resources from consideration of more effective solutions.

The only possible alternative discussed is "none" – and right now that is the most honest choice. We must work together to look at real solutions and put this dishonest water tunnel plan to rest.

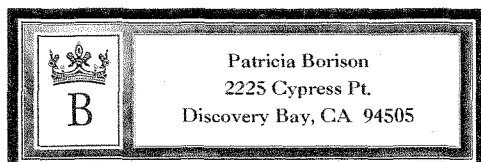
Let's let the voters (and taxpayers and ratepayers) of California have a say



Thank you.

Pat Borison

Discovery Bay, CA

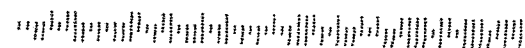


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