

From: Daniel Witte <boatboy@pacbell.net>
Sent: Monday, July 28, 2014 10:32 PM
To: bdcg.comments@noaa.gov
Subject: Twin Tunnels Opposition
Attachments: Document1.docx

Importance: High

To Whom It May Concern:

Please see my attached letter regarding the Twin Tunnels Project. Thank you for your consideration.

Sincerely,
Daniel Witte

BDCP1927

July 30, 2014

Ryan Wulff
National Marine Fisheries Service
650 Capital Mall
Suite 5-100
Sacramento, CA 95814
Bdcp.comments@noaa.gov

My name is Daniel Witte. I am 18 years old and a freshman at San Francisco State University intending to major in communications. As a voter, this is an issue that is one of my biggest voting factors. Throughout my life, I have been a boater, fisherman, and nature lover which makes me strongly opposed to the Delta Tunnels Project.

The Delta Tunnels Project is one of the worst things we could do for the environment for many different reasons.

It will increase the salinity in the rivers. If this happens, it will harm many of the freshwater fish which include Striped Bass, Salmon, Steelhead Trout and the Delta Smelt. Although salmon do not live in fresh water, they breed in fresh water and the Sacramento Delta is one of the biggest mating grounds in Northern California.

Along with harming our fish, this will greatly inconvenience boat traffic. One aspect of the BDCP is installing salinity gates at many different places such as old River, Georgiana Slough and Montezuma Slough to counteract the salinity increase. Unfortunately, this will block boat traffic requiring boaters to radio and request openings. This slows the boat traffic down because they have wait for the gates to open and close on either side of the locks. When boats have to wait, they burn fuel which will put more pollution into the environment.

It is extremely important for water to flow through the Delta. To plan to remove the water before it reaches the Delta is a severe problem because it will not be able to flow through this area. When the water cannot flow through the Delta, everything will dry up causing it to become a marsh.

The Delta Tunnels Project is going to create severe unemployment for people in Northern California. These people include, but are not limited to, boat mechanics, fishing guides and harbor employees. If no boats are coming into the harbors in the Delta, the harbors will have no money from the patrons which will result in closures and layoff of employees. My cousin is a boat mechanic who works out of his home on the water, in Discovery Bay. If there was no water for the boats, they couldn't or would be less likely to, come to his house for repairs, resulting in a severe job loss.

Our levies have held up for many years under the stress of water. Given that they have held up this long, they will likely hold up for many more years. With proper maintenance, such as raising the levies every year, a strong earthquake or other natural disaster will not harm the levies resulting in a severe flood.

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All in all, I as a fisherman, boater and nature lover do not agree with the Delta Tunnels Project. I ask that none of our taxpayer dollars be wasted on this project or on habitat restoration required as a result of this fiasco. Thank you for considering my opinion as a voter.

Sincerely,
Daniel Witte

From: Paula Sugarman <paula@sugarmandesigngroup.com>
Sent: Thursday, June 12, 2014 11:15 PM
To: BDCP.Comments@noaa.gov
Cc: Greta Lacin; Lowell Richardson; Kent
Subject: Bay Delta Conservation Plan comments due June 13

To Whom It May Concern,

I am very concerned about the Bay Delta Conservation Plan. It is designed for the benefit of Southern Californians and agribusiness and leaves nothing to protect the Northern State. It makes no sense to have the water contractors that benefit from the twin tunnels to be managing the building process. There is no way that they can possibly be taking the needs and rights of Northern Californians in mind. You have just sold us downstream. This plan will severely constrict options and future policy decisions, surrendering the authority of the state to the narrow interests of water contractors, despite the obvious conflicts of interest. This BDCP gives all the authority of the state and federal agencies over to the narrow interests of those who would benefit from the massive tunnels the most, the water contractors.

In addition, I am worried about salt water intrusion. Removing this quantity of fresh water from the Delta on an ongoing basis will degrade the troubled habitat that remains. The fisheries will be irreparably harmed: no fish screen will protect them from the sea water that will inexorably move inland. Even if the science of the future warrants it, changes will be nearly impossible under this plan.

There must be a better plans that fulfill the needs of the entire state. It would be far wiser to invest in developing water conservation and purification methods on the vast scale that will be needed. This plan offers no innovative solutions to the very real problem of severe fresh water shortages which are sure to last our lifetimes and beyond. It simply serves Southern California and their water needs and farmers who would prefer not to invest in water wise practices. All this is at the expense of our environment for years and years to come.

To conclude my argument, given the fiasco with the construction of the new Bay Bridge, I question whether the state government is capable of building a project this large. My confidence is shaken. I vote against this plan.

Sincerely,
Paula Sugarman
5050 Osgood Way
Fair Oaks, CA 95628

From: Jan Dougall <jandougall@gmail.com>
Sent: Monday, July 28, 2014 9:23 PM
To: BDCP.Comments@noaa.gov
Subject: BDCP Comments

Thank you for the opportunity to comment.

I support conservation measures 2-22 and oppose conservation measure 1: water facilities and operation (construction of the twin tunnels). Such a fix would simply be another repair on a single system, when the real problem is lack of statewide planning and oversight. The \$25 billion would be better spent on statewide water planning and enforcement than just in the Delta area with a massive engineering project.

1. We have a prohibition against water waste that lies powerlessly in the constitution without any enforcement. It needs to be enforced in order to improve supply reliability. “It is hereby declared that because of the conditions prevailing in this State the general welfare requires that the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use or unreasonable method of use of water be prevented, and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare.” Yet rather than enforce water waste, the BDCP aims to build twin tunnels so the state can avoid having to enforce this constitutional provision. Instead of tunnels, I recommend we revamp the entire statewide system of water use to enforce reasonable use and prevent waste.

2. The prohibition against water waste should be enforced first, before billions are spent on more engineered water solutions.

a. Urban water use should be considered wasteful if it is .

- The Pacific Institute says that over 1.5M AF of potential demand reductions in southern California are from Urban water use efficiencies not yet achieved – that’s more than 25% of the 5.5M AF the tunnels would provide.
- Here in the arid southland, excessive use of water through rich greenery and water features is a status symbol. This water use is not constitutionally supported.
 - Each exclusive gated community has water features, including huge water falls, as does every upscale shopping mall, car wash, office complex and even medical offices.
 - The weekly Sotheby’s real estate flyer and Sunday LA Times real estate magazine always show palatial estates surrounded by verdant green, pools and fountains.
 - The City of Los Angeles may use the same amount of water now as in 1990 at a rate of 152 gallons per capita per day (gpcd), even with 5 million more people, but with

almost 60% in multifamily residential units, it is not as good as it sounds. And, that figure surely doesn't apply to the Holmesby Hills neighborhood where a mansion just sold for \$150 million.

- o The Los Angeles Area Lakes TMDL included the fact that some artificial lakes within exclusive gated communities are filled with potable State Water Project water.
- There are likely other hotspots of excessive urban water use, such as Hillsborough, Granite Bay and elsewhere. Enforcement is needed in these places.

b. The prohibition against water waste is not enforced in agricultural areas. This should be enforced first, before billions are spent on more engineered water solutions. I support water deliveries for agriculture, but not for the purpose of getting rich at the expense of the environment.

- Statewide planning should include strict regulation of groundwater withdrawals. Agricultural areas have been overdrafting groundwater, and critically reducing environmental surface water flows. Overdrafting groundwater is "unreasonable use" in the extreme, since it causes subsidence and removes the capacity for water storage for future use.
- We should not provide more water in drought years to farmers who gambled on perennial crops that need more sustainable water than is available. Drought-prone areas should be planted in annual crops or the farmers should suffer the consequences of their wagers themselves. If users can't responsibly manage their water use the state needs to intervene.
- We should not be swayed by agricultural industry's propaganda on revenue and job losses, as this report indicates even with the current drought, revenue is down 3% and jobs have decreased by only 4.2% (<http://californiawaterblog.com/2014/05/19/severe-drought-impacts-to-central-valley-agriculture-forecast-this-year/>)
- Some of these areas problems with selenium and salinity are such that those lands should never have been cultivated in the first place. I support the state purchase of lands with selenium problems to remove them from cultivation.

3. Delta environmental concerns –

- The Delta Independent Science Board EIS finds that the state's BDCP is faulty and will not accomplish the environmental goals it claims. <http://www.sacbee.com/2014/05/19/6416852/panel-delta-tunnel-project-falls.html>
- I agree with and support concerns communicated by the Friends of the River (FOR) BDCP comment letters written on behalf of endangered species. They conclude in their letter of January 14, 2014, that "the BDCP Water Tunnels project is in fact prohibited by the ESA because it would adversely modify designated critical habitat for at least five endangered and threatened fish species."
- FOR also says "the 45 mile-long twin Delta tunnels and their freshwater intakes, forebays, tunnel debris disposal sites, and additional facilities will eat up at least 5,700 acres of Delta farmland and wildlife habitat."

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- At a minimum, the BDCP should not be finalized or approved until the State Water Resources Control Board adopts water quality criteria and flow standards for the Delta, and the rivers that feed it.
- If an expensive engineered plan is to proceed, **I support the Environmental Water Caucus's Responsible Exports Plan** (<http://www.ewccalifornia.org/reports/responsibleexportsplanmay2013.pdf>)
- Furthermore, I support the purchase and restoration of some Delta islands, particularly those closest to the Bay. Such large areas of estuarine habitat will provide essential habitat that was lost with the conversion of Delta islands to farming.

4. Need for transparency – A statewide water use survey by both water providers and by end-users should be conducted and made publicly viewable. The only efforts I see for water conservation are appeals to conscience, but only a minority of the population exerts effort to conserve because it's the right thing to do. The majority will continue to waste water until it is a financial burden they can't afford or when they attract public shame. Elected officials shun enforcement because it makes them unpopular with the majority who waste, which would jeopardize not only their positions, but their capacity to do any good at all. Thus, I recommend enacting state law that allows each water customer's water use to be publicly available. The Willamette Weekly in Portland Oregon occasionally publishes a Water Hogs issue with the city's top users and their water consumption exhibited for public criticism. I saw very little water waste in Portland. Aside from sensationalism, the averages for areas, including agricultural areas, would be very informative for decision making, especially if given in readily understandable units (gallons per day per household or per person). I also support more transparency in agricultural water use: how much water are they using (in feet of water per year) and who is benefiting from it (small farmers or some wealthy agricultural industrialist who lives in a mansion outside the valley?).

5. California needs a comprehensive statewide water plan, joined with comprehensive statewide land use planning to preserve natural resources and ensure that water demand does not exceed supply. "California must overhaul its existing, piecemeal water rights policies, which already over-allocate existing water and distribute rights without regard to equity" (Responsible Exports Plan, <http://www.ewccalifornia.org/reports/responsibleexportsplanmay2013.pdf>).

Statewide land use planning with urban growth boundaries and smart development and redevelopment would limit increases in water diversions for people. I support urban growth laws with urban growth boundaries like those in Oregon.

5. California needs population planning. Population has grown to not only locally unsustainable numbers but is growing towards numbers that will not be sustainable, even with multi-billion dollar engineering solutions. Smaller families, adoption, and childlessness are all viable options.

It occurs to me that the BDCP's focus on the delta alone is similar to Caltrans singular focus on moving motor vehicles. Caltrans' freeway system moves cars, but that singular focus has severed neighborhoods, increased air pollution and asthma, and barred wildlife passage. It is my hope

California could broaden the scope of planning for the Delta to include the statewide issues mentioned above.

Jan Dougall

Agoura Hills, CA 91301

800P1929

From: Tressa Dahlberg <tressajazzsinger@yahoo.com>
Sent: Tuesday, July 29, 2014 9:29 AM
To: bdcpc.comments@noaa.gov
Subject: Formal Comment on BDCP EIR/EIS Report & opposition to the proposed tunnels

July 28, 2014

BDCP Comments

Attn: Ryan Wulff, National Maine Fisheries Services
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

Dear Mr. Wulff,

My wife and I are both very concerned about the negative impact of the proposed twin tunnels and both stand in opposition to it. One of our many concerns/comments are as follows:

Our comments are in reference to the tunnel intakes in the Alternative Plans in your EIR/EIS Report in Chapter 7.3.3.2.

#1. Your report states on page 7-46, "The Delta Region," lines 19-21, that "the construction of the conveyance facilities would require dewatering operations. The dewatering wells would be generally 75 to 300 ft. deep, placed every 50-75 ft. apart along the construction perimeter as needed, and each would pump 30-100 gpm."

How will the power be delivered to each of the said pumps?

What will be the impact on the land that will be dewatered?

Where will the groundwater be pumped to?

What will the distribution system look like?

#2. Your report states on page 7-46, lines 31-32, that "groundwater removed with the dewatering system would be treated as necessary and discharged to surface water under an NPDES permit."

Where would the treatment plant be located and how would the NPDES permit be written without any background sampling information?

What will be required to be removed?

How and where will the concentrated constituents be handled, transported, and stored?

Would the effluent quality meet drinking water standards?

According to your figures, "10,500 gpm" from the dewatering operation would require a treatment plant to process 14.4 MGD. Where would these treatment plants be located and how much land will be required for the processing operation?

How many treatment plants would required?

#3. On page 7-48, line 16, your report states that "the BDCP proponents will ensure agriculture water supplies are maintained."

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If the land is being dewatered, then where will the BDCP get the water supply from for agriculture supplies?

If the land in the dewatering zone is being irrigated, would percolation and runoff be a factor in the dewatering process and should it be considered in the dewatering flows?

Please address and provide more detail on these issues. Thank you for your time and consideration in this matter.

James and Tressa Dahlberg, 38465 County Road 144, Clarksburg, CA 95612. (I am a Certified Waste Water Treatment Plant Operator and have been for over 23 years. Tressa's family has owned & operated their family farm at this location since 1872.)

Very sincerely,

James A. Dahlberg, Jr.