BDCP801.

From: Aldo Leupold <mark.grexton@gmail.com>
Sent: Wednesday, June 25, 2014 10:10 AM
To: BDCP.comments@noaa.gov
Subject: Stop the Delta Drain Tunnels!

The Bay Delta "Conservation" Plan is nothing but window-dressing over a water-grab funded by Big Agribusiness and foisted off on the taxpayers of California by paid politicians.

Six pages into the plan the Big Agribusiness bias is evident by listing a "Steering Committee" (not an Advisory Committee, steering implies giving direction) made up of the very people who are asking to be permitted to kill endangered species, elected government agencies (who take political contributions from those same permit applicants,) and by the way "other" concerned parties. This tells me immediately that this is anything but an unbiased report.

It is also extremely telling that the funding for the Drain Tunnels has been thought about and worked out, but the "Conservation" part has not?

I have lived in the Delta my entire life, I have personally seen the decline in my lifetime that has been caused by increasing removal of fresh water from the system, the idea of building two giant drain tunnels to make this even worse is horrifying to me, and unthinkable to anyone who lives in what will be the decimated region.

It makes it even more ridiculous that, after the corrupt construction administration of the state took 11 years (7 over schedule) and $6.4 Billion dollars (5x the original budget) to build the bay bridge, you want to put the same corrupt construction administration in charge of a 50-year project that would cost $24.5 billion dollars (at Bay Bridge schedules that means the project would take 79 years and $142 billion**without inflation** dollars....)

I am completely behind agriculture making money, but not at the cost of killing my Delta, and that is exactly what this "plan" does. Take this plan, completely scrap anything and everything to do with the Drain Tunnels, use the construction money to buy out the desert that is the Westlands Water district and turn it back into publically owned grazing acreage, THEN implement the "conservation" portion of this plan.

Almost everyone who lives here in the Delta is vehemently against the Delta Drain Tunnels project and will fight it tooth and nail at every opportunity, Save The Delta placards and signs are up in every other yard and bumpersticker that you see driving across the Delta, this is a horrible plan that is sure to kill off towns here in the Delta that rely on what the fresh water brings us.

Please, please scrap this plan altogether and work on something that doesn't have (the cynically described) "co-equal goals" and just has one goal SAVE THE DELTA!

-Mark Grexton, West Sacramento, CA

From: Cane, Nicholas <ncane@Bechtel.com>
Sent: Thursday, June 26, 2014 3:53 AM
To: BDCP.comments@noaa.gov
Subject: BDCP engineering options for tunnel and intake solutions to California water supply

Hi there,

I would like to understand the process to which you arrived at the proposed tunnel and intake solution to provide California with the water supply mentioned in the BDCP? Can you point me towards the other engineering options you considered as part of the process?

Many thanks
Nick

Nick Cane | Ports and Marine Specialist
Chartered Scientist and Chartered Water and Environmental Manager
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M: +44(0)7917 599686
E: ncane@bechtel.com

BDCP803.

TOWN OF DISCOVERY BAY

A COMMUNITY SERVICES DISTRICT

June 4, 2014

Ryan Wulff
ATTN: BDCP Comments
National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

Subject: Town of Discovery Bay Community Services District Comments on the Draft Bay Delta Conservation Plan and Bay Delta Conservation Plan Draft Environmental Impact Report/ Environmental Impact Statement

Dear Mr. Wulff:

The Town of Discovery Bay appreciates the opportunity to review and comment on the Draft Bay Delta Conservation Plan and Bay Delta Conservation Plan Draft Environmental Impact Report/Environmental Impact Statement. This letter provides the Town's comments in accordance with the provisions of the California Environmental Quality Act (CEQA), CEQA Guidelines, and the National Environmental Protection Act (NEPA).

The Town of Discovery Bay, located in eastern Contra Costa County, is the largest residential water based community on the environmentally sensitive California Delta. The Delta is the lifeblood of our community. The Delta and its ecosystem singularly sustain the largest estuary on the Pacific Coast and it is home to a myriad of fish, waterfowl, and mammals, many of them endangered. The Delta offers countless recreational opportunities as well, including boating, fishing, bird watching, hunting and many others. Most importantly, however, the Delta is also home to the farms and fields that feed America.
The BDCP proposes to make physical and operational improvements to the State and Federal water projects in the Delta claiming to protect reliable future water supplies and to restore and protect ecosystem health in the Delta. Unfortunately, the BDCP as proposed fails to accomplish either of these purposes and the Draft EIR/EIS inadequately analyses impacts to the Delta ecosystem, water quality and supply, and communities.

The Town of Discovery Bay Community Services District Board of Directors believe that implementation of the BDCP, and particularly the construction of the dual conveyance system allegedly designed to reduce the amount of fresh Sacramento River water flowing into and through the Delta, would cause additional and significant deterioration of an already sensitive Delta ecosystem. The Delta ecosystem has shown increasing signs of stress as the natural hydrology has been altered by the operations of the State and Federal Water Projects in the Delta. Salt water intrusions have continued to move upstream for many years, more and more native species are being threatened, and increased water diversions have resulted in substantial degradation of water quality. Less water flowing into and through the Delta would exacerbate these problems rather than resolve them.

1800 Willow Lake Road • Discovery Bay • CA • 94505-9376
Telephone • 925.634.1131 • Fax • 925.513.2705
www.todb.ca.gov

The dual conveyance system's draw on the Sacramento River will substantially upset the extensive network of levees, rivers, and dams in the Delta region. Fisheries and fish habitats will be impacted as less fresh water is introduced to the system. Brackish water would move much further upstream resulting further degradation of the Delta and the destruction of a large portion of the rich agricultural industry that provides many of the food crops for America. The BDCP and the dual conveyance system will result in significant ecosystem, fishery, flood control, and water quality impacts which are not sufficiently analyzed in the Draft EIR/EIS.

The dual conveyance system, in its present proposed alignment, crosses directly in, through and adjacent to the Town of Discovery Bay on its way to the Clifton Court Forebay. The environmental impacts that will be caused as a result of the construction and ongoing project maintenance will forever change the relationship between the Discovery Bay community, the environmental stewardship of the Delta, and the economic and significant cultural resources of the Delta region. These significant impacts are not adequately addressed in the Draft EIR/EIS.

The BDCP, and the dual conveyance system, will not resolve California's ongoing water issues. Rather, it will degrade the Delta environment, ecosystem, and communities. We urge you to reconsider your support of the BDCP and join the millions of Americans who believe water conservation and water storage projects are more environmentally preferable than the dual conveyance system.

Based on the comments provided above and those of the other Delta Initiative stakeholders, the Town believes that the current Draft EIR/EIS is technically and legally inadequate, as it does not comply with the provisions of CEQA, CEQA Guidelines, and NEPA. Accordingly, we urge you to deny the Draft EIR/EIS.

Sincerely,

The Board of Directors of the Town of Discovery Bay Community Services District

Board President
Mark Simon

Director
Bill Pease

Vice-President
Chris Steele

Director
Marianne Wiesen

Director
Kevin Graves

1800 Willow Lake Road • Discovery Bay • CA • 94505-9376
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Cc: Honorable Supervisor Mary N. Piepho, Board of Supervisors, District III
Honorable John Garamendi, Member House of Representatives, 3rd District
Honorable Mike Thompson, Member House of Representatives, 5th District
Honorable Doris Matsui, Member House of Representatives, 6th District
Honorable Senator Mark DeSaulnier, 7th District
Honorable Jerry McNerney, Member House of Representatives, 7th District
Honorable Jim Frazier, California State Assembly, 11th District
Honorable Nancy Pelosi, Member House of Representatives, 12th District
Honorable Barbara Lee, Member House of Representatives, 13th District
Honorable Jackie Speier, Member House of Representatives, 14th District
Honorable Eric Swalwell, Member House of Representatives, 15th District
Honorable Sam Farr, Member House of Representatives, 17th District
Honorable Anna G. Eshoo, Member House of Representatives, 18th District
Honorable Ken Salazar, Secretary, United States Department of the Interior
Honorable Rebecca Blank, Acting Secretary, United States Department of Commerce
Honorable John Laird, Secretary, California Natural Resources Agency
Mayor, City of Brentwood
Mayor, City of Oakley
Mayor, City of Stockton
Mayor, City of Tracy
Mountain House Community Services District
Ironhouse Sanitary District
Byron-Bethany Irrigation District

BDCP803

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

---------- Forwarded message ----------
From: **Anita Deguzman - NOAA Affiliate** <anita.deguzman@noaa.gov>
Date: Thu, Jun 26, 2014 at 10:53 AM
Subject: BDCP COMMENTS
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

I have attached the following 13 comments for your files.

Copies have been made and are in your mailbox - original letters are up front at the reception desk.

--

Anita deGuzman
Administrative Assistant
NOAA Fisheries * West Coast Region
U.S. Department of Commerce
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

KINDER MORGAN
ENERGY PARTNERS, L.P.

BDCP804.

SFPP, L.P.
Operating Partnership

June 6th, 2014

Ryan Wulff, NMFS
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

Re: Comment on Bay Delta Conservation Plan Draft EIR/EIS

Mr. Wulff:

SFPP, L.P. has operating product pipelines that are within the Restoration Opportunity Area in Conservation Zone 11. The draft EIR/EIS includes plans for areas of habitat restoration and habitat protection within the ROA. The establishment of new restored and protected areas should not place limits on the performance of routine maintenance activities on the existing pipelines. SFPP, L.P. would be pleased to provide further information regarding routine maintenance activities on the pipelines if requested.

Thank you for the opportunity to comment on the Bay Delta Conservation Plan Draft EIR/EIS.

Sincerely,

Allan Campbell
Director, Project Permitting

1100 Town & Country Road Orange, California 92868 714/560-4600 714/560-4601 Fax

BDCP8041

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

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From: **Anita Deguzman - NOAA Affiliate** <anita.deguzman@noaa.gov>
Date: Thu, Jun 26, 2014 at 10:53 AM
Subject: BDCP COMMENTS
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

I have attached the following 13 comments for your files.

Copies have been made and are in your mailbox - original letters are up front at the reception desk.

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Anita deGuzman
Administrative Assistant
NOAA Fisheries * West Coast Region
U.S. Department of Commerce
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Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
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BDCP805.

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY
EDMUND G. BROWN JR., GOVERNOR
CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Rm. 151
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682
PERMITS: (916) 574-2380 FAX: (916) 574-0682

June 13, 2014

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

Subject: Bay Delta Conservation Plan Draft Environmental Impact Report
SCH No. 2008032062

Dear Mr. Wulff:

The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Bay Delta Conservation Plan (BDCP). The BDCP is a comprehensive habitat enhancement and conservation plan designed to be implemented through the State Natural Community Conservation Planning Act and the federal Endangered Species Act. The BDCP seeks to implement 22 Conservation Measures throughout the Delta in support of a 50 year permit to incidentally "take" endangered species as part of the ongoing operations of the Central Valley Project (CVP) and the State Water project (SWP).

The Conservation Measures include construction of new water conveyance infrastructure and restoration of various types of habitat. Many of the proposed actions will occur on or around facilities of the State Plan of Flood Control (SPFC) including modifications to the Sacramento River Flood Control Project (SRFCP). The SRFCP is the core of the flood protection system along the Sacramento River and tributaries and includes most of the levees, weirs, control structures, bypass channels, and river channels that comprise the SPFC. These levees are relied upon today to provide flood protection during major storms to over 2 million people in approximately 50 communities with an estimated $37 billion in urban and agricultural development. [1]

The Board is an independent state agency required at all times to enforce on behalf of the State the erection, maintenance and protection of the levees, embankments and channel rectification as will, in the Board's judgment, best serve the interests of the State.[2] In accordance with Water Code Section 8608, the Board is charged with establishing and enforcing standards for the maintenance and operation of levees, channels, and other flood control works of an authorized project or an adopted plan, including but not limited to standards for encroachment, construction, vegetation and erosion control measures. The jurisdiction of

[1] American River Common Features Project, Natomas Post Authorization Change Report and Interim General Re-evaluation Report, USACE, October 2010, page 1-20.
[2] See California Water Code § 8534.

the Board encompasses the Central Valley, including all tributaries and distributaries of the Sacramento River, the San Joaquin River, and designated floodways.[3] The Board also has all the responsibilities and authorities necessary to oversee future modifications of the SPFC as approved by the U.S. Army Corps of Engineers (USACE) pursuant to assurance agreements with the USACE and the USACE Operation and Maintenance Manuals under Code of Federal Regulations, Title 33, Section 208.10 and United States Code, Title 33, Section 408.

The Board has reviewed the DEIR/EIS and BDCP for consistency with these mandates in order to ensure the BDCP proponents consider these important flood control concerns in implementing the BDCP. In accordance with Public Resources Code Section 21002, it is the policy of the State that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental impacts of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.

The following comments and recommendations are designed to substantially lessen the potentially significant impacts to the SPFC.

I. BDCP Potential Impacts to the Implementation of the Central Valley Flood Protection Plan

Chapter One of the DEIR/EIS describes the relationship to other conservation plans in the Delta. Chapter 7 discusses regulatory compliance with a number of other agency permits that may be required for BDCP implementation. Chapter 13 discusses the "on the ground" regulatory environment, including those agencies with land use authority in the study area. The DEIR/EIS includes project features that have the potential to impair or impede implementation of the Central Valley Flood Protection Plan (CVFPP)[4] a requirement of the Central Valley Flood Protection Act of 2008. The CVFPP is a comprehensive framework for system wide flood management and flood risk reduction for the Sacramento and San Joaquin River Basins.[5] The CVFPP was unanimously adopted by the Board in June 2012. The primary objective of the CVFPP is to improve flood risk management, including both facilities and formulation of standards, criteria and guidelines to facilitate actions to protect urban areas and other lands of the Sacramento and San Joaquin river basins and the Delta. The CVFPP must be updated every five years, and current efforts are underway for the 2017 update.

Recommendation: All Conservation Measures with the potential to affect the SPFC should be analyzed for consistency with the state system wide investment approach outlined in the 2012 CVFPP and in accord with any applicable guidelines, standards or criteria developed as part of the CVFPP in effect at the time of BDCP implementation.

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[3] 23 C.C.R., Section 2.
[4] Water Code Section 9613(a)(3)
[5] See Ca. Water Code § 9603(b).

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II. BDCP Conservation Measures Must Include Analysis of the Impact to the SPFC Operations and Maintenance

Since the release of the Administrative Draft EIR for the BDCP in 2013, the planning efforts for ecosystem restoration within lands under the jurisdiction of the Board have been further clarified. According to the DEIR, page 3-123, "Any modification to the Yolo Bypass or other CM2 [Conservation Measure 2] actions would be required to be designed and implemented to maintain flood conveyance capacity at the design flow level and to comply with other flood management standards and permitting processes. These activities would be coordinated, as appropriate, with USACE, DWR, Central Valley Flood Protection Board (CVFPB), and other flood management agencies."

The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River, the San Joaquin River, designated floodways and regulated streams.[6] According to the DEIR, BDCP restoration and mitigation features will be constructed within the SPFC regulated streams under the jurisdiction of the Board, including the following:

Georgiana Slough (Sacramento County);
Sacramento River (From Kenwick Dam –to west end of Sherman Island);
Mokelumne River (Sacramento County, San Joaquin County – to Camanche Reservoir);
San Joaquin River (Friant Dam to West End of Sherman Island);
Sacramento Deep Water Channel (Solano and Yolo);
Sacramento Bypass (Yolo County);
Old River (San Joaquin to Paradise Cut);
Three Mile Slough (Sacramento County);
Sevenmile Slough (Sacramento County);
Threemile Slough (Sacramento County);
Elk Slough (Yolo County);
Duck Slough (Yolo County);
Miner Slough (Solano County);
Sutter Slough (Counties of Solano, Sacramento, Yolo);
Steamboat Slough (Counties of Solano, Sacramento, Yolo);
Cache Slough (Solano County);
Cache Creek (Yolo County, Yolo Bypass to ½ mile west of Inter-state 5);
Putah Creek (Counties of Yolo, Solano – to Monticello Dam);
Putah Creek, South Fork (Solano County);
Sycamore Slough (Colusa County);
Haas Slough (Solano County);
Hastings Cut (Solano County);
Lindsey Slough (Solano County);
Shag Slough (Counties of Solano, Yolo);
Yolo Bypass (Counties of Yolo, Solano)

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[6]. 23 C.C.R, Section 112.

The BDCP likewise proposes to modify floodways under the Board's jurisdiction. According to the DEIR, pages 3-123 Yolo Bypass Fisheries Enhancement (Conservation Measure 2), includes "...modifications to the Yolo Bypass that, in balance with existing uses, would benefit covered fish by increasing the frequency, duration, and magnitude of floodplain inundation and improving fish passage."

State and local flood management agencies responsible for levee maintenance and vegetation management are subject to significant increases in their maintenance costs when implementing vegetation control measures adjacent to existing habitat within the floodways. Habitat restoration projects increases populations of protected species that live on levees operated and maintained by local maintaining agencies.

According to the CVFPP page 1-20, "System maintenance will continue to be challenged by the need to complete annual maintenance activities such as mowing grass, trimming trees and brush, filling burrows, clearing sediment, and restoring patrol roads while at the same time minimizing impacts on migrating fish, nesting birds, and hibernating snakes. The result is a combination of rapidly rising costs, shortening maintenance windows, high mitigation costs, and uncertainty".

Levee maintenance costs are significant with expenses ranging up to $90,000 per levee mile including increased costs to protect threatened or endangered species that live in animal burrows within levees.[7] Levee repairs to remove animal burrows in levees are often delayed due to regulatory compliance measures. Delays in repairing animal burrows within the levees increases flood risks due to potential water seepage through animal burrows within levees.

Recommendation: All Conservation Measures in the BDCP with the potential to impact the operations and maintenance of the SPFC, including habitat restoration projects and multi-benefit projects that increase or enhance existing habitat in or around floodways and system levees, should be analyzed for impacts to the operations and maintenance of the SPFC. State and local maintaining agencies should be consulted prior to implementing Conservation Measures in the floodways and system levees. The BDCP should identify ways to integrate long-term management of the system that serves both public safety and environmental needs.

III. Proposed Ecosystem Restoration Projects within the Yolo Bypass Must be Consistent with Title 23 Standards

Modifications proposed by the BDCP include increasing the flood frequency within the Yolo Bypass where flows are allowed to spill from the Sacramento River into the bypass system through the Fremont Weir and the Sacramento Weir. These weirs are significant over flow locations in the flood control system and provide flood protection based on their ability to convey up to 80% of the flow of the Sacramento River basin during high water events. The weirs' primary purpose was to release overflow waters of the Sacramento River, Sutter Bypass, and the Feather River into the Yolo Bypass. Spills into the Yolo Bypass could be reduced due to back water effects caused by the deferred maintenance of vegetation and sedimentation within the floodway.

The need to ensure adequate flood flow design capacity is a critical flood safety concern for the Board and local maintaining agencies. According to the USACE, "Fortunately, the levees in the Sacramento area have not been overtopped in recent flood events, although several floods

[7] FY 2014/2015 Levee Maintenance Budget, DWR Flood Maintenance Office.

BDCP505

have come close. However, it is possible that a large enough flood event could occur that would overtop the Sacramento levees. In past flooding, levees upstream have failed, relieving some of the pressure on the Sacramento area. But as repairs to these levees are made, it increases the flood risk to Sacramento as project levees could face the full brunt of the flood event. Because these levees were not built to modern engineering standards and levee failures upstream are assumed not to occur, levee overtopping would potentially lead to failure of the levee and cause devastating flooding."[8]

Flow in the Sacramento River is reduced by spilling floodwater into the Yolo Bypass through the Fremont and Sacramento weirs. Increasing the frequency and duration of floodplain inundation may increase the need for vegetation management and sediment removal to maintain the ability to convey design flood flows. According to the DWR Flood Control System Status Report, page A-20, "Freeboard results show that portions of both banks of the Sutter Bypass, both banks of the Yolo Bypass…do not meet freeboard criteria." The design of proposed ecosystem restoration projects without fully considering the Supplemental Standards of Section 136 may result in cumulative adverse hydraulic impacts in both upstream and downstream reaches of the Fremont Weir and Sacramento Weir.

Projects within the Yolo Bypass are required to obtain a Board permit and comply with 23 C.C.R. Section 136 Supplemental Standards for Yolo Bypass and Sutter Bypass including the following:

"(a) Final detailed plans for all construction, grading and planting must be submitted to and approved by the board prior to the start of work.
(b) A detailed operation and maintenance plan must be submitted to and approved by the board prior to the start of work.
(c) A profile of the existing levee crown roadway and access ramps that will be utilized for access to and from the construction area must be submitted to the board prior to the start of work.
(d) Any damage to the levee crown roadway or access ramps attributable to the construction or maintenance of croplands or wetlands must be promptly repaired by the permittee.
(e) The planting of vegetation or the impoundment of water is not permitted within one thousand (1,000) feet of the Fremont Weir structure.
(f) The planting of vegetation or the impoundment of water shall not be permitted in any area where there could be an adverse hydraulic impact.
(g) Irrigated and nonirrigated pastures and croplands are allowed without permit from the Board when consistent with the board's flowage easements.
(h) The planting of vegetation is generally permitted for the development of native marsh, riparian vegetation and wetlands.
(i) Rooted vegetation and aquatic beds of floating (nonrooted) or submerged vegetation are generally permitted to be established in ponded water.
(j) The depth of ponded water must be controlled to prevent the growth of unauthorized vegetation that could adversely affect the operation of the flood control project.

[8] American River Common Features Project, Natomas Post Authorization Change Report and Interim General Re-evaluation Report, USACE, October 2010, page 2-13.

(k) No permanent berms or dikes are permitted above natural ground elevation without a detailed hydraulic analysis except where otherwise expressly provided for in reservations contained in easement deeds to the Sacramento and San Joaquin Drainage District.
(l) required maintenance may include removal, clearing, thinning, and pruning of all vegetation directly or indirectly resulting from the permitted project."

Prior to implementation of any Conservation Measure in the Yolo or Sutter Bypasses, the BDCP should identify the existing conveyance capacity of the Yolo Bypass and provide an accurate representation of the effect on flood elevations resulting from the various conceptual ecosystem improvements examined within the BDCP. System design plans should identify actual conveyance capacity of the Yolo Bypass which is now based on historical high water events. The hydraulic analyses should include Lower Cache Creek sedimentation entering the Yolo Bypass and evaluate alternatives to avoid decreasing design flows in the study area which includes the Yolo Bypass.[9]

Recommendation: All projects proposed within the Yolo Bypass should comply with Title 23, Section 136 Supplemental Standards for Yolo Bypass and Sutter Bypass. The supplemental standards protect the flood control functions, safeguard existing agricultural land use, and control the development of proposed wetlands. To the extent the proposed modifications to the Yolo Bypass have the potential to reduce conveyance capacity and/or to divert flows upstream and through the Sacramento River, those modifications should only be considered after a conveyance capacity impact analysis is run.

IV. The BDCP Must Analyze Impacts to Levee Roads Resulting from Increased Traffic during BDCP Implementation

The BDCP construction activities will result in transportation impacts to levees. According to p. 19-189, "In particular, implementation of CM2 and CM3–CM10 would generate traffic on area roadways during implementation due to transport of construction vehicles, equipment, and employees to and from the sites for the purposes of modifying or installing new facilities, or making changes in operation of existing facilities. Because the specific areas for implementing these conservation measures have not been determined, this effect is evaluated qualitatively."

A qualitative traffic analysis is insufficient to analyze potential damage to levee roadways. The BDCP alternatives include truck haul routes using levee crown roadways for extended periods. Impacts to levees from excessive load, dynamic impacts, or traffic can include deformation and crest depression due to non-uniform settlement and damage to levee slopes due to use of levee hinge points for vehicle turn-outs. These impacts could result in loss of levee integrity, leading to levee failures.

Recommendation: Whenever haul routes or construction zones include travel over levee roads, the BDCP should implement mitigation measures, including pre-project inspections and levee geometry surveys including the elevations of levee crests and waterside and landside

[9] Review Plan Lower Cache Creek, Yolo County, Feasibility Study, USACE, August 2010, page 7.

BDCP805

hinge points, and continuous monitoring during construction for evidence of levee deformation. Traffic control measures should include reducing truck speed limits and limiting the number of trucks on the levee during flood seasons. Levee deformation (either vertical or lateral) should be mitigated and be restored in accordance with project levee designs pursuant to Board and USACE.

V. CVFPB Role as Non-Federal Sponsor for Purposes of Section 408

The Board has all the responsibilities and authorities necessary to oversee future modifications or additions to the SPFC as approved by the USACE pursuant to assurance agreements with the USACE and the USACE Operation and Maintenance Manuals under Code of Federal Regulations, Title 33, Section 208.10 and United States Code, Title 33, Section 408.

USACE policy requires the Board to serve as the lead non-Federal sponsor for projects to improve or alter facilities of the SPFC pursuant to Code of Federal Regulations, Title 33, Section 408. The State's objectives include fulfilling the USACE's expectations pursuant to assurances given by the Board to the USACE to operate and maintain the SPFC facilities.

Conservation Measure 1 of the BDCP includes the construction of new State Water Project conveyance facilities including water intakes, pumping plants, tunnels, access shafts, forebays, canals, earthen embankments, and extensive supporting facilities on adjacent lands.

According to the DEIR, Chapter 6 Surface Water, p. 6-36, "The CVFPB and the USACE are primarily responsible for the levees along the Sacramento River. Under California Water Code Section 8536 and related regulations, the CVFPB has no jurisdiction or authority over the construction, operation, or maintenance of the CVP or SWP. However, DWR will consult with these agencies to ensure that all construction of new structures or levee modifications within the waterways will not adversely affect the flood profile, and that the integrity of the levees is not degraded by structures that are constructed under, over, or through the levees."

Recommendation: BDCP documents should properly reference the Board as the non-federal sponsor for any project proposed to modify a SPFC facility. Even if the "project" is determined to be exempt from Board authority per Water Code §8536, the State retains the obligation to ensure those projects are compliant with the Operations and Maintenance Manuals and Assurance Agreements given to the USACE by the State. Therefore, any proposed project that can affect a SPFC facility should be approved by the Board either under its permitting authority or in conjunction with its duties as the non-federal sponsor for levee modification projects submitted to the USACE.

In summary, any modification or encroachment into the SPFC must not impair or impede implementation of the Central Valley Flood Protection Plan and have no adverse impact on design flows. A flood protection system cannot be relied upon if it hasn't been properly maintained. Future plans for the implementation of the BDCP should include Board review and concurrence of BDCP project plans, and Board staff should be a part of any design review or peer review panel that may be assembled in the future to discuss design criteria for conveyance facilities.

Thank you for your consideration of these comments. If you have any questions, please contact Len Marino, Chief Engineer at (916) 574-0608 or via email at Len.Marino@water.ca.gov.

Sincerely,

Leslie M. Gallagher
Acting Executive Officer

cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, California 95814

Members of the Central Valley Flood Protection Board:

William (Bill) Edgar, Board President
Emma Suarez, Board Vice-President
Jane Dolan, Board Secretary
Michael Villines, Board Member
Timothy Ramirez, Board Member
Joseph Countryman, Board Member
Clyde Macdonald, Board Member
Assemblyman Dr. Anthony Rendon, Ex-Officio Member
Senator Fran Pavley, Ex-Officio Member

BDCP805

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

---------- Forwarded message ----------
From: **Anita Deguzman - NOAA Affiliate** <anita.deguzman@noaa.gov>
Date: Thu, Jun 26, 2014 at 10:53 AM
Subject: BDCP COMMENTS
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

I have attached the following 13 comments for your files.

Copies have been made and are in your mailbox - original letters are up front at the reception desk.

--

Anita deGuzman
Administrative Assistant
NOAA Fisheries * West Coast Region
U.S. Department of Commerce
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

BDCP805

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Friday, July 11, 2014 2:55 PM
To: bdcp comments - NOAA Service Account
Subject: Fwd: BDCP COMMENTS | resend
Attachments: 20140619 Central Valley Flood Protection Board.pdf

Here is the correct CVFPB letter. The last one was missing pages.

---------- Forwarded message ----------
From: **Anita Deguzman - NOAA Affiliate** <anita.deguzman@noaa.gov>
Date: Fri, Jul 11, 2014 at 2:48 PM
Subject: BDCP COMMENTS | resend
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

sorry for that oversite Ryan.

Here's the electronic copy which is also saved in the BDCP Folder in SACDATA

--

Anita deGuzman
Administrative Assistant
NOAA Fisheries * West Coast Region
U.S. Department of Commerce
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

BDCP806.

3281 Rogers Avenue
Walnut Creek, California 94597
May 21, 2014

Ryan Wulff, NMFS
650 Capitol Mall
Suite 5-100
Sacramento, California 95814

Dear Ryan Wulff:

I would like to start off by saying that I am very happy to see that conservation and protection of California's delta is being taken seriously. The fact that the BDCP plan includes restoring many parts of the delta. I am still a little skeptical of the idea to take more water than before, I feel that doing it this way should cause less damage.

This brings me to the point of writing this letter. I feel that while the BDCP plan is thorough, it has an oversight. That oversight being the usage of the water pulled from the delta. Not only are citizens over-using and wasting our water, but so is the agriculture in our state. I feel that awareness should be made about the inefficient watering practices being used by the agriculture in our state. Along with the proposal to add into the BDCP plan is a reform of water usage regulation.

A Majority of the farms in California use an irrigation system known as Flood irrigation. Flood irrigation is a very inefficient system in water amount usage, while it is beneficial in the idea of speed, ease of use and convenience. We as a state can no longer afford these wasteful but convenient systems. Flood irrigation has a tendency to lose a lot of water to both evaporation and over watering of the soil. It also can aid in the salinization of soil at a quicker rate due to the large amounts of water used. This must be stopped and a more efficient system be mandated to be used. Center pivot and drip irrigation should be enforced to be used in as many situations as possible. For these systems use less water and deliver it more efficiently. Center pivot can and should be used for seasonal crops that can be arranged and used in this fashion. Examples include corn, carrots, cabbage, etc. Drip irrigation can be used for crops that are long term or trees. Drip irrigation can be set up for low cost to each tree to allow for more effective and targeted watering. Example of these crops are almonds, grapes and pistachios.

Agriculture is not the only culprit, while not as large of consumers as agriculture in our state, resident consumers do have an impact. Regulation must be put in that requires more low flow devices and smarter watering of resident yards and gardens. While residents have improved over the years there is still more to be done. A tax increase should be a plan of last resort to promote smarter and more efficient usage.

This is a big part of the problem with our water usage and it should have been addressed already. It cannot be ignored for it will lead to an over usage of our vital resources that could forever damage or destroy them. I ask for a reply on what you plan to do and updates as to how this plan is doing and when it succeeds.

Cordially,

Kyle F. Kunze
enc

BDCP806

Evaluation of a Drip Vs. Furrow Irrigated Cotton Production System

E.R. Norton and J.C. Silvertooth

Abstract

A newly installed subsurface drip system was compared to a conventional furrow-irrigated cotton production system in the Marana Valley in 2000. Regular measurements included soil moisture, flower tagging, general plant growth and development measurements, and lint yield. Results indicate that an increase in lint yield of approximately 250 lbs. lint/acre was obtained under the drip irrigation system. Approximately 1/3 less irrigation water was used under the drip irrigation system. Pounds of lint produced per acre-inch of water applied provide the most dramatic results. In the furrow-irrigated system approximately 25 lbs. of lint was produced per inch of water applied while the drip system ranged from 70-80.

Introduction

In desert agricultural production systems, water is by far the most limiting factor. Proper crop water relations are essential in optimizing cotton growth, development, and yield. Traditional methods of irrigation in Arizona and other irrigated regions of the cotton belt include flood or furrow irrigation. Other methods of delivering irrigation water to the crop have been successfully implemented in cotton production systems. One of these methods is subsurface drip irrigation. This method of water delivery can greatly enhance irrigation efficiency and the efficiency of fertilizer applications. Fertilizers are often applied through subsurface drip systems (fertigation) allowing for placement of the fertilizer directly in the rootzone. Fertigation also allows the fertilizer to be applied at the proper time to coincide with the demand of the crop.

A subsurface drip irrigation system has the capability of applying sufficient water to meet the evaporative demand of the crop on a daily basis. This promotes maximum growth while minimizing any stress resulting from an inadequate supply of soil moisture. Proper water management of a crop with subsurface drip prevents the development of anoxic conditions that can frequently occur to the crop directly after a furrow irrigation event, while minimizing the water stress that often occurs just prior to a furrow irrigation event. Therefore, with proper management, water stress can be minimized so that it does not become a limiting factor in achieving an optimum yield.

The objective of this project was to compare several aspects of a newly installed, 130-acre subsurface drip system to an adjacent 40-acre conventional furrow irrigated field.

Materials and Methods

The subsurface drip system was installed during the winter and early spring of 1999/2000 near Marana, AZ at approximately 2000 feet elevation. The furrow-irrigated field is a fairly uniform Pima silty clay loam soil. Approximately the east 2/3 of the drip field is classified as a Gila loam soil. The west 1/3 of the field is classified as a Vinton-Anthony sandy loam. The furrow-irrigated field was planted to Stoneville 474 on 18 April into moisture. The east 64 acres of the drip field were planted to Stoneville BXN 47 on 1 May with the remaining 66 acres planted to DPL 33B on the same day. The drip-irrigated field was dry planted and then watered up with the drip system. Irrigations were terminated during the first week of September for both fields.

To accomplish the soil moisture measurements made using a neutron probe, two access tubes were placed in both the furrow and drip irrigation fields. Measurements were made to a depth of 150 cm by 30 cm increments on approximately 3-day intervals from the beginning of June through mid-August. Neutron probe counts were converted to volumetric water content using a calibration curve specific to that probe and soil type.

This is part of 2001 Arizona Cotton Report, The University of Arizona College of Agriculture and Life Sciences, index at http://ag.arizona.edu/pubs/crops/az1224/

Flower tagging was conducted on approximately 3day intervals from the beginning of July (first bloom) to late April (just prior to cut-out). Fresh flowers were tagged in four separate, 3-m row segments in both the furrow and drip irrigated fields. Retained blooms were calculated by collecting the number of tags remaining on the plant after defoliation.

General plant measurements including; plant height, number of mainstem nodes, node of the first fruiting branch, number of aborted or missing fruit, nodes above the top fresh flower (NAWF), and petiole NO_3^--N levels were taken approximately once per week. From this data we are able to calculate percent fruit retention (FR), height (in.) to node ratio (HNR) and also monitor the nitrogen (N) status of the crop.

Leaf water potential readings using a leaf pressure chamber were taken periodically just prior to and just after furrow irrigation events in both the furrow and drip irrigated fields. Approximately 5 leaves were taken from each field for leaf water potential measurements.

Final lint yields were estimated by harvesting approximately 48 row blocks into modules. Final lint yield was estimated from local gin weights and turnout values for each module.

All of the parameters measured were referenced to back to stage of growth using heat units accumulated after planting (HUAP).

Results and Conclusions

Despite the fact that the furrow-irrigated field was planted approximately 10 days earlier, both crops were similar with respect to growth and development. Fruit retention and HNR estimates for both fields are shown in Figure 1. The drip-irrigated field had more vigorous crop growth as evidenced by the HNR graph in Figure 1. Fruit retention levels for the drip-irrigated field were consistently higher over the growing season. The increased FR was also observed with the flower tagging data (Figure 2). The drip-irrigated field retained a higher number of flowers early in the season and also later in the season (Figure 2).

Table 1 lists values for NAWF in both the drip and furrow-irrigated fields. These data demonstrate the fact that the furrow irrigated field progressed through cut-out more rapidly than did the drip-irrigated field. This is most likely due the improved water status of the plant in the drip-irrigated field, which alleviated significant water stress. Table 2 lists the petiole NO_3^--N levels for both the furrow and drip-irrigated fields. The drip-irrigated field appeared to maintain a higher level of N fertility than did the furrow-irrigated field. Both fields were fertilized in a similar manner receiving two applications of approximately 50 lbs. N/acre (100 lbs. N/acre total).

Soil moisture levels measured using a neutron probe are shown in Figures 3 and 4 for the furrow and drip-irrigated fields respectively. Figure 3 demonstrates the fluctuations in soil moisture that commonly occur under a furrow irrigated system leading to periods of stress before (dry conditions) and after (anoxic/saturated conditions) a furrow irrigation event. Figure 4 shows the more consistent soil moisture status that is common under drip-irrigated systems. This provides for a more stable environment of reduced stress and favorable water status for the crop.

Figure 5 shows the total amount of irrigation water applied to both the drip and furrow irrigated fields. On average, approximately 20-25 acre-inches of water/acre was applied during the season to the drip field. It should be noted here that this value does not include the water used to germinate the crop. An additional 3-5 acre-inches of water was used to wet the seed for germination. The furrow-irrigated crop required approximately 60 acre-inches of water. As with the drip field, this value does not include the pre-irrigation water required to prepare the field for planting.

Lint yields estimates for both varieties in the drip system and the furrow system are shown in Figure 6. Lint yields were very similar between the BXN 47 (drip) and the STV 474 (furrow). However, the DP 33B produced approximately 250 lbs. Lint/acre more in the drip than the Stoneville varieties in either system.

The most notable results are found in Figure 7. Water use efficiency (WUE) estimates were calculated as lbs. of lint produced per acre-inch of water applied. The furrow-irrigated system achieved a WUE of approximately 25 lbs. lint per acre-inch of water applied while the drip system achieved approximately 70-80.

Overall the drip system performed well for the first year despite the fact that many challenges were experienced in relation to the new system of irrigation and management that was employed. Continued research will be conducted with this new system examining both phosphorus (P) nutrition and variety evaluation in the 2001growing season.

Table 1. Nodes above the top fresh flower for both drip and furrow irrigated fields.

Drip		Furrow	
HUAP on Sample Date	**NAWF**	**HUAP on Sample Date**	**NAWF**
1500	11.0	1394	10.0
1677	9.5	1517	9.0
1840	8.5	1701	9.0
2340	5.0	1884	7.6
2550	3.0	2547	1.8

Table 2. Petiole NO_3^--N levels for both drip and furrow irrigated fields.

Drip		Furrow	
HUAP on Sample Date	**Petiole NO_3^--N (ppm)**	**HUAP on Sample Date**	**Petiole NO_3^--N (ppm)**
1310	21,000	1517	13,000
1500	17,000	1701	15,000
1677	14,000	1884	11,000
1840	15,000	2047	6,100

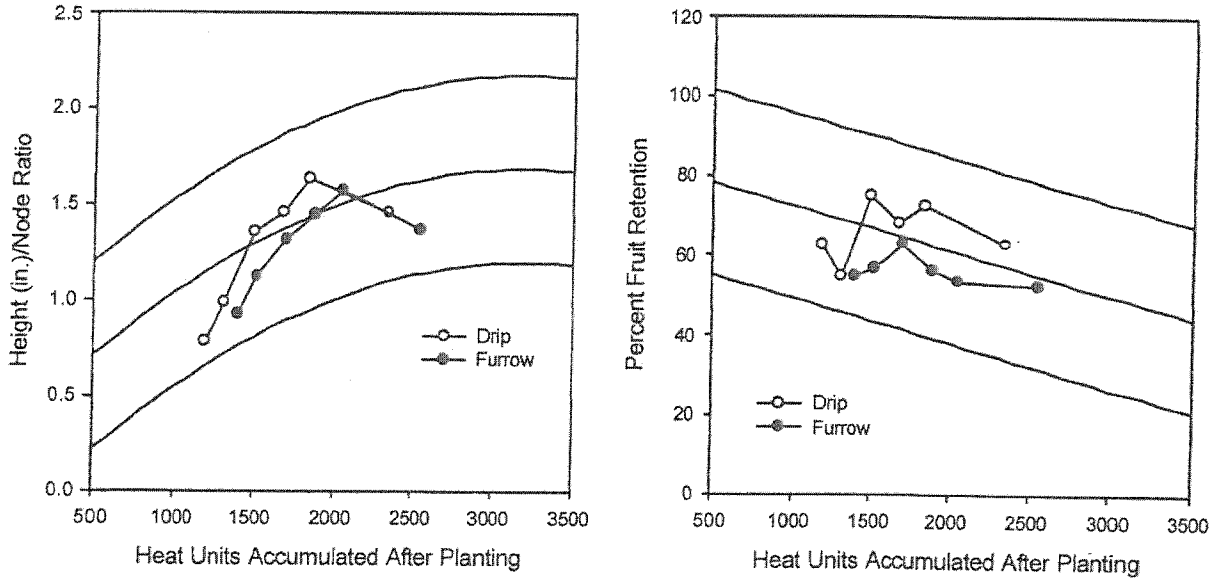

Figure 1. Height (in.)/node ratio and fruit retention estimates for both drip and furrow-irrigated fields.

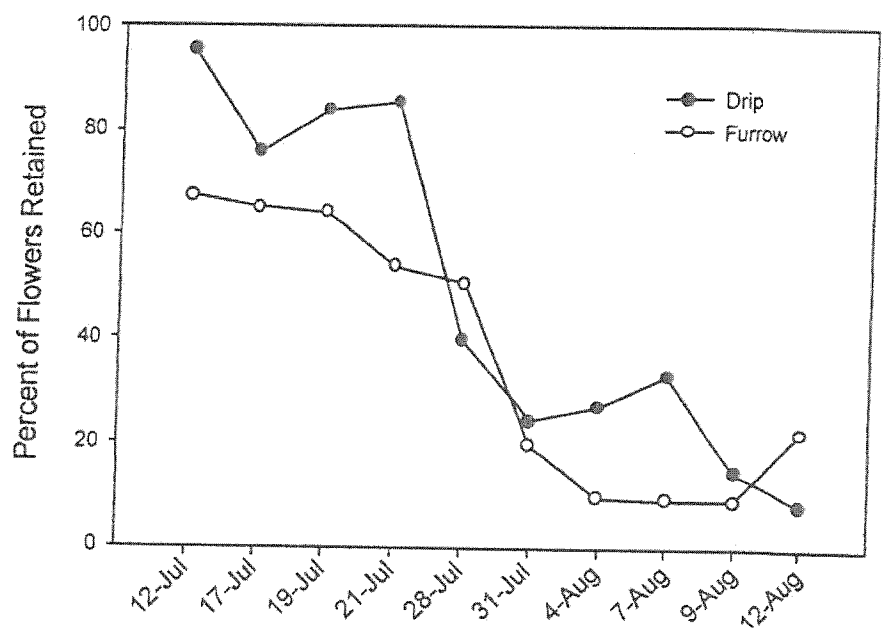

Figure 2. Flower tagging data illustrating the number of retained flowers for both the drip (BXN 47) and furrow irrigated (STV 474) fields.

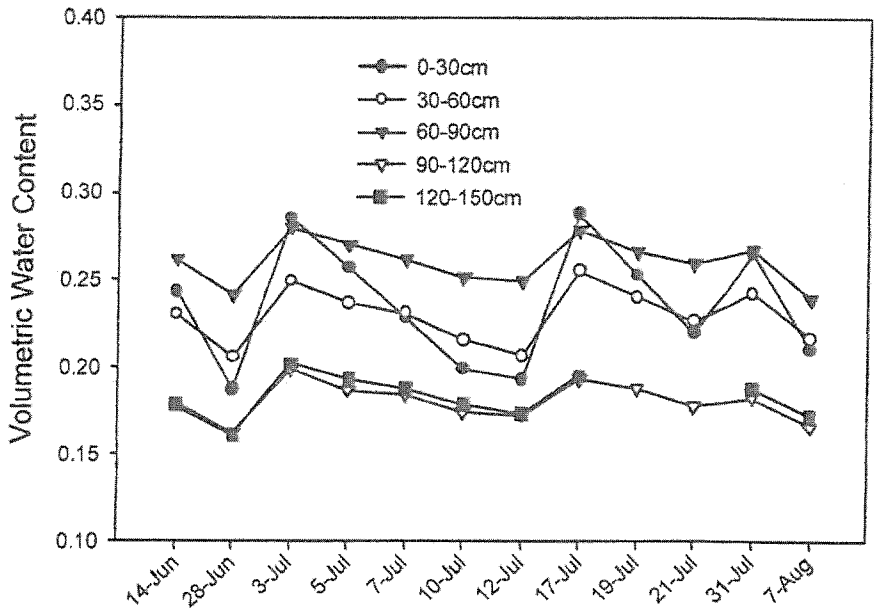

Figure 3. Volumetric water content measured with a neutron probe for the furrow-irrigated field to a depth of 150cm by 30 cm increments.

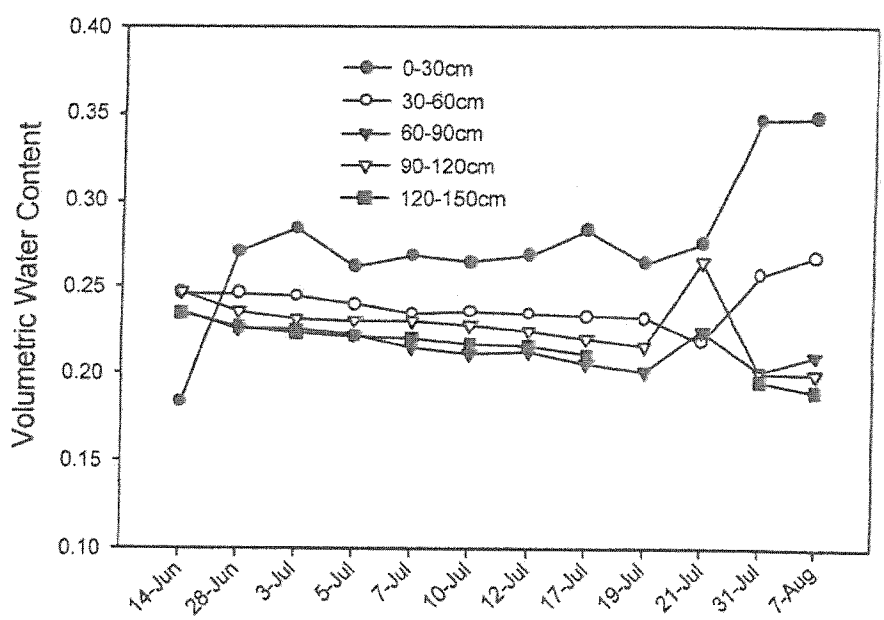

Figure 4. Volumetric water content measured with a neutron probe for the drip-irrigated field to a depth of 150cm by 30 cm increments.

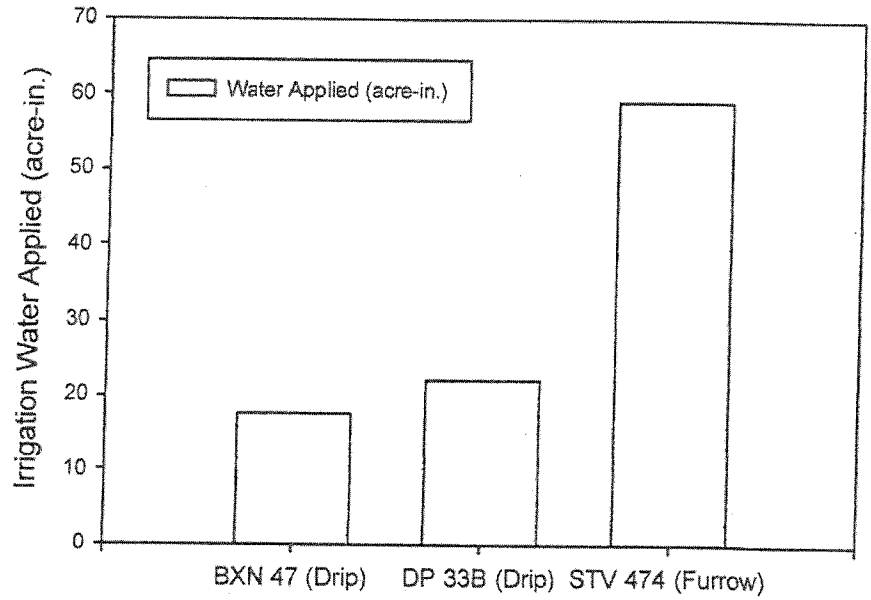

Figure 5. Total amount of irrigation water applied for both the drip (BXN 47 and DP 33B) and the furrow (STV 474) irrigated fields.

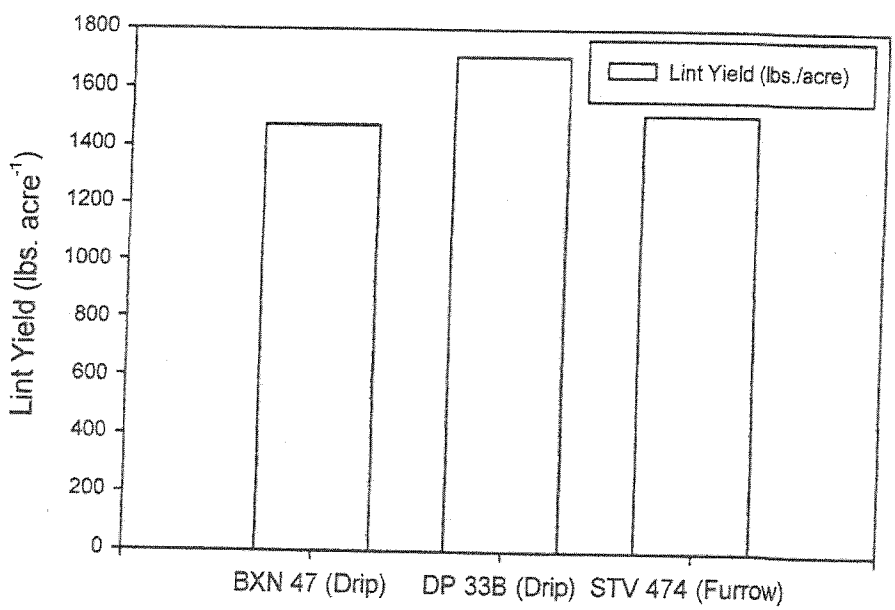

Figure 6. Lint yield estimates for both the drip (BXN 47 and DP 33B) and the furrow (STV 474) irrigated fields.

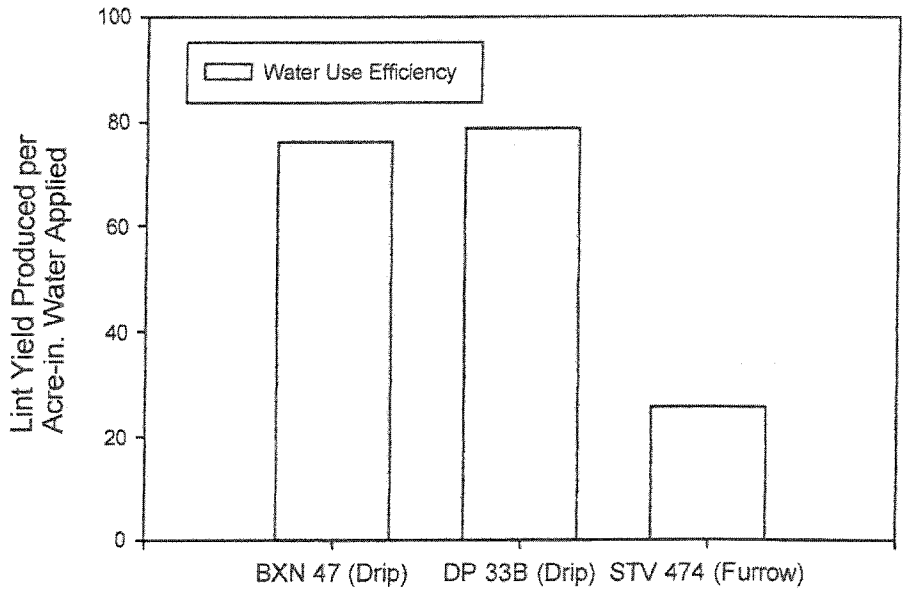

Figure 7. Water use efficiency expressed as lint yield produced per acre-in. of irrigation water applied for both the drip (BXN 47 and DP 33B) and the furrow (STV 474) irrigated fields.

BDCP806

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

---------- Forwarded message ----------
From: **Anita Deguzman - NOAA Affiliate** <anita.deguzman@noaa.gov>
Date: Thu, Jun 26, 2014 at 10:53 AM
Subject: BDCP COMMENTS
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

I have attached the following 13 comments for your files.

Copies have been made and are in your mailbox - original letters are up front at the reception desk.

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Anita deGuzman
Administrative Assistant
NOAA Fisheries * West Coast Region
U.S. Department of Commerce
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

BDCP807.

June 7, 2014

Dear Mr. Wulff

Before take permits can be issued under a habitat conservation plan, funding must be shown to be sufficient for all proposed activities, and all financial contributors and planned allocation of funds must be identified. You should be very skeptical of any Implementing Agreement that BDCP planners eventually submit, given the fact that they have been unable to give the public a reasonable amount of time to evaluate the funding proposal before the close of the EIR/EIS comment period.

The State and Federal water contractors argue that the twin tunnels should be built because they have spent a quarter of a billion dollars on producing a Bay Delta Conservation Plan draft and environmental documents, including paying millions of dollars to consultants, holding years of meetings, and making dozens of presentations. However, they admit that the engineering for the actual tunnels is only 10% complete. This provides a poor basis for estimating the cost of building the twin tunnels that are the centerpiece of this habitat conservation plan.

It is therefore not surprising that urban and agricultural users that would be the beneficiaries of BDCP are balking at paying for these tunnels that cannot guarantee them more water. Now that the state sees the effect of prolonged drought, it is obvious

BDCP807

to users that the tunnels could not even guarantee a more reliable supply of less water, even if water quality protections for fish and people are suspended. Metropolitan Water District member agencies in Southern California do not have take or pay contracts; some are looking for their own water supply alternatives and could opt out of taking SWP water, making MWD unable to meet its financial obligations. Similarly, agricultural users in the San Joaquin Valley have made it clear that they will not be able to afford the cost of water delivered by the tunnels. If contractors cannot meet their financial obligations for the project once it is built, taxpayers will end up paying.

As far as funding the actual habitat restoration portion of the plan, the water contractors have redefined ecosystem work as a public benefit and are counting on federal assistance and bond funding to pay for it. But there is absolutely no guarantee that Californians will approve a water bond this year or in the future, or that any bond they do approve will include funding for BDCP. Similarly, there is not guarantee that the federal government will come up with the $3.5 billion that BDCP is counting on from that source.

No one wants to pay for this ill-conceived infrastructure project, so I encourage the fisheries agencies to refuse to issue permits that would enable it to go forward.

John Minnehan

BDCP807

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

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Date: Thu, Jun 26, 2014 at 10:53 AM
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650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

BDCP808.

Dear Ryan Wulff,

I am writing to register my concern that the tunnels will have many negative Consequences. I have been a Stockton resident since 1970 and have family in Clarksburg with 3 generations of farming the Delta. There is inherent environmental negative impact for Delta farmers.

The impacts are listed in Chapter 13; Table 31-1. BDCP violates the intent of the 2009 reform legislation to protect the Delta as place .

There are too many unknowns about all environmental impacts. The EIR AND EIS will not satisfy state and federal laws. And therefore the tunnels will not be able to be built.

Also, public comments will be made on a plan for which there is no financing commitment.

Let's start over and have water storage, desalinaztion, etc.

Thank you for your consideration.

Frances Matteucci

Frances Matteucci
5921 Widgeon Ct.
Stockton, ca, 95207

BDCP808

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Thursday, June 26, 2014 10:57 AM
To: bdcp comments - NOAA Service Account
Cc: BDCPcomments
Subject: Fwd: BDCP COMMENTS
Attachments: 20140611 Irwindale Chamber of Commerce.pdf; 20140611 John Minneham.pdf; 20140611 Town of Discovery Bay.pdf; 20140611 Woodbridge Irrigation District - address change.pdf; 20140612 Kinder Morgan Energy Partners, LP.pdf; 20140613 San Gabriel Valley Legislative Coalitoin of Chambers.pdf; 20140616 Betty Gibbel, Eastern Municiapl Water District.pdf; 20140616 Frances Matteucci, Stockton.pdf; 20140616 John E. Calley, Moreno Valley.pdf; 20140616 San Joaquin Valley Air Pollution Control District.pdf; 20140619 Central Valley Flood Protection Board.pdf; 20140619 Fairfield - Suisun Chamber of Commerce.pdf; 20140619 Kyle F. Kunze, Walnut Creek.pdf

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650 Capitol Mall, Suite 5-100
Sacramento, CA 95814
916-930-3600 - main
916-930-3629 - fax
Anita.deGuzman@noaa.gov

L # BDCP 809

- ☐ Unused
- ✓ Duplicate of _773_
- ☐ Out of Scope
- ☐ Other: _____

(replace original)

BDCP810.

From: Food & Water Watch <act@fwwatch.org> on behalf of Siddharth Mehrotra <act@fwwatch.org>
Sent: Thursday, June 26, 2014 12:48 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 26, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in Santa Barbara County have provided little benefit to citizens; whereas the present drought precludes the wisdom of transporting water thus, to nonessential purposes; the latter themselves precluded by the present extent of environmental pollution. Furthermore, the disruption of social infrastructure and the exhaustion of resources to no achievement, occasioned by these tunnels, make the project far less advisable.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Siddharth Mehrotra
3230 Orange Dr
Camarillo, CA 93010-1322

BDCP811.

From: Food & Water Watch <act@fwwatch.org> on behalf of Sarah Rabkin <act@fwwatch.org>
Sent: Thursday, June 26, 2014 10:48 AM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 26, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

As far as I can tell, this project is backed by, and designed primarily to benefit, large corporate enterprises engaged in fracking and in growing water-intensive crops mostly for export. It will cost billions of taxpayer dollars at a time when our state cannot afford it.

An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry. The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. Sarah Rabkin
4257 Fairway Dr
Soquel, CA 95073-3004

BDCP812.

From: Food & Water Watch <act@fwwatch.org> on behalf of Tom Bresnahan <act@fwwatch.org>
Sent: Thursday, June 26, 2014 12:18 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 26, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

This is a continuation of cronyism and decision making that actively excludes voters. That is simply wrong

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Tom Bresnahan
6SSS Klump Ave
North Hollywood, CA 91606

From: Allan, Jim D. <JDAllan@SolanoCounty.com>
Sent: Thursday, June 26, 2014 3:57 PM
To: 'BDCP.comments@noaa.gov'
Subject: looking for map
Attachments: Jim Allan.vcf; ATT00001.txt

Early in the scoping process there was an animated map showing a predicted levee failure cascade. I have not been able to locate it in your materials. Could someone send me a link?

Jim Allan
Agricultural Commissioner
Sealer of Weights and Measures

(707) 784-1480 direct Work
(209) 470-3677 Mobile

501 Texas Street
Fairfield, CA 94533

From: Food & Water Watch <act@fwwatch.org> on behalf of Kelly Burch <act@fwwatch.org>
Sent: Saturday, June 21, 2014 5:06 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

The cost of this 'project' is a sham of calculated fraud on real tax and rate payers or five reasons.
First: Water, a public resource is being given away to for-profit companies who are wasteful and antiquated in farmng practies.

Second: The price tag for giving away this public property acquired with public dollars to the private sector to wastefully use is DOUBLE the announced cost due to the PRIVATE FOR PROFIT financing of 'public bonds' to benefit the Wall Street Scammers who have tagged LA and other public government entities with 'finance swaps' which have destroyed those cities projects well into the future. So your multi-billion dollar project has a DOUBLE whammy for Californians.

Third: Our water is precious and will become increasingly scarce. By providing a cheap and irreplaceable 'good' at a giveaway price it encourages rapid depletion. Farms are already lowering the water table at rates which will completely deplete ground water in less than 20 years. This does not mean that they will slow their pace in pursuit of profits: they will escalate and take what they can get. When gone, the system of tunnels will GUARANTEE they maintain their ability to blackjack Californians to continue their squandering under duress of losing jobs, food and WATER!

Fourth: It cannot be understated that the corporate welfare represented y giving away H20 to people who denounce government, who decry 'socialism' but DO NOT PAY THEIR FULL SHARE of contributing to this society, CANNOT BE less than TRAVESTY.

FIFTH: Once and environment has been destroyed, it is lost forever.
FOREVER! Wiping out species of frogs, fish, birds and mamals may seem inconsequential but those critters occupy spaces which determine our very survival. Wthout the smelt we lose our water purification systems in the flora which thrives where those fish swim. We lose the food system those forage fish underpin. In a thing called trophic cascade, the collapse of integral components DEVASTATE place where HUMANS live.
(EG: You kill off bees with poisons, we lose food for populations and in 20 years, there WILL NOT be enough food to feed our state)

The BIG PICTURE is a big deal and you need to GET it. Once a decision to make vulnerable supplies of life sustaining water is made, the evil of the ramifications are irreversible.
ONLY a moron can do what you are proposing. So: don't.

NO MATTER WHAT: I am voting for your opponent! Fb is going to pass that around and network a real election issue out of your foolishness, Jerry.

BDCP814

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Kelly Burch
PO Box 3496
Oakhurst, CA 93644-3496

From: Food & Water Watch <act@fwwatch.org> on behalf of Greg and Laurie Schwaller <act@fwwatch.org>
Sent: Saturday, June 21, 2014 12:05 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

It is time for Big Ag to take major steps to become more sustainable in California. We have got to start living within our means. There is no excuse for destroying critical ecosystems just so a few can profit by growing and exporting water-intensive crops in the desert (San Joaquin Valley). Many of the jobs provided by Big Ag are for less-than-minimum wage migratory workers.

We live in Tulare County, the second-largest agricultural county in the nation and one of the nation's very poorest counties, with terrible air quality (often the nation's worst), awful health problems, contaminated public water supplies that communities cannot drink or bathe in, gangs, drop-outs, and often poor public services and very poor infrastructure (except for the massive networks of canals carrying huge amounts of imported water past our own bone-dry rivers and ever-multiplying and ever-deeper-drilled wells that are taking all our groundwater as well.

Clearly, we cannot go on like this. We can't keep robbing Peter to pay Paul, and we can't keep robbing our future generations. The last thing we need is fracking, with its horrendous waste and contamination of water supplies. There are so many alternative sources of energy, but there is no replacement for clean, abundant fresh water.

NO on moving rivers to water the desert! Move the farms to where the rivers are, or grow crops with low water needs. Reduce, re-use, recycle. STOP the endless waste at gigantic and never-ending expense to the taxpayers for the benefit of the corporate few.

Thank you. We are counting on you.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Greg and Laurie Schwaller

43857 S Fork Dr
Three Rivers, CA 93271-9615

BDCPB15

BDCP816.

From: Food & Water Watch <act@fwwatch.org> on behalf of Bo Boudart <act@fwwatch.org>
Sent: Sunday, June 22, 2014 11:09 AM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Citizens are already paying hundreds of times the rate that agriculture or big oil do. In drought years--all must tighten our water use.
Tough times means all users must do their share to conserve our limited water supply.

No-to increases of water rates by the people--and keep corporations from robbing the people of their water.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Bo Boudart
PO Box 7395
Menlo Park, CA 94026-7395

From: Food & Water Watch <act@fwwatch.org> on behalf of Liz Amsden <act@fwwatch.org>
Sent: Saturday, June 21, 2014 12:11 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

Please DUMP this plan immediately. It puts the greed of frackers and Big Ag before the rights and needs of the people of California.

Read Vandana Shiva on small-scale farming, embrace the Transition movement and start moving to a smarter water policy where family farms are the order of the day, produce is grown that is either suitable for our arid climate or in greenhouses where the water can be efficiently recycled and the use of pesticides kept to a minimum.

Small farms ARE the wave of the future. Already, using between 20 & 25% of the world's farmland, they are feeding the entire world:
http://www.permaculture.co.uk/news/0406145066/small-farmers-are-feeding-world-less-land

Invest in clean energy. That will create jobs - well-paying careers, help reduce global warming and not devastate our land, air and water the way that fracking will do. Green energy is sustainable.

The advocates of fracking are in it for short term profits and look to exports to make more money, faster. Who will clean up their spills?
Who will replace the animal species they destroy? How will we reclaim the water they waste? What will their infrastructure be used for in ten or twenty years?

The tunnels project will be a disaster on many levels. DON'T waste tax dollars, DON'T impose unfair costs on the citizens of Los Angeles.
STOP NOW!!!

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale greed by unsustainable farming methods and into the cesspool of chemical runoff from fracking.

No. NO. NOOO!!!

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. Liz Amsden
5158 Almaden Dr
Los Angeles, CA 90042-1006

BDCP817

BDCP818.

From: Friends of the River <info@friendsoftheriver.org> on behalf of Melanie Tighe <info@friendsoftheriver.org>
Sent: Tuesday, June 24, 2014 1:21 PM
To: BDCP.Comments@noaa.gov
Subject: I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta

Jun 24, 2014

Mr. Ryan Wulff, NMFS
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

Dear Mr. Wulff, NMFS,

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

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

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

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

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

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

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

As I travel around the area I see increasing numbers of signs indicating opposition from farmers. If the farming community does not want this project then neither do I. They are too important to us to ignore.

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

BDCP 818

Thank you for considering my comments.

Sincerely,

Mrs. Melanie Tighe
1553 Jennifer Way
Tracy, CA 95377-2268

From: Nancy Schimmel <nancy@sisterschoice.com>
Sent: Saturday, June 21, 2014 7:58 AM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

I oppose BDCP for the reasons listed below, and I also question its necessity. I see a lot of exposed canals as I drive down I-5. How much water is lost to evaporation? How much could be saved by shading it with solar panels? How much could be saved by better irrigation methods? By repairing city water mains to prevent leakage? BDCP will cost money. Could it be better spent on water-saving methods?

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.
8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change responses such as water efficiency, water conservation and demand reduction.

9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.

10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS.

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.

12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).

13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.

14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S.

15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.

17. The BDCP DEIR/S must be amended to assure that the Trinity River and its beneficial uses will be protected for existing or future CVP and SWP operations to keep viable fish populations below Trinity and Lewiston Dams.

18. Page 5-60 of the BDCP must be amended to prevent catastrophic loss of cold water storage and basic flows to keep fish in good condition below Trinity and Lewiston Dams.

19. In order to protect fish listed under the Endangered Species Act, the proposed project must be amended to include pumping constraints in the Delta that will minimize the risk of losing cold water from the Trinity and Lower Klamath rivers stored in Trinity Lake to out of basin export.

20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.

21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.

22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.

23. Fracking should not be considered a reasonable use of water under the BDCP. As proposed, the BDCP considers fracking a reasonable use of water. Since the BDCP facilitates fracking, it must also disclose the environmental impacts of fracking. One hydraulic fracking well uses 3 to 8 million gallons per day. California's water is already over allocated and fracking puts water supplies at risk, especially when developers drill through aquifers en route to gas reserves in shale. Waste water from Fracking is so contaminated it cannot be recovered, and the chemicals are left in the ground.

24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

BDCP819

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Nancy Schimmel
1639 Channing Way
Berkeley, CA 94703

From: Waltraud Usahanun <waltraud.usahanun@chello.at>
Sent: Saturday, June 21, 2014 10:11 AM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,
The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.
8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change responses such as water efficiency, water conservation and demand reduction.
9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.
10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS.

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.
12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).
13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.
14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S.
15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.
16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.
17. The BDCP DEIR/S must be amended to assure that the Trinity River and its beneficial uses will be protected for existing or future CVP and SWP operations to keep viable fish populations below Trinity and Lewiston Dams.
18. Page 5-60 of the BDCP must be amended to prevent catastrophic loss of cold water storage and basic flows to keep fish in good condition below Trinity and Lewiston Dams.
19. In order to protect fish listed under the Endangered Species Act, the proposed project must be amended to include pumping constraints in the Delta that will minimize the risk of losing cold water from the Trinity and Lower Klamath rivers stored in Trinity Lake to out of basin export.
20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.
21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.
22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.
23. Fracking should not be considered a reasonable use of water under the BDCP. As proposed, the BDCP considers fracking a reasonable use of water. Since the BDCP facilitates fracking, it must also disclose the environmental impacts of fracking. One hydraulic fracking well uses 3 to 8 million gallons per day. California's water is already over allocated and fracking puts water supplies at risk, especially when developers drill through aquifers en route to gas reserves in shale. Waste water from Fracking is so contaminated it cannot be recovered, and the chemicals are left in the ground.
24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

BDCP820

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

ENDLESS GREED FROM ECONOMY & HELPING AUTHORITIES HAS TO STOP ALL KINDS OF DESTRUCTION TO THE ENVIRONMENT & LIVING CREATURES BY APPLY STRONGEST JUSTICE TO THE RESPONSIBLES.

DEMAND ALL INITIATORS ACTING IRRESPONSIBLY TO PAY REDEMPTION TO FUTURE GENERATIONS!
People need to vote unacting authorities acting irresponsibly to future generations out of occupations once and for all!

Waltraud Usahanun
Treustr. 63 / 6 / 12
Wien, ot 1200

From: Barbara Goodell <bgoodell@mcn.org>
Sent: Sunday, June 22, 2014 10:35 AM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

I am writing from the perspective of a 68-year old observer of the rivers of Northern California. As a child the Navarro still had a healthy population of fish, but in the last 30 years the Navarro has gone from a compromised river to one in severe danger with only a handful of endangered Coho and some steelhead left to struggle in receding or no water. Our other Northern California rivers are no different. To take yet more water out is unthinkable if you care about future generations.

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

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3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
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Respectfully,

Barbara Goodell
P.O. Box 74
Street 2
Boonville, CA 95415

From: Lynne Allen <lynnesmail@msn.com>
Sent: Monday, June 23, 2014 12:40 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

Too many people in So. Cal already entitled to green lawns at the expense of the Environment. Golf courses in So Cal can learn to act responsibly, use the intelligence God gave them, and find another way to handle their fairways.

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

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4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
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BDCP822

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Respectfully,

Lynne Allen
38250 9th st e
Palmdale, CA 93550

From: Carl May <caveatcen@pacbell.net>
Sent: Monday, June 23, 2014 9:40 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

Damage to the delta is not the whole story about the harm that would be done by the peripheral tunnels. Northern California is also suffering from drought and does not have surplus water to send south. Even without drought, dams on the Sacramento River and its tributaries, diversion of Trinity River water to the Sacramento, and diversion of Eel River water to the Russian River have already done tremendous damage to freshwater supplies, agriculture, and, obviously and well-documented, fisheries in the northern counties of the state. In California, the old Western adage that water flows from need toward money and political power is all too obvious.

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
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Respectfully,

Carl May
814 Sierra St.
Moss Beach, CA 94038

From: Claudia Gibson <claudiagibson@hotmail.com>
Sent: Friday, June 20, 2014 4:37 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

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Respectfully,
At some point you control density by saying you're beyond your resources. Well, we are. No more pipelines. People have to migrate where they find resources. They have for eons. Those that won't cause water wars. Also eons old.

Claudia Gibson
Cascade dr
Fx, CA 94930

From: Luke Asbury <luke.asbury@gmail.com>
Sent: Friday, June 20, 2014 4:38 PM
To: BDCP.Comments@noaa.gov
Subject: ABANDON the Bay Delta Conservation Plan

Dear Mr. Wulff,
The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences.

We are destroying our planet and its life at an alarming rate. This must STOP if we are to survive.
This project does NOTHING to preserve the Delta.

Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.

The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.
8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change responses such as water efficiency, water conservation and demand reduction.
9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document

addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.

10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS.

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.

12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).

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15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.

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In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is NOT going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. Instead, it is a political payoff to the AG interests in the southern end of the Valley. The risks of the proposed project are simply too great. Please ABANDON the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Luke Asbury
2945 Lexington Drive
Ventura, CA 93003

From: Bonnie MacRaith <bmacraith@reninet.com>
Sent: Friday, June 20, 2014 5:15 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,
Here on the California north coast the rivers are already low and it is only June. Normally by now we have lots of rain but it hasn't rained here in over a month! I am concerned about the fall Salmon spawning without water in our local rivers!

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
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Respectfully,

Bonnie MacRaith
2592 Maple Ln.
Arcata, CA 95521

From: Jeanne France <glasswintu@hotmail.com>
Sent: Friday, June 20, 2014 5:28 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

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Also remember, that Dr. Jerry Meral, said at the Winnemem Wintu Village, in Redding, CA "The BDCP was never about saving the Delta, the Delta cannot be saved."

I believe and many others do to, that it is about watering desert lands in the Western San Joaquin Valley. The lands are hard pan and poisoned with selenium. It is marginal land that should NEVER been put into production. ,

Jeanne France
PO Box 219
32408 Dickerson Road
Whitmore, CA 96096

From: Mercedes Lackey <helloelsie@gmail.com>
Sent: Friday, June 20, 2014 5:49 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

This is a classic case of "Borrowing from Peter to pay Paul." ALL of California is suffering from drought. All you will be doing is making conditions worse in the North.

There are many other, better solutions, but all of them will have to be used together. Waste Water Reclamation. Storm Water storage. More efficient irrigation systems in the Central Valley. And above all, no more water going to fracking.

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In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Mercedes Lackey
16525 E 470 Rd
Claremore, OK 74017

From: Janice Hutchinson <glassfilly@gmail.com>
Sent: Friday, June 20, 2014 5:49 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

This idea is exactly contrary to a sensible water solution for our state. It prioritizes central valley farming to the detriment of everyone else in the state. The costs are mind boggling. The destruction it will cause is permanent. Water shortages are not being addressed in a meaningful way. The central valley is not the only distressed water user in the state.PLEASE STOP THIS!

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.
8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change responses such as water efficiency, water conservation and demand reduction.

9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.

10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS.

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.

12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).

13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.

14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S.

15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.

17. The BDCP DEIR/S must be amended to assure that the Trinity River and its beneficial uses will be protected for existing or future CVP and SWP operations to keep viable fish populations below Trinity and Lewiston Dams.

18. Page 5-60 of the BDCP must be amended to prevent catastrophic loss of cold water storage and basic flows to keep fish in good condition below Trinity and Lewiston Dams.

19. In order to protect fish listed under the Endangered Species Act, the proposed project must be amended to include pumping constraints in the Delta that will minimize the risk of losing cold water from the Trinity and Lower Klamath rivers stored in Trinity Lake to out of basin export.

20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.

21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.

22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.

23. Fracking should not be considered a reasonable use of water under the BDCP. As proposed, the BDCP considers fracking a reasonable use of water. Since the BDCP facilitates fracking, it must also disclose the environmental impacts of fracking. One hydraulic fracking well uses 3 to 8 million gallons per day. California's water is already over allocated and fracking puts water supplies at risk, especially when developers drill through aquifers en route to gas reserves in shale. Waste water from Fracking is so contaminated it cannot be recovered, and the chemicals are left in the ground.

24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

BDCP829

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Janice Hutchinson
1726 Parker St
berkeley, CA 94703

From: Karen Jacques <threegables@macnexus.org>
Sent: Friday, June 20, 2014 6:13 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,
The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions, while costing billions of dollars much of which will come from ratepayers. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures. These measures should always be the first place to start when dealing with water scarcity and, given that ongoing droughts are predicted for California, they are the only reasonable options for water in California and the only real hope for the delta. Spending billions of dollars to drain and destroy the delta and all the species that inhabit it is nothing short of insane and seems to be motivated by Big Ag. interests with little regard for residents and small water users and zero regard for other species. The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies. The amount of water available to the delta must be increased, not reduced and it is impossible to see how that can happen if the BDCP is implemented.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased, again something that does not appear possible if the BDCP is implemented.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project. That project has been a disaster for endangered species so why in the world move foreward with an even bigger, more destructive project?
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels and, given the uncertainties expressed by the scientific community, there is no way to assure such success. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to increase, not decrease the amount of water available to the delta, require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years. It does not appear possible for the BDCP to be amended in such a way that any of this would actually occur.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.
8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change

responses such as water efficiency, water conservation and demand reduction. It is foolish to spend billions of dollars to move water that California most likely won't have without even trying to increase water efficiency and conservation.

9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.

10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS. Water in all three is extremely low (and probably will continue to be in the future) and are struggling due to the drought

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. Saying, without hard data, that there will be no impact is nothing short of mind boggling, especially given the drought and predictions of future drought. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.

12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)). Saying that the BDCP is a conservation plan appears to be nothing more than a public relations ploy.

13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.

14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S. From my perspective, pretending that water exists when it doesn't is fradulent.

15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.

17. The BDCP DEIR/S must be amended to assure that the Trinity River and its beneficial uses will be protected for existing or future CVP and SWP operations to keep viable fish populations below Trinity and Lewiston Dams.

18. Page 5-60 of the BDCP must be amended to prevent catastrophic loss of cold water storage and basic flows to keep fish in good condition below Trinity and Lewiston Dams.

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20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.

21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.

22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.

23. Fracking should not be considered a reasonable use of water under the BDCP. As proposed, the BDCP considers fracking a reasonable use of water. Since the BDCP facilitates fracking, it must also disclose the environmental impacts of fracking, including significant water contamination and impacts on green house gas levels. One hydraulic fracking well uses 3 to 8 million gallons per day. California's water is already over allocated and fracking puts water supplies at risk, especially when developers drill through aquifers en route to gas reserves in shale. Waste water from Fracking is so

contaminated it cannot be recovered, and the chemicals are left in the ground with the result that the poisoning will go on for generations.

24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

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In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major, irreversible environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. In conclusion, the BDCP appears to be an extremely costly boondoogle. It can't produce more water where water doesn't exist. And, given that it can't produce more water and that drought conditions are likely to continue and possible worsen, there is no way that it can address the issues raised above. The state needs to stop spending time and vast amounts of money on this destructive nonsense and get serious about adopting measures that result in water conservation, recycling and the collection (not in the form of more damns, but locally) and recycling of rain water. Please abandon the Bay Delta Conservation Plan before irreparable damage, both environmental and financial, is done. Respectfully, Karen Jacques

Karen Jacques
1414 26th Street
Sacramento, CA 95816

From: Meaghan Simpson <Mendingwheel@webtv.net>
Sent: Friday, June 20, 2014 8:56 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,
The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

STOP THIS RIP OFF ROTTEN ILL CONCEIVED DIRTY DEAL NOW!!! JUST ANOTHER STUPID WATER WARS GRAB LIKE ALWAYS CENTRAL AND SOUTHERN CALIFORNIA TRYING TO STEAL WATER RESOURCES FROM NORTHERN CALIF RIVERS AND FISH, FARMERS AND RURAL COMMUNITIES ALREADY UNDER LONG SEIGES OF WATER DIVERSIONS TO THE SOUTH AND FIGHTING TO RESTORE WATERS STOLEN SO ALL THE SALMON ARE GOING EXTINCT SO SO CORP FARMER CAN EMBEZZLE THE NORTH FOR BIG AG BIZ PROFITS!!! WHAT A RAT'S NEST MESS GOV BROWN IS INSANE AND UNFIT FOR PUBLIC SERVICE!!!

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
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12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).

13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.

14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S.

15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

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20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.

21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.

22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.

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24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

BDCPB31

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Meaghan Simpson
2401 Newburg Road
Fortuna, CA 95540

From: Tom Peters <tpete@reninet.com>
Sent: Friday, June 20, 2014 9:06 PM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,
For the following reasons and more, the so-called Bay Delta Conservation plan is about the dumbest idea I have heard. There is no possible way that removing large quantities of water from the through-delta flow will benefit fish and wildlife. I see it as a blatant attempt by such entities as the always- greedy Westlands Water District to grab more of Northern California's water for marginal crops in marginal farmland. It should also be noted that in earthquake prone California, large underground pipelines are disasters waiting to happen. This proposal is no exception. Please consider the following problems and objections to the Plan and reject this needless wasteful squandering of my taxpayer's dollars.

The Draft Environmental Impact Report/Statement (DEIR/S) for the Bay Delta Conservation Plan (BDCP) uses models based on over-allocated water rights to analyze the plan's impacts, which would result in severe environmental consequences. Building more irrigation infrastructure, as the BDCP proposes, is not going to fix drought problems in California, instead these projects will exacerbate drought conditions. The proposed plan would result in impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. As proposed, the "conservation plan" is flawed and should be abandoned or revised to reduce exports that take water out of rivers, it should instead prioritize delta recovery, and improve water conservation, recycling and stormwater capture measures.
The 40,000 page BDCP document fails to disclose cumulative effects to our rivers and salmonids. The BDCP contains major flaws resulting in irreversible environmental impacts, and for the many reasons outlined below, the plan must be rejected.

1. Policy must be written into the BDCP to prevent environmental rollbacks from occurring during drought emergencies.
2. In order to mitigate impacts to protected species, delta exports must be reduced, not increased.
3. The BDCP is not consistent with its own biological objectives and the requirements of the federal and state endangered species acts because operation of the tunnels would contribute to the decline of numerous fisheries, which have already decreased by 90% or more since the inception of the State Water Project.
4. Habitat restoration project funding and success must be assured prior to construction of the twin tunnels, because of the uncertainties expressed by the scientific community. No commitment can be made to invest in tunnel costs or construction until restoration actions have demonstrated a benefit to the delta, as called for in the 2009 Delta Reform Act.
5. The BDCP fails Endangered Species Act requirements for ecological benefits to the proposed seasonal floodplain inundation of the Yolo Bypass and impacts to salmonids.
6. In order to avoid take of listed species, the BDCP must be amended to require improvements to fish screens and salvage operations to mitigate reverse flow impacts on fisheries at the existing South Delta export facilities at Jones and Banks that would continue to pump during dry years.
7. In order to comply with the Clean Water Act Section 401 and 303, the BDCP must establish science based flow criteria that restore the Delta through in-stream water rights that provide legal protection for the flow needs of sensitive waterways and the species they support.

8. The Plan's "Conservation Measures" are inadequate and must be amended to include adaptations to climate change that are supported by quantitative data. Policies must be amended to include cost effective climate change responses such as water efficiency, water conservation and demand reduction.

9. DEIR/S Chapter 11 Page 11-55 says that the flow impacts on key fish species migration cannot be determined. This is unacceptable, as the public and scientific community cannot properly assess the validity of a document addressing impacts on endangered fish species the plan is supposed to recover if the impacts to protected species are undetermined.

10. BDCP water operations modeling erroneously assumes that the High Outflow Scenario (HOS) water would all come from Oroville, which does not comply with the Coordinated Operations Agreement between DWR and Reclamation. It is likely that Shasta, Trinity and Folsom would see their cold water pools depleted by the HOS.

11. BDCP modeling assumptions that there will be no changes or impacts to the Trinity River are unsubstantiated because there are no specified limits to the amount of water that can be exported from the Trinity River Basin. To avoid significant environmental impacts, the plan must include specific limits of water that can be exported from the Trinity River Basin.

12. The information provided in Chapter 8 does not provide assurances that adequate funding will be provided to implement conservation actions to minimize effects to threatened or endangered species to satisfy the federal Endangered Species Act (USC 1539(a)(2)(A)) or the Natural Community Conservation Planning Act ([Fish & Game Code 2820(a)(10)).

13. BDCP documents must be amended to include specified limits to the amount of water that can be exported from the Trinity River Basin in order to avoid cold water pool depletion.

14. Total consumptive water rights claims for the Sacramento and Trinity River basins exceed annual average unimpaired flows by a factor of 5.6 acre-feet of claims per acre-foot of flow. The Central Valley Project and the State Water Project have failed for decades to have enough water to fulfill the contract-based demands of their numerous contractors in the Central Valley and southern California. The proposed project uses modeling based on water rights that allocate more water than exists. If the project is carried out based on this data, it will result in significant environmental impacts to rivers and fish that have not been disclosed in the DEIR/S.

15. The absence of clearly analyzed and legally reliable water availability for aquatic resources means that the state and federal fishery agencies risk incidental take of protected species for the benefit of the Applicants.

16. The BDCP must outline how new Trinity River management approaches address over allocated water rights and water management for the benefit of fish and the Trinity River watershed communities.

17. The BDCP DEIR/S must be amended to assure that the Trinity River and its beneficial uses will be protected for existing or future CVP and SWP operations to keep viable fish populations below Trinity and Lewiston Dams.

18. Page 5-60 of the BDCP must be amended to prevent catastrophic loss of cold water storage and basic flows to keep fish in good condition below Trinity and Lewiston Dams.

19. In order to protect fish listed under the Endangered Species Act, the proposed project must be amended to include pumping constraints in the Delta that will minimize the risk of losing cold water from the Trinity and Lower Klamath rivers stored in Trinity Lake to out of basin export.

20. BDCP models must be amended to acknowledge the 50,000 acre-feet Humboldt County area of origin reservation of water.

21. Comprehensive Trinity River Basin Plan temperature objectives must be fully described, analyzed and incorporated in the BDCP environmental documentation and policy, as well as the Bureau of Reclamation's state water permits.

22. The BDCP must be amended to include policy that incorporates the NMFS 2000 Biological Opinion for the Trinity River, which includes a minimum carryover storage on September 30 of at least 600,000 AF and requires reconsultation if storage falls below that level.

23. Fracking should not be considered a reasonable use of water under the BDCP. As proposed, the BDCP considers fracking a reasonable use of water. Since the BDCP facilitates fracking, it must also disclose the environmental impacts of fracking. One hydraulic fracking well uses 3 to 8 million gallons per day. California's water is already over allocated and fracking puts water supplies at risk, especially when developers drill through aquifers en route to gas reserves in shale. Waste water from Fracking is so contaminated it cannot be recovered, and the chemicals are left in the ground.

24. The BDCP must address and mitigate impacts to listed species in the Sacramento River including winter and spring run Chinook due to habitat loss and incidental takes such as mortalities caused by pumping facilities, low water quality, and loss of habitat.

BDCP832

In order for the Trinity River to be protected, BDCP and its EIR/EIS must at a minimum include a recommendation that the SWRCB convene a Trinity-specific water right hearing as directed in SWRCB Water Quality Order 89-18. The water right hearing shall license Reclamation's eight Trinity River water permits as follows:

- Conformance with the in-stream fishery flows contained in the Trinity River Record of Decision.

- Provision for release of Humboldt County's 50,000 AF in addition to fishery flows per the 1955 Trinity River Act.

- Inclusion of permit terms and conditions to require Reclamation to comply with the Trinity River temperature objectives contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB) for all relevant time periods and for all uses of Trinity water diverted to the Sacramento River.

- A requirement to maintain an adequate supply of cold water in Trinity Reservoir adequate to preserve and propagate all runs of salmon and steelhead in the Trinity River below Lewiston Dam during multi-year drought similar to 1928-1934.

- Eliminate paper water in Reclamation's Trinity River water rights.

- Require Reclamation to solve the temperature issue in Lewiston Reservoir through a feasibility study and environmental document to follow up on the 2012 preliminary technical memorandum by Reclamation.

In summary, the Bay Delta Conservation Plan is inadequate for many reasons and if implemented, it would result in major environmental impacts to rivers and estuaries that are already impaired and several fish species that are protected under the Endangered Species Act. Building two giant tunnels to transport water from the San Joaquin Delta is not going to carry out either of the plan's two main goals: to reliably transport more water to San Joaquin farms and Southern California cities, or to restore the fisheries and ecology of the delta. The risks of the proposed project are too great. Please abandon the Bay Delta Conservation Plan before irreparable damage is done.
Respectfully,

Tom Peters
221 Dollison St.
Eureka, CA 95501

From: Elizabeth Zenker <eazenker@gmail.com>
Sent: Saturday, June 21, 2014 10:13 AM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

The Draft Environmental Impact Report/Statement for the Bay Delta Conservation Plan uses models based on over-allocated water rights, to result in severe environmental consequences.

This plan is not going to fix drought problems in California. Instead, these projects will exacerbate drought conditions, resulting in greater impacts to endangered fish by reducing flows to impaired watersheds, draining estuaries that are essential to healthy river ecosystems, and allowing the continued operation of pumps that will kill fish that are protected under the Endangered Species Act. Altogether, a full misuse of the projected 67 billion dollars!

The "conservation plan" should instead reduce exports that take water out of rivers, prioritize delta recovery, and improve water conservation measures.

As a 3rd generation Northern Californian Grandmother, with 5th generation CA grandchildren, this state is sacred.

Just as a child who broke a leg from riding a broken bicycle needs to understand that a band-aid will not "fix" that bone, we need to equally focus on fixing that bike - our current water usage practices, to prevent future damage.

As Albert Einstein stated, "No problem can be solved from the same level of consciousness that created it."

In full respect,

Elizabeth Zenker
PO Box 453
Arcata, CA 95518

From: Food & Water Watch <act@fwwatch.org> on behalf of John Selinsky <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:38 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Try building a water pipeline from Washington state or Colorado. Far cheaper.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. John Selinsky
1292 Orbetello Ct
Brentwood, CA 94513-1640

From: Food & Water Watch <act@fwwatch.org> on behalf of Christine Scott <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:37 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.A disaster in the making!

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Why not make huge reservoirs to collect rainwater for the agricultural businesses and just forget the fracking period.?We cannot afford to waste water in such an environmentally disasterous way.It is time to get away from fossil fuels and to use the sun and wind for our energy.Insist all new buildings from this day forward have solar panels on their roofs. and get wind turbine designs that do not kill birds.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mrs. Christine Scott
100 Wilson Ave
Novato, CA 94947-4241

From: Food & Water Watch <act@fwwatch.org> on behalf of Larry Lima <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:37 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

Oil companies want more water for fracking, which contaminates fresh water with toxic chemicals. Big ag wants to continue growing water-intensive crops like pistachios and almonds in the desert, mostly to export. These companies support the tunnels as long as they are guaranteed massive amounts of water.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

These tunnels could cost us over $67 billion and would force higher water bills through much of California. At a time when Californians are becoming more efficient and using less water, big ag and big oil are doing the opposite. And beyond the extraordinary expense, the twin tunnels would siphon necessary funding away from real, necessary water solutions, like investment in local water, groundwater cleanup and stormwater capture.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Larry Lima
209 Alice Ave
Campbell, CA 95008-2903

From: Food & Water Watch <act@fwwatch.org> on behalf of Steve Claassen <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:36 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

The big urban districts will survive with sustainable urban planning, rainwater collection, better grey water utilization, and of course more conservation. Most rural Californians' water needs would be secure if you'd do something about the groundwater overdraft and our archaic surface water rights. It's big oil, big ag and big development that are the real backers for your inane water projects. They're the same small fraction of Californians who already control up to 80% of the state's fresh water. Want to leave a bigger water legacy than your dad's, then use your emergency power as Governor of California to restore fresh water's status as a publicly owned resource.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Steve Claassen
34615 Powerhouse Rd
Auberry, CA 93602-9608

From: Food & Water Watch <act@fwwatch.org> on behalf of Timothy Mosher <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:06 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Please discontinue the theft of Northern California to serve the over populated Southern California . Here is a cheaper solution and could benefit ALL of CALIFORNIA for generations to come . START BUILDING DESALINATION PLANTS ! Allocate the funding for continued R & D .
Refining this technology , this resource is unlimited .

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Timothy Mosher
PO Box 214
La Honda, CA 94020-0214

From: Food & Water Watch <act@fwwatch.org> on behalf of Carl Mesick <act@fwwatch.org>
Sent: Saturday, June 21, 2014 10:06 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

Large corporate farms and Southern California Cities should not be allowed to divert even more water from the Sacramento and San Joaquin Delta while the fish are struggling and all Californians are being asked to pay for the improvements. Increased diversion rates will likely harm the native fish species that reside in or migrate through the delta. New screens will likely harm the salmon populations in the Sacramento River. If the water supply system needs to be improved it should not be done with increases in diversion rates to the south. Any new infrastructure, including the tunnels, and restoration of the delta habitats to protect native fish should be paid for by those who receive the water.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Dr. Carl Mesick
7981 Crystal Blvd
El Dorado, CA 95623-4817

From: Food & Water Watch <act@fwwatch.org> on behalf of Lesley Hunt <act@fwwatch.org>
Sent: Saturday, June 21, 2014 9:38 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

I feel sure that it would be cheaper to give central valley farmers market-rate loans to install efficient irrigation systems than to build these tunnels. We give enough subsidies to these farmers already and they do many inefficient things as a result. We need reform, not tunnels.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. Lesley Hunt
236 Warwick Dr
Walnut Creek, CA 94598-3213

From: Food & Water Watch <act@fwwatch.org> on behalf of Claudia Rawlins <act@fwwatch.org>
Sent: Saturday, June 21, 2014 9:08 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

It makes no sense to create a desert in order to water a desert. Here in the Northstate, we are managing our water resources carefully in order to balance the needs of nature, agriculture, and urban users. If the amounts of water the tunnel project is designed to move are taken from our surface water, we will have to pump our ground water aquifer. The result will be catastrophic for our native oak and sycamore trees.
It will likely break the water tension that is essential to recharge the aquifer. What a catastrophe.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers. In addition the transfer of Northstate water will have wide-ranging and permanent negative impacts.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Dr. Claudia Rawlins
2267 E 8th St
Chico, CA 95928-9135

From: Food & Water Watch <act@fwwatch.org> on behalf of kathlean (kate) <act@fwwatch.org>
Sent: Saturday, June 21, 2014 9:08 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Coal for electric power NATURAL GAS cheap cheap cheap for whom?
FRACKING if we simply STOP arguing and look @ the DAMAGE might we see our future is now all that is left to lose?
FRACKING 350.org argue this TRUE SCIENCE congress! GOV BROWN what happen to the ole hippy in you?

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. kathlean (kate)
PO Box 8133
Santa Cruz, CA 95061-8133

From: Food & Water Watch <act@fwwatch.org> on behalf of LaVive Kiely <act@fwwatch.org>
Sent: Saturday, June 21, 2014 9:07 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

Stop sending out water to wasteful agriculture. I drove through the Central Valley last month and was absolutely SHOCKED to see air-sprayed irrigation going on in the middle of the day, in 90 degree heat with about 30 miles per hour of wind!
I could not believe it! Only half of that water makes it to the ground.
The rest simply evaporates.
And since agriculture uses about 38% of all the water in the state, THEY NEED TO GET THEIR ACT TOGETHER ! ! !
Make them install drip irrigation, or at least water their damned crops at night.
Sincerely.
LaVive Kiely

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. LaVive Kiely
1420 Portola Dr
San Francisco, CA 94127-1409

From: Food & Water Watch <act@fwwatch.org> on behalf of B. Noblin <act@fwwatch.org>
Sent: Saturday, June 21, 2014 9:06 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of dollars and have disastrous consequences for our natural water systems.
Stop messing with our fish and clean water.
NO to tunnels!!!

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. B. Noblin
PO Box 335
Vineburg, CA 95487-0335

From: Food & Water Watch <act@fwwatch.org> on behalf of Bill Sampson <act@fwwatch.org>
Sent: Wednesday, June 25, 2014 11:33 AM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 25, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The rich simply need no more welfare and this is a give away to them and them alone.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mr. Bill Sampson
PO Box 6936
Malibu, CA 90264-6936

From: Food & Water Watch <act@fwwatch.org> on behalf of Martha Booz <act@fwwatch.org>
Sent: Saturday, June 21, 2014 12:04 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry. I am particularly distressed that the water would be used by the oil industry for tracking. We should not have tracking in this State. We should go to 100% renewable energy. We should use the money to develop storage options for renewable energy.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

These tunnels are a terrible idea.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. Martha Booz
3823 Valley Ln
El Sobrante, CA 94803-3118

From: Food & Water Watch <act@fwwatch.org> on behalf of Taylor Teegarden <act@fwwatch.org>
Sent: Saturday, June 21, 2014 5:07 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

Well, if there's a way to redirect taxpayer's dollars to foot the bill for private corporate development, Californians led by Jerry Brown can't be beat. Or can they?

As long as profits can be made strong-arming the taxpayer, whether it's building new tunnels that are water-wasteful and backward-thinking, or pump-and-pollute projects from the oil industry, the unregulated out-of-control private corporations that operate out of Sacramento's pocket will drive the rest of us to the poorhouse.

What's next -- an IQ quota or job-slot lottery to determine which of us live and which die? California cannot afford it this kind of crap any longer. We grow crops that don't belong in a drought state. We use watering technologies that are wasteful instead of using something like what Israel uses for their crops.

Why is an entire river being redirected for the sake of large-scale, unmetered agriculture and the oil industry?

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Jerry Brown was there for the first flim-flam scam and he's at it again.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Ms. Taylor Teegarden
2008 Franciscan Way Apt 211
Alameda, CA 94501-6102

From: Food & Water Watch <act@fwwatch.org> on behalf of Charlotte Moore <act@fwwatch.org>
Sent: Saturday, June 21, 2014 5:06 PM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 21, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

There seem to be a lot of unanswered questions abut the project itself and its impact on the land and people in the region and the CA tax payer in general. It is wrong to build first and ask questions later and actually ultimately depend on the CA taxpayer to foot the bill. It seems some more prepwork needs to be done, such as closing law loopholes which now exist whereby some individuals are selling subsidized water to the highest bidder.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mrs. Charlotte Moore
754 Parkbrook St
Spring Valley, CA 91977-5533

From: Food & Water Watch <act@fwwatch.org> on behalf of Maria Weiner <act@fwwatch.org>
Sent: Sunday, June 22, 2014 11:39 AM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

Your job is to enhance the lives of Californians. This action does not do that. We are doing our bit to conserve water. You are paid by the taxpayers to do the same.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Mrs. Maria Weiner
111 Rancho Adolfo Dr
Camarillo, CA 93012-5114

From: Food & Water Watch <act@fwwatch.org> on behalf of Jim Derden <act@fwwatch.org>
Sent: Sunday, June 22, 2014 11:09 AM
To: BDCP.comments@noaa.gov
Subject: I Oppose the BDCP

Jun 22, 2014

Ryan Wulff
650 Capitol Mall. Suite 5-100
Sacramento, CA 95814

Dear Wulff,

I am concerned and alarmed by the proposal for the new tunnel project to redirect water from the Sacramento River.

This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry.

The proposed tunnels have already been rejected by voters in 1982, and similar tunnel projects in places like Santa Barbara County have not been cost effective and have provided little benefit to taxpayers.

The Native American, Sports, and Commercial fishing are being sacrificed to inefficient big ag. This has happened over and over again. It needs to stop. For instance, why is cotton being grown in California with cheap water? Why is selenium saturated soil in production? Why not make big ag conserve? How many more vineyards are being allowed to start up? There are many more alternatives to try before making me subsidize big ag with my money.

Gov. Brown, you should take a salmon/steelhead fishing trip on the Trinity and Klamath rivers. And you should go see for yourself what is happening to the Scott and Salmon rivers for the sake of alfalfa.

Overall, the tunnels are unnecessary and fiscally irresponsible. The existing aquaduct could be reinforced and other local water projects like rainwater collection could be implemented instead, providing a much greater benefit at a lower cost.

Sincerely,

Dr. Jim Derden
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