

From: Laine Buckingham <laineboss@att.net>
Sent: Sunday, July 27, 2014 7:49 AM
To: BDCP.comments@noaa.gov
Subject: No to Delta Tunnel

This is a terrible idea. The cost. The drought. The audacity of taking water by force.

The governor is totally off base on this one. What is wrong with his head? Or is there some hidden reason or payoff we haven't heard about yet.

There is no reason why people in the southern part of the state can't find water close to them, desalinate it, and /or just plain use less. They should stop wasting water.

No more green grass, no more swimming pools, no more watering parks. That should be true for them and for everyone.

Laine Buckingham
Sausalito

Sent via Galaxy phone

From: Friends of the River <info@friendsoftheriver.org> on behalf of James Hodgkin
<info@friendsoftheriver.org>
Sent: Sunday, July 27, 2014 9:02 AM
To: BDCP.Comments@noaa.gov
Subject: I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta

Jul 27, 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.

I do not want these tunnels. I have property on the Delta and I enjoy the wildlife and peacefulness of the area. I do not want the water diverted. There has not been enough evidence that this is a good solution and it is too costly.

NO TUNNELS IN THE DELTA!

Thank you,

James Hodgkin

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

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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.

Thank you for considering my comments.

Sincerely,

Mr. James Hodgkin
228 Lisbon St
San Francisco, CA 94112-2019
(415) 584-2277

From: Gavin Tanner <gavin.tanner@comcast.net>
Sent: Sunday, July 27, 2014 11:14 AM
To: BDCP.comments@noaa.gov
Subject: Bay Delta Project Comment

I do not believe the draft of the EIR for the Bay Delta project is complete. There is not enough cost versus benefit documentation provided, and the costs of graywater recovery, further conservation, and de-salinization recoveries are not provided as alternative considerations.

In consideration of the growing movement of salinity up the Sacramento River, no further water should be removed. And that growing destruction is not sufficiently ameliorated by the project's plan outlined.

There is not a complete cost benefit analysis provided to measure the worst case destruction scenarios of the delta against further shipment of water needed by the San Francisco Bay and estuaries away from the bay area further south.

In consideration of the destruction and cost anticipated in building the project much broader efforts should be made at the de-salinization needed in areas of the state without sufficient rainfall.

The San Francisco Bay is one of the nation's greatest estuaries. The untold loss of fish hatchery environment brought on by any further removal of fresh water flow into the estuary must be correctly documented, calculated, and measured against any economic gain from such an expensive and invasive project.

Gavin Tanner
724 Arastradero Rd, Apt 111
Palo Alto, CA 94306-3829
(650) 493-1036

From: Friends of the River <info@friendsoftheriver.org> on behalf of Molly Roy
<info@friendsoftheriver.org>
Sent: Sunday, July 27, 2014 1:03 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

Jul 27, 2014

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There could be so many unknown consequences for diverting this water that have not even been researched. Wildlife in the Delta area is already under pressure to survive, and farms already take up too much ground water to be sustainable for future generations. It makes more sense in the long run, for our children and our children's children, to focus our money, energy, and time on water conservation, recycling and education of the public.

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

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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.

Thank you for considering my comments.

Sincerely,

Ms. Molly Roy
5871 14th St
Sacramento, CA 95822-2905

From: Friends of the River <info@friendsoftheriver.org> on behalf of Alex Cole-Weiss
<info@friendsoftheriver.org>
Sent: Sunday, July 27, 2014 1:03 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

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Sacramento, CA 95814

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[I am reaching out to you with the hope that you will take my concerns seriously, that you care about what your constituents have to say. The legitimacy of our democracy depends not only on individual efforts at civic participation, but a genuine consideration of commentary and feedback on your part.]

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Thank you for considering my comments.

Sincerely,

Ms. Alex Cole-Weiss
5871 14th St
Sacramento, CA 95822-2905

From: Mark Altgelt <markaltgelt@sbcglobal.net>
Sent: Monday, July 28, 2014 5:08 PM
To: BDCP.comments@noaa.gov
Subject: BDCP Comments

Dear Bay Delta Conservation Plan Steering Committee,

Please include my following published comment to not implement the Draft Bay Delta Conservation Plan in your decision making process.

Mark Altgelt - 733 Illinois Street - Vallejo, CA 94590

Must devise a sensible plans to rescue and revitalize the Delta

By Mark Altgelt, guest commentary © 2013 Bay Area News Group
Posted: 11/22/2013 04:00:00 PM PST

The Sacramento-San Joaquin River Delta estuary is the largest and most important aquatic ecosystem in the western United States and is in decline because of increasing water diversions, loss of habitat, competition from non-native species and poor water quality because of pesticides, herbicides and other pollutants.

The Sacramento and San Joaquin rivers are the main arteries that provide the lifeblood of fresh water that sustains the ecological balance of the Delta. That fresh water is a commodity that is valuable beyond measure and powerful interests are behind a plan to take control of that water.

Their plan is to build 40-foot diameter twin tunnels to divert 15 percent to 60 percent of the Sacramento River's flow of clean, fresh water 35 miles under the Delta from Courtland to Tracy where it would be delivered to Agriculture and Southern California water users.

Gov. Jerry Brown's proposed Bay Delta Conservation Plan combines the twin tunnels that will take water away from the Delta with a plan to revise and restore the Delta through 22 conservation measures.

The two plans would have opposing results but proponents of the BDCP lump the plans together and claim without the BDCP, fish populations and water deliveries will decline.

They include the twin tunnels as a contributing factor to their projections even though taking fresh water flow away from the Delta cannot possibility help the Delta's ecology.

Restoring the Delta will require more fresh water, not less. Smelt monitoring has shown when fresh water flows' decrease, smelt populations decrease.

Longfin and Delta smelt are at the base of the Delta's food chain, are harbingers of the Delta's health and are near extinction. Decreasing the flow of fresh water through the Delta would be the death knell of the area.

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Restoration of the Delta should start with a plan to rebuild and reconfigure the antiquated network of Delta levees to provide a better water delivery system that would combine the water sources of the Delta's entire water shed.

That plan should include increasing the bypass of Sacramento River water between Walnut Grove and White Slough to infuse clean water with San Joaquin River water that has high concentrations of salt, pesticides and selenium.

Comprehensive restoration of the Delta estuary should include protection and restoration of habitat, recovery of endangered species, improving water quality and sedimentation and rehabilitating ecological processes.

High-tech screen installations to prevent fish kill at hundreds of pumping stations throughout the Delta should be prioritized to reduce the massive number of fish that are killed.

Florida's plan to restore 18,000 square miles of water resources, including the Florida Everglades, provides a good example for managing the Delta.

After decades of encroachment, pollution and water diversions, including turning a river meandering through the Everglades into a straight canal, a plan has been developed to revitalize Florida's natural environment by capturing 1.7 billion gallons of fresh water per day that flow to the Atlantic Ocean and the Gulf of Mexico.

Brown, the California natural resources agency, the state water board and other California leaders should follow Florida's example by using the \$25 billion projected cost of the twin tunnels to rebuild the Delta levee infrastructure, use more fresh water leaving the Delta and restore tidal marshes.

A water desalination process being developed using graphene filtration screens could soon make fresh water available and affordable in Southern California and globally.

The Sacramento-San Joaquin River Delta estuary is an invaluable natural resource that needs to be preserved through conservation and maintaining the flow of fresh water through the Delta so the plan to build the twin tunnels must be stopped.

Mark Altgelt is a resident of Vallejo.

From: Friends of the River <info@friendsoftheriver.org> on behalf of Terri Stowers
<info@friendsoftheriver.org>
Sent: Sunday, July 27, 2014 7:04 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

Jul 27, 2014

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650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

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We need to Keep Delta water right where it is for the wildlife!!!!

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.

Thank you for considering my comments.

Sincerely,

BDCP1902

Mrs. Terri Stowers
609 Eileen St
Brentwood, CA 94513-1591

From: Friends of the River <info@friendsoftheriver.org> on behalf of Janice Woo
<info@friendsoftheriver.org>
Sent: Sunday, July 27, 2014 7:04 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

Jul 27, 2014

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650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

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California must change the way we USE water, not alter how the natural geology has delivers water to us. The water tunnels are a bad idea, on par with 1950s plan to fill in San Francisco Bay that was thankfully averted.

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.

Thank you for considering my comments.

BDCP1903

Sincerely,

Ms. Janice Woo
6410 Waldo Ave
El Cerrito, CA 94530-2833

From: Dorothy Lovato <dilovato@aircloud.net>
Sent: Sunday, July 27, 2014 7:05 PM
To: BDCP.Comments@noaa.gov
Subject: oppose the tunnels

I am opposed to this destroy the Delta plan. The result is Southern CA gets the fresh water, the Delta will get the salt water, and we get our property taxes raised.

I do not want to pay for another construction mess like our Bay Bridge. I think that Gov. Brown has too many wealthy cronies that will make a guaranteed profit from this in So. Ca.

Dorothy Lovato

Bay Area

From: Marty Kreisler <mkreisler@ca.rr.com>
Sent: Sunday, July 27, 2014 7:11 PM
To: BDCP.comments@noaa.gov
Cc: Scott Wilk; Dirk Marks@clwa. org; Russ Briley
Subject: Comments Delta Bay Conservation Plan

RE: Support BDCP EIR/EIS

Alternative #4

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

Dear Mr. Wulff:

Attending the BDCP symposium in Santa Clarita on Friday July 18th was more than just a wakeup call, it was an urgent call to action to everybody in a decision making capacity or anybody capable of passing along this urgent alarm.

I wonder how many can relate to what the USGS has reported - there is a 66% chance of an earthquake of magnitude 6.5 or greater by the year 2032. This magnitude in that region would pretty much destroy the capability of the Delta to be a source of fresh water after such an event.

Are we gamblers or just plain unaware. If we are gamblers, who among us would play Russian Roulette with a gun at our heads, knowing there have been 3 shots with no bullets and now we are down to the final 3 chambers and we know there are 2 bullets inside. Isn't this analogy equivalent to our chances of having a horrible event before 2032? If we are just plain unaware, there should be public service announcements and billboards everywhere to let people know what we need to do to prevent a catastrophe.

Are the solutions unaffordable? How can you compare the cost with the devaluation of Southern California after a sustained loss of half the water we depend upon. The cost of water will have to increase to such a point that it will be undesirable to live in the arid land that currently depends on imported water. We need leaders with vision, who are not passing the baton to the future for a solution.

I support the BDCP, and specifically Alternative #4, as a workable draft proposal that can lead to a final successful plan of action because it offers the best solution to minimize seismic risk to our state's water supply infrastructure while restoring the Delta's ecosystem. I am on the Castaic Area Town Council (CATC), but my letter of support is my personal position. I will send a copy of this to my other CATC Members.

Marty Kreisler
(661) 476-5088

From: DSikkema <dsikkema@blacksage.com>
Sent: Sunday, July 27, 2014 7:40 PM
To: BDCP.comments@noaa.gov
Subject: Public Comment

This project is nothing more than the peripheral canal repackaged. Its stated intent is to improve and restore the ecological balance of the delta but in fact it is simply to deliver northern California water to southern California municipalities and central valley agricultural concerns. It is time to realize that there are and need to be limitations placed on growth. This is particularly true now that we are in what appears to be a prolonged drought that if any thing is only going to become worse with increased global warming (a fact that was not addressed at all in the document).

While I do not have time to read the entire document, in what I did read little was done to address water reuse. If memory serves me correctly about 20-25% of California water is used to meet municipal water needs. Considerably more needs to be done to reclaim this water, e.g. both San Francisco and Los Angeles discharge waste into the ocean. Why isn't this water being recycled into agricultural use or processed to the point where it can be reused for human consumption.

Also, no mention of desalinization as a water alternative. While this is more costly than taking water from the delta, in San Francisco Bay this cost can be reduced significantly by using less salty water than ocean water.

Also, little has been done to address water use reduction. Considerably greater effort needs to be made in shifting to drip irrigation systems and away from systems that permit massive evaporation.

Also, no mention is made of the fact that agriculture is removing massive amounts of ground water and little if anything is being done to replenish these ground water reservoirs.

In short, (1) if we are going to spend money on tunnels for water, it should be tunnels to return treated waste water to the San Joaquin river, (2) on increasing water use restrictions to better use the water we have, (3) on limiting population growth by limiting the number of new water hookups (say no more than 0.2%/year to match only population growth), and (4) increasing the price of water significantly to encourage more conservation.

L # BDCP1907

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

(replace original)

From: Friends of the River <info@friendsoftheriver.org> on behalf of Kathryn Major
<info@friendsoftheriver.org>
Sent: Friday, July 25, 2014 2:59 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

Jul 25, 2014

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

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I feel the tunnels plan is abusive to the environment on so many levels. Not only will more and more fresh water be diverted to those that waste and are not sufficiently restricted but the entire delta would be drastically jeopardized. Humans can always move or change their careers as needed but we must protect the natural state of the environment for those that cannot (nor would not) adapt and survive when we muck things up on "our" behalf.

How many rivers and lakes must be drained dry before the humans in charge stop thinking in terms of the \$\$\$ bottom-line and realize that all of our bottom-lines depend on preserving the natural state that we all love so much?

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

BDCP1908

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.

Thank you for considering my comments.

Sincerely,

Mrs. Kathryn Major
1979 Ayers Rd
Concord, CA 94521-1406

From: Jerry Banks <jerryjbanks@gmail.com>
Sent: Friday, July 25, 2014 4:48 PM
To: BDCP.Comments@noaa.gov

I wish you all the best. We know longer have a Folsom zip code. Can we still "sign" the letter against this horrible twin tunnel idea?

JJB

sent from a mobile device

From: Thomas Browne <tw.browne@att.net>
Sent: Friday, July 25, 2014 6:48 PM
To: BDCP.Comments@noaa.gov
Subject: Protect the Delta, Deny Twin Tunnels Permit

Dear Mr. Ryan Wulff,

I am writing to strongly oppose the "Twin Tunnels" project (aka Bay Delta Conservation Plan) that threatens to dewater the Sacramento-San Joaquin Delta for the benefit of a few water contractors and agribusinesses.

These tunnels would sharply reduce water flow throughout the delta and harm thousands of sensitive aquatic species, including chinook salmon, steelhead trout, smelt, and green and white sturgeon. The tunnels would also wipe out food sources and habitat for migratory birds and other wildlife that depend on a functioning delta ecosystem to survive.

The project's heads justify this killing by proposing future habitat restoration even as they readily admit uncertainty about where and how to make such a plan work. Further, the \$25-\$60 billion tunnels will rely on taxpayers to fund most of this restoration. Water is a public trust resource, and taxpayers shouldn't have to shoulder the burden of this project while water contractors turn a profit from exporting the delta's water.

This is certainly a waste of my tax dollars! Using my taxes to subsidize water for the wealthy farmers and agribusiness at the cost of a damaged delta and near extinction of fish species is the ultimate folly. The agricultural water districts are not even held accountable for how much water they consume now, why should we give more? i can think of many ways to better spend 25-60 billion of our tax dollars! NO! to this project. This thing smells rotten.

California's water crisis is best solved by adopting a combination of water conservation, efficiency, reuse and desalination strategies for both cities and farms. The state and nation should invest in these proven strategies, instead of wasting tax dollars and sacrificing our precious natural resources. Please -- protect the delta and deny this project's permit.

Sincerely,

Thomas Browne
1267 Filton Ct
FREMONT, CA 94536
US

From: Gary Schloss <252Gary@Comcast.net>
Sent: Saturday, July 26, 2014 9:35 AM
To: BDCP.Comments@noaa.gov
Subject: My Concerns over Proposed Delta Plans (Twin Tunnels Plan)

The Honorable Edmund G. Brown Jr.

Governor, the State of California
State Capitol Building, Suite 1173
Sacramento, CA 95814

Mr. Ryan Wulff

National Marine Fisheries Services
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

RE: Concerns over proposed Delta plans

Dear Governor Brown and Mr. Wulff,

I'm writing you today, as a concerned citizen, to ask that any Delta solution developed by the state does not come at the expense of those who live and work in the Sacramento region. The proposed solutions in the Bay Delta Conservation Plan focus on solving the Delta's environmental problems and Central and Southern California's water supply needs. However, it continues to ignore the needs of Northern California upstream of the Delta. This poses serious risks to our economy, environment and quality of life.

In early 2014, I was shocked and saddened by the drought's impacts upon Folsom Lake and the lower American River. The lake and river are key to the Sacramento region's economy, lifestyle and environment and are crucial in providing water for California's water system and the Sacramento-San Joaquin Delta.

The current draft of the BDCP's Environmental Impact Statement/Environmental Impact report states that as the BDCP is implemented, Folsom Reservoir could go to "dead pool" approximately once every ten years. Folsom Lake is crucial not only to our water supplies, but for the entire state. The BDCP acknowledges the possibility of Folsom Lake going dry, but the state is not proactively working toward solving this critical issue.

In this "dead pool" scenario, significant urban populations in Sacramento, Placer and El Dorado counties – including Granite Bay and the cities of Folsom and Roseville – would be essentially cut off from critical surface water supplies for several months. This would devastate the region's economy, devalue property and likely lead to depopulation of cities. It would also ultimately devastate the same environment that the BDCP is looking to restore -- the San Francisco- San Joaquin Bay Delta. These economic and environmental impacts would not only harm the Sacramento Region, but also harm the entire state.

BDCP1911

The Sacramento region's water agencies, cities and counties have worked together on a comprehensive review of the current draft of the BDCP and its related documents and have identified fatal flaws. As a concerned citizen of California, I feel it is critical to reiterate the fatal flaws in the current draft of the BDCP.

The current draft of the BDCP is fundamentally inconsistent with existing water rights and contracts held by diverters from Folsom Reservoir (cities of Roseville and Folsom and San Juan Water District). The current plan does not meet the basic federal and state criteria to be considered complete. The BDCP lacks an operational plan for the proposed twin tunnels, and the overall governance of the twin tunnels is unclear. Without clarity in the BDCP about the operation of the twin tunnels, the impacts to Folsom Reservoir remain unclear and our region continues to face the potential of "dead pool" with no clear solutions.

With too many unanswered questions, errors and questionable assumptions, I strongly feel that the current draft of the BDCP should be considered incomplete. I ask that you direct the Department of Water Resources to do a better and more complete job and provide the public with a document that clearly defines a solution to the Delta and also supports a good, comprehensive water plan for all of California.

Sincerely,

Norman A Schloss, Jr.
252 Cascade Falls Drive
Folsom, CA 95630

cc: Assembly Member Beth B. Gaines-REP, Senator Ted Gaines-REP

Regards,
Gary Schloss

From: Friends of the River <info@friendsoftheriver.org> on behalf of KIRK ALLEN
<info@friendsoftheriver.org>
Sent: Saturday, July 26, 2014 2:01 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

Jul 26, 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.

THESE PROPOSED TUNNELS WOULD ALLOW SALTWATER INTRUSION INTO THE DELTA.
PIONEERS MUST HAVE THOUGHT THE DELTA WAS A GARDEN OF EDEN.
WHY DESTROY LOCAL FARMING IN THE DELTA TO BENEFIT CORPORATE FARMS IN THE SAN JOAQUIN?
A REALLY STUPID IDEA. REMEMBER THE GOVERNORS PERIPHERAL CANAL IDEA? WE VOTED THAT DOWN.
DO WE GET TO VOTE ON THESE TUNNELS?

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

BR 1912
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.

Thank you for considering my comments.

Sincerely,

Mr. KIRK ALLEN
3459 Monroe Ave
Lafayette, CA 94549-4520
(925) 212-8157

From: Friends of the River <info@friendsoftheriver.org> on behalf of Charles Heimstadt
<info@friendsoftheriver.org>
Sent: Monday, July 28, 2014 7:05 AM
To: BDCP.Comments@noaa.gov
Subject: I oppose all alternatives in the BDCP that propose construction of new diversions and tunnels under the Delta

Jul 28, 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.

At one point, developers must stop putting housing into places that do not have the water to sustain these homes. If people still insist on living in a desert, instead of stealing water that is the life blood of salmon and other species, they should have pay for expensive salt water recovery, leaving northern California water in northern California. Stop this, it is not the answer.

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

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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.

Thank you for considering my comments.

Sincerely,

Mr. Charles Heimstadt
743 Larch Ave
South San Francisco, CA 94080-1524

From: Chuck Heimstadt <chuckheimstadt@yahoo.com>
Sent: Monday, July 28, 2014 7:12 AM
To: BDCP.Comments@noaa.gov
Subject: Comment on twin tunnel project proposal

The idea of putting twin tunnels to take water out of the delta is a bad idea on so many levels. This state must look at the consequences of allowing more housing to go into desert areas where water would need to be imported. This kind of development should be regulated and limited, and those who still choose to live where water is so scarce will need to pay for such scarce resources as water, relying on reclaimed or de-salination since moving it from the delta where so many native species will be impacted is not the answer.

Stop this insane scheme, keep the water resources in the areas where they are, keeping in mind that they are mainly scarce no matter what area of the state under discussion. Thank you, C. Heimstadt, 743 Larch Ave., So. San Francisco, CA

L # BDCP1915

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

(replace original)

From: Friends of the River <info@friendsoftheriver.org> on behalf of Chad Sylvia
<info@friendsoftheriver.org>
Sent: Monday, July 28, 2014 12:05 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

Jul 28, 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.

[.We have lived on the Delta for years, and do NOT want these tunnels to be voted to go through.

This is unfair to all of us homeowners that brought property on the Delta.

Please stop this proposition. We ask you to help those of us who live in Northern California!

Thanks,

Chad Sylvia

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.

Thank you for considering my comments.

Sincerely,

Mr. Chad Sylvia
5729 Marlin Dr
Discovery Bay, CA 94505-9385
(925) 437-5642

From: Lawrence Danos <ldanos@sbcglobal.net>
Sent: Monday, July 28, 2014 1:13 PM
To: BDCP.comments@noaa.gov
Subject: Against the Bay Delta Tunnel Project

I am against the project because we already have a plan to shift water southward. We should fix the Delta for survival of drought and Global Warming with sea level rise but not shift water from the Sacramento River before it gets to the Delta. The fact that we have the uncertainty of drought and Global Warming to manage, this project should be stopped.

Also, if such a project were to be built, the matter of control over the amount of water that will sent southward would always be fight in our legislature.

Sincerely,
Lawrence Danos
24087 Park St.
Hayward, CA 94541

From: Richard S. <argalite@gmail.com>
Sent: Monday, July 28, 2014 2:45 PM
To: BDCP.comments@noaa.gov
Subject: Comments on BDCP

BDCP Comments

Many people have been interested in this plan, and I have just a few comments.

If exports do not allow the proper amount of water at the proper time to flow out the golden gate, as detailed in the national academy of sciences report completed several years ago, there will be no conservation, it will be death for our aquatic natives.

Why cannot the State go with the findings of that report?

Why cannot this so-called conservation plan say how much maximum and minimum will be exported per day?

No one who isn't a corporate farmer wants this, and it is sickening to see the BDCP- a document that does not describe what is being proposed in a meaningful way, as something that this state needs.

What this state needs is someone that looks to conserve, not pump water down south, as that is not a part of conservation.

NEPA is incomplete, does not even analyze the effects on SF Bay.

Alternatives that are realistic are not proposed, as there are no reduced flow alternatives.

There is no effect analysis! How can I comment on effects if you don't describe them?

Maybe you should have presented a complete project so I can tell what is going to happen.

I know if I turned in a document like this, I would be told to complete it before it goes to the public. Thanks for a piece of crap to comment on, you overpaid pigs who want to kill native aquatic life so you can get more money.

Richard Smith

9412 fort worth way

Sacramento

From: Katharine Barrett <kdbarrett08@gmail.com>
Sent: Monday, July 28, 2014 3:17 PM
To: BDCP.comments@noaa.gov
Subject: Public Comment on BDCP twin tunnels

I am a retired teacher and a biologist, and I have studied the issues related to conservation of water resources and the Delta for many years.

I am opposed to the BDCP for the twin tunnels for the following reasons:

The tunnels will continue the de-watering of the Delta, and will contribute to further decline of native Delta species. The project will be an enormous financial burden on taxpayers, and will cause a cascade of environmental impacts throughout the region. In this time of dwindling water resources there is the danger of drawing down major Northern California reservoirs.

Sincerely,

Katharine D. Barrett

31 Dos Posos

Orinda, CA 94563

From: Wendy Heaton <wendy@danehenasdesign.com>
Sent: Monday, July 28, 2014 5:24 PM
To: BDCP.comments@noaa.gov
Subject: BDCP comments -- levee roadways

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

RE: Comments on the BDCP and Draft EIR/EIS

Dear Mr. Wulff,

I appreciate the opportunity to comment on the Bay Delta Conservation Plan and the Draft EIR/EIS.

The DEIR/EIS should *not* be certified because it contains inadequate analysis of heavy equipment traffic on levee roadways.

Chapter 19, the Transportation analysis, addresses impacts to pavement, but **does not address impacts to the levees *underneath* the pavement on levee roadways.**

These levees were not constructed to bear the weight or frequency of the loads that would be generated during the BDCP construction. The DEIR/EIS should analyze the baseline condition of the levees under impacted roadways, determine their ability to withstand heavy truck traffic, determine what, if any, measures that should be taken in advance of construction, and what repairs to the levees may be required post-construction to return the levees to their baseline condition.

These levees protect lives and property – it is critical that they not be damaged by BDCP construction. A thorough analysis of levee conditions on impacted roadways should be made part of the DEIR/EIS.

Respectfully submitted,

Paul R Hughes

PO Box 360

Clarksburg, CA 95612

From: Trisha Lotus <trishale@sonic.net>
Sent: Wednesday, July 30, 2014 4:25 AM
To: BDCP.Comments@noaa.gov
Subject: Abandon the Bay Delta Conservation Plan

Dear Mr. Wulff,

Please forgive this comment being a few hours past July 28, with this comment but I just now saw this deadline to comment on this shocking information. NO, we will not agree to ship our water to the south. Look at the Eel River; already depleted to a low grade when dry weather comes about, as it is being diverted to Mendocino and Sonoma County..

Capture water as you can, and we will capture and conserve for our water to last. Our fish are already dying in the Eel River that is trickle from the way it used to be when I was growing up. You must use inventions to convert ocean water to utilize and cut back on water use.

Our water is not for sale or taking. You have allowed too many homes to be build in the desert, and now you see the problem with this. We must protect what we have left and conserve what we have left. Even up here, we need to incorporate water capturing devises to utilize, and conserve our water usage..

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.

In addition to the Fracking using a kajillian million gallons of water to our flushing a toilet, and this must stop now.

The unacceptable 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.

- BDCP 1921
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.
- 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,

Trisha Lotus
2425 C Street
Eureka, CA 95501

From: Paul Barrett <pauljr25@att.net>
Sent: Monday, July 28, 2014 4:31 PM
To: BDCP.comments@noaa.gov
Subject: Delta Tunnels

I absolutely oppose the construction of the twin Delta tunnels.

My reasons for opposing the twin Delta Tunnels are:

- will continue the de-watering of the Delta;
- will contribute to the further decline of native Delta species
- will lead to the draining of major Northern reservoirs in CA such as the Trinity reservoir;
- will be an enormous financial burden on taxpayers
- will cause a cascade of environmental impacts throughout the region

Paul Barrett

Orinda CA 94563

pauljr25@att.net

L # BDCP1923

- ☐ Unused
- ☒ Duplicate of L # **1587**
- ☐ Out of Scope
- ☐ Other: _____

(replace original)

From: Michael Frost <mr.michaelfrost@gmail.com>
Sent: Tuesday, July 29, 2014 11:55 PM
To: bdcg.comments@noaa.gov
Subject: Michael Frost BDCP EIR/EIS Comments

Michael Frost

2223 Carmelita Drive

San Carlos, CA 94070

BDCP Comments

Ryan Wulff, NMFS

650 Capitol Mall, Suite 5-100

Sacramento, CA 95814

Dear Mr. Wulff:

The BDCP is inadequate as a basis for issuing take permits. I have very serious concerns about the BDCP's settings and impacts, funding, and project objectives..., amongst others that are too numerous to list.

SETTINGS and IMPACTS: There are multiple adverse impacts to the Delta, State of CA, and United States in Table 31-1 on pages 31-9 to 31-13 of Chapter 31 of the draft EIR/EIS. Most of the adverse impacts listed are irreparable and could devastate the climate, Delta region, biodiversity, agricultural economy, hydrology, groundwater quantity/quality, and mercury, chloride, bromide, pesticide concentrations, amongst others. Some adverse impacts were NOT listed; such as the negative impact to Bay/Delta/Coast tourism industry, biodiversity, and renewable resource economy (Chinook salmon fishing), amongst others. These adverse impacts (listed and unlisted) are not consistent with 2009 Delta Reform legislation calling for the meeting of coequal goals of water supply reliability and ecosystem restoration while protecting the Delta as an evolving place. Specifically, this objective is articulated in Water Code Section 85020 (b): **“protect and enhance the unique cultural, recreational, and agricultural values of the California Delta as an evolving place.”**

FUNDING: 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

BDCP 1924

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.

PROJECT OBJECTIVES: The 2009 Delta Reform legislation called for the meeting of coequal goals, but said, “The policy of the State of California is to reduce reliance on the Delta in meeting California’s future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency.” This language, included in Water Code Section 85201, makes sense for a 21st century economy. In the age of “big data analytics” why should we NOT upgrade our water systems with “smart” systems, and use tried and true methods, such as permeable paving, gray water systems, waterless urinals, rainwater capture, recharging groundwater basins, and retire drainage impaired farmland in the semi-arid desert of Western San Joaquin Valley? Instead, the BDCP relies on unsustainable Delta exports with proven disastrous economic consequences.

The primary conservation measure for BDCP – CM1 Water Facilities and Operations – calls for exports of 4.71 – 5.59 million acre feet per year (Chapter 9, Table 9-3. Take Alternatives Overview, page 9-14.) Average annual Delta exports of 5 million acre feet in the first decade of the 21st century of saw historic and simultaneous declines in fisheries. Not only are these plans not consistent with Water Code Section 85201, but they represent economically devastating consequences for Northern and Coastal California economies. The Delta has more long-term value supporting biodiversity, renewable resources like Chinook salmon, steelhead, smelt, anchovies, sturgeon, and multiple fisheries that support multi-million dollar annual economies. The annual California Chinook salmon industry supports a multi-billion dollar annual economy... dependent on the amount of water flowing through the Delta into the Pacific ocean. What is the present value of a locally sourced superfood, wild Chinook salmon, in perpetuity? How does that value compare with growing nuts, grapes, and row crops (most of which are sold overseas for cash) in salty desert soils with publicly subsidized water?

EIR/EIS Chapter 2 Project Objectives and Purpose and Need, includes the following as a purpose for the proposed actions of the BDCP: “Restore and protect the ability of the SWP and CVP, to deliver up to full contract amounts, when hydrologic conditions result in the availability of sufficient water, consistent with the requirements of the state and federal law and the terms and conditions of water delivery contracts held by SWP contractors and certain members of San Luis Mendota Water Authority, and other existing applicable agreements. “ In the current drought conditions, regulators up and down the chain of command have been willing to waive water quality standards in favor of maintaining exports. This language is concerning to me regarding the state and federal terms and conditions of water delivery contracts referenced here being honored when there is insufficient water. The policy framework of the BDCP will allow state and federal regulators to increase reliance on the Delta and violate Water Code 85020 by favoring water exporters over the value of the Delta’s ecosystem, agricultural economy, cultural values, and recreational economy.

Please deny the issue permits required under the proposed BDCP because nobody in California wants to pay for this recycled 1930s plan that doesn’t create any new water. We must reduce reliance on the Delta, retire drainage impaired farmland in the semi-arid desert of the Western San Joaquin Valley, and create long-term jobs implementing regional self-sufficiency; per California Water Code Sections 85020 and 85021.

Sincerely,

BDP/1924

Michael Frost

2223 Carmelita Drive

San Carlos, CA 94070

L # BDCP1925

- ☐ Unused
- ☒ Duplicate of L # **1718**
- ☐ Out of Scope
- ☐ Other: _____

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