

L # BDCP301

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- ☐ Other: _____

(replace original)

From: Steve Orgain <steve@chefstouch.com>
Sent: Wednesday, February 19, 2014 7:46 PM
To: BDCP.Comments@noaa.gov
Cc: Devoreaha.Smith@wellsfargo.com; jim@mcgrail-law.com
Subject: No Tunnels !!
Attachments: Letter to BDCP, Disco Bay #1.docx

BDCP,

Attached, Please see our comments,

Sincerely,

Steve Orgain
Primary Resident
5771 Salmon Court
Discovery Bay, Ca. 94553

Steve Orgain and Devoreaka Smith

February 18, 2014

To: BDCP.Comments@noaa.gov

My wife and I live on the water in Discovery Bay California. We bought this home because we love being on the water. We, our children and grandchildren, Swim, ski, and boat in our bay and the delta. We love our home. The proposed tunnels will undoubtedly adversely affect life as we know it.

It is outrageous that you have decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying.

Posting comments in an online docket during EIS process is standard federal government procedure. Why has the highly controversial project been selected for special treatment ? I demand that all comments be posted in an easily accessible format and that the comment period be extended for the length of time that comments were not posted on time.

Sincerely,

Steve Orgain

5771 Salmon Court, Discovery Bay California 94553

From: Bob Ackerly <bob@ackerly.com>
Sent: Sunday, February 16, 2014 7:28 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: BDCP Comments

BDCP Comments

Why does this Delta “conservation” plan smell as bad as the 100 piles of delta muck it will produce?

As a 16 year resident and Discovery Bay homeowner, I am outraged and dismayed that my government is once again wasting tax dollars planning a project that will be detrimental to me, my family and community and destroy one of the greatest water resources in the world – the California Delta. To do so under the guise of conserving the Delta when in fact it will destroy the Delta is beyond belief. The State must think its residents are mindless idiots! Well, I am not. I think for myself, I can read and understand what is presented in the BDCP and here are my concerns and comments. (BDCP EIS and EIR comments will follow in a separate mailing.)

- 1) **Constantly shifting cost estimate.** First it was \$13.5 Billion, then \$25B. Now we’re hearing \$65 Billion as the cost to build the tunnel project. How much you want to bet the real number is over \$100 Billion once we factor in all of the missing costs the plan has failed to include (bond interest expenses, mitigation costs, lawsuit defense costs, reduced property taxes due to lower property values of homes and farms affected by reduced water flows, increased salinity levels, etc., lost taxes on the 10% of fertile cultivated productive farmland taken by eminent domain, and so forth. And how do you quantify the cost of the disruption in lives, traffic, and to the environment this project will create over its 10 year build cycle and 50+ year life that have not been included in these documents?
- 2) **Cost / Benefit analysis is flawed.** The analysis presented uses 60 years to calculate the benefits and 50 years to calculate the operating costs. What is that all about? Unless the cost benefit analysis is revised to compare apples to apples, it cannot be believed in any objective way. Is this intentionally deceptive?

Until the cost estimate is a “real” number, how can a cost benefit analysis even be performed? The plan is based on a cost of \$13.5 Billion which is nowhere even close to reality. What would it look like at the current estimated \$65-100 Billion cost? I’m led to believe the BDCP is only 10% designed. How can a cost basis be established to possibly project the final cost of this boondoggle when such a small part of the design process has been completed? Complete the design then tell us how much the BDCP will cost.

The 2% per year cumulative earthquake risk “abatement” cited as a benefit of the project is bogus. Robert Bea, professor of civil and environmental engineering at the University of California, Berkeley, exposed the earthquake induced massive levee failure risk as false. There has never been an earthquake induced levee failure in the last 100 years in the Delta and neither the 1906 nor Loma Prieta quakes created one levee failure. What creates failures is lack of maintenance which is a real issue that needs to be addressed. Also, the risk of tunnel failure due to liquefaction during an earthquake is probably much greater than any risk of levee failures. Where in the BDCP is the cost of earthquake or other possible tunnel failures calculated?

- 3) **New or alternative water sources have not been presented or addressed in the study.** The City of Carlsbad has approved a new desalination plant be built and it is now 25% completed. At a cost of approximately \$1 Billion, the desalination plant will produce 50,000,000 gallons of clean drinkable water each and every day! That's 50 Million new additional gallons **not diverted from the Delta**. If the State were to build 65 such desalination plants instead of this hair-brained "conservation" plan (which really is nothing more than a disguised water grab by "farmers" and Southern California water districts) we would produce 15,000 Trillion gallons of water each year and probably lower the rising water levels of the Pacific enough to save the island of Tuvalu and others from disappearing. All of these gallons would be new water, a huge net plus! **The current BDCP does not produce one additional drop of water and does nothing to help the State during drought periods such as the one we are currently experiencing.** Tell me again why the BDCP makes sense?
- 4) **Who controls the tunnel flows?** As I read it, the water districts through the tunnel management operating agreement would be in control of determining the appropriate flow of water through the tunnels with little oversight and with **veto authority**! This is insanity at its best; the fox is guarding the hen house.
- 5) **Current water storage facilities are inadequate to support the BDCP.** I have heard from BDCP staffers at meetings that there is usually a large surplus of water during the spring run-off period that is diverted into the Yolo Canal for flood control purposes and wasted. Conceptually, the BDCP provides for a "big gulp, little sip" approach to water management taking advantage of these large spring run-offs to divert water with little or no effect on the Delta and sipping small amounts of water when flows are lower. Great concept but the BDCP makes no provisions for building of storage facilities to save this massive water diversion. Where does the water go after it is gulped from the Delta? Why isn't this expense included in the cost/benefit analysis? And who determines the appropriate timing and sippage?
- 6) **Increased desert farming is not prohibited under the plan but should be.** Why would the State take fertile productive revenue producing Delta farmland out of production by eminent domain to support the expansion of almond growers using desert farmland that would never grow anything without our precious water? This makes no sense at all unless you are the desert farmer who bought his land cheap. Planting of permanent crops on desert soil should be prohibited under the BDCP and existing plants/crops required to be plowed under / taken out of production.
- 7) **Water for fracking has not been addressed in the BDCP and must be prohibited.** Why doesn't the BDCP prohibit the use of Delta water for fracking?
- 8) **The construction of the BDCP will likely damage existing aquifers due to the use of various chemicals and agents needed for the build.** What are the mitigants to this damage and how much will it cost? Why isn't this included in the BDCP?
- 9) **What will the impact be on Delta boating and navigation safety?** Are existing county, state and federal resources adequate to maintain safe boating and Delta navigation? Can emergency responders be effective given the disrupted boating patterns required by the BDCP build? Why isn't this addressed in the BDCP?
- 10) **Do the rate payers who will be the beneficiaries of this big-gulp water understand the true cost to them once the project has been completed?** What will the cost increase per household water bill be per month, quarter or

annually? How can users agree to approve or support this project without knowing how much it is going to cost them each individually?

- 11) Why hasn't the State kept its promises to us?** At local meetings I attended last year, I asked questions like those posed here and staffers were unable or unwilling to answer them in the public forums. I gave BDCP staffers my email address and was told I would receive answers. I haven't. It's like this project has already been determined to be acceptable by the State and is being steamrolled over the objections of its citizens.
- 12) Will the BDCP be put on a ballot for voter approval?**
- 13) Why isn't the BDCP process transparent?** Where can I go to read comments others are sending to the State regarding the BDCP? Where are they posted for me to read them? In this day and age of the internet, why isn't there a website available for me to read other opinions, not just the "party-line" put forth by BDCP staffers?

From: LaVan Bock <lavanb@comcast.net>
Sent: Thursday, February 13, 2014 3:18 PM
To: Noaa comments
Subject: BDCP Comments
Attachments: BDCP comments PDF.odt

Attached are my comments on the BDCP.

BDCP Project Comments

I have a waterfront home in Discovery Bay and have enjoyed the recreation possibilities of the entire Delta since the late 60's. Our 4 kids have learned to ski here and returned every summer to continued enjoying this place. I bought a 24' Cutty-cabin boat 20 years ago and continue to enjoy staying several nights on the Delta many times each year. Skiing and fishing has been an important activity for our whole family.

I am opposed to the BDCP of the twin 40' tunnels for many reasons which I will point out as follows:

The Draft EIR/EIS mentions the environmental benefits including monitoring water quality stations within our bays but to this day there are no monitoring sites as promised. The reduction of high quality of fresh water flowing through our bays will require increased weed control and dredging and restrict most water contact sports. I see no purported environmental benefit whatsoever from this project since the water quality will diminish.

The Draft EIR/EIS should not be included with the Habitat Conservation Plan since the tunnels have nothing to do with restoration of the Delta. It should include all economic impacts including reduced property values and tax revenue and local economy degradation.

All mention of alternatives has not been explored which would produce More water such as desalination, in-ground recharge or increased storage. The approach of "little sip, big gulp" has absolutely no merit since it relies on taking extra water during the heavy rain occasions with no place to store it since most reservoirs will already be full. We must have an increase of storage capacity if this project will have any merit. The EIR/EIS Draft must be revised and recirculated to include a reasonable range of alternatives that include various storage concepts. Since enough water flows over the flood control diversion structures at the Sacramento Weir and Fremont Weir during peak winter storm events in a few days to supply Southern California with all its water needs we must find a way of capturing and storing water diverted by these weirs.

The decision not to post all comments online as they come in so everyone can see what others are commenting is outrageous. Posting comments in an online docket during the process is standard federal government procedure. All comments must be posted online in an easily accessible format. Thwarting informed public participation by keeping everyone in the dark about what others are saying must stop.

The entire premise of this project is dishonest since the tunnels are not a conservative measure. It is only designed to export more water to Southern California and not to save fish or help the Delta. All water exports must be reduced since there is simply not enough water to expect the Delta species to survive.

This is a another comment on the BDCP project. This project should be abandoned. It is a waste of the tax payer money and does not comply with the Endangered Species Act. The tunnels are not a conservation measure since they are a water supply infrastructure. The tunnels have nothing to do with saving species and labeling it as a Habitat Conservation Plan doesn't make it one. You can't recover the Delta as the Delta Reform Act requires and continue to export water at current levels, let alone the increased levels that the tunnels will allow.

L # 305

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L # 306

- ✓ Unused (form only)
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(replace original)

From: Peter Sustarich <capnpete@yahoo.com>
Sent: Thursday, February 13, 2014 9:35 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Comments on BDCP

To whom it may concern,

I am a Discovery Bay resident and have been involved with boating and watersports in the Delta for over 35 years. My children and now my grand-children have enjoyed and are enjoying the beauty of the Delta. I would like to preserve the Delta so that they and their children and grandchildren could continue to enjoy its beauty. After being exposed to the BDCP I am truly disappointed that it does NOTHING to preserve the integrity of the Delta and, in fact, potentially has a greater than average change of hurting the delicate balance of the eco-system of the Delta.

I find it ludicrous that you have decided not to post all comments online so that everyone can see what other tax paying citizens are commenting on. Posting comments in an on-line docket during an EIS process is standard federal government procedure. So why has this controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

In a similar subject I , and many other people, attended a meeting in the Brentwood library to provide our comments and questions and were told that we would receive feedback. No one to my knowledge has received ANY feedback. This only feeds to the feeling of distrust in the process of the BDCP and that is one of the reasons **why I want all comments posted online.**

The following comment is on the Draft EIR/EIS. The EIR/EIS fails to analyze any alternative with a storage component. As we know from our current dry year, we get no rain then we get too much rain, all at once, in the wrong place, at the wrong time, and thanks to mother nature it is often very erratic. Note that if the "tunnels" were in place they would NOT help the current dry situation we are in. The reason is very simple..... they DO NOT add any water to our systems, they only convey more water from point A to point B. The only solution is to be able to harvest and store the water that comes in great bursts at times when our existing reservoirs are already full. WE NEED NEW STORAGE. Without new storage we continue to draw water from the Delta at times when water is critically low and at times when exports harm fish and other species. If we had water in storage at these times we wouldn't need to draw water (or at least as much water) from the Delta at these times. To me this seems very basic. Has storage been considered? And if not why not? It seems that all the energy and resources of the BDCP have been focused on building the BIG OLD TUNNELS to get more water flowing rather than addressing the issue of a way to provide water in the least disruptive manner for a long term solution. So I suggest that you and your teams go back, put the concept of the tunnels aside, and redefine the problem. Then figure out alternatives that provide a solution in a cost effective manner. The end solution should minimize impact to stakeholders (environment, species, recreation use, needs of northern and southern California residents and taxpayers). To me increased storage is a no-brainer and it would help alleviate the dry condition we are in right now... the big old

tunnels would not help. Think about it and take some action!

BDO 304

Sincerely
Pete Sustarich
Discovery Bay resident
California Tax Payer
capnpete@yahoo.com

L # 308

- ✓ Unused (replaces form)
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- ☐ Out of Scope
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(replace original)

From: mauipete@comcast.net
Sent: Thursday, February 20, 2014 11:25 AM
To: bdcg.comments@noaa.gov
Cc: stcda@nodeltagates.com; mauimindy@comcast.net; pds5000@aol.com
Subject: Comments on Draft EIR/EIS

Dear Sirs, Having lived in Discovery Bay Ca in the heartland of the Delta for 25 plus years I have a few comments to make.

1. You have not allowed what is standard procedures and due process of law to post all comments to this proposed EIR for everyone to see and add to additional points of contention. Why have you not followed other Federal and State protocol, have something to hide? We the public also cannot access the builders and supporters comments to voice our objections.

2. Since we are directly in the scope of impact in Discovery Bay we would expect a public hearing to voice our concerns in our own communality, which was promised but not delivered on. Some specific points I would ask?

A. We are already experiencing clogged water ways of various plants, invasive species of water hyacinths and algae. It is so bad that many of our bays are unusable to swim and boat in.

B. The pump station at Clifton fore bay filters a huge amount in vast tonnage of water hyacinths which will cease with the tunnels. What impact does that add to the already clogged waterways.

C. Discovery Bay has a silt problem in filling in our waterways and bays. Has anyone done a study to find the impact on future low flows of water thus adding time for debris and silt to settle out?

D. Overall water quality is decreasing around Discovery Bay witnessed that the inflow pumping station was moved from Old River to Slew upstream to pump water to Los Vaqueros Reservoir. What impact does lower water flows to higher pollutants in the existing water?

E. My granddaughters swim in the waterways and bays in Discovery Bay. What scientific testing has been done on the bacteria count and pollutants that come from sewer treatments plants, storm water runoff and agricultural runoff? Human contact to decreased water quality in swimming, fishing, hiking and drinking has not been addressed.

F. No monitoring station has been proposed in Discovery Bay.

3. No consideration has been given to alternates to the tunnel in terms of water conservation by all citizens of California, the easiest remedy. No mention of desalinization even as California is building facilities. No additional water storage is in this plan to use if the water is diverted.

4. Any industrial project in the state of California would have to have a full EIR covering all the issues mentioned above, think Bay Bridge, Local gas fired electrical power plant(Antioch/Oakley) local area kind of projects. This is a flawed illegal project that discriminates against all the local inhabitants by not following nationally recognize EIR procedures, public notices and public participation.

Peter Schneider Discovery Bay Ca.

From: mauipete@comcast.net
Sent: Thursday, February 20, 2014 12:04 PM
To: bdcg comments
Cc: stcda@nodeltagates.com; mauimindy@comcast.net; mauipete@comcast.net
Subject: Comments on BDCP Project

Dear Sirs, I have lived in Discovery Bay Ca for 25 years plus. This project and how it is being processed is beyond our rights to a fair due process by not allowing our comments and the oppositions comments to be publicly posted and accessible. We have no way of knowing what our fellow effected residents are commenting on. We also have no rights as to comment on pro tunnel participants comments and arguments. This discriminates to those of us who are most at risk to this proposed project.

My concerns and comments are,

1. the Tunnels are not a water conservation project as it does not address, water conservation by all Californians in way, shape or size. It is a way to bypass the Delta so that the current pump stations don't kill off all the fish either going up stream to mate or returning to the ocean to grow.
2. The fresh cleanest water upstream by Sacramento is the pump point. Any water downstream will be impacted by bacteria count, storm water runoff and agricultural runoff. A higher concentration of pollutant will be the result of this water grab. No safety checks and balances are in place.
3. This project discriminates against the inhabitants in this region and to the plants and wildlife that live here. None of these factors are being considered.
4. The water is not destined to support humans but for farmers in poor soil and growing regions unfit to farming.
5. The project should be abandoned and real conservation measures such ones used in Israel and even in Maui for Pineapple growers true conservation measures would produce tremendous savings.
6. The funding for this project is in line with the High Speed Rail project which is open ended and will result in costs associated with the Bay Bridge fiasco.
7. No alternative projects are or going to be considered which is a direct violation of public trust which is adheared to in all Federal and state projects.
8. All this project does is take the freshest water upstream and by passes the problem with endangered species act, concentrate waters that have sewer discharges, storm water runoff and agricultural runoff. This concentrated pollution will be a critical factor for all Delta communities and their people.
9. This project will add to the major problem of clogged waterways, bays and estuaries. Present water flows wash down the water hyacinths, algae and debris and cleanse the delta. Now the pump station at Clifton fore bay filters out huge tons of water hyacinths which will be left in the delta. No one has accounted for this drastic change or additional tonnage in the Delta system.

Peter Schneider Discovery Bay Ca

From: Ramsey Gregory <ramseygregory@comcast.net>
Sent: Saturday, February 22, 2014 9:23 AM
To: BDCP.comments@noaa.gov
Subject: Public comments

I strongly oppose the proposed plan to build water tunnels taking water above the Bay to ship south. This plan will harm the delta ecology, harm existing agricultural activities in the delta, will allow further saltwater incursion up the bay and into the Sacramento River, rewards greedy southern water companies, and endangers local habitat.

Ramsey Gregory
916/616-1003 (cell)
ramseygregory@comcast.net

From: MICHAEL <mppmcmahon@comcast.net>
Sent: Thursday, February 20, 2014 10:32 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: RIR/EIS

My wife and I have lived in Discovery Bay on the water for 25 years. We enjoy wildlife, fishing, swimming and boating. We are very interested in saving the Delta.

This is my comment on the Draft EIR/EIS. I would like to see a good problem statement with a list of all the alternatives for solving the problem. For instance, a series of reservoirs down the state, desalinization units in the southern part of the state, mandatory rationing for all.

Thanks, Mike McMahon

From: MICHAEL <mppmcmahon@comcast.net>
Sent: Thursday, February 20, 2014 10:41 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Canal

My wife and I have lived in Discovery Bay on the water for 25 years. We enjoy wildlife, fishing, swimming and boating. We are very interested in saving the Delta.

I think the canal proposal is bad. Either a large pipe or canal would be cheaper and better.

Thanks, Mike McMahon

L # BDCP314

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From: Jimmy Jenkins <jimjenkins444@yahoo.com>
Sent: Thursday, February 20, 2014 6:08 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Measuring Environmental Impact

This is a comment on the Draft EIR/EIS. If we are to assure environmental benefit there must be ongoing monitoring and adaptive management programs as part of any plan. Representatives from Discovery Bay have requested at public meetings that monitoring stations be included to measure the impact on the 16 bays of Discovery Bay. As of today, monitoring stations have been included. Let's get real and measure the quality of water now and latter so we can assure high quality water.

From: Jimmy Jenkins <jimjenkins444@yahoo.com>
Sent: Thursday, February 20, 2014 6:11 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: "Little Sip, Big Gulp"

This is a comment on the Draft EIR/EIS. The assertion has been made that the projected tunnels will support environmental concerns by taking water in a less harmful way than that which is in current practice. The BDCP has advertised its "little sip, big gulp" concept as one of the ways the tunnels will mitigate adverse impacts. When water levels are low or water is critically needed for fish populations, the tunnels will take only small amounts of water. When water is abundant or not needed for fish populations the tunnels will take larger amounts of water. This is the reasoning but it is flawed because the BDCP includes NO provisions for additional storage when water is abundant. Without a place to store water that would be harvested when water is abundant the "big gulp" concept is not a real proposal. This is true because during large winter storm events reservoirs are typically full and water cannot be harvested since there is no place to put and store it. Building adequate storage is central to any plan that includes a "little sip, big gulp" component.

The EIR/EIS states that "developing new water storage" is beyond the scope of the BDCP and yet if one of the central concepts is "little sip, big gulp" there has to be storage of this "big gulp" water. The project proponents do not have the authority to simply decide that storage is not an issue they will deal with. If including storage lessens one of the more significant impacts, you are required by law to consider it.

From: Jimmy Jenkins <jimjenkins444@yahoo.com>
Sent: Thursday, February 20, 2014 6:16 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Wasting Taxpayer Money

This is a comment on the BDCP project. The entire project should be abandoned as it is a complete waste of taxpayer money and does not comply with the Endangered Species Act. The tunnels are neither a conservation measure nor a Habitat Conservation Plan. The tunnels have nothing to do with saving species. Please abandon this plan before there are millions spent on it and an equal amount in law suits against it.

From: Jimmy Jenkins <jimjenkins444@yahoo.com>
Sent: Thursday, February 20, 2014 6:12 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Capturing Existing Water

This is a comment on the Draft EIR/EIS. It is well known that there is currently enough water that flows over the flood diversion structures at the Sacramento Weir and Fremont Weir during the peak winter storm events in a few days to supply ALL the water needs of southern California for several years!! We have plenty of water but we MUST HAVE A WAY TO CAPTURE IT. The BDCP should review and analyze ways to divert these weirs. The environmental benefits would be enormous because none of this water flows through the Delta. It would be possible to meet export needs and reduce the amount of water taken from the Delta. It is a solution worth considering even with the expense. Why is it not included in the considerations??

L # BDCP319

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(replace original)

From: GRAHAM207@aol.com
Sent: Friday, February 21, 2014 10:26 AM
To: bdcg.comments@noaa.gov
Cc: bdcg.comments.copy@nodeltagates.com
Subject: BDCP Project

We live in Discovery Bay and have spent a lot of time reviewing the "Tunnels" projects. This is a comment on the BDCP project. This project should be abandoned. It is a waste of taxpayer money and does not comply with the Endangered Species Act. The tunnels are not a conservation measure, they are water supply infrastructure. Simple labeling your project a Habitat Conservation Plan doesn't make it one in reality and the tunnels have nothing to do with saving species.

Please go back to and look at options that will help the California water situation, protect fish and wildlife and won't cost 60 billion dollars.

Carolyn Graham

L # BDCP321

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L # BDCP322

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From: Carl Ohlson <carllindsayohlson@gmail.com>
Sent: Sunday, February 23, 2014 11:05 PM
To: BDCP.comments@noaa.gov
Cc: bruceoleohlson@hotmail.com
Subject: comments

Fellow residents of planet earth,

Given that we are in the most severe drought of our recorded history,
and given that we humans have caused climate change that is predicted will reduce the expected rainfall in Northern
and Central California,
it seems immanently reasonable that we build additional water storage capacity here in the North,
and that we save the money and environmental impacts by NOT building additional capacity to ship water to the South
end of this State.

Thank you for your concern. Please make the correct decision.

Sincerely,

Carl Lindsay Ohlson

From: aecjackson@att.net
Sent: Friday, February 21, 2014 12:13 PM
To: BDCP.comments@noaa.gov
Subject: draft copy

BDCP,
Can you send a DVD copy of the draft BDVP proposal to : Estelle Jackson, 128 Chestnut Street, #22, Boston, MA 02018-3346. I am a California land owner with six miles of a major feeder creek to the Sacramento River on my property. This information will be useful.
Thank You,
Estelle Jackson

From: Amy Skewes-Cox <amysc@rtasc.com>
Sent: Saturday, February 22, 2014 7:40 AM
To: BDCP.comments@noaa.gov
Subject: Copy of DVD

I would like to request a copy of the DVD for the BDCP EIR/EIS and associated documents. My address is PO Box 422, Ross, CA. 94957. Many thanks.

Amy Skewes-Cox

Cell phone 415-203-0454

From: Pat Borison <pborison@yahoo.com>
Sent: Friday, February 21, 2014 10:15 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: BDCP EIR/EIS

Comments on BDCP EIR/EIS

February 20, 2014

I have lived in a waterfront home in Discovery Bay for 13 years and have been boating on San Francisco Bay and on the Delta since the mid-1960s.

Before commenting on the EIR/EIS I wish to state my opposition to your apparent decision not to post all comments online as they come in so that everyone can see what others are saying. This decision can only be aimed at thwarting informed public participation. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

That said, the following is a comment on several issues of concern in the Draft EIR/EIS.

The EIR/EIS does not adequately address water quality impacts in Discovery Bay. Discovery Bay representatives have requested that an analysis of the project's water quality impact on Discovery Bay be included in the draft EIR/EIS. Discovery Bay consists of 16 shallow water bays; impacts on water quality in nearby open water sloughs do not translate to impacts on our bays. I respectfully request that site-specific analyses be conducted to determine the true impact on our bays.

The EIR/EIS does not address the need for monitoring stations in Discovery Bay to adequately monitor water quality. The 16 bays of Discovery Bay are heavily used for boating and water contact sports, such as swimming and paddle boarding. Adequate monitoring stations in Discovery Bay are critical to establishing adequate mitigation measures.

The EIR/EIS has completely overlooked the need for baseline data in order to have a meaningful monitoring and mitigation program. Bacteria levels may already be high due to invasive weeds. Project operations may make these levels even higher, threatening human health, especially that of our children. Establishing adequate baseline data and a robust site-specific monitoring program in Discovery Bay are essential for an effective monitoring, mitigation and adaptive program.

The EIR/EIS fails to address the economic impact of this project on Discovery Bay, a year-round family-based community with 3,200 waterfront homes and nearly 15,000 residents. The EIR/EIS does not adequately address the economic impact on the many marinas and other water-related businesses that the area supports.

The EIR/EIS is too long and too complex. It seems to have been made so deliberately to discourage public participation. I am retired, but most people have to get up and go to work; they could digest a less verbose document and provide meaningful observations. I request that this document be withdrawn, shortened, edited and reissued with the intent of seeking meaningful public input – and that those comments be posted online for all to see.

Pat Borison
2225 Cypress Point
Discovery Bay CA 94505

From: JP Cosentino <jpcosentino@yahoo.com>
Sent: Thursday, February 20, 2014 4:20 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: Comments on BDCP

Hello,

My name is JP Cosentino and I have been a resident in Discovery Bay for almost 5 years (Home owner for about 1 year). My wife and I are huge boater and have been using the delta water ways for over 10 years and my father use to take the family on the Delta through out my younger stages in life. We are on the delta at least 2-5 times a week during the spring, summer and even fall. The life style that the delta has is a life style that we are hoping to be able to enjoy with our future children. We are afraid that if you run these tunnels, our future children will never be able to enjoy the Delta life style.. I have family and friends who are year long hunters and they use the delta to hunt wild game, and I have recently obtained my hunter's license in hoping to start my journey as a hunter in the Delta. Taking water away from the Delta will change and dramatically impact the wild life that the delta has to offer.

It is scandalous that you have decided not to post all of the comments online as they come in so that everyone can see what others are sayings. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

(EIR/EIS) Much of the purposed environmental benefit, and assuring that the project will not cause harm, depending on an ongoing monitoring and adaptive management program. Representatives from Discovery Bay have requested at public meetings and at other times that one or more monitoring stations be included to monitor water quality impacts on the 16 bays of Discovery Bay. Yet no Discovery Bay monitoring stations have been included. The bay of Discovery Bay are heavily used for water contact sports (swimming, sailboarding, paddle boarding, etc). The failure to included adequate monitoring of Discovery Bay water quality in unreasonable. Conditions in the bays of Discovery Bay are not reflected by existing monitoring stations in open water locations. There i much less circulation in the bays of Discovery Bay and numerous other differences in conditions. Adequate monitoring stations in Discovery Bay are required to establish an adequate mitigation and monitoring programs. My wife and recently purchased a house in Discovery Bay off water, but we are hoping to purchase a house on the water in the future by the time we have children. When we lived on the water, I would swim with my dogs on a daily basis, borrow my neighbor's paddle boards and boats and of course take the boat out. We still have friends that live on the water and we use their docks to still do everything we use to, before we moved off water. Cutting the circulation away from the bays will make the bays a bad place to do all of these sports and more.

(BDCP) I am AGAINST the construction of the twin tunnels. The BDCP as proposed does not comply with the Delta Reform Act. The Delta Reform Act requires that actions of the state with regard to the Delta shall "reduce reliance on the Delta." The BDCP is a recipe for vastly increased reliance on the Delta. With impending reductions in the amount of water that southern California can take from the Colorado River, there will be increased pressure to take more water from the Delta.

(BDCP) Here's the problem: you are to clever by half. Labeling the tunnels as a "conservation measure" and putting in place an "adaptive management" plan that gives the water contractors the ability to direct management if the tunnels is thinly disguised water grab and nothing else.

Jean Pau Cosentino

L # BDCP328

- ✓ Unused
- ☐ Duplicate of _____
- ☐ Out of Scope
- ☐ Other: _____

(replace original)

From: GRAHAM207@aol.com
Sent: Friday, February 21, 2014 10:32 AM
To: bdcg.comments@noaa.gov
Cc: bdcg.comments.copy@nodeltagates.com
Subject: Tunnels

You call this boondoggle a "conservation project"!!! How do you sleep at night? It should be called the Bay Delta Water Grab. How gullible do you think we are? Have you ever heard of reservoirs? Please post all comments and emails.

Sincerely,

Bob Graham
Discovery Bay

From: Ann Watson <ann.jerewatson@gmail.com>
Sent: Saturday, February 22, 2014 1:48 PM
To: BDCP.Comments@noaa.gov
Subject: BDCP DRAFT EIR/EIS

My name is Ann Watson. I have been a resident of Discovery Bay for 20 years and have enjoyed the beauty of the delta for 10 years before moving here.

I understand that you have decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online format during EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

Government must "transparent" especially for controversial issues such as this.

Respectfully....Ann Watson

From: Cynthia Spencer <cynthia.spencer16@yahoo.com>
Sent: Friday, February 21, 2014 9:44 AM
To: BDCP - Tunnels
Subject: EIR/EIS Comments Posting

As a resident of Discovery Bay, I find it unbelievable and probably illegal that you are not posting comments online as they come in so everyone can read them. Posting comments online is a standard government procedure. I demand that all comments be posed online in a usable format and that the comment period be extended for the length of time that comments have not been posted online.

what are you afraid of?

Cynthia Spencer
cynthia.spencer16@yahoo.com

From: diane sevim <diane_sevim@yahoo.com>
Sent: Saturday, February 22, 2014 7:39 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: COMMENTS ON BDCP DRAFT EIR/EIS

THIS IS MY HOME! I have lived here for sixteen years and just bought a second home, again on the water, one story, and plan to retire there in two years.

There is tooooooo much on the line (and our life) when you are considering the changes of diverting our water to Southern California.

PLEASE reconsider!!!!

- 1) Extend the check time for review and comment on the Draft
- 2) Post ALL comments online as they come in, keeping the public informed
- 3) Diverting water will give us a low supply of drinking water, affect the supply of fish and change the environment that we live and play in
- 4) Can you really say what the total cost and analysis will be? Where is the science background info?
- 5) Where will the water be stored in should this plan go into action. Will it be stored above or below ground?
- 6) You are only moving water, not creating more. Come on, are you kidding? Whats the point?
- 7) And what about all the muck should the tunnels be dug. Football size of fields and fields of muck and a hundred feet high. Are you kidding?
- 8) You are walking a thin line on our county identity and our agriculture, also on our economy, boating, fishing and our life. And what about any aspects or risks of flooding?

WE CAN'T AFFORD THIS FINANCIALLY AND OTHERWISE!!!

Ray and Diane Sevim
5067 Cabrillo Pt
Discovery Bay CA 94505

From: Trudy Schafer <TSchafer@lwvc.org>
Sent: Friday, February 21, 2014 2:27 PM
To: BDCP.comments@noaa.gov
Cc: Samuel.Rauch@NOAA.gov; mlconnor@usbr.gov; Gary_Frazer@FWS.gov; McCarthy.Gina@EPA.gov; Will.Stelle@noaa.gov; secretary@resources.ca.gov
Subject: BDCP Public Review and Comment Period Time Extension Request
Attachments: BDCP time extension request from LWVC.pdf

Attached please find a letter from the League of Women Voters of California requesting an extension of the public review and comment period for the BDCP and its environmental documents.

Trudy Schafer
Sr. Director for Program
League of Women Voters of California
1107 Ninth Street, Suite 300, Sacramento, CA 95814
916-442-7215; 916-705-1090 (cell)
tschafer@lwvc.org



BDCP333

LEAGUE OF WOMEN VOTERS® OF CALIFORNIA

February 21, 2014

Via email to the following addressees:

Samuel D. Rauch
Administrator for Fisheries
NOAA Fisheries Service
Samuel.Rauch@NOAA.gov

Michael L. Connor
Deputy Secretary
U.S. Bureau of Reclamation
mlconnor@usbr.gov

Gary Frazer
Assistant Director-Endangered Species
U.S. Fish and Wildlife Service
Gary_Frazer@FWS.gov

Gina McCarthy
Administrator
U.S. Environmental Protection Agency
McCarthy.Gina@EPA.gov

William W. Stelle, Jr.
Acting Regional Administrator
NOAA Fisheries Service
Will.Stelle@noaa.gov

John Laird
Secretary
California Resources Agency
secretary@resources.ca.gov

BDCP.comments@noaa.gov

Re: BDCP Public Review and Comment Period Time Extension Request

A fundamental objective of the League of Women Voters is to promote public understanding and participation in decision making as essential elements of responsible and responsive management of our natural resources. Nowhere is meeting this objective more challenging than with respect to water resources.

We have in the past advocated for greater transparency in the Bay Delta Conservation Plan process, and we appreciate efforts by the Brown Administration to increase transparency and allow for greater public participation in the planning process. However, we are concerned that insufficient time is being allowed for public review and comment on the draft plan and its environmental documents, given the length of the released documents (40,214 pages).

Public comments are an essential part of the NEPA/CEQA process. We respectfully request that the public review and comment period for the BDCP and its environmental documents be extended for an additional 120 days beyond the planned 120 days based on the December 13, 2013 release date. This would make August 15, 2014 the revised deadline for public comments.

Sincerely,

Jennifer A. Waggoner
President

1107 9th Street
Suite 300
Sacramento, CA
95814-3608

916 442.7215
888 870.8683
916 442.7362 fax

lwvc@lwvc.org
www.lwvc.org
www.smartvoter.org
www.easyvoter.org

From: Jessica Law <jessica@jbenvirocomm.com>
Sent: Monday, February 24, 2014 9:14 AM
To: bdcg comments - NOAA Service Account
Subject: FW: Questions on Twin Tunnel Water Project

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

From: "Scott Troyer" <alanstroyer@gmail.com>
Date: Feb 22, 2014 11:27 AM
Subject: Questions on Twin Tunnel Water Project
To: <lesliekatz@gmail.com>
Cc:

Hi Leslie

Thanks for giving me your card at the Thursday night discussion on the Twin Tunnel water project. My concern is regarding salt content in the fresh water supply. All water has some degree of salt content in it; fresh water commonly has about 50 ppm. Salt buildup in agricultural soils has been the primary reason for many agricultural areas collapsing. I have read that salt build up in the central valley in California is becoming a major issue. It is a very difficult problem to deal with particularly in more arid climates like California, because of the higher rates of evaporation and the need to actually supply more water to flush the salt out.

I am a small farmer, mostly growing food for my own family. I use crop rotations to maintain fertility, high volumes of compost for soil composition and nutrition, and drip irrigation. Hence my water consumption per lb of yield is about 25% of a commercial farmer's water usage in the central valley. Soils with high compost content retain much higher amounts of water, and hence much less water is needed on continual basis.

The following is what I believe to be true regarding water supplies in California, and if I am wrong I would greatly appreciate being corrected. California's water supply is from precipitation and imports from Colorado, Oregon and Mexico.

Annual water supply

- During wet years about 335 million acre-feet of water.
- During average years about 200 million acre-feet of water.
- During dry years about 145 million acre-feet of water.

Dedicated supplies to users

- During wet years about 97.5 million acre-feet of water, 29% of supply.
- During average years about 82.5 million acre-feet of water, 42.5% of supply.
- During dry years about 65.1 million acre-feet of water, 44.7% of supply.

Dedicated Uses

	Urban Users	Agricultural users	Environmental Uses
During Wet years	7.7 (MAF) 8%	27.7 (MAF) 28%	62.2 (MAF) 64%
During Average years	8.8 (MAF) 11%	34.3 (MAF) 42%	39.4 (MAF) 47%
During Dry years	8.6 (MAF) 13%	34.1 (MAF) 52%	22.4 (MAF) 35%

Annually 50-60% of our water supply is not available for human consumption because it is consumed by native vegetation, evaporates or is needed to sustain estuaries for ecological balance on its way to the ocean. Of the remaining 40-50% available, distribution goes to urban use, agricultural uses, and environmental uses or is stored in surface or ground water reservoirs. Of the allocation dedicated for human consumption 80% is consistently being allocated to agricultural proposes.

I would very much like to see some conservation guidelines in the proposal attached to the supply of water, where farmers would be required to convert to farming techniques that use much less water. In the U.S. today the average person consumes about 1,500 gallons of water per day, with 1,250 gallons going to food production. California has a population of 38.3 million, which would require a total of 64,348,118 acre feet of water annually or 53,623,267 acre feet just for agriculture if we tried to be self sustaining. Currently we only allocate 34 million acre-feet for agriculture on an ongoing basis. It is pretty clear to me agriculture should be trying to use 50% less water, which is possible if they improved their irrigation practices, along with improving soil quality.

The questions I was hoping to get answered are the following.

1. What elevation is the pump station currently at?
2. What is the range of salt content in the water currently being pumped? I assume it varies depending on how high tide is.
3. What is the salt content in the water that would be pumped from the Sacramento River?
4. How would the Sacramento River water be separated from delta water to ensure no cross contamination occurs? Sea level is projected to rise about 18" by the mid century and 3' by the end of the century. The pump obviously needs to be protected against sea level rise.
5. Where can I find the storage capacity of California lakes, and underground aquifers?
6. What is this year's allocation of water to agriculture?
7. Lastly would it be possible to get a tour of the pump facility?

If the project were presented as a means of providing higher certainty that available fresh water would be protected from rising sea levels and our agricultural businesses would be required to institute conservation measures to reduce consumption, I think the proposal would be received much better.

Thanks, Scott Troyer, 4944 Proctor Rd. Castro Valley, Ca 408 505-7499 alanstroyer@gmail.com

From: Roger Difate <rockfish62@yahoo.com>
Sent: Thursday, February 20, 2014 9:25 PM
To: BDCP.Comments@noaa.gov
Subject: Comments on Draft EIR/EIS

COMMENTS ON BDCP DRAFT EIR/EIS BDCP.Comments@noaa.gov

I live in N. California on the water in Discovery Bay. My family and I enjoy swimming, boating and fishing in the Delta for over 15 years. We have attended many of the Bay/Delta Tunnel meetings and find it very disturbing we have NO representatives from N. Cal on any committees to determine the outcome of our DELTA.

1. It is very disappointing to see you have not posted all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.
- 2) Comments on the EIR/EIS. Representatives from Discovery Bay have requested at BDCP public meetings and through other channels that specific analysis of the project's water quality impacts on Discovery Bay be included in the Draft EIR/EIS. They have not been included. Discovery Bay is different than the rest of the Delta. It consists of 16 shallow water bays, ranging in size from less than an acre to several acres. There is little circulation in the bays. The impacts on water quality in nearby open water sloughs and channels do not translate to water quality impacts in the bays, where reduction in high quality fresh water will translate to much greater degradation of water quality. The EIR/EIS fails to adequately address water quality impacts in Discovery Bay. I respectfully request that site specific analysis be conducted to determine water quality impacts on the bays of Discovery Bay.
- 3) Comment on the Draft EIR/EIS. Operation of the tunnels will cause adverse water quality impacts on Discovery Bay and throughout the entire Delta. Representatives from Discovery Bay have requested at BDCP public meetings and in meetings with BDCP representatives that specific mitigation measures be included in the EIR/EIS to offset those negative water quality impacts on Discovery Bay. The requested mitigation measures include weed control (egeria densa), dredging, and improvements to Discovery Bay's circulation system. These mitigations measures will all improve circulation in Discovery Bay and help to offset the reduction in high quality freshwater flows that will result from BDCP operations. I respectfully request that these, and all other feasible mitigation measures, be included in order to mitigate the water quality impacts on Discovery Bay to a level of insignificance.
1. Comment on the Draft EIR/EIS. Much of the purported environmental benefit, and assurance that the project will not cause harm to our community. This is a false comment since we have documented evidence that increased pumping schedules and changing water flows stifle the water quality in Discovery Bay. Representatives from Discovery

Bay have requested at public meetings and at other times that one or more monitoring stations be included to monitor water quality impacts on the 16 bays of Discovery Bay. Yet no Discovery Bay monitoring stations have been included. The bays of Discovery Bay are heavily used for water contact sports (swimming, sailboarding, paddle boarding, etc). The failure to include adequate monitoring of Discovery Bay water quality is unreasonable. Conditions in the bays of Discovery Bay are not reflected by existing monitoring stations in open water locations. There is much less circulation in the bays of Discovery Bay and numerous other differences in conditions. Adequate monitoring stations in Discovery Bay are required to establish an adequate mitigation and monitoring program.

1. Comment on the Draft EIR/EIS. The EIR depends heavily on ongoing monitoring and adaptive management. In order to have a meaningful monitoring program you need to know what the baseline conditions were before the project begins operation. There is no meaningful data included to establish what baseline conditions are in the 16 bays of Discovery Bay. The bays have a different environment and are very different in conditions from the locations of existing monitoring stations relatively nearby from which you have taken your baseline data. In order to have a meaningful monitoring and mitigation program, it is necessary to establish monitoring of Discovery Bay before project operation begins in order to establish accurate baseline conditions. The bays of Discovery Bay are probably the most heavily used area of the Delta for human contact sports. Bacteria levels may already be high at some times due to the presence of invasive weeds. Project operations may take undesirable bacteria levels to unsafe levels. This is a question of human health, particularly the health of children. Establishing adequate baseline data and a robust site specific monitoring program for Discovery Bay are essential ingredients of the monitoring, mitigation, and adaptive management plan that have been entirely overlooked!
1. Comment on the Draft EIR/EIS. Air quality impacts due to disruption of boating traffic have not been adequately identified and analyzed in the EIR/EIS. Boat traffic will be restricted due to construction activities and long-term operation of diversion structures and other structures. Numerous 5 mph zones will be put in place and a boat lock will be installed at the head of Old River. Boaters will change their boating patterns to avoid these areas. This will cause increased boat travel, which will increase boat emissions. Larger diesel powered boats in particular will avoid these areas and travel farther to other areas of the Delta. The impact on boat traffic patterns and attendant increase in emissions has not been identified or analyzed.

7) Comment on the Draft EIR/EIS. The EIR/EIS fails to analyze a reasonable range of alternatives. Where a reasonably feasible alternative exists that would lessen the adverse environmental impacts of the project the law requires that it be included, analyzed, and considered. By definition an HCP is mitigation. It mitigates the take of species due to effects of the project. Here the project is the operation of the CVP/SWP. The project kills fish because it doesn't leave enough water in the Delta for their needs. The tunnels are supposedly mitigation for the take because they will harvest and move water in a less harmful way at less harmful times than the way water is currently harvested and moved. The BDCP has advertised its "little sip, big gulp" concept as one of the ways that the tunnels will mitigate adverse impacts. When water levels are low or water is critically needed for

fish populations, the tunnels will take only small amounts of water. When water is abundant or not needed for fish populations the tunnels will take larger amounts of water. Or so goes the reasoning. But the reasoning is flawed because the BDCP does not include provisions for additional storage (new reservoirs, increased ground water banking, etc). Without someplace to store water that might be harvested at times of abundance the “big gulp” concept is just an illusion. This is particularly true because during large winter storm events reservoirs are typically full and water cannot be harvested because there is no where to put it. The project as currently proposed is a “run of the river” project, not a “little sip, big gulp” project. The ability to move much more water only means that more water can be drawn away from the Delta but not at times that would be less harmful. In fact, since reservoirs are empty or low at times of critical shortage, it means more water can be taken out of the Delta only at times when it is most harmful to take it.

The EIR/EIS states that “developing new water storage” is beyond the scope of the BDCP. Draft EIR/EIS at 3A-81. I disagree. If the “little sip, big gulp” approach is within the scope of the BDCP, why would constructing the infrastructure that would actually make it possible not be within the scope of the BDCP? Is it within the scope of the BDCP to advertise “big gulp, little sip” when it is illusory (and the proponents of the project know full well it is illusory) but not within the scope of the BDCP to actually do what it takes to make the concept a reality?

The project proponents do not have the authority to simply decide that storage is something they don’t have to deal with. If including storage is reasonably feasible and lessens one or more significant impacts, you are *required by law to consider it*.

The Draft EIR/EIS should be revised and re-circulated to include a reasonable range of alternatives that include various storage concepts.

8) Comment on the Draft EIR/EIS. The EIR/EIS is fatally flawed because it does not include any alternatives that include additional storage. Storage is the key to mitigating the impacts of operation of the CVP/SWP on the Delta and its species. Reasonably feasible storage projects that would lessen the adverse impacts of operation of the CVP/SWP and lessen the adverse impacts of the tunnels themselves are well known. For example, the NODOS project (also known as Sites reservoir) has been extensively studied. NODOS would draw water from the Sacramento River during winter periods of high water and store it in a new reservoir. The water would be released back into the Sacramento River during periods of shortage. NODOS is well upstream of the proposed tunnel intakes. Therefore, water from NODOS storage could be released into the river, travel downstream to the intakes, and be diverted for export. This would allow diversions with *no net decrease in river flow* at times of critical need. That would clearly decrease adverse impacts of exports. Why doesn’t the BDCP include this concept as part of an alternative? The only reason given is that “developing new water storage” is beyond the scope of the BDCP. Draft EIR/EIS at 3A-81. BDCP project sponsors don’t have a magic wand that they can wave and make a reasonably feasible alternative “beyond the scope of the BDCP” just because they would rather not deal with it. If it is 1) reasonably feasible; and 2) would lessen adverse impacts, you are *required* to consider it.

9) Comment on the Draft EIR/EIS. The Draft EIR/EIS fails to analyze any alternative with a storage component. We all know that the problem in California is that we get too much rain, all at once, in the wrong place, at the wrong time, and erratically. Everyone agrees that climate change will make all of this worse. The *only* solution is to be able to harvest and store the water that comes in great bursts at times when our existing reservoirs are already full. WE NEED NEW STORAGE. Without new storage we continue to draw water from the Delta at times when water is critically low and at times when exports harm fish and other species. If we had water in storage at these times we wouldn’t need to draw water (or at least as much water) from the Delta at these times. What about this is so hard to understand? But you must not understand it because none of the alternatives include new storage that would allow water to be harvested at times of abundance, stored, and used at times of shortage. Not only is an alternative, or several alternatives, that include storage reasonably feasible, it is downright unreasonable not to consider them. Please take a deep breath, go back to the drawing board, and

use the many talented people at your disposal to come up with real alternatives that solve real problems by BUILDING MORE STORAGE.

10) Comment on the Draft EIR/EIS. In order for the BDCP to actually be a less harmful way to export water (which is the rationale for calling the tunnels a “conservation measure”) you have to consider alternatives that include new storage. If you don’t have storage, you can’t take water at times when it is not harmful to take it, because currently at those times our reservoirs are already full. One alternative for additional storage is groundwater banking. Additional groundwater recharge is widely accepted as one of the most feasible and cost-effective means of obtaining new storage. The National Heritage Institute and others have published extensive studies showing this to be true. The California Water Plan also acknowledges that groundwater banking is an important component of solving California’s water problems. Why not spend less on massive tunnels, build one smaller tunnel, and use the savings to connect the CVP/SWP to new groundwater recharge facilities throughout the state? California’s network of canals connected to the CVP/SWP reaches almost every corner of the state already. The smaller tunnel could operate at capacity at times of abundance (when the currently proposed massive twin tunnels will be shut down for lack of storage) thus diverting as much or more water with much less harm. This is a reasonable and feasible alternative that has not been included. It should be.

11) Comment on the EIR/EIS. I haven’t found where you analyze how much more water could be harvested using the existing point of diversion at Clifton Court Forebay *if* there were new storage to accept water at times of high river flow. The Draft EIR/EIS should include an alternative that shows the maximum amount of water that could be diverted at the existing point of diversion if adequate storage were available and that proposes new storage to accommodate those increased diversions. I expect that there is existing data that shows historical times of high flow and historical data of when the smelt are (and are not) present at the Clifton Court intakes. Why can’t you plot these two variables and determine projected times of abundance when smelt would not interfere with pumping? Then you could calculate how much water could be exported at these times and calculate how much new storage would be required to hold it. Then you could design storage facilities. After all this is done, you might find the tunnels aren’t needed or a much smaller single tunnel would do the job. This all should be considered as an alternative to the currently proposed project.

12) Comment on the EIR/EIS. Enough water flows over the flood diversion structures at the Sacramento Weir and Fremont Weir during peak winter storm events in a few days to supply all the water needs of southern California for *several years*! We have plenty of water. We just don’t have any way of capturing or storing it. The BDCP should analyze a bold alternative that captures and stores water currently diverted by these weirs. The environmental benefits would be enormous because none of this water flows through the Delta. You could meet export needs *and* drastically reduce the amount of water taken from the Delta. Expensive? Yes. But worth it? Yes. Just think of the environmental benefit of restoring almost 100% of Delta flows to environmental needs.

13) Comment on the EIR/EIS. This document is too long! Yes, this is a big project but an EIR/EIS is supposed to be a “concise statement.” At some point the legal requirement that an EIR be “concise” has to have some meaning. It appears that this thing has *intentionally* been made so long that the public will be unable to grapple with it. You are *discouraging* meaningful informed public participation by issuing a document that is so long that no one who has a life outside the BDCP can ever get through it. The “public” has to get up in the morning and go to work, take the kids to school, and take care of a household. There is no way that an ordinary citizen can also deal with this monstrous document. The law requires public participation. Not special interest group participation or paid consultant participation, or lawyer participation. Virtually any piece of writing can be made better by editing it and making it shorter. In order to make this process meaningful, you need to cut the EIR/EIS down to one quarter its present size. Yes, editing is hard work! But you will actually find that you have a more coherent and more legally defensible document by doing so. I request that this document be withdrawn, edited, shortened, made accessible to the real public, and re-issued.

BDP 335

Roger di Fate
Discovery Bay Homeowners Secretary
rockfish62@yahoo.com

L # BDCP336

- ✓ Unused
- ☐ Duplicate of _____
- ☐ Out of Scope
- ☐ Other: _____

(replace original)

From: Roger Difate <rockfish62@yahoo.com>
Sent: Thursday, February 20, 2014 9:33 PM
To: BDCP.Comments@noaa.gov
Subject: Comments on Draft EIR/EIS

BDCP337.

COMMENTS ON THE BDCP PROJECT

I ABSOLUTELY oppose the BDCP Project: My family and I live on the California Delta for the past 15 years. We s boat and fish in this special ECO system that requires a special balance with man.

- The goal of the Delta Plan was to preserve the scenic beauty of the Delta. A 10 to 15 year construction project through the heart of the Delta is in direct conflict with the Delta Plan. Instead, the construction should be planned in a route with less impact, such as next to Hwy 5 then across from Stockton near where the East Alignment is shown. That would avoid heavy trucks on the levees, avoid trucks on farm and small roads not adequate for heavy traffic (like Hwy 160 and Hwy 4) and construct year round. That would move the pollution to an area where there is already pollution due to high traffic volumes. Minimize the effect on Delta waterfowl and fish. Reduce the impact to Delta farms and communities. Avoid having to dewater small communities and farmers' wells for long periods of time. The muck could be used to build additional lanes for Hwy 5 in the congested area between Stockton and Sacramento.
- 40 ft diameter twin tunnels have little to do with habitat restoration, and should be separated from the Habitat Conservation Plan (HCP). The EIR for the tunnels should not be a HCP, and, therefore, should include all economic impacts including the impact of reduced property values and tax revenues in the 5 counties, and the impact on the local economy, both during and following construction.
- The Cost / Benefits Analysis (Table 9-32) identifies a net benefit of \$4.5 to \$5.3 billion, given an incremental cost of \$13.5 billion. There are several flaws in this analysis, including not taking into account the cost of bond interest, the cost of mitigation, which is necessary to experimentally offset the additional water take, the economic loss due to poor water quality in the south delta, and the economic loss of taking productive delta farmland out of production. The analysis uses "apples and oranges" e.g. using 60 years for the benefit, and 50 for the operating costs. The project is only 10% designed: a 37% contingency is inadequate – look at the Bay Bridge cost.
- (This comment can be used for both the BDCP Project and the EIR) - The BDCP (Chapter 1B.1) and EIR (Table 3.1) fail to include alternatives that actually produce more water for California: Desalination, storage, and re-use. After correcting the BDCP costs noted above, the cost / acre foot exceeds \$1,000, (\$1,900 for urban rate payers) which equals the estimated cost of desalination. Given that pumps would no longer be necessary to transport delta water over the Grapevine, the energy differential is even lower.
- The Authorized Entity Group, which has jurisdiction over real-time operation of the tunnels, includes the Water Contractors. The BDCP, Chapter 7.1.5.1, has deferred the actual decision-making roles to a later date, possibly to avoid comments. Water Contractors should be non-voting members with regard to the amount of water allowed in the tunnels, and pumped out of Clifton Court Forebay, to avoid "the fox guarding the hen house".
- 10% of fertile delta cultivated farmland is proposed to be taken (Chapter 3.3.6.13.2) via eminent domain for experimental mitigation efforts, so more desert can be irrigated. This makes no sense given the additional water requirement / acre and delivery expense to irrigate the southern San Joaquin Valley.
- The BDCP assumes (as part of its Benefit Analysis, Appendix 9A Sec. 9A.5) massive levee failures over the 50 year life of the Plan (2% probability / year), yet we have never had a levee failure due to

earthquake in recorded history, and UCLA researchers could not cause a levee to fail with a simulated 7.0 earthquake. Levee failures have occurred due to high water runoff, a time when pumping would not be affected. Additionally, the BDCP benefit is not reduced by earthquake risk to the tunnels, which would suffer the same liquefaction. The State would be better served by strengthening the San Luis dam and the Aqueduct over the Grape Vine, both of which actually straddle earthquake faults.

- No new water sources are identified as part of the BDCP, which makes it a waste of taxpayer / rate payer money. Instead, the State should require mandatory water conservation and re-use, and invest in new sources of water via new water storage and desalination.
- Planting of future permanent crops on desert soil should be denied as part of the BDCP, and when permanent crops are plowed under, only seasonal crops should be allowed.
- The impact of the costs to rate payers is not in the BDCP. Once they find out, support for the BDCP will dwindle.
- The impact on navigation and safety in the Delta has not been adequately addressed.
- Proposed recreation mitigation does not benefit the south Delta (EIR Chapter 15).
- Construction of the BDCP may damage the aquifers, subjecting them to foaming agents and other hazardous chemicals.
- The BDCP allows the X2 salinity line to move inland, jeopardizing water quality and the ability of communities such as Antioch to use the water for drinking or farming. Fisheries will be impacted.
- The giant muck ponds are forever in the Delta, and are too close to communities like Discovery Bay.
- Citizens have attended public out-reach meetings such as the one at the Brentwood City Library, where the consultants were unable to answer any of our questions or comments. Promises that they would respond have been ignored, and the only changes made to the BDCP have made recreation near Discovery Bay worse. This is not a transparent process.
- The 57 species being covered under the BDCP excludes many species that are at exactly the same level of risk and that live in the Delta. The BDCP Plan Appendix 1-A was not updated to cover the lesser sand hill crane even though the new alignment goes through a sensitive sand hill crane reserve. The BDCP Plan also does not cover the endangered great blue heron, egrets, geese and other waterfowl that live here and could be adversely affected by water quality degradation.
- Recreation e.g., waterskiing, wakeboarding, and tubing would be effectively eliminated (EIR Ch. 15 Page 268) on the two primary recreational sloughs near Discovery Bay used for those activities: Short-term due to barges and docks; Long-term because the EIR does not include plans to repair damage done to sloughs from docks and barges (e.g., replanting the center berm(s) and levees along primary recreational channels).
- Destroying recreational boating for Discovery Bay residents will seriously impact the marine-based economy that relies on boating.
- The BDCP marketing collateral and press releases announced that the tunnel muck is not harmful after all. Instead, it is now being called "Reusable Tunnel Material" or "RTM". The glossy brochure stated all of the possible benefits and where it could be used (fill in islands to make shallower/better wetlands, improve levees). However, the BDCP Plan Chapter 4 sections about tunnel muck are exactly the same EXCEPT the word "muck" was replaced by "RTM". Yet the write-up still talks about how the RTM needs to be stored in lined ponds so as not to pollute the groundwater and the maps still show large muck ponds.
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COMMENTS ON THE EIR

- The EIR grossly understates the impact ten years of construction will have on recreation and the Delta's economy.
- The EIR does not adequately capture the economic impact to marinas due to construction. For example, Chapter 15 page 259 states that use of the Bullfrog Landing Marina's boating facilities would not be effected but then goes on to say it is in the construction area and boaters "would be disturbed by noise and visual disruptions and 5 mile/hour zones which could last up to 8 years, resulting in a long-term

BDCP 337

adverse effect". This shows how the writers of the BDCP know absolutely nothing about boating, fishing, etc. That marina will be affected. Boaters will move their boats to quieter marinas away from the construction zone. The marina will go broke.

- The EIR does not even identify a primary anchorage in the South Delta – Mildred Island – nor label it on any map (e.g., Chapter 15 Mapbook Figure M15-4: Sheet 5 of 8, page 31). There are barge sites planned affecting getting there from the north or the south and noise disruption through the summer will make it unusable. Not having access to an anchorage in the South Delta will affect our communities' economy

Roger di Fate

Discovery Bay Homeowners Secretary

rockfish62@yahoo.com

From: James Lewis <jameslewisripon@gmail.com>
Sent: Saturday, February 22, 2014 9:48 AM
To: BDCP.Comments@noaa.gov
Cc: James Lewis
Subject: Comments to BDCP Draft EIR/EIS
Attachments: Dear BDCP Decisionmakers and Governor Brown.docx

See attached letter.

James Lewis
425 Meyenberg Avenue
Ripon, CA 95366

February 22, 2014

Email to: BDCP.Comments@noaa.gov

Dear BDCP Decisionmakers and Governor Brown:

The Draft EIR/EIS is deficient because it either fails to consider, or adequately consider, the following points:

1. The proposal to take thousands of acres of Delta farmland out of production is not adequately justified. This will only hurt the California economy and force us to buy more food from Mexico, Chile, and other countries. The net effect will be that those countries will increase their production and hurt the global environment more than we will because we have superior farming methods and more restrictive environmental regulations.
2. If you wish to spend taxpayer dollars wisely, why don't you pay off the farmers who have created farms in the California desert -- where there is no water -- instead of the farmers who have farms in the Delta near the water?!
3. Instead of spending money on this project, funds should be spent on alternative sources of water production, storage, and conservation methods including but not limited to:
 - a. new dams;
 - b. new reserviors;
 - c. aquifer recharging;
 - d. desalinization plants;
 - e. drip irrigation systems for agriculture; and
 - f. more efficient pipelines, canals, and water treatment plants.

James Lewis
425 Meyenberg Avenue
Ripon, CA 95366

From: Eric <emourelatos@msn.com>
Sent: Wednesday, February 26, 2014 11:57 AM
To: bdcg.comments@noaa.gov
Cc: bdcg.comments.copy@nodeltagates.com
Subject: COMMENTS ON THE BDCP PROJECT

Please allow me to introduce myself. My name is Eric Mourelatos. I reside at 1853 Seal Way in Discovery Bay, Ca. I am 54 years old and have lived in this area since 1975. I was very involved with the Delta very early on in life. I studied it when I was a Junior in high school as part of my education in Marine Biology. I did not complete that education but learned a great deal about the ecosystem that is our California Delta. I also lived through the drought at that time and remember it well and the harm that the salt did to the delta and its habitat. Many of its fish and plant life suffered as a result of the salt water intrusion due to the pumping of fresh water up stream. I have also now witnessed the diversion of more water in this water shortage year due to over pumping that was promised to not occur. In the BDCP plan it is stated that there would only be water pumped in excess during high water years...obviously if it were a lie before it is a lie again. Please read on below for my comments on this plan:

- 1) It is outrageous that you have decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.
- 2) This is a comment on the BDCP project. I oppose the construction of the twin tunnels. The entire premise of the project is dishonest. The tunnels are not a "conservation measure." They are a piece of water supply infrastructure designed to export more water to southern California-not to save fish or help the Delta. If you want to help species in the Delta recover, the only way to do it is to *reduce exports* from the Delta through conservation, desalination, developing local supplies, and banning wasteful agricultural practices such as growing cotton and rice in the desert. Any honest Habitat Conservation Plan must recognize that there simply is not enough water to allow the Delta species (Salmon, Smelt, Shad) to survive and meet the demands of the water contractors who are behind this project. You have to reduce exports. Period.
- 3) This is a comment on the BDCP project. I am against the construction of the twin tunnels. The BDCP as proposed does not comply with the Delta Reform Act. The Delta Reform Act requires that actions of the state with regard to the Delta shall "reduce reliance on the Delta." The BDCP is a recipe for vastly *increased* reliance on the Delta. With impending reductions in the amount of water that southern California can take from the Colorado River, there will be increased pressure to take more water from the Delta.
- 4) This is a comment on the BDCP project. This project should be abandoned. It is a waste of taxpayer money and does not comply with the Endangered Species Act. The tunnels are not a conservation

measure, they are water supply infrastructure. Simple labeling your project a Habitat Conservation Plan doesn't make it one in reality and the tunnels have nothing to do with saving species.

- 5) This is a comment on the BDCP project. You have given the water contractors who benefit most from increased exports too much control over the project. The water contractors have publicly stated that they do not believe that exporting water from the Delta causes harm to the Delta. How can they be expected to manage export levels in a way that restores Delta health when they believe that exporting more water never harms the Delta? Do you honestly believe that they will act against their financial interest when it becomes obvious that export levels must be reduced to protect the Delta? Please go back to the drawing board and come up with a better plan.
- 6) This is a comment on the BDCP project. Here's the problem: you are too clever by half. Labeling the tunnels as a "conservation measure" and putting in place an "adaptive management" plan that gives the water contractors the ability to direct management of the tunnels is a thinly disguised water grab and nothing else.
- 7) Governor Brown will pay a political price for foisting a thinly disguised water grab on the people of northern California. This is nothing but a water grab dressed up as a habitat plan. Tell the governor to get real and drop this hair brained scheme. We need real solutions: conservation, desalination, development of regional self-sufficiency. The Delta can't support the extravagant water habits of the rest of the state. A real habitat conservation plan for the Delta must include a schedule for significantly reducing exports over the medium and long term. This doesn't do it.
- 8) The BDCP makes much of a long stakeholder process and considering many different options before deciding on the present twin tunnel plan. But this plan is in substance the same as the disgraced 1982 peripheral canal. The idea is to grab water from far upstream so you will no longer have to be concerned about salinity levels in the lower Delta and can move the intakes away from the smelt habitat. All of that simply is designed to allow you to pump more water with fewer restrictions and no need to be concerned about the health of the Delta. You can call it a habitat conservation plan all you want but that doesn't make it so. This is a water grab plain and simple. In fact, it is an insult to the intelligence of the voting public that you think we will believe that a giant canal is a "conservation measure." Governor Brown will hear about this at the polls if he ever decides to run for office again.
- 9) The simple fact is that there just isn't enough water to support exports and recover the Delta. Any meaningful habitat conservation plan must include a timetable for reducing exports. You can't recover the Delta and continue to export water at current levels, let alone the increased levels that the tunnels will allow. Curtailing exports should begin as alternative supplies, such as desalination, are implemented. The Delta Reform Act requires that reliance on the Delta be reduced. The Endangered Species Act requires that habitat conservation plans actual mitigate the take of species. To comply with law, the BDCP must include a meaningful reduction in export levels.

Sincerely,
Eric Mourelatos

From: Eric <emourelatos@msn.com>
Sent: Wednesday, February 26, 2014 11:49 AM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com
Subject: COMMENTS ON BDCP DRAFT EIR/EIS

Please allow me to introduce myself. My name is Eric Mourelatos. I reside at 1853 Seal Way in Discovery Bay, Ca. I am 54 years old and have lived in this area since 1975. I was very involved with the Delta very early on in life. I studied it when I was a Junior in high school as part of my education in Marine Biology. I did not complete that education but learned a great deal about the ecosystem that is our California Delta. I also lived through the drought at that time and remember it well and the harm that the salt did to the delta and its habitat. Many of its fish and plant life suffered as a result of the salt water intrusion due to the pumping of fresh water up stream. I have also now witnessed the diversion of more water in this water shortage year due to over pumping that was promised to not occur. In the BDCP plan it is stated that there would only be water pumped in excess during high water years...obviously if it were a lie before it is a lie again. Please read on below for my comments on this plan:

- 1) It is outrageous that you have decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at miss directing the public participation because no good purpose can be served by not sharing what others have said in their comments. Posting comments in an online docket during an EIS process is standard federal government procedure. I demand that this project be treated the same. I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.
- 2) This is a comment on the Draft EIR/EIS. Representatives from Discovery Bay have requested at BDCP public meetings and through other channels that specific analysis of the project's water quality impacts on Discovery Bay be included in the Draft EIR/EIS. They have not been included. Discovery Bay is different than the rest of the Delta. It consists of 16 shallow water bays, ranging in size from less than an acre to several acres. There is little circulation in the bays. The impacts on water quality in nearby open water sloughs and channels do not translate to water quality impacts in the bays, where reduction in high quality fresh water will translate to much greater degradation of water quality. The EIR/EIS fails to adequately address water quality impacts in Discovery Bay. I respectfully request that site specific analysis be conducted to determine water quality impacts on the bays of Discovery Bay.
- 3) This is a comment on the Draft EIR/EIS. Operation of the tunnels will cause adverse water quality impacts on Discovery Bay. Representatives from Discovery Bay have requested at BDCP public meetings and in meetings with BDCP representatives that specific mitigation measures be included in the EIR/EIS to offset those negative water quality impacts on Discovery Bay. The requested mitigation measures include weed control (egeria densa), dredging, and improvements to Discovery Bay's circulation system. These mitigations measures will all improve circulation in Discovery Bay and help to offset the reduction in high quality freshwater flows that will result from BDCP operations. I respectfully request that these, and all other feasible mitigation measures, be included in order to mitigate the water quality impacts on Discovery Bay to a level of insignificance.

- 4) This is a comment on the Draft EIR/EIS. Much of the purported environmental benefit, and assurance that the project will not cause harm, depends on an ongoing monitoring and adaptive management program. Representatives from Discovery Bay have requested at public meetings and at other times that one or more monitoring stations be included to monitor water quality impacts on the 16 bays of Discovery Bay. Yet no Discovery Bay monitoring stations have been included. The bays of Discovery Bay are heavily used for water contact sports (swimming, sail boarding, paddle boarding, etc). The failure to include adequate monitoring of Discovery Bay water quality is unreasonable. Conditions in the bays of Discovery Bay are not reflected by existing monitoring stations in open water locations. There is much less circulation in the bays of Discovery Bay and numerous other differences in conditions. Adequate monitoring stations in Discovery Bay are required to establish an adequate mitigation and monitoring program.
- 5) This is a comment on the Draft EIR/EIS. The EIR depends heavily on ongoing monitoring and adaptive management. In order to have a meaningful monitoring program you need to know what the baseline conditions were before the project begins operation. There is no meaningful data included to establish what baseline conditions are in the 16 bays of Discovery Bay. The bays have a different environment and are very different in conditions from the locations of existing monitoring stations relatively nearby from which you have taken your baseline data. In order to have a meaningful monitoring and mitigation program, it is necessary to establish monitoring of Discovery Bay before project operation begins in order to establish accurate baseline conditions. The bays of Discovery Bay are probably the most heavily used area of the Delta for human contact sports. Bacteria levels may already be high at some times due to the presence of invasive weeds. Project operations may take undesirable bacteria levels to unsafe levels. This is a question of human health, particularly the health of children. Establishing adequate baseline data and a robust site specific monitoring program for Discovery Bay are essential ingredients of the monitoring, mitigation, and adaptive management plan that have been entirely overlooked!
- 6) This is a comment on the Draft EIR/EIS. Air quality impacts due to disruption of boating traffic have not been adequately identified and analyzed in the EIR/EIS. Boat traffic will be restricted due to construction activities and long-term operation of diversion structures and other structures. Numerous 5 mph zones will be put in place and a boat lock will be installed at the head of Old River. Boaters will change their boating patterns to avoid these areas. This will cause increased boat travel, which will increase boat emissions. Larger diesel powered boats in particular will avoid these areas and travel farther to other areas of the Delta. The impact on boat traffic patterns and attendant increase in emissions has not been identified or analyzed.
- 7) This is a comment on the Draft EIR/EIS. The EIR/EIS fails to analyze a reasonable range of alternatives. Where a reasonably feasible alternative exists that would lessen the adverse environmental impacts of the project the law requires that it be included, analyzed, and considered. By definition an HCP is mitigation. It mitigates the take of species due to effects of the project. Here the project is the operation of the CVP/SWP. The project kills fish because it doesn't leave enough water in the Delta for their needs. The tunnels are supposedly mitigation for the take because they will harvest and move water in a less harmful way at less harmful times than the way water is currently harvested and moved. The BDCEP has advertised its "little sip, big gulp" concept as one of the ways that the tunnels will mitigate adverse impacts. When water levels are low or water is critically needed for fish populations, the tunnels will take only small amounts of water. When water is abundant or not needed for fish populations the tunnels will take larger amounts of water. Or so goes the reasoning. But the reasoning is flawed because the BDCEP does not include provisions for additional storage (new reservoirs, increased ground water banking, etc). Without someplace to store water that might be harvested at times of abundance the "big gulp" concept is just an illusion. This is particularly true because during large winter storm events reservoirs are typically full and water cannot be harvested because there is no where to put it. The project as currently proposed is a "run of the river" project, not a "little sip, big gulp" project. The ability to move much more water only means that more water can be drawn away from the Delta but not at

times that would be less harmful. In fact, since reservoirs are empty or low at times of critical shortage, it means more water can be taken out of the Delta only at times when it is most harmful to take it.

The EIR/EIS states that “developing new water storage” is beyond the scope of the BDCP. Draft EIR/EIS at 3A-81. I disagree. If the “little sip, big gulp” approach is within the scope of the BDCP, why would constructing the infrastructure that would actually make it possible not be within the scope of the BDCP? Is it within the scope of the BDCP to advertise “big gulp, little sip” when it is illusory (and the proponents of the project know full well it is illusory) but not within the scope of the BDCP to actually do what it takes to make the concept a reality?

The project proponents do not have the authority to simply decide that storage is something they don’t have to deal with. If including storage is reasonably feasible and lessens one or more significant impacts, you are *required by law to consider it*.

The Draft EIR/EIS should be revised and re-circulated to include a reasonable range of alternatives that include various storage concepts.

- 8) This is a comment on the Draft EIR/EIS. The EIR/EIS is fatally flawed because it does not include any alternatives that include additional storage. Storage is the key to mitigating the impacts of operation of the CVP/SWP on the Delta and its species. Reasonably feasible storage projects that would lessen the adverse impacts of operation of the CVP/SWP and lessen the adverse impacts of the tunnels themselves are well known. For example, the NODOS project (also known as Sites reservoir) has been extensively studied. NODOS would draw water from the Sacramento River during winter periods of high water and store it in a new reservoir. The water would be released back into the Sacramento River during periods of shortage. NODOS is well upstream of the proposed tunnel intakes. Therefore, water from NODOS storage could be released into the river, travel downstream to the intakes, and be diverted for export. This would allow diversions with *no net decrease in river flow* at times of critical need. That would clearly decrease adverse impacts of exports. Why doesn’t the BDCP include this concept as part of an alternative? The only reason given is that “developing new water storage” is beyond the scope of the BDCP. Draft EIR/EIS at 3A-81. BDCP project sponsors don’t have a magic wand that they can wave and make a reasonably feasible alternative “beyond the scope of the BDCP” just because they would rather not deal with it. If it is 1) reasonably feasible; and 2) would lessen adverse impacts, you are *required* to consider it.
- 9) This is a comment on the Draft EIR/EIS. The Draft EIR/EIS fails to analyze any alternative with a storage component. We all know that the problem in California is that we get too much rain, all at once, in the wrong place, at the wrong time, and erratically. Everyone agrees that climate change will make all of this worse. The *only* solution is to be able to harvest and store the water that comes in great bursts at times when our existing reservoirs are already full. WE NEED NEW STORAGE. Without new storage we continue to draw water from the Delta at times when water is critically low and at times when exports harm fish and other species. If we had water in storage at these times we wouldn’t need to draw water (or at least as much water) from the Delta at these times. What about this is so hard to understand? But you must not understand it because none of the alternatives include new storage that would allow water to be harvested at times of abundance, stored, and used at times of shortage. Not only is an alternative, or several alternatives, that include storage reasonably feasible, it is downright unreasonable not to consider them. Please take a deep breath, go back to the drawing board, and use the many talented people at your disposal to come up with real alternatives that solve real problems by BUILDING MORE STORAGE.
- 10) This is a comment on the Draft EIR/EIS. In order for the BDCP to actually be a less harmful way to export water (which is the rationale for calling the tunnels a “conservation measure”) you have to consider alternatives that include new storage. If you don’t have storage, you can’t take water at times

when it is not harmful to take it, because currently at those times our reservoirs are already full. One alternative for additional storage is groundwater banking. Additional groundwater recharge is widely accepted as one of the most feasible and cost-effective means of obtaining new storage. The National Heritage Institute and others have published extensive studies showing this to be true. The California Water Plan also acknowledges that groundwater banking is an important component of solving California's water problems. Why not spend less on massive tunnels, build one smaller tunnel, and use the savings to connect the CVP/SWP to new groundwater recharge facilities throughout the state? California's network of canals connected to the CVP/SWP reaches almost every corner of the state already. The smaller tunnel could operate at capacity at times of abundance (when the currently proposed massive twin tunnels will be shut down for lack of storage) thus diverting as much or more water with much less harm. This is a reasonable and feasible alternative that has not been included. It should be.

- 11) This is a comment on the Draft EIR/EIS. I haven't found where you analyze how much more water could be harvested using the existing point of diversion at Clifton Court Forebay *if* there were new storage to accept water at times of high river flow. The Draft EIR/EIS should include an alternative that shows the maximum amount of water that could be diverted at the existing point of diversion if adequate storage were available and that proposes new storage to accommodate those increased diversions. I expect that there is existing data that shows historical times of high flow and historical data of when the smelt are (and are not) present at the Clifton Court intakes. Why can't you plot these two variables and determine projected times of abundance when smelt would not interfere with pumping? Then you could calculate how much water could be exported at these times and calculate how much new storage would be required to hold it. Then you could design storage facilities. After all this is done, you might find the tunnels aren't needed or a much smaller single tunnel would do the job. This all should be considered as an alternative to the currently proposed project.
- 12) This is a comment on the Draft EIR/EIS. Enough water flows over the flood diversion structures at the Sacramento Weir and Fremont Weir during peak winter storm events in a few days to supply all the water needs of southern California for *several years*! We have plenty of water. We just don't have any way of capturing or storing it. The BDCP should analyze a bold alternative that captures and stores water currently diverted by these weirs. The environmental benefits would be enormous because none of this water flows through the Delta. You could meet export needs *and* drastically reduce the amount of water taken from the Delta. Expensive? Yes. But worth it? Yes. Just think of the environmental benefit of restoring almost 100% of Delta flows to environmental needs.
- 13) This is a comment on the EIR/EIS. This document is too long! Yes, this is a big project but an EIR/EIS is supposed to be a "concise statement." At some point the legal requirement that an EIR be "concise" has to have some meaning. It appears that this thing has *intentionally* been made so long that the public will be unable to grapple with it. You are *discouraging* meaningful informed public participation by issuing a document that is so long that no one who has a life outside the BDCP can ever get through it. The "public" has to get up in the morning and go to work, take the kids to school, and take care of a household. There is no way that an ordinary citizen can also deal with this monstrous document. The law requires public participation. Not special interest group participation or paid consultant participation, or lawyer participation. Virtually any piece of writing can be made better by editing it and making it shorter. In order to make this process meaningful, you need to cut the EIR/EIS down to one quarter its present size. Yes, editing is hard work! But you will actually find that you have a more coherent and more legally defensible document by doing so. I request that this document be withdrawn, edited, shortened, made accessible to the real public, and re-issued.

From: Kristen Hamstra <kristen.khdesigns@gmail.com>
Sent: Tuesday, February 25, 2014 7:59 PM
To: bdcg.comments@noaa.gov
Subject: Comments for the BDCP and the EIR/EIS

What are you thinking of not posting all comments online of other peoples comments! This is my first RED Flag that you are trying to keep something from us, the public. We are not being heard and if we are why can we not see others comments?

These comments are for both the BDCP and the EIR/EIS. It is standard federal government procedure to post on line comments. The forum of online posting is **key** to knowing how the public feels and how they think about something that will be costing them an arm and there first born child. It is a controversial project disguised as a conservation measure. The time for comments needs to be extended because I (and everyone else) have not been informed of information that is my right to see and know.

How will the tunnels affect our water quality? Operation of the tunnels will cause adverse water quality impacts on Discovery Bay. Construction of the BDCP may damage the aquifers, subjecting them to foaming agents and other hazardous chemicals. The plan also allows the X2 salinity line to move inland, jeopardizing water quality and the ability of communities such as Antioch to use the water for drinking or farming.

The BDCP marketing collateral and press release says the tunnel muck is not harmful after all. The new plan is to use the muck to build freeways; however, the muck still needs to be stored in lined ponds as to not pollute the ground water and the maps show large muck ponds very close to Discovery Bay. These things all affect our water quality adding new hazardous chemicals into our water, by way of muck extraction or storage of the muck.

As I write these comments I sit on my back deck enjoying the quiet Sunday morning serenity, the calm waters and the songs of the birds. I believe there is so much that has not been considered and there are better ways to be environmentally sound and to support the needs of all Californians. You need to listen to the people and consider a better way. Clearly this is not being done. The Tunnels are not the answer.

William Hamstra

1275 Willow Lake Road

Discovery Bay, Ca 94505

925.699.5440

From: Kristen Hamstra <kristen.khdesigns@gmail.com>
Sent: Tuesday, February 25, 2014 8:01 PM
To: bdcg.comments@noaa.gov
Subject: Comments for the BDCP

Vacation is a state of mind and that is why I live in Discovery Bay. I endure the commute back and forth from work because Discovery Bay is vacation. After living here for 22 years and raising my kids here I have come to be part of an amazing community. We are not big but we care about each other and we are willing to fight to keep what we have. It is the right thing to do. The tunnels are the wrong thing to do.

The cost of this project will be huge and we all know the so called budget is not even close to what the actual cost will be in the end. It will cost us financially and environmentally.

This is a comment on the BDCP project. This project needs to be abandoned; it is a waste of tax payer money. You will expect us to pay and do not allow us a vote. I vote against it! You are so clever to say this is a **conservation measure** and putting in place an **adaptive management** plan that gives the water contractors the ability to direct management of the tunnels. This is a thinly disguised water grab and nothing else.

This is an outcry that you need to post all comments online so others can see these comments; I know there are many out there who feel as I do. Public participation is necessary! I actually believe you are keeping us in the dark to keep the voting public from stopping something that will destroy our Delta and line your pockets and the water contractors. I went to Brentwood for the question and answer session, left work early, to never be contacted again. The promise was we would be heard and answered. YOU LIE!

Save the Delta and stop the tunnels!

Kristen Hamstra

1275 Willow Lake Rd

Discovery Bay, Ca 94505

From: Mark <markabuckman@msn.com>
Sent: Tuesday, February 25, 2014 8:06 PM
To: BDCP.Comments@noaa.gov
Cc: BDCP.Comments.copy@nodeltagates.com; Elyse Buckman
Subject: Delta Tunnels

To: BDCP Comments

My wife and I own a waterfront home in Discovery Bay and both of us enjoy our place in paradise. I have been waterskiing, wakeboarding, and participating in a great variety of recreational activities on the Delta for 15 years. We also enjoy the restaurants and all the social activities available by boat.

We have become very concerned about the plan to install tunnels from Sacramento to the Discovery Bay area to divert water that would otherwise flow through the Delta. All of us understand that there is no environmental benefit to the Tunnels, it is simply a way to get more water down south at the expense of the Delta Environment. Less water flow means more stagnant water, more brackish water further inland, and a decline in the Delta environmental state.

There is huge risk in building the tunnels as well. The project will cost many billions of dollars, and there is a real likelihood that the estimate is very low. Cost overruns could cost water user a huge amount of money, and impact taxpayers. California is just starting to get it's financial house in order, now is not the time to start a huge project, with highly questionable benefit.

The Tunnel product will not necessarily make more water available. In dry years such as this there will be little water flow to pump through the tunnels, and if the water is diverted it would have a huge negative impact on the Delta Environment.

For these reasons and a multitude of other reasons my wife and I are adamantly opposed to the Tunnel project.

Mark and Elyse Buckman
4083 Beacon Pl.
Discovery Bay Ca, 94505
925 628-2634

From: Kristen Hamstra <kristen.khdesigns@gmail.com>
Sent: Tuesday, February 25, 2014 8:06 PM
To: bdcg.comments@noaa.gov
Subject: Comments for the BDCP

I have lived in Discovery Bay for 22 years and call it home. It is an amazing place where the marsh lands have a plethora of beautiful birds. I love watching them spread their wings, taking in the sun rays and they are at home here. The fish jump on a warm fall evening in groups...I call it my fish fry. So amazing! The BDCP is not addressing these wonders and these comments are for you.

I left work early to attend one of the Brentwood Library meetings. I signed in and voiced my concerns. I was told you would respond back to me within two weeks to respond to my concerns. Well I never heard another word from you. I thought my comments were not worthy of a response because I am merely a taxpayer and voter. I went to a meeting at the Discovery Bay Gym just last Wednesday 2/19/2014 and they asked the question...who went to one of these meetings? The majority of hands went up...then they asked who of you received an answer? All hands went down, not even one hand remained in the air. This speaks volumes to me. The premise of this project is dishonest. I oppose the construction of the twin tunnels.

The tunnels are **not a conservation measure**. The tunnels are a piece of water supply infrastructure designed to export more water to southern California, not to save fish or even help the Delta. You come in like a Trojan Horse saying you want to help species in the Delta recover, if you do reduce exports from the Delta through true conservation, desalination, developing local supplies, and banning wasteful agricultural practices such as growing cotton and rice in the desert. Be honest! Any Habitat Conservation Plan must recognize that there simply is not enough water to allow the Delta species (Salmon, Smelt and Shad) to survive and meet the demands of the water contractors who are behind project. Reduce Water Exports! Save the Delta and stop the tunnels!

These comments are for the BDCP

Kristen Hamstra

1275 Willow Lake Road

Discovery Bay, CA 94505

From: Doug Yee <dyee@surewest.net>
Sent: Tuesday, February 25, 2014 6:55 PM
To: BDCP.comments@noaa.gov
Subject: comments

In regards to the delta plan, I am opposed to the plan only because the brunt of the costs will be born by the average consumer/taxpayer, not the major beneficiary of the water, the large agribusinesses whom if I am not mistaken, use approximately 80% of available water in the state. Does this not beg the question on why we are subsidizing corporate profits on the backs of the average citizen? And why is produce being grown where it should not be and not in its normal growing season? The upside of restoration of the delta is a good one, but the beneficiaries of this water transfer are few, and overall long term costs to the citizen too high, thus in my opinion, not a worthy project.

L # BDCP346

- ✓ Unused
- ☐ Duplicate of _____
- ☐ Out of Scope
- ☐ Other: _____

(replace original)

Comments on BDCP Draft EIR/EIS

Our contacts with the Delta began near the end of WWII when my husband visited his grandparents who were living on a houseboat anchored at Bethel Island. Later as members of the Berkeley Water Ski Club we boated from their 2 locations in the Delta near Old River. Then we joined the Golden Anchor Boat Club in Tracy and visited the Delta from that location. In the early 70's we bought our first lot in Discovery Bay, moving here full time in 1976. We boat regularly in the Delta and the San Francisco Bay.

Since the onset of pumping, the quality and quantity of the water has certainly declined. Specifically the water level in Indian Slough and Kellogg Creek is so low that we must travel near high tide to leave Discovery Bay to do any boating. We stopped fishing in the Delta long ago. We no longer swim the bays and advise our neighbors who are part timers here not to swim in the bays.

All comments should be posted on line as you receive them so that everyone can see what others are saying about this project. Posting comments on line during an EIS process is standard federal government procedure. Why isn't it being done on this highly controversial and expensive process?

Discovery Bay is different from the rest of the Delta. We have 16 shallow bays ranging in size from less than an acre to several acres. The EIR/EIS fails to adequately address water quality impacts in Discover Bay. We request that a site-specific analysis be conducted to determine water quality impacts on the bays of Discovery Bay.

Patricia and Harold Whitlow
whitlow2@pacbell.net

BDCP 3417

From: Patricia and Hal Whitlow <whitlow2@pacbell.net>
Sent: Sunday, March 02, 2014 4:03 AM
To: BDCP.comments@noaa.gov
Cc: bdcg.comments@nodeltagates.com
Subject: comments on draft eir (pw)
Attachments: Comments on BDCP Draft EIR.docx

From: GRAHAM207@aol.com
Sent: Sunday, March 02, 2014 11:46 AM
To: bdcp.comments@noaa.gov
Subject: Re: Comment on the Draft BDCP and Draft EIR/EIS Re: Draft EIR/EIS Comment

Where can we read all the comments that are being sent in?

In a message dated 3/2/2014 11:40:35 A.M. Pacific Standard Time, bdcp.comments@noaa.gov writes:

Thank you for submitting a formal comment on the Draft BDCP and Draft EIR/EIS. All comments received on the Draft EIR/EIS will be considered in the Final EIR/EIS and decision-making process. For more information, assistance in locating the documents or if you have special needs, contact 866-924-9955. Additional information can be found at www.baydeltaconservationplan.com

From: jody mazzarella <firelady1@sbcglobal.net>
Sent: Thursday, February 27, 2014 11:48 AM
To: BDCP.comments@noaa.gov
Subject: 2nd request for a audio DVD

I would like a copy of the audio on DVD for the meeting of Feb 29, 2012 at the Pagoda Building. If you can send me the link you can send it to thie email address. Let me know what needs to happen so I can get this copy.

Thanks Jody

From: jody mazzarella <firelady1@sbcglobal.net>
Sent: Thursday, February 27, 2014 11:56 AM
To: bdcpc comments - NOAA Service Account
Subject: Re: Comment on the Draft BDCP and Draft EIR/EIS Re: 2nd request for a audio DVD

I am not commenting, I am requesting a copy of a meeting on Feb 29.

From: bdcpc comments - NOAA Service Account <bdcpc.comments@noaa.gov>
To: firelady1@sbcglobal.net
Sent: Thursday, February 27, 2014 11:51 AM
Subject: Comment on the Draft BDCP and Draft EIR/EIS Re: 2nd request for a audio DVD

Thank you for submitting a formal comment on the Draft BDCP and Draft EIR/EIS. All comments received on the Draft EIR/EIS will be considered in the Final EIR/EIS and decision-making process. For more information, assistance in locating the documents or if you have special needs, contact [866-924-9955](tel:866-924-9955). Additional information can be found at www.baydeltaconservationplan.com

From: Cecily Tippetery <cecilyt@pacbell.net>
Sent: Thursday, February 27, 2014 3:07 PM
To: BDCP.Comments@noaa.gov
Subject: Comment on the Draft EIR/EIS

This is a comment on the Draft EIR/EIS:

It is my understanding that not all comments are being posted online as posting comments during an EIS process is standard federal government procedure. I formally request that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

I live and work as a Realtor in Discovery Bay. We have a boat and tell everyone they can travel around the world and come back home using the waterways. It is unfortunate for both my career and lifestyle that the twin tunnels are even being considered as this causes uncertainty in the market.

We currently have less than 10 feet of water behind our home that is brackish and full of weeds. If the two tunnels go in, we are likely to have less than half the water we have now as we are in an area farthest away from the main channel. We are concerned that we see otters and seals behind our home as they are starting to come farther inland looking for food. Obviously, the twin tunnels will not help that situation as amount of water and water quality will be adversely affected. The ecology of the Delta is so fragile now, give it a chance to grow and heal. Reducing water levels will not help! As you may know we have very little circulation in our bays. It is my understanding that a proper water quality and environmental impact study be done if the two tunnel project is being seriously considered which would include specific analysis of the project's water quality impacts on Discovery Bay be included.

Much of the purported environmental benefit, and assurance that the project will not cause harm, depends on an ongoing monitoring and adaptive management program which are not included in the draft. There is much less circulation in the bays of Discovery Bay and numerous other differences in conditions. Adequate monitoring stations in Discovery Bay are required to establish an adequate mitigation and monitoring program as opposed to the open water monitoring stations.

Bottom line: the Draft EIR/EIS is not adequate and if corrected will clearly show that the project is not a reasonable solution to improving water quality in the Delta.

Cecily Tippetery
2023 Seal Way, Discovery Bay, CA 94505
and
Prudential California Realty
Broker Associate CalBRE #01095391
ctippetery@pacbell.net, cecilyt@pacbell.net
www.Cecily.com

