

Comments on the RDEIR / SDEIS

by

Barney F. Hope

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October 30, 2015

- A. The RDEIR / SDEIS excludes probable and possible economic and ecological impacts in counties or origins.
 - I. Given the scope and cost associate with the proposed project, it is a major failure of the RDEIR / SDEIS to exclude water, economic, and ecological connections in the southern Cascades, the upper Sacramento Valley, the Sierra Nevada, the coastal mountains, and the San Joaquin Valley.
 - II. Focusing on “the Delta” and its immediate vicinity leads to a study that is non comprehensive in its geographical scope and scientifically superficial for counties of origins in terms of economics, communities, and ecology.
 - a. While non Delta areas and water sources are mentioned and charted in the RDEIR / SDEIS, they are not include in a comprehensive manner and only tangentially referred to at various places in the RDEIR / SDEIS: they are never comprehensively detailed, discussed, or analyzed in terms of “impacts”.
 - III. The RDEIR / SDEIS ignores impacts on communities, environments, and economies in the excluded geographical area. Why?
 - a. The RDEIR / SDEIS, the so called “stakeholders”, powerful water institutions, State and Federal agencies, and “specialists / experts” reveal callous indifference to those that live and work in upstream (trans-Delta) regions.

- i. The RDEIR / SDEIS includes an chapter on “Environmental Justice”, but fails to specify how “Environmental Justice” will work in trans-Delta regions and whether “Adaptive Management” programs will include “environmental justice”.
- B. The RDEIR / SDEIS contains “Adaptive Management” dimensions, but there is no “Adaptive Management” possibilities if there are determinatal impacts in the non Delta areas.
- I. If the RDEIR / SDEIS projections for “End of Storage for 4a” are wrong for Trinity Lake, Shasta Lake, or Lake Oroville, then what are the “Adaptive Management” possibilities contained in the RDEIR / SDEIS? Answer: None.
- C. There are no “Adaptive Management” strategies that address the ecological and economic impacts of groundwater extraction.
- I. The RDEIR / SDEIS notes that *“Rivers draining the Coast Ranges and the Sierra Nevada convey water into the Central Valley 8 and Suisun Marsh, interconnect with the underlying groundwater basins, and eventually flow 9 into San Francisco Bay.”*
 - a. The 7-3 map showing “Groundwater Basins in the Central Valley” is deceptive as it does not show the connections of these basins to volcanic or mountain environments.
 - II. The BDCP must scientifically analyze and discuss the impacts of groundwater extraction on volcanic and mountain environments and communities.
 - III. Why does the RDEIR / SDEIS ignore the water flows from the Cascades bordering the northern and eastern Sacramento Valley? If it was not for the volcanic-water-storage capacity in this area of California, there would be virtually no water available for extraction from the Delta.

IV. While the RDEIR / SDEIS recognizes the “interconnect with the underlying groundwater basins”, why is there no “Adaptive Management” possibilities if there are adverse impacts of non sustainable groundwater extraction?

V. Do BDCP agricultural and urban water users in central and southern California agree to pay for the costs of “Adaptive Management” programs?

VI. If groundwater extraction associated with the direct or indirect impacts of the BDCP becomes unsustainable and/or generates costly economic and ecological consequences either in the Delta or for upstream regions and communities, how will the BDCP be terminated?

a. The RDEIR / SDEIS requires a “living will” that will specify the steps and procedures to terminated the BDCP.

b. The “living will” must specify who will pay the stranded costs of the projects when the BDCP is terminated.

c. The “living will” must specify how all the BDCP facilities will be removed, including a projected estimated in current dollars for facilities removal.

i. One of the problems of dam removals in the US stems from the fact that there was no “living will” governing their removal when they were proposed. This problem - and solution - must be addressed in the BDCP with the inclusion of a “living will.”

ii. Do agricultural and urban water users in central and southern California agree to pay for all future stranded costs and, if necessary, the removal of BDCP facilities if the conditions of the “living will” dictate the termination of the BDCP?

D. Costs

I. The RDEIR / SDEIS must include an appendix listing every water institution,

corporation, water district, and/or municipality purchasing water from the BDCP and list how much each water user will contribute to the construction and maintenance cost of the BDCP.

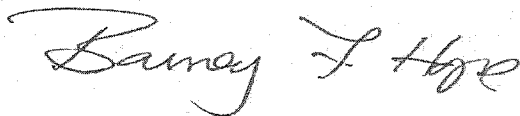
II. The RDEIR / SDEIS must specify who will pay for any and all cost overruns associated with the BDCP.

III. The RDEIR / SDEIS must include an appendix listing how water institutions, corporations, water districts, and municipalities purchasing water from the BDCP will contribute to paying for future stranded and/or termination costs of the BDCP.

IV. Taxpayers must be informed whether they will share any profits from commercial beneficiaries of the BDCP and taxpayers must be informed whether they will be liable for cost overruns, termination costs, and/or stranded costs.

a. Will commercial beneficiaries of the BDCP privatize the profits and socialize the costs of the BDCP?

E. The BDCP must be rejected if the above concerns are not included in the RDEIR / SDEIS.



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The author of these comments is not employed as a lobbyist.

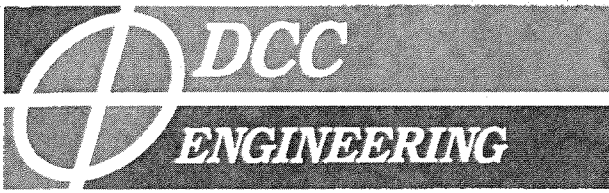
The author of these comments did not receive any compensation from any entity or person for writing these comments.

The comments represent the views of the author and not any institutions or university associated with the author.

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From: be hope <bh.csuchico@gmail.com>
Sent: Friday, October 30, 2015 11:31 PM
To: BDCPcomments
Subject: BDCP Comments from B. H.
Attachments: RDEIR SDEIS Comments by Barney Hope 30Oct2015.pdf

Please see attached PDF file



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PERMITTING
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ARCHITECTURE
PROJECT MANAGEMENT

October 30, 2015

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

Subject: Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft EIR/EIS comments for Reclamation Districts: 38 (Staten), 554 (Walnut Grove), 1002 (Glanville), 556 (Upper Andrus) and the Brannan-Andrus Levee Maintenance District.

Overview

After reviewing various sections of the Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft EIR/EIS, there still remains insufficient information to offer a complete evaluation impacts from construction and operations of the water facilities within the Sacramento San Joaquin Delta. The CEQA/NEPA environmental review process is still premature. No specific project design details are provided beyond a general footprint and overall component sizes in shown in the Mapbook and Chapter 3: Description of Alternatives. A separate EIR/EIS should be done for Conservation Measures (CM) 2 through 21 provided they are no longer incorporated in several alternatives, including the preferred Alternative 4 and have no specified locations. The potential for adverse impacts from these various CMs will be significant but cannot be evaluated here due to lack of detail.

It was difficult to ascertain if previous comments were responded to due to a complete re-format from the Draft BDCP EIR/EIS to the RDEIR/RDEIS. Maintaining the same format as well as providing all of the previous information from the 2013 document with the track changes would be easier to follow than simply providing the modified excerpts and placing all of the resource sections (the bulk of the report) in the Appendix. In the event of another revision, please maintain the same format of the EIR/EIS so comment responses can be tracked. The change in format appears to be a tactic to obfuscate a comprehensive review by affected stakeholders. The sheer mass of the document and ubiquitous references to other sections that reference *other* sections already successfully performs that task.

The following comments on the RDEIR/RDEIS are with regards to impacts on Reclamation Districts: 38 (Staten), 554 (Walnut Grove), 1002 (Glanville), 556 (Upper Andrus) and the Brannan-Andrus Levee Maintenance District.

Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft EIR/EIS Appendix A

Chapter 3: Description of Alternatives

The initial statement in Section 3.4 Components of the Alternative: Overview, "The following is a comprehensive list of *possible* water diversion and conveyance facilities that could be included in one or more of the action alternatives" summarizes the ambiguous nature of this document. This type is repeated throughout the document and is further proof that an EIR/EIS is premature. Without providing clearly defined features and detailed descriptions/exhibits it is hard for affected stakeholders and State and Federal agencies to get a clear enough picture of the project to successfully assess impacts. Rather we are forced to speak in generalities. For example, the Mapbook and Chapter 3: Description of Alternatives include basic descriptions and extremely simplified site plans of the intermediate forebay, related spillway and RTM areas on Reclamation District 1002, Glanville. These are a large part of the project and will have significant effects on crop production, transportation, and levee management on this district. Some of these areas are directly adjacent to sensitive areas such as Snodgrass Slough and the levees. Through the project's discussion it appears these areas will be filled with water and be surrounded by dikes. Given the potential for seepage, descriptions on whether or not these features are lined or require excavation would be helpful but are missing from the document. Due to a lack of information and detail in the environmental analysis, reclamation districts, agricultural users and many other stakeholders will essentially be left to deal and pay for unanticipated and unmitigated impacts.

Chapter 6: Surface Water

This section was reviewed to determine how construction and operations of the water facilities would change surface waters of channels in the Delta and in turn how that impacts islands downstream. Still no discussion was provided on the effect of dropping channel elevations on the operation of downstream siphons. This impact needs to be address and mitigated so that all intake functions will be maintained if downstream water levels become too low or if water quality is too degraded for irrigation or on-island wetland management. When looking for impacts from changing water levels on levees and public safety the reader is directed to Chapter 25: Public Health. Chapter 25 then directs the reader to Chapter 10: Soils. The impacts, although repeated within the document should summarized here along with a note saying more detail can be found in Chapter "X". Similarly in Section 6.3.2: Determination of Effects, changes in water surface elevations and stream flows at within the Delta are referenced to the 2013 BDCP Appendix 5A. Results from that data should be summarized, tabulated and included in this document especially since this is the only document we are allowed to comment on in this comment period.

According to Section 6.3.1.2: Methods for Analysis of Flood Management along Major Rivers, storm water management on the landside of levees is discussed in Chapter 20: Public Services and Utilities but within Chapter 20 there is no such discussion beyond following NPDES requirements.

Also Section 6.3.1.2 includes a new section of "Analysis of Potential Changes in Conditions that Could Affect Flood Management along Major Rivers" but it is followed by no text or reference to another section. This analysis needs to be included due to the lack of discussion on impacts to levees that are not directly impacted by the construction and operation of conveyance facilities. These impacts to levees within the Sacramento-San Joaquin Delta and State Plan of Flood Control due to changes in water operations as a result of the BDCP will be significant. For example in Section 6.3.2: Determination of Effects, says the highest monthly flows within channels when flood potential is already high would increase under the Alternatives. Also the channels are expected to carry dewatering flows which would create an unanticipated high water condition at areas downstream possibly outside of the flood season. Mitigation Measure SW-4: Implement Measures to Reduce Runoff and Sedimentation, requires hydraulic analysis to be completed on the existing channels to determine their capacity to carry dewatering flows. This analysis should be completed and included in this environmental analysis to effectively analyze impacts on channels from dewatering flows which will most likely be significant. Further hydraulic analysis will be required to determine changes in conveyance capacity and upstream/downstream flows in existing channels from the installation of the in-water facilities. Channel blockage was included in previous comments but is still overlooked in this document.

Impact SW-7: Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Flooding due to the Construction of New Conveyance Facilities, discusses exposure of people and structures to flooding due to construction of new conveyance facilities and notes that facilities would be designed to be protected from flooding. Yet, features such as sedimentation basins, which do not have a specified location in the mapbooks, are described to be excavated 30 feet. Excavation of that magnitude could cause flooding if they are adjacent to a levee. The sedimentation basins depending on location could increase hydrostatic pressures due to a lower landside depth if located too close to levees. Also the statement "Some project facilities could require rerouting of access roads and waterways that could be used during times of evacuation or emergency response" has no context and needs to be defined further and include potential locations. Reclamation Districts have emergency response plans that must be coordinated with construction activities. It is advised that BDCP proponents and contractors work with levee districts to minimize risks in emergency situations.

Chapter 7: Groundwater

The "construction perimeter" needs to be clearly labeled within the mapbooks. Figure 7_27: Forecasted Groundwater Level Lowering From Construction Dewatering for Alternative4, helps define the basic areas where dewatering is set to occur but the areas where dewatering will occur are substantial. A more detailed view of these dewatering areas is needed to determine what effects it will have on adjacent properties and levee systems.

Mitigation Measure GW-1: Maintain Water Supplies in Areas Affected by Construction Dewatering should include a condition that properties that lose access to ground water due to

dewatering should be supplied water to match previous use, unless the property owner agrees to compensation from lost production. Previous use should be determined by both project proponents and affected stakeholders prior to any dewatering activities. In this same measure, BDCP proponents will determine the area of influence of dewatering, this should be done within this environmental review of this project rather than after the fact ensure all properties affected by dewatering are covered. A mitigation measure should be included to grant property owners/stakeholders within a certain radius (i.e. 1 mile) to provide documentation of any unanticipated groundwater issues due to dewatering to DWR/BDCP proponents to receive compensation or assistance to remedy the issue.

Well monitoring data prior to and during project construction should be publicly accessible so affected stakeholders can manage their irrigation systems and water supplies. Strategies and assurances must be put in place in the event that water deliveries from dewatering impacts are inadequate.

In Mitigation Measure GW5: During Operations of New Facilities, Interfere with Agricultural Drainage in the Delta, the area where baseline groundwater conditions will be determined and monitored during construction must be defined. Monitoring and visual surveys should take place not only at the restoration and water conveyance sites but in a predetermined radius of influence where construction activities are expected to produce an impact. Monitoring activities should obtain land surface elevation data in addition to groundwater surface elevations and salinity. In addition, reports on ground water conditions shall be furnished to levee district managers and agricultural users for their own planning purposes. For example, dewatering activities from the construction of the intermediate forebay could lower interior surface elevations on Glanville. Impacts from land subsidence/settlement could weaken levees or their foundations or create higher hydrostatic pressures that could compromise the levees structural integrity. For a complete environmental analysis are more detailed study on groundwater levels including the determination of an area of influence as a result of dewatering is needed to successfully evaluate dewatering impacts.

Chapter 9: Geology and Seismicity

Impacts and mitigation from construction on levees and land surfaces within the Delta is heavily reliant on geotechnical analysis prior that will be performed prior to construction. Geotechnical analysis must be included within this environmental analysis so the significance of the construction impacts can adequately be reviewed and vetted. The environmental commitments in place to minimize potential risks need to be summarized here provided those commitments are found in the 2013 BDCP documents and not reviewable here. As a result of an incomplete geotechnical analysis and the speculative nature by which impacts are assessed, it is premature to claim that construction impacts are less than significant and do not require mitigation. Even a statement along the lines of, "Upon review of geotechnical analysis, impacts will be assessed and mitigation applied as necessary to reduce the likelihood of loss of property, personal injury or death due to

construction of Alternative 4" would be more sufficient to protect those at risk of negative impacts from construction within the Delta.

Impact GEO 4: Loss of Property, Personal Injury, or Death from Slope Failure during Construction of Water Conveyance Facilities states that the new perimeter levees/building pads adjacent to the Sacramento River will provide the same level of flood protection as the existing levee system, PL84-99 standards at minimum. However, Impact GEO 1: Loss of Property, Personal Injury, or Death from Structural Failure Resulting from Strong Seismic Shaking of Water Conveyance Features during Construction says water conveyance features will be designed based on USACE Earthquake Design and Evaluation for Civil Works Projects (ER1110-3-1806). This discrepancy needs to be cleared to determine what standard the perimeter levees will be built to and how these levees will be incorporated into existing flood control system. Also, there no discussion on impacts to flood protection for Snodgrass Slough near the intermediate forebay. This too will require flood protection measures to ensure the levee system isn't compromised or weakened due to construction or left vulnerable from a seismic event during construction.

Chapter 10: Soils

In Impact SOILS-5: Accelerated Bank Erosion from Increased Channel Flow Rates as a Result of Operations, accelerated bank erosion from increased channel flows due to operations is said to occur in "some Delta channels." These channels must be specified here given they are subject to increased flows and related impacts from BDCP operations. This section also notes conservation measures (no reference to what CM) include dredging these major channels to create a larger cross section. Provided that dredging has effectively shut down in the Delta for over 40 years, this idea has to be analyzed further and impacts need to be assessed. These changes would be significant to the existing flood control system and reclamation districts need to be informed. Based on the discussion under this impact, the CEQA determination that impacts would be less than significant and requiring no mitigation is not supported by any concrete data provided here. The channels need to be specify and flow data must be provided in order to make an informed determination on impacts

Chapter 12: Terrestrial Biological Resources

Thank you for responding to previous comments about removing the RTM areas from the southern end of Staten Island to protect wetlands management operations for Greater Sandhill crane habitat. However two tunnel shafts and a safe haven work area as well as tunnel boring operations still exist on Staten Island. Construction of these features will still have an adverse effect on species, including Greater Sandhill crane, that use Staten Island for nesting, roosting and forage areas.

Under Impact BIO-69: Loss or Conversion of Habitat for and Direct Mortality of Greater Sandhill Crane, construction activities are not anticipated to result in direct mortality in the study area because the cranes would avoid contact with construction. Based on past permitting experience, this is an unacceptable response in developing an effect determination. This is a common flaw

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referred to as the "Displacement Approach" in the USACE Section 7 Consultation Template. Thus, throughout this document this type of analysis is unsuitable in the determination of construction impacts on species.

Chapter 14: Agricultural Resources

In order for reclamation districts and agricultural users to assess the total effects of land being taken out of production, the values of permanent acreage loss and associated loss in economic productivity should be tabulated per island. The same should be done for temporary acreage loss. This will create a reference point for BDCP proponents and stakeholders to determine lost property taxes and assessments for each individual island. For example, within the body of the text, "approximately 240 acres" will be converted to non-agricultural use for the intermediate forebay and associated spillway on Glanville. It seems these values do not account for RTM areas also located on Glanville so it is unclear how many acres are actually taken out of production permanently or temporarily. A table would provide clarity so impacts to operations for reclamation districts and agricultural uses can properly be assessed.

Impact AG-2: Other Effects on Agriculture as a Result of Constructing and Operating the Proposed Water Conveyance Facility says 5 miles of irrigation canals and drainage ditches will be interrupted on Staten Island. The locations of these disruptions need to be provided in this report or given to the District Supervisor for the reclamation district prior to construction. Ensuring the island drains properly is an important flood control function on Staten Island and other reclamation districts especially in the south Delta. These impacts must be identified and mitigated for.

Chapter 16: Socioeconomics

The recognition of lost assessments to reclamation districts is appreciated. But assurances need to be made within mitigation measures that for each district assessments must be covered by BDCP proponents for the entire acreage on that has permanently taken out of production for the lifetime of the conveyance facility construction and operation until physical removal.

Thank you for your consideration of these comments. We did not receive a direct response to our last comments but we hope to receive comments for this phase.

Sincerely,



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From: Emily Pappalardo <emily@dccengineering.net>
Sent: Friday, October 30, 2015 6:10 PM
To: BDCPcomments
Subject: Comments for BDCP/Waterfix RDEIR/SDEIS
Attachments: DCCE_BDCP RDEIR SDEIS Comments 10-30-2015.pdf

To Whom It May Concern:

Please find comments for the BDCP RDEIR/SDEIS attached.

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From: Emily Pappalardo <empappa@gmail.com>
Sent: Friday, October 30, 2015 11:53 PM
To: BDCPcomments
Subject: Emily Pappalardo Delta Resident BDCP/Water Fix RDEIR/SDEIS Comments
Attachments: Emily Pappalardo_BDCP RDEIR SDEIS Comments.pdf

Please find my comments on the BDCP/Water Fix RDEIR/SDEIS attached. I attempted to read as much of the document as I could and thus ran out of time to proof read my comments. I think they make sense.

Sincerely,

Emily Pappalardo
Delta Resident and the Delta's biggest fan

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October 30, 2015

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

Subject: Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft EIR/EIS
comments for Steamboat Resort, recreation, and the Delta Community

Overview

The Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft EIR/EIS is still programmatic in nature and contains insufficient information to offer even an adequate evaluation impacts from construction and operations of the conveyance facilities within the Sacramento-San Joaquin Delta. The reformatting of the document and the constant deflection of important subjects from chapter to chapter clearly exhibits and lack of respect for stakeholders attempting to review the proposed projects. I have over a decade of experience in permitting and constructing projects in the Delta and the conveyance project as proposed is grossly insufficient, is this a joke? Other than one simplified exhibit set showing the proposed facility locations and basic size descriptions of the features in Chapter 3: Description of Alternatives, there are no detailed exhibits and no detailed descriptions of any elements proposed from intake facilities to the tunnel shafts to the barge loading facilities. Furthermore, most of the CEQA/NEPA determinations are wholly reliant on geotechnical and hydraulic analysis that will significantly inform project design and they have yet to be done. Based on my experience, Federal or State agencies will deem a project application incomplete without a such analysis or detail. The following statement in Section 3.4 Components of the Alternative: Overview, "The following is a comprehensive list of *possible* water diversion and conveyance facilities that could be included in one or more of the action alternatives" effectively sums up the general and ambiguous nature of this environmental document.

The following comments are based on the projects impacts to the Delta community and recreation.

Chapter 3: Description of Alternatives

This section would be much improved if it were accompanied by a detailed set of exhibits of at least the preferred Alternative 4 as well as detailed descriptions of each project component. I have numerous questions about the design of the facilities and construction operations that would aide in the review of project impacts. The following is exemplary of questions that arise due to the lack of information on the project on Temporary Barge Unloading Facilities.

Temporary Barge Unloading Facilities are described as being 0.7 acres up to 5.7 acres. That is an immense size with major impacts on the waterway but is hard to relate to and easy to miss because

it is in acres. So for example, the smallest barge facility would be possibly 30 feet by 1000 feet and considering 30 feet would be as wide as you could go within a channel, the largest barge loading facility could be 30 feet by 1.5 miles, is that accurate? What warrants these extreme sizes? What would the access roads look and how would they impact the levees? Excessive pile driving in the water way can cause significant noise impacts, negative impacts to aquatic species and could pose threats to levee stability depending on their proximity to the critical levee section.

The project sites an existing dock in Hood Section 3.6.1.8 Temporary Access and Work Areas for Intake, Canal, and Pipeline/Tunnel Construction. There exists no dock of significant size that could support these construction activities. There is a building located on the waterside of the levee however.

Chapter 6: Surface Water

This chapter should discuss impacts to surface water from project operations and construction activities. It is difficult to determine, however, if the projects will increase flows in the rivers or decrease flows or do both. Clearly dewatering activities have the chance to increase channel stages during any time of the year. This could be problematic for annual levee maintenance work if reclamation districts are not notified of dewatering releases. Maintenance work occurs during the summer when water levels are low to avoid any issues with seepage and erosion due to high flows during levee repair. No levee work is allowed during the flood season November 1 to April 15. Although hydraulic analysis is needed it seems there may be concerns of the channels' carrying capacity for such flows. These could essentially create flood conditions and impact maintenance activities of reclamation districts. This impact needs to be noted and evaluated in this document.

Section 6.3.2: Determination of Effects discusses that instances in highest monthly flows will occur in the Sacramento River and most likely tributaries. This is unclear, is the increased flow from greater releases from the reservoirs to supply water to the tunnels? Other areas in the document explain drops in water levels of up to 3 feet or a 40% reduction Figures 6-14 and 6-15 from the 2013 BDCP. A map showing expected river stages due to various operations must be provided help clear up these issues and allow residents, farmer, and reclamation districts anticipate impacts from changes in surface water beforehand.

Impact SOILS-5: Accelerated Bank Erosion from Increased Channel Flow Rates as a Result of Operations, should be included in this chapter, surface water, because it is an impact from surface water. I'm sure this was an oversight and was not intentional. However, accelerated bank erosion from increased channel flows due to operations said to occur in "some Delta channels" would be incredibly significant and cannot be just an offhand comment in the Soils chapter. These channels must be specified here with anticipated increases in flows due operations. This section also notes conservation measures (no reference to what CM) include dredging these major channels to create a larger cross section. I applaud you on your spirit. Dredging practices are not at all encouraged in the Delta due to significant environmental impacts from potentially re-suspending harmful

constituents from the mining era back into the water column and harming fish. Dredging also is desperately needed since there have not been extremely scouring flows in the Delta since 1997 to reduce channel sedimentation. These changes would be significant to the existing flood control system and reclamation districts need to be informed. Based on the discussion under this impact, the CEQA determination that impacts would be less than significant and requiring no mitigation is not supported by any concrete data provided here. The channels need to be specify and flow data must be provided in order to make an informed determination on impacts. This environmental analysis cannot be considered even close to complete without data and project specifics.

Chapter 7: Groundwater

Mitigation measure GW-1: Maintain Water Supplies in Areas Affected by Construction

Dewatering mentions these areas will be determined by the BDCP Proponents. Many residents and agricultural users within the Delta rely on groundwater so this impact will be significant. Not enough data is provided in this report to suggest a true area of influence of dewatering activities thus if some wells are affected that were not identified beforehand by the proponents, this should not preclude them from being mitigated. Figure 7_27: Forecasted Groundwater Level Lowering From Construction Dewatering for Alternative 4, helps define the basic areas where dewatering is set to occur but this is considered 50,000 foot view. This figure needs to be closer to a 100 foot get detailed information to assess dewatering areas and impacts.

Chapter 13: Land Use

Impact LU-2: Conflicts with Existing Land Use as a Result of Constructing the Proposed Water Conveyance Facility (CM1)

Any facility associated with the conveyance facility including the conveyance facility will be incompatible with all land uses and will be a significant and adverse impact to surrounding properties, this is not included in the CEQA Conclusion and it should be. That said, "where applicable" should not be included when discussing compensation to property owners who lose their homes or any parts of their property as a result of this project. The BDCP proponents will compensate property owners for losses and these losses should be discussed between the proponents and the property owner to determine a fair value. Not only is the property loss but the value it held either as a home or their livelihood. Also in this section the removal of a structure itself is not an environmental impact but it is an impact. If a house is removed from a residential property, nobody can use the property to as a residence, its use is effectively removed. This should be clarified. A person or family lost their home or their business is that less significant than accidentally killing a Delta smelt? If the home was the location or the business was dependant on that location there is no monetary compensation to bring that back. For example, I live on a resort on Steamboat Slough. The value in the home is not the structure but the location. The resort also operates as a private boat club (not mapped in the documents public/private marinas map), Steamboat Resort as a business is also dependent on the location. If the structure or dock was

removed for any element of this project there would be no way to replace this through monetary compensation, it is location dependent as are many homes and businesses in the Delta. Also even if money was provided to rebuild elsewhere, many structures are no longer compatible with new zoning codes so they could never be replaced but they add to the character of this community. This discussion might fit better in the Cultural or Socioeconomics chapter either way impacts from removal of structures should be highlighted as a significant adverse and unavoidable impact.

Impact LU-3 discusses the placement of permanent structures around the town of Hood. Hood is a struggling community mostly made up of low-income residents. Locating a significant amount of facilities around the town, tunneling under it, and restricting traffic and 15 years of construction noise will effectively destroy this town. This is an Environmental Justice issue as most residents in Hood do not have the means to sue in the event of unanticipated adverse impacts, nor do they have the means to relocate. The community is trying to grow with a new restaurant being constructed and potential wineries along the River Road however these ventures will fail as a result of this project. The construction and operation of the conveyance facilities would put a disadvantaged community at an even greater disadvantage, this is not included in the Environmental Justice chapter or in this chapter. The impacts of this would be adverse and significant and need to be included in this analysis.

Chapter 15: Recreation

Impact REC-2 states that six recreation areas are within indirect impact areas of construction. It would be more beneficial to see this as well as recreational areas that will be removed temporarily and permanently due to the conveyance facilities in the form of a map. This impact also notes noise from construction activities will be an impact. This needs to be further discussed and isn't really touch on in the Noise chapter either. People come to the Delta to relax and take vacation. Constant construction noise could deter visitors to the Delta. Steamboat Resort is one such place close enough to construction activities that excessive noise and barge activity could result in people who have moored boats at the resort for over 20 years to leave. Furthermore there are many wedding venues and wineries in close vicinity of the construction areas like Scribner Bend that would be negatively affected. No bride will want to hear a impact hammer driving piling throughout her wedding. Venues like these are opportunities for farmers to offset losses from lost agriculture productivity due to conveyance facilities. They may not be able to survive the 15 year construction period to survive. Discussion on wedding venues, farm stands, and wineries are recreational activities and need to be included and evaluated in this chapter for negative impacts. In effect, there are likely far more than six recreational areas affected by construction activities.

Impact REC 3 - The speed restriction zone must be clearly defined instead of upstream and downstream. These speed zones can only be in the exact location of the actual facility. Boat traffic on the Sacramento River in these areas is high during weekends in the summer especially during the drought when other recreational areas such as Folsom Lake can't support this type of activity. Encroachments into the waterway from intake and barge unloading facilities can pose a

hazard to boaters by reducing the navigable area of the channel. They also need to provide lights in the water so they are not hit by passing boats at night. Impacts on recreational boating from these facilities for the amount of time is significant. This impact also notes that eight barges are expected per day, what is the timing on the barges. The barges will also create dangerous conditions for boaters by adding to congestion and reduce the quality of recreation. A barge schedule should be provided to the marinas so boaters can avoid being on the river during peak barge traffic. The following Mitigation measure should be included to reduce impacts on boat recreation. During the weekdays, barges should only be allowed to travel on the Sacramento River between the hours of 8 am to 5 pm when there is light and no chance of collision due to lack of visibility. They also should not be on the river on weekends from May 1 to September 30. If this measure was included impact on boating recreation would be insignificant. Otherwise per the CEQA conclusion, eliminating waterskiing, wakeboarding, and tubing during construction would be very significant but it is based on my suggestions it is avoidable.

The statement in Impact REC-7 that "the areas around the proposed intake locations are not usually used for waterskiing, wakeboarding, or tubing" is false. I personally use the areas around the intake locations frequently for wakeboarding. They are also heavily used on the weekends in the summer. Impacts on any in-water maintenance work of the facilities will be significant to these activities. While there are other miles of the Sacramento River to recreate this is where people live, this is where their boats are, they are not willing to travel outside of the area, that is a negative impact.

Section 15.3.3 Effects and Mitigation Approaches, states that traffic modeling indicates increases in noise from truck hauling and worker commutes would not be substantial however the Transportation chapter has tables that show traffic noise increasing 20 dB from existing conditions. The chapter also states that an increase in 5dB is significant so 20 dB is extremely significant. This needs area needs revision.

Chapter 16: Socioeconomics

The Delta community will not benefit from this project whatsoever, it will only benefit agricultural interests in the southern part of the State. This project would only result in negative impacts to this community mostly in the form of its economy. When agricultural lands are removed for conveyance facilities, compensation for the cost of the land is only part of the economic impact. Agricultural productivity over the lifetime of the lost land and the other businesses that productivity would have supported would be lost as well (ECON-7). How will that impact be mitigated? It can't and the impact would be significant and adverse because agriculture supports most of the businesses in the Delta. Some businesses in the Delta operate on a shoestring and could not survive the loss of income associated with loss of agricultural productivity. This element must be discussed in this section.

Continuously in this chapter the CEQA Conclusion says because the impacts are social in nature, rather than physical, they are not considered impacts under CEQA. Please clarify where in the CEQA is this explicitly stated. Are social impacts covered under NEPA. Removal of highly productive ag land that supports a ton of other businesses in the Delta is significant to the existence of Delta as place which is covered under the Sacramento-San Joaquin Delta Reform Act of 2009 and needs to be stated here.

Beyond the Delta community, it is a spectacular region with beautiful views that are the subjects of many famous artists like Wayne Thiebaud and Gregory Kondos, which isn't mentioned in Chapter 17: Aesthetics and Visual Resources.

Conservation Measures 2 through 22

Conservation Measures 2 through 22 also present significant impacts to the Delta region. Given there are no specific project locations they should be removed from this analysis and put into a separate EIR/EIS process when those project details exist. As stated within this report there is absolutely no way to evaluate impacts other than through speculation.

Conclusion

The adverse impacts the conveyance facility construction and operation has to be considered when under final review by the permitting agencies. Providing overriding considerations to approve the project although there are numerous significant unavoidable impacts where mitigation may only reduce the severity should be extremely difficult to justify.

If somehow I missed something within the report and has been assessed an impact that I think was left out, I encourage you to respond to me with the location within the report. As stated in many emails you intend to respond to all of our comments. I look forward to your response.

Sincerely,

Emily Pappalardo

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