

NOV 03 2015

Please find another way to preserve the farms of the central valley and the golf courses of southern California than by destroying the delta system.

At least in 1982 we had the opportunity to vote against Peripheral Canal - this time we the people who will experience the results of the ill conceived plan have no say!

The waterfowl are having a difficult time during the current drought, our fish are struggling to survive these times. Our fish industry is very important not just to Calif. but to the world so lets not destroy it.

Could you at least postpone this decision allow us to vote on our future.

Sincerely,

Patsy Sheltan
34 Rock Rd
Kentfield, Ca 94904

34 Post Rd
Kentfield, Ca 94904

SAN FRANCISCO CA 9410

28 OCT 2015 PM 5 L



NOV 03 2015

BDCP California Waterway Comments
P.O. Box 1919
Sacramento, Ca 95812

RECIRC2808

1380 Greenwich St. #203, S.F. 94109 415 775 1812
October 29, 2015

BDCP/Californmia WaterFix
PO BOX 1919
Sacramento, Ca 95812

NOV 03 2015

Re: Delta tunnels

Please reject this plan which obviously will destroy San Francisco bay fisheries, change the null line allowing much more salt water incursion up the Delta.

To provide more water to industrial farming planting water thirty plants is so very objectionable. In addition the Westland district selenium poisoning of soils is an ongoing water pollution problem ultimately threatening the bay.

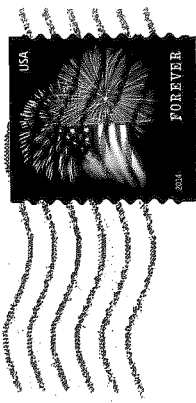
Sincerely,

A handwritten signature in cursive script, appearing to read "Susan M. Smith".

Susan M. Smith

BDCP/Californmia WaterFix
PO BOX 1919
Sacramento, Ca 95812

RECIRC2809



SAN FRANCISCO CA 941

30 OCT 2015 PM 7 L

BDCP/California WaterFix
PO BOX 1919
Sacramento, Ca 95812

NOV 03 2015



95812+1919

NOV 03 2015

REP/ RICHARD ESTY PETERSON, PATENT ATTORNEY
537 VALLEY, SAN FRANCISCO, CA 94131
415-826-3921, FAX 415-962-4042
SFREPTILE@MAC.COM

October 29, 2015

NOV 03 2015

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

Dear Trustees of our water in California

I have been a resident of San Francisco since 1964. I am an ecologist, as well as an engineer and lawyer. I was legal counsel for Ecology Action of Berkeley in 1967 and walked from San Francisco to Los Angeles with its group giving lectures on the environment of California, particularly the Central Valley. I joined in the opposition to the Peripheral Canal, proposed to deliver fresh water to Southern California. We were successful in stopping that ill-fated engineering endeavor.

Now, it is the Peripheral Tunnels that must be stopped. It is a disaster in the making, both economically and environmentally. The salmon population is already at a critical level because of a lack of cold water flow. The State has shown a lack of regard for a comprehensive water program and only recently has recognized the unrestrained extraction of our aquifer reserve. The proposals for peripheral pipes and new dams are viewed as unnecessary building projects that will, as all government sponsored projects, go over budget and saddle future taxpayers with a burden they can ill afford, for junk.

If the objective is to get more water to the Central Valley, why not repurpose the San Luis Reservoir? Now, Central Valley water is pumped up to the reservoir as a reserve supply. Instead, if a capital-intensive project is desired, build a water refining plant in Gilroy to process San Francisco Bay wastewater. Build a holding pond at Pacheco Pass (perhaps when routing the Super Train). Pump water up to the holding pond during times of low cost power, and drop the water to the reservoir during times of high cost power, recovering energy by the existing power plant. Final natural polishing can occur in the O'Neil Forebay before release to the valley. Net water gain at minimal net pumping costs.

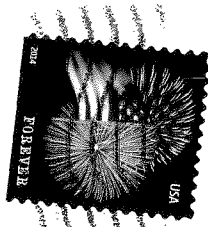
Other alternatives to water conservation are obvious to the conscious engineer. A client has proposed floating thin-film solar sheets on the north/south aqueduct. Generate power (apparently 10% of Cal power goes to pumping) with the solar collectors and reduce evaporation losses (apparently 10 feet of the initial 40 foot flow) by the sheets.

We don't need to spend money just to spend money. There are many educated and smart people in California that don't feel they have a say, until an engineering fiasco occurs, like the Brown Bay Bridge.

Sincerely,


Richard Esty Peterson

Richard E. Peterson
537 Valley St
SF CA 94131



SAN FRANCISCO CA 940

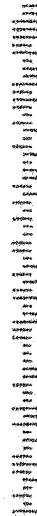
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RECIRC2810

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

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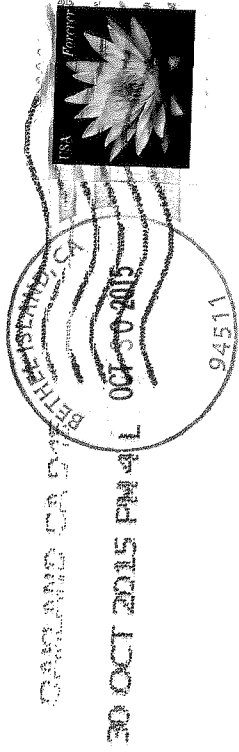
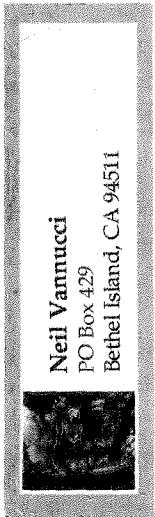
COMMENTS ON THE BDCP WATER FIX.

NOV 03 2015

- 1) WHY RUIN LAND THAT PRODUCES 1.5 TIME THE NATIONAL AVERAGE WITH OUT IRRIGATION AND SEND IT SOUTH TO A AREA THAT WAS DESERT, IS SINKING AS MUCH AS 15 FT., CONTAINS SELINUM, HAS A HARD PAN NEAR THE SURFACE & ALREADY HAS HAD TO TAKE 100,000'S OF ACRES OF LAND OUT OF PRODUCTION?
- 2) WHY RUIN THE LARGEST WEST COAST FRESH WATER ESTUARY & DOOM SAMON & STURGEON AND WHY SHOULD 1.5 Million PEOPLE HAVE OUR WHOLE ECOLOGY CHANGED FOR A FEW BECAUSE OF THEIR GREED AND GO ON UNTIL THE LAND IS USELESS?
- 3) IT STARTED WITH TOLE LAKE (THE LARGEST LAKE WEST OF THE MISSISSIPPI RIVER) GOING DRY BECAUSE OF IRRIGATION, TAKING NORTHERN CALIF. WATER TO THE SOUTH AND WANTING TO TAKE MORE WATER UNTIL WE CANNOT FARM OR HAVE ENOUGH FOR OUR OWN RESIDUES.

PLEASE DO NOT LET THIS HAPPEN.

NEIL J. VANNUCCI
PO BOX 429
BETHEL IS.
CALIF 94511



BOEP/ CALIFORNIA WATER-FIX COMMENTS
P.O. Box 1919
SACRAMENTO Ca. 95812

NOV 03 2015

RECIRC2811

95812131015

95812131015

October 29, 2015

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

BDCPComments@icfi.com

NOV 03 2015

To Whom It Should Concern,

Thank you for the opportunity to comment on the Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement regarding the Bay Delta Conservation Plan and California Water Fix. I have been following this plan for several years and have been keeping my neighbors, friends, and family informed of my findings through a monthly blog. While I have read the Executive Summary of the REIR/SDEIs, I am neither a scientist nor a lawyer, so my comments will be rather general.

During the EIR process, I have noticed that DWR and BDCP administrators and consultants have listened to the concerns initially expressed by those effected by the BDCP, and have made adaptations, added extra hearings, and even given tours of the Delta, which are all appreciated. Changes in the current documents reflect some of the suggestions and concerns expressed in the last go round of comments on the DEIR.

However, there is more work to be done if this new plan should be allowed to come to fruition. There are multiple inconsistencies regarding legal and environmental requirements, a lack of complete assessments of likely environmental impacts, failure to disclose and offer mitigations of significant adverse impacts, and several instances of poorly presented information designed to mislead the public and decision makers about these effects.

Legal Issues

1. Although required by the 2009 Delta Reform Act and Delta Plan, this proposed plan fails to adequately address the co-equal goals of improving statewide water reliability and protecting and restoring a healthy Delta ecosystem while preserving and enhancing the agricultural, cultural, and recreational characteristics of the Delta.
2. The RDEIR/SDEIS is not consistent with the requirements of the National Environmental Policy Act and California Environmental Quality Act.
3. The BDCP /California Water Fix conflicts with, the Environmental Protection Act, the Clean Water Act, and the Delta Protection Act.
4. The BDCP doesn't reduce reliance on the Delta as a water source as mandated by state law and the California Water Action Plan.

5. According to the Natural Resources Defense Council analysis of the DEIR/SDEIS, there are multiple instances where the document misleads the public. For example, the plan uses illegal baselines for determining freshwater flows before installation of the project as well as after construction is complete. When determining freshwater flows through the Delta to meet standards, the document indicates that the flow will be measured above the tunnel outtake, not downstream from the tunnels where the actual flow will occur. If the public and decision makers are to trust data provided by the project, then that data should be accurate and appropriately gathered.

Environmental Issues

1. The BDCP will affect thousand of acres of water and wetlands habitat as well as the water quality of millions of people relying on the Delta. Yet, the Draft Plan does not include adequate analysis of its effects on those downstream from the West Delta. While the new document does include some data analysis about the Bay, it is limited. The likely environmental impacts on the Carquinez Straits, San Pablo Bay, and San Francisco Bay are not adequately reported. The San Francisco Bay-Delta Estuary is the largest estuary in the Western hemisphere and environmental impacts happening in one area will likely affect all portions of it. The DEIR/SDEIS should include a full accounting of the environmental effects on the entire Estuary.
2. According to the Delta Independent Science Board's analysis of the DEIR/SEIS, the document falls short of the "good enough" scientific standards, particularly in the neglect of possible impacts to downstream areas. For example, There is no analysis of the effects of reduced freshwater flows on aquatic species in the San Francisco Bay like Dungeness crab, Pacific herring, northern anchovy, and Bay shrimp which provide livelihood for fisherman as well as food for resident and migratory birds.
3. Although charged with developing a plan that improves Delta flow over current conditions, this plan fails to do so. In the previous plan, extensive habitat restoration would have replaced the need for increased freshwater flow to benefit listed species. Without those mitigations, more Delta flow is needed. Without the mitigations of the previous BDCP, the current plan is likely to contribute to significant declines and potential extinction of salmon and other native fishes due to lack of freshwater flows, reverse flows, and entrainment. This could seriously affect the fishing industry within the Bay-Delta Estuary as well as the entire Pacific Coast of Northern California.
4. With the reduced water flows created by BDCP/CWF there will be a reduction in suspended sediment delivery which will likely have a negative impact on certain fish as well as on the growth of plants in developing wetlands. These wetlands are becoming more essential in mitigating sea level rise due to climate change, but the sediment necessary for them to develop won't be available. The documents do not address the importance of this or include an analysis of how proposed operations might affect sediment delivery downstream.

5. The BDCP/CWF plan has negative effects from construction and operation of the tunnels project on multiple listed species with in the Delta including salmon, smelt, sturgeon, shorebirds, nesting and migrating waterfowl, Clapper rails, and the salt harvest marsh mouse. No mitigation for these impacts is included in the current document.
6. While CWF includes moving the tunnel construction so there is less disruption to private agriculture, there will likely be increased negative effects on nesting sand hill cranes that winter on Staten Island. Significant mitigation for this is not described in the document.
7. Although the current Draft Plan data shows reductions in electrical conductivity, chloride, selenium, and bromide as a result of the amended project, the document fails to convincingly address changes salinity levels in the Bay and Delta as a result of the proposed project. The complexity of determining the X2 salinity line is made more difficult when adding in the predicted effects of sea level rise due to climate change over the next 15 years.. The Plan should take this into account when modeling the needs for freshwater flows through the Delta and into the Bay.

Water Quantity Issues

1. As mentioned above, the amount of freshwater flow through the Delta is important to habitat and agriculture alike. Freshwater flows vary by tidal effects, season, and demand for water, and will be reduced by the use of the tunnels, all of which calls for adaptive management. This type of administration requires fast, current, and accurate data. Modeling of flows presented in the Draft Plan has been inaccurate and in current situations has caused the DWR to erroneously release water for irrigation that it didn't really have. The Draft Plan needs assurances that accurate modeling and correct data can be provided.
2. The water delivery system proposed in the new Draft Plan will deliver less water than the original plan. The water project facility is 40% smaller. Only excess flows can be taken, and in a drought year like this one that would mean no water could be taken. According to analysis by the Kern County Water Agency, there is concern that the operational criteria currently set forth in the RDEIR/SDEIS result in a project that is not economically viable for PWAs because of water supply issues.
3. The uncertainty of how and when water will be delivered in such a way as to protect fish in the Delta, while providing oversubscribed water to others is not adequately addressed in the document.

Economic Issues

1. The Draft Plan fails to insure funding for the 15,000 acres of mitigation and or habitat restoration delineated as part of the new California Water Fix. Commitments for Habitat Conservation Plans and Natural Community Conservation Plans must ensure that adequate funding is provided to carry out the conservation actions identified in the plan, including the sufficiency of mechanisms for long-term funding of all components of the plan and contingencies. Funding is not ensured for habitat restoration actions for the lifetime of the permit.

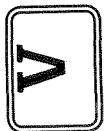
2. In order for the project to ultimately be successful, it must be implemented in a transparent, neutral and science-driven manner. It is particularly important for the Collaborative Science and Adaptive Management Program (CSAMP) to advance both the state of the science and the level of agreement on the conclusions reached based on that science. As noted by the Kern County Water Agency, the funding sources for the SCAMP are unclear.
3. Because water rights have been oversubscribed through out the state, it is likely the State and/or Federal government will need to purchase water to keep the CWP and SWP flowing through the tunnels and south if the project is to be effective for water agencies. There is no mention of funding sources for such actions in the Draft Plan.
4. No thorough economic cost/benefit analysis has been completed. The public, elected, and other decision makers have no economic data on which to judge the effectiveness of California Water Fix or to determine if the project should be built at all.

In conclusion, the reader of the RDEIR/SDEIS is left with more questions than answers. There are no clear statements about water yields, costs, or assurances that the California Water Fix would work the way it is proposed. Californians are left wondering just exactly is going to happen to our primary water source, our agribusiness, our environment, and our fishing industry. The document delineates a plan that is illegal, unscientific, environmentally unsound, ineffective in its purpose, and not well funded. Because of obfuscation and the vast amounts of unclear or incomplete data within the document, we are left "muddled in mud."

Sincerely,



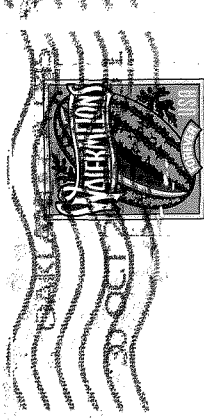
Gayle Vaughan
123 Banbury Way
Benicia, Ca 94510



Gayle Vaughan
123 Banbury Way
Benicia, CA 94510-1604

OAKLAND CA 945

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RECIRC2812

NOV 03 2015

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

95812

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95812191919

October 30, 2015

132 S. Crescent Ave.
Lodi, California 95240

NOV 03 2015

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

Subject: Anti-California Water Fix Comments

Dear Madam or Sir:

The Delta Fly Fishers, an organization of over 100 members, is unalterably opposed to the California Water Fix RDEIR/SDEIS concept. Since the inception of the State Water Project and the Central Valley Project, we have watched the San Joaqui-Sacramento Delta fisheries diminish to the point of near extinction. We have read both the Environmental Protection Agency's and the Army Corps of Engineers scathing assessments of the BDCP. The BDCP would guarantee the loss of the Delta and its fisheries. The California Water Fix has removed the BDCP's environmental protections. We find this lack of concern for the Delta, the four million people living in or near the Delta, the Delta's environment and economy totally repugnant.

The current status of the fisheries in the Delta and in the state is intolerable. The continuing mismanagement of our water resources exacerbates the ongoing decline of the fish populations. The most recent water trawl studies by the California Department of Fish and Wildlife were unable to discover any of the endangered Delta smelt. They are probably now extinct. We have lost over 95% of all their studied species. California's proposed water fix will annihilate the Delta fisheries. The health of the Delta is also crucial to the states' salmon population. Now, however, much of the salmon population also faces extinction. The Delta salmon generate \$1.5 billion dollars. The states' commercial fishing industry is dependent on the health of the Delta for its' survival. Also, many people living in or near the Delta depend on Delta fish for sustenance. They are continuing to loose a source of their food supply. If the State adopts the California Water Fix, it will be an execution warrant for our fisheries.

Since the 1960's, the Delta has lost millions of fish due to entrainment at the Clifton Court Forebay near Tracy. The three to five intakes of the proposed tunnels will be another potential source of entrainment of the fish. At this time, the tunnels have not been planned to prevent this situation. In reality, less than 15% of the Twin Tunnels have actually been planned. Verifiable answers to these questions do not

exist. The states' Legislative Analyst has been prevented from studying the California Water Fix.. This "fix" leaves us without any verifiable answers.

There are an overwhelming number of reasons why the California Water Fix should never be built. The Delta Fly Fishers have expressed some of our concerns regarding the Delta's fisheries. Additional reasons the California Water Fix should not be attempted are economic, environmental and scientific. If this project is built, the DELTA WILL BE LOST FOREVER and what will we gain? NOTHING! The project will not create any new sources of water. We will only continue to maintain unsustainable, highly subsidized corporate farms in the arid south San Joaquin Valley.

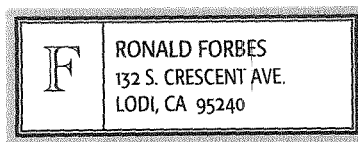
Members of the National Academy of Science found the BDCP poorly planned and indefensible from a scientific standpoint. More recently, the Delta Independent Science Board again objected to the Twin Tunnels Plan as both incomplete and opaque. For three years they have asked questions regarding this plan. They have received no response from the State. They have concluded that the State's environmental documents have not provided what benefit the tunnels would achieve nor the impacts they will have. It should be noted that nowhere on earth has an estuary, like our Delta, been restored by removing water!

Gov. Brown, the State Water Board, the Department of Water Resources and the Bureau of Reclamation, need to realize we live in the 21st Century. The proposed California Water Fix is just a 20th century answer to the State's and Delta's water crisis and will only exacerbate our problems.

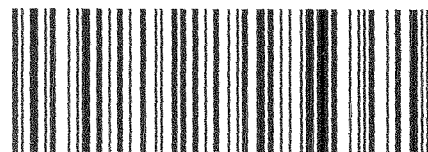
Respectfully submitted,

A handwritten signature in black ink that reads "Dr. Ronald A. Forbes". The signature is written in a cursive, flowing style.

Dr. Ronald A. Forbes
Conservation Chairman
Delta Fly Fishers



CERTIFIED MAIL



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BDCP / Water Fix Comments

P.O. Box 1919

Sacramento

NOV 03 2015

California 95812

RETURN RECEIPT
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11-2

REC16C2813

RECIRC LTR # 2814

- ☐ Unused
- ☒ Duplicate of 2615
- ☐ Out of Scope
- ☐ Other:

(replace original)

Leslie Bloudoff

20537 East Harney Lane, Linden, CA 95236

OCT 20 2015

October 13, 2015

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

Dear Governor Brown;

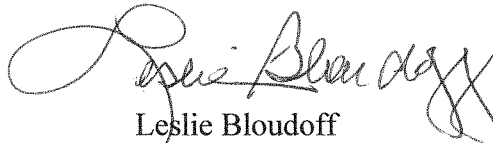
I am a second generation Californian and have lived all 57 years within San Joaquin County. My family has always farmed in the area and I have witnessed just how fragile our eco-system is. Having observed the negative changes, which have occurred over the past 20-30 years, I am opposed to the current water fix plan.

The California Water Fix Plan does not meet the restoration goals of the Delta Reform Act, nor does it address the environmental, public health or economic impacts of the proposed Delta tunnels project. Salinity intrusion is already impacting the western Delta farmers and removing fresh water from this taxed system will only make matters worse. Further, the proposed Delta Tunnels will not provide more water, but will adversely impact both municipal water and wells for millions of rural and urban residents living in five Delta counties.

California can do better than this. We can come up with a plan that protects our waterways and the environment for future generations, using sensible conservation and recycling technologies. Funding water recycling and groundwater recharging projects would save billions of dollars and move both rural and urban communities towards water sustainability. Retiring thousands of acres of impaired and/or pollution generating farmland in the southern San Joaquin Valley is a viable option. Improving Delta levees to address potential earthquakes, flooding and future sea level rise is far less expensive than the conveyance projects that are currently under consideration.

Admittedly we have water problems that must be addressed, but the California Water Fix Tunnels Plan isn't the answer. This project will not produce more water, will not provide a more reliable supply, nor will it improve the environmental conditions plaguing the Delta. I would encourage you to seek other alternatives that will reduce water exports and increase the Delta flow in order to comply with the Delta Reform Act and enable the Delta eco-system to flourish.

Sincerely,



Leslie Bloudoff

Leslie Bloudoff
20537 East Harney Lane
Linden, CA 95236

SACRAMENTO CA 957

13 OCT 2015 PM 11

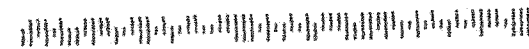


BDCP/Water Fix Comments
P.O. Box 1919
Sacramento, CA 95812

OCT 20 2015

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- ☒ Duplicate of 2501
- ☐ Out of Scope
- ☐ Other:

(replace original)

From: Ryan Camero <rcarcamero@gmail.com>
Sent: Friday, October 30, 2015 3:42 PM
To: BDCPcomments
Subject: CA Water Fix Public Comments
Attachments: CAWaterFixLetter.docx

Hello,

Attached is a letter of opposition against the Bay Delta Conservation Plan, a hazardous project immediately impacting the five counties, eight cities, and fourteen towns that encompass the Sacramento-San Joaquin Delta.

This letter is a coalition between student advocates and leaders that demand protection of the largest set of waterways on the West Coast, and are requesting that efforts to sustain water resources during this drought are not for corporate gain and instead uphold the public trust doctrine.

In sincerity,

Ryan Camero (Stockton, CA)
Arts Educator for the Beehive Design Collective

Emili Abdel-Ghany (Santa Monica, CA)
Solidarity Organizing Program Director for the California Student Sustainability Coalition

Wagio Collins (Stockton, CA)
Radio Host for KWDC 93.5, The Voice of Stockton

Francisco Ferreyra (Oxnard, CA)
Vice President of External Affairs, Student Senate for California Community Colleges

Jaime Gonzalez (Sacramento, CA)
President of the Students for a Sustainable Future Club, Cosumnes River College

Hannah Rubin (San Francisco, CA)
Editor of the Potrero View

This is a letter expressing opposition to the Delta Tunnels as a part of the proposed California Water Fix.

The plan inherently goes against the federal Clean Water Act (CWA) which was implemented in the United States in order to protect the integrity of water in the country. The objective of the legislation is to prevent pollution of water and the environment while supporting public facets of purifying wastewater. This was the first piece of legislation heavily supported by the Environmental Protection Agency (EPA).

In addition, the Delta Reform Act of 2009 was that implemented for California for preserving the environmental, cultural, biological, and economic values of California is being violated by the idea of building the Delta Tunnels in the Sacramento and San Joaquin Delta Area.

Third, the California Water Fix ignores a significant part of the Endangered Species Act because if implemented it will negatively affect the environment and lives of endangered species through the abuse of habitat of said species.

The California Water Fix does not meet goals inherent in the Delta Reform Act, the Clean Water Act, or the Endangered Species Act. In fact, the tunnels will go against the grain of these acts by draining water from the San Francisco Bay-Delta estuary. In this way, water will not be provided to those that need it most.

My objections to the tunnels are threefold:

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

The environment, economy, and health of the people living in the San Joaquin Delta area will be hugely compromised if the California Water Fix is carried out. Taxpayers will have to pay for a project that will not assist their needs in any way. The project will take jobs from those who depend on the San Joaquin Delta Estuary and the water sources they depend on.

My environmental concerns with the plan are:

The impact on wildlife and plant species in the Delta that depend on freshwater include the Delta smelt, chinook salmon, steelhead, San Joaquin kit fox, and tricolored blackbird, protected species already on the brink that will face decimation due to a diminishing food-web.

The animals, plants, and other organisms that prosper in the San Joaquin Delta Estuary will be affected heavily by changes in freshwater flow. These include endangered species such as the Delta Smelt, Chinook Salmon, Steelhead, San Joaquin Kit Fox, Tricolored blackbird, South Pacific Puget Sound Orca Whales, and more.

My public health concerns with the plan are:

Because water flows will decrease in the San Joaquin Delta Estuary if the tunnels are built, the levels of contamination will increase. All members of communities living in the five Delta Counties will be affected.

Chemicals that are not being taken into consideration during construction will be released into the atmosphere, causing such maladies as cancer through the form of carcinogens.

The tunnels plan fails to model for potential increases of carcinogens and other formation of byproducts that would cause cancer and other serious health effects. The communities that live in the area will face threats to their food supply due to contaminants such as mercury in fish and other forms of wildlife.

My economic concerns with the plan are:

For large metropolitan cities such as Los Angeles and San Jose that depend on export water, water rates and property taxes will go up, but they will get no additional water.

The economy supported by San Francisco Bay will most probably be affected. These industries depend on Delta freshwater flows for their crab and salmon fisheries, wildlife sighting, boating, and their restaurant economy, which attracts tourism and recreation from all around the world. Not only does such industry showcase the culture of San Francisco but is worth billions annually. If freshwater from the Delta is gradually redirected to water-intensive crops instead of the Bay Area, there is no doubt that important industries supporting millions of people will be affected.

Salinity intrusion is impacting farms west of the Delta. Removing any more Sacramento River fresh water will make matters worse. Irrigating crops with salt water is impossible. However, this will be an inevitable reality due to increasing salinity from reductions in water flow. Delta Agriculture generates \$5.2 billion for the California economy annually based upon the hard work of farmers who have worked on their craft for decades.

In addition to the agricultural industry of the Delta, the historic fishing industry is worth billions annually, with the salmon industry alone worth \$1.5 billion. The contamination and salinity of water in the Delta Estuary will remove thousands of jobs and livelihoods tied to the fishing industry.

Alternatives to Water Exports Ignored

Alternatives to the Delta Tunnels are largely ignored. These alternatives would be more sustainable in that they would efficiently export water south of California in order to remedy the water crisis. In addition, the quality of fresh water and environments surrounding it would keep their integrity. Instead, it seems the only activity being supported will be in the form of water exports from the Delta.

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

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

The Reduced Exports Plan formulated by the Environmental Water Caucus could potentially preserve the state of freshwater pertaining to the San Joaquin Delta Estuary if implemented. It will place a stringent limits on water exported from the Estuary and help preserve natural species and ecosystems by supporting more inflow and outflow of freshwater. The plan will be a cause for decreasing the demand for water and at the same time send water south of California which will definitely mediate the water shortage crisis. By providing more sustainable and efficient systems south of the Delta, those who need water in these areas will be self-sustainable through localizing the control and movement of water resources in the area. This reliability will come from strengthening levees beyond current efforts. By doing so and more this plan would be in line with legislation pertaining to Estuary preservation and an extremely cheaper alternative than plans implemented by the Water Fix Initiative.

In addition, there is the possibility of building the Benicia Salinity Control Gates which would an extremely efficient alternative to the building of the Delta Tunnels. These gates would be extremely sustainable in that they would not manifest or cause any environmental issues due to the fact that paths of water directed by such a plan would not be blocked nor constricted. These gates would assist the passage of fresh water to be sent south of California. In this way, the gates could literally end the state's water shortage right after its construction. In addition, these control gates will be extremely easy to build-- it will require months instead of years to finish. Lastly, the project will only cost 30 million dollars instead of the billions of dollars that would be required to execute the twin tunnels. The Benicia Control Gates would be amazing at controlling the salinity of water around the Delta Estuary, while allowing a natural like flow system to remain in place. The gates will keep fresh water effectively separated from salt water from the Bay Area, and maintain the flow of fresh water so that salinity would not get out of hand within the San Joaquin Delta.

The flow of freshwater through the Delta is an extremely important force of nature that needs to be maintained and preserved in order to reduce pollutants so that ecosystems and wildlife can be maintained. The increasing of such fresh water is important so that endangered species reliant on water from within the Delta Estuary can be restored.

In Summary

Our environmental, ecological, health and economic values as are according to the Reform Act of 2009 will be hugely compromised and aggravated by the implementation of the Water Fix Initiative in the state of California.

Firstly, this is due to the fact that the building of the Delta Tunnels will redistribute water in inefficient ways which will not produce any new water. Second, needed supplies and solid infrastructure for systematic water systems are not being supported. The money going to fund the

California Water Fix Initiative could be fixing our water drought through supporting initiatives other than the Tunnels.

With hope, we would appreciate the implementation of alternative plans contrary to the plan for the Delta Tunnels as listed above because they would protect the environment, preserve and even supplement California's economy, and lastly provide water throughout the state so efficiently that we could end the state's water drought with immediacy.

Thus, with the desire of being in line with the Delta Reform Act, the federal Endangered Species and Clean Water Acts, with this letter we are wanting to communicate the need for the state to abandon the California Water Fix initiative which will support the building of the Delta Tunnels in the San Joaquin Delta area. This statement is being declared with the utmost compassion and consideration for those living in the state of California and for generations to come.

With sincerity,

Ryan Camero (Stockton, CA)
Arts Educator for the Beehive Design Collective

Emili Abdel-Ghany (Santa Monica, CA)
Solidarity Organizing Program Director for the California Student Sustainability Coalition

Wagio Collins (Stockton, CA)
Radio Host for KWDC 93.5, The Voice of Stockton

Francisco Ferreyra (Oxnard, CA)
Vice President of External Affairs, Student Senate for California Community Colleges

Jaime Gonzalez (Sacramento, CA)
President of the Students for a Sustainable Future Club, Cosumnes River College

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General Counsel

In reply refer to: L2015-061

NOV 03 2015

October 30, 2015

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

VIA EMAIL BDCP.comments@icfi.com
AND U.S. POSTAL SERVICE

Re: Comments on Partially Recirculated Draft EIR/Supplemental Draft EIS for BDCP

Dear Sir or Madam:

These comments on the Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Bay Delta Conservation Plan ("BDCP")/California WaterFix are submitted on behalf of El Dorado Irrigation District ("EID"). EID also submitted comments on the then-BDCP and accompanying environmental document in July 2014.

EID serves more than 100,000 residents of El Dorado County, entirely from surface water supplies in the South Fork American River and Cosumnes River basins, and thus has vital interests at stake in this proceeding. In addition to very senior water rights associated with its upstream reservoirs and diversions in both river basins, EID relies heavily on Folsom Reservoir for multiple supplies. Specifically, at Folsom Reservoir EID has a water service contract for up to 7,550 acre-feet annually of Central Valley Project ("CVP") water supplies, and two Warren Act contracts: one to take up to 4,560 acre-feet annually of pre-1914 and licensed water rights associated with former EID ditches and Weber Reservoir, and another to take up to 8,500 acre-feet annually of supplies under state Water Rights Permit 21112, a 17,000 acre-foot per annum entitlement issued to EID under area-of-origin laws and associated with EID's hydroelectric project, FERC Project No. 184. EID expects to secure a Warren Act contract for the entire 17,000 acre-foot Permit 21112 entitlement in the near future. Also, EID expects to be the beneficiary in the near future of a subcontract for all or a portion of the El Dorado County Water Agency's pending 15,000 acre-foot water service contract for CVP water supplies from Folsom Reservoir.



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EID is mindful of the project proponents' request that the current round of public comments focus on the RDEIR/SDEIS, rather than on sections of the Draft EIR/EIS that were not recirculated. The difficulty with that request is that EID's 2014 comment letter identified numerous deficiencies in the Draft EIS/EIS, and it does not appear that any of those deficiencies have been corrected – or in most cases, even addressed – in the RDEIS/SDEIS.

In 2014 and now, EID has been monitoring and assessing the BDCP/California WaterFix and its accompanying environmental documentation for their conformance to the core principles of regional self-reliance, the protection of senior and area-of-origin water rights, avoidance of redirected impacts upstream of the Delta, and promotion of the co-equal goals. In 2014, we concluded that as then formulated, the then-BDCP and Draft EIR/EIS either did not conform to these core principles, or failed to provide sufficient information by which to judge their conformance. EID called on the project proponents and coordinating agencies to address specified fundamental flaws and omissions in the documents, and to recirculate them for public comment, before proceeding further toward implementing this massive and enduring undertaking. Unfortunately, the RDEIR/SDEIS does not address the flaws and omissions EID identified in 2014.

EID's foremost concern was that the operational and hydrologic modeling in the Draft EIR/EIS was fundamentally flawed, for several reasons. First, it did not employ the most current and correct methodologies. Second, it assumed that CVP operations would not adapt to climate change-driven changes in future hydrological conditions. Third, the modeling's projections of future water demands in the American River basin were inconsistent with both state-generated population projections and local water supply plans. Fourth, the in-Delta operations actually modeled differed from the narrative descriptions of those operations in the Draft EIR/EIS. Our 2014 letter explained that because this modeling served as the cornerstone of the Draft EIR/EIS's analyses of surface water, socioeconomic, and in-Delta aquatic impacts, those impact analyses could not meet the standards of the California Environmental Quality Act and the National Environmental Policy Act unless the modeling was corrected.

Unfortunately, although the RDEIR/SDEIS does include additional information about and apparently some modifications to modeling methodologies (See Appendix A, sections 8.3.1.1 and 8.3.1.3), all of these revisions are focused on water quality analyses downstream of Folsom Reservoir. None of the four flaws EID identified in 2014 has been addressed. The only reference EID could find to the disconnect between modeling and actual CVP operations is the unsubstantiated assertion that because operational decisions are made and adjusted in real time based on various factors, "the best available models cannot simulate" them. (Appendix A, section 8.3.1, p. 8-52:2-5.) Based on our own recent experience with retained consultants running the CALSIM II model, EID believes this statement to be false.



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In 2014, EID also noted that the failure to model BDCP operations both with and without sea level and climate change assumptions compounded the inadequacy of the project's impacts analysis (and therefore, its mitigation measures), because it made it impossible to differentiate between impacts caused by the project, and impacts caused by climate change. Although the RDEIR/SDEIS now includes a No Action Alternative (Early Long Term) (RDEIR/SDEIS at section 4.2), this alternative still assumes the same effects of sea level rise and climate change as the original No Action Alternative – despite the change in timeline from 2060 to 2025. Not only is it unreasonable to assume that sea level and climate changes in just the next decade would be the same as they would through 2060, the continued failure to model operations without sea level and climate change impacts still obscures the extent to which impacts are caused by the project, rather than changes in the surrounding environment.

Nor does the RDEIR/SDEIS do anything to narrow the virtually unbounded agency discretion and lack of defined performance standards in the BDCP's plan for adaptive management that EID highlighted in 2014. As we stated then, although adaptive management is a beneficial concept, the continued over-reliance on future adaptations improperly "assumes away" reasonably foreseeable project impacts, and the failure to define adequately the "triggers," performance standards, and "bookends" of future adaptations improperly defers the formulation of feasible and effective mitigation measures for those impacts.

EID remains greatly troubled by the prospect of redirected impacts, and particularly impacts on its senior, upstream, area-of-origin water rights. In 2014, we noted that the Draft EIR/EIS did not even attempt to assess the BDCP's socioeconomic impacts outside of the statutory Delta, and suggested that this voluntary donning of analytical blinders did not bode well for a plan that is supposed to avoid redirected impacts. Nothing has changed in this regard in the RDEIR/SDEIS.

Aside from inserting an anodyne, unsupported statement that "[t]he alternatives would not modify water deliveries to non-SWP and non-CVP water rights holders" (see, e.g., Appendix A at p. 5-1) and affirming that the CALSIM II modeling did not modify water rights deliveries to non-SWP and non-CVP water rights holders (*Id.* at 5-2), the RDEIR/SDEIS does nothing to allay our concern that, inevitably, EID and other upstream interests will be called upon to bear a share of the proposed project's burdens, in the form of water foregone, CVP contract charges, or both.

EID fully recognizes the need for a comprehensive, fair, and lasting solution to the myriad problems associated with the Delta. EID is committed to the co-equal goals. EID can and will support a program that advances those goals, and that supports regional self-reliance, protects senior and area-of-origin water rights, and avoids redirecting impacts to third parties. However, the revised BDCP/California WaterFix and the accompanying environmental document, as revised and supplemented by the RDEIR/SDEISAs currently formulated, the BDCP and the Draft EIR/EIS still is not that program – and would not be even if the documents were not marred by numerous and fatal analytical flaws. EID therefore repeats its 2014 call upon the



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project proponents to step back, reconsider, redraft, and recirculate for public review a plan and environmental documentation that can earn the support of upstream, area-of-origin interests.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas D. Cumpston".

Thomas D. Cumpston
General Counsel

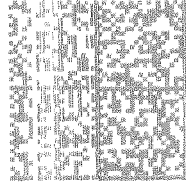
TDC:pj

cc: Jim Abercrombie, EID General Manager
Brian Poulsen, EID Senior Deputy General Counsel
Dan Corcoran, EID Environmental Manager

El Dorado Irrigation District
2890 Mosquito Road, Placerville, California 95667

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