

---

**From:** robin keehn <robink48@hotmail.com>  
**Sent:** Friday, October 30, 2015 7:02 AM  
**To:** BDCPcomments  
**Subject:** "WaterFix" Opposition

To: Bay Delta Conservation Plan/Twin Tunnels

Project Input Team Members

From: Robin Keehn

I live in Chico, part of the Sacramento River watershed and strongly oppose the California Water Fix. I believe it is the Governor's latest plan to drain the vitality from the North State. Our homes, businesses, farms, and wild lands depend on healthy groundwater, creeks, and streams. I will fight this water grab in every way I can to prevent turning the Sacramento Valley into an echo of the Owens and San Joaquin valleys. *No Twin Tunnels!*

This BDCP/WaterFix and its related EIR/EIS do not comply with State water law and inadequately assess the environmental and socioeconomic impacts. The state and federal agencies are assuming enormous liability for the harm that the BDCP/WaterFix will cause.

Much of southern California is naturally a desert. People, businesses, including agriculture, should live within their region's hydrologic means. I urge you and the Governor to work with the citizens of this state to develop environmentally sustainable practices to meet, and or decrease, our needs for water in California.

---

**From:** starla@ekit.com  
**Sent:** Friday, October 30, 2015 11:04 AM  
**To:** BDCPcomments  
**Cc:** info@aqualliance.net

Hello,

I live in the Sacramento River watershed, and have my whole life. I am extremely opposed to the Delta Tunnels and think it's one of the worst ideas our elected official(s) have come up with, EVER.

Our homes, businesses, farms, and wild life and lands depend on healthy water for so many things. The tunnels will have such a negative impact on so many people and wildlife, it boggles the mind.

If they're built, by the time everyone realizes the damage that has been caused, it will be too late. Do NOT allow these tunnels to happen!

There are other options, including desalinization, recycling, conservation, rainwater catchment and storage. There's also stopping the idiocy of farming in the central part of the state. Yes, the system we have been using to allocate and move water is broken and illogical, but the tunnels are not a good solution!

I have sat back and watched as California's politicians have done a lot of objectionable stuff, but I refuse to sit back and let something like this go through. I will do whatever I can to block these tunnels from happening and I know many people that feel the same way.

NO TWIN TUNNELS!

Sincerely,  
Starla Larry

and strongly oppose the California Water Fix,  
the Governor???'s  
latest plan to drain the vitality from the NorthState. Our  
homes, businesses,  
farms, and wildlands depend on healthy groundwater, creeks,  
and streams. I will  
fight this water grab in every way I can to prevent turning  
the Sacramento  
Valley into an echo of the Owens and San Joaquin valleys. No  
Twin Tunnels!

---

**From:** PLarry <pammanda@yahoo.com>  
**Sent:** Friday, October 30, 2015 12:12 PM  
**To:** BDCPcomments; info@aqualliance.net  
**Subject:** California "Water Fix"

Dear Sirs-

I live in Butte County, part of the Sacramento River watershed. I strongly oppose the California Water Fix, the Governor's latest plan to drain the water from the NorthState. Our homes, businesses, farms, and wildlands depend on healthy groundwater, creeks, and streams. I will fight this water grab in every way I can to prevent turning the Sacramento Valley into an echo of the Owens and San Joaquin valleys. No Twin Tunnels!

I am appalled that the BDCP/WaterFix and its related EIR/EIS do not comply with State water law and inadequately assess the environmental and socioeconomic impacts. The actions of the BDCP/WaterFix would damage the region's economy, environment and living conditions for my community and farmers.

Fresh, clean, water supports the Delta, the largest nursery for California fisheries, the largest Pacific Coast fly over stop for migrating waterfowl, more than 500,000 acres of California prime farmland, and an urban community that is home to over 4 million people. Stockton and San Joaquin County's primary industries are agriculture, transportation, Port of Stockton operations, and construction, and all these industries are tied to sufficient Delta water quality and quantity.

Please stop this destructive plan that will cause nothing but problems for the State Of California.

Thank you.

Best regards-  
Pamela Larry  
Chico, CA.

---

**From:** Laslo Karen <karenlaslo@gmail.com>  
**Sent:** Friday, October 30, 2015 9:20 AM  
**To:** BDCPcomments  
**Subject:** No Twin Tunnels!

I live in the Sacramento River watershed and strongly oppose the California Water Fix, the Governor's latest plan to drain the vitality from the NorthState. Our homes, businesses, farms, and wildlands depend on healthy groundwater, creeks, and streams. I will fight this water grab in every way I can to prevent turning the Sacramento Valley into an echo of the Owens and San Joaquin valleys. No Twin Tunnels!

*I'm a senior citizen now, but when I first voted for Gov. Brown I was a young woman. I voted for him again 4 years ago because I thought he'd be really good when it came to protecting the environment and he has been, except for this one issue.*

*Gov. Brown: this is NOT the way to solve our water problems. Don't sacrifice one of our last intact Calif. watersheds to the San Joaquin desert "farmers." Do you want to be remembered as the governor who destroyed the Sacramento River watershed?*

Karen Laslo  
[karenlaslo.com](http://karenlaslo.com) "A Picture's Worth"

"Preserve well, for you now have, this is all." - Tozan Ryokai, Zen teacher

---

**From:** Carol Perkins <cuestageo@live.com>  
**Sent:** Wednesday, October 28, 2015 11:21 AM  
**To:** BDCPcomments  
**Cc:** info@aqualliance.net  
**Subject:** Oppose the Delta Tunnels/California Water Fix (Alternative 4A)

I live in the Sacramento River watershed and strongly oppose the California Water Fix, the Governor's latest plan to drain the vitality from the NorthState. Our homes, businesses, farms, and wildlands depend on healthy groundwater, creeks, and streams. In fact, ALL of California depends on the water that flows from the headwaters of California through the Sacramento River Valley. I **will** fight this water grab in every way I can to prevent turning the Sacramento Valley into an echo of the Owens and San Joaquin valleys. No Twin Tunnels!

Regards,

*Carol Perkins*

Water Policy Advocate

Northern Sacramento Valley

[cuestageo@live.com](mailto:cuestageo@live.com)

530.518.4369

**From:** Tom Edgar <tedgar05@comcast.net>  
**Sent:** Thursday, October 29, 2015 2:10 PM  
**To:** BDCPcomments  
**Cc:** 'AquAlliance'; dunlaplegal@yahoo.com; 'Butte County Supervisor Bill Connelly'; 'Butte County Supervisor Maureen Kirk'; 'Butte County Supervisor Steve Lambert'; 'Butte County Supervisor Les Wahl'; 'Paul Gosselin [Butte County Water]'; 'Vicki Newlin - - Butte County Water'; 'Cindy Paulson Phd [Brown and Caldwell-Engineers]'; 'Caroline Burkett -----Northern California Groundwater Users Alliance'; 'Friends of Butte Creek'; 'John Scott'; 'Albert Beck'; 'California Sportfishing Protection Alliance'; 'Barbara Barrigan-Parrilla 209/479-2053'; 'AquAlliance'; 'YubaNet'; 'William Jennings'; 'Marty Dunlap Esq - Citizens Water Watch'; 'John Merz --Sacramento River Trust'; 'Eric Wesselman'; 'Lindsay McDonnell'; 'Tom and Carol Wrinkle'; 'Karan Jo White'; 'Thomas Edgar Esq - Citizens Water Watch'; 'Jack and Norna Van Rossum'; 'Heather Hacking-Chico Enterprise Record'; 'Carol Perkins - -Butte Environmental Council'; 'Jim Brobeck - - AquAlliance'; 'Karen Duncanwood'; 'Tony St. Amant'; 'Robyn Difalco'; 'Robyn Difalco'; 'Sharron Ellis'; 'Bruce Smith'; 'nani teves'; 'Barbara Hennigan Butte-Sutter Basin Area Groundwater Users'; 'Jennifer Rotnem'; tedgar05@comcast.net  
**Subject:** Adverse Comments Upon The Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS); Opposition To The Proposed Twin Tunnels

Gentlepersons:

I live in the Sacramento River watershed and strongly oppose the California Water Fix [hereafter, **GRAFT-GREED-COORUPTION WATER THEFT-FIX**], the Governor's [and Kern County's] latest plan to drain the vitality from the NorthState. Our homes, businesses, farms, and wildlands depend on healthy groundwater, creeks, and streams. I will fight this water grab in every way I can to prevent turning the Sacramento Valley into an echo of the Owens and San Joaquin valleys. No Twin Tunnels!

I am worried that the Proposed Sites Reservoir is part of a new and larger scheme by Metropolitan Water District of Los Angeles and of Westlands Water District [Southern California, etc.] to take control of our Northern California Water [acting in conjunction with the **proposed** Twin Tunnels Project. I am worried that these projects will become the modern version of the Rape [And Desecration] Of Owens Valley by Metropolitan Water District of Los Angeles; in about 1908, the Los Angeles Aqueduct effectively eliminated the Owens Valley as a viable farming community and eventually devastated the Owens Lake ecosystem. I am skeptical, but am willing to further discuss [and learn about] the Proposed Sites Reservoir Project. Hopefully, we can obtain improved legislation to protect our Northern California Water Rights.

*The BDCP/WaterFix [**GRAFT-GREED-COORUPTION WATER THEFT-FIX**, herein] and its related EIR/EIS, do not comply with State water law and inadequately assess the environmental and socioeconomic impacts. The actions of the **GRAFT-GREED-COORUPTION WATER THEFT-FIX** would damage the region's economy, environment and communities. For these reasons, the Butte County Board of Supervisors remains opposed to the **GRAFT-GREED-COORUPTION WATER THEFT-FIX**. The state and federal agencies are assuming enormous liability for the harm that the **GRAFT-GREED-COORUPTION WATER THEFT-FIX** will cause. Butte County will consider taking appropriate measures to protect the County's economy, environment and communities.*

*Gov. Brown [supported by Kern County Water Agency] has proposed massive underground water export tunnels for the Delta, now inaccurately named the "California Water Fix." [**GRAFT-GREED-COORUPTION WATER THEFT-FIX**, herein]. It is essentially the same project as the peripheral canal, which California voters*

*rejected in 1982 by a 62.7% majority. The tunnels could grab the Sacramento River, which is the main supply of fresh water in the Delta, San Joaquin County, and the entire San Francisco Bay-Delta estuary.*

*Fresh, clean, water supports the Delta, the largest nursery for California fisheries, the largest Pacific Coast fly over stop for migrating waterfowl, more than 500,000 acres of California prime farmland, and an urban community that is home to over 4 million people. Stockton and San Joaquin County's primary industries are agriculture, transportation, Port of Stockton operations, and construction, and all these industries are tied to sufficient Delta water quality and quantity...*

Thank you. I would be glad to discuss this further, at your convenience.

Thomas E. Edgar  
Attorney At Law [SBN 70732]  
1380 East Avenue, Suite 124, PMB 205  
Chico, CA 95973  
Telephone [530] 282-7202  
Facsimile [530] 893-1525  
E-Mail: <[tedgar05@comcast.net](mailto:tedgar05@comcast.net)>



October 30, 2015

Bay Delta Conservation Plan (BDCP)/California WaterFix Comments  
P.O. Box 1919  
Sacramento, CA 95812

[BDCPComments@icfi.com](mailto:BDCPComments@icfi.com)

Dear BDCP/California WaterFix:

On behalf of the Burbank Water and Power (BWP), I would like to provide the following comments on the Bay Delta Conservation Plan/California WaterFix (BDCP/WaterFix) and its refined draft environmental impact statement/report released on July 10, 2015.

The City of Burbank relies on State Water Project (SWP) supplies as a critical component of the community's overall water portfolio. The City of Burbank imports 100% of our water through the Metropolitan Water District of Southern California (MWD). Over the years, we have focused on what we can do locally to be less dependent on imported water. We have made great strides, but more must be done and the key factor is having a reliable supply of water while also restoring the Delta; the City of Burbank has long supported the co-equal goals of restoration and reliability. BWP has had a number of initiatives to become less dependent on imported water.

By the end of 2015, BWP will be serving nearly every school in Burbank, the golf course, and a myriad of commercial, industrial, and institutional customers, which represent our largest outdoor water users, with recycled water equal to 11% of Burbank's total water supply. In addition, the Burbank community has conserved water during the drought and is well on our way to meeting our required 24% state mandatory reduction in water use. All these efforts have materially reduced Burbank's dependence on imported water, but we are at the point in time when California must renew and modernize its aging water infrastructure to create a more reliable supply of water and reduce environmental conflict.

The principal source of new drinking water supply comes to California through winter storms. Luckily, the SWP is uniquely capable of capturing significant quantities of wet-year and wet period supplies, allowing MWD to store these supplies for drought-cycle needs. These past efforts to store during the wet times has helped southern California

weather the current historic drought cycle in which we find ourselves. However, it is widely known that the ability of the SWP to reliably capture wet-period water is at severe risk due to the existing configuration of the pumping system, regulatory constraints and long-term threats due to climate change and catastrophic natural events such as earthquakes and flooding.

Throughout the nine year process where federal and state agencies have been working to find a lasting water system/ecosystem solution for the Sacramento-San Joaquin Delta, the City of Burbank has been closely monitoring and commenting on the BDCP, now called California WaterFix. The modified preferred alternative outlined in BDCP/WaterFix represents a significant shift in this nine-year planning process that the City of Burbank has reviewed and carefully considered. BDCP began as an effort that sought to combine water system and ecosystem improvements within a single permitting construct as a habitat conservation plan under Section 10 of the federal Endangered Species Act (ESA) and as a Natural Communities Conservation Plan under the State ESA law.

A major change from previous versions is that the BDCP has been separated into a two track system. The modified preferred alternative (Alternative 4a) delineates a different approach, with the WaterFix intake/conveyance improvements proceeding as a stand-alone project with ESA permitting requires an approach similar to the existing ESA permitting/regulatory construct of the SWP. Approximately 30,000 acres of proposed Delta ecosystem improvements, meanwhile, would proceed on a parallel, but separate program now as California EcoRestore. The City of Burbank understands that the rationale of this modification is to identify an achievable path to permitting given overwhelming scientific uncertainty on how to best manage the Delta in the coming decades. The ability of public water agencies to participate in a historic reinvestment of the SWP will rely on a final plan that meets the state's co-equal goals of a reliable water supply and restoration of the Delta.

Burbank remains supportive of the overall proposed configuration of the water supply improvements outlined in Alternative 4a. The key features include three new intakes in the northern Delta on the Sacramento River that would provide the opportunity to divert high-quality supplies reliably and address reverse-flow conditions in the southern Delta that are a result of the existing diversion system. Another element is the proposed twin-tunnel conveyance system that would protect this supply long-term from threats such as seismic events and sea level rise. Proposed project modifications, such as the consolidation of intake pumping into a single facility in the southern Delta on SWP property near Clifton Court Forebay, have further reduced the physical footprint in sensitivity to Delta communities and existing land use activities. Burbank continues to support state-of-the-art fish screens at intake points to improve real-time monitoring and embrace adaptive management as essential ways to refine project operations over time to protect both threatened natural fisheries and water supply reliability.

As a member of MWD, Burbank supports the long-standing criteria for a Delta solution as established by the Metropolitan Water District Board of Directors:

- **Water Supply Reliability:** A successful final plan would accomplish several reliability needs: It would re-establish a consistent ability to capture wet-period supplies in a range of year types. It would improve reliability of deliveries in an average year. And it would protect supplies long-term. The draft EIR/EIS provides some information that is useful for analysis. Yet, more and better information would be helpful to compare potential water supply capabilities under various future scenarios since MWD and its members have invested billions of dollars to develop a storage and distribution system designed to capture SWP supplies when they are available and limit demands on the SWP system during dry periods. We refer to this water management strategy as the “big gulp, little sip” approach.
- **Project Mitigation:** The preferred alternative significantly increases habitat mitigation related to construction compared to the very same project as proposed in the draft EIR/EIS in December 2013. Little rationale is provided for the increased mitigation requirements. While full mitigation for project impacts is always appropriate, placing an excessive burden on mitigation for any project, particularly the size of California WaterFix, is not. A careful review of all the target mitigation acreages is appropriate in order to settle on a final mitigation strategy that is commensurate with impacts. Shifting away from a habitat conservation plan is not a reason to conflate mitigation requirements for the project and unduly impact the final project’s cost.
- **Improved Water Quality:** The preferred alternative continues to advance the objective of improving water quality of SWP supplies. High source quality for this imported supply is essential for southern California communities to increase the production of recycled water. In addition, the new modeling and analysis of in-Delta water quality, as a result of proposed water project operations, is helpful information to assure that the state can meet overall water quality objectives in the estuary.
- **Flexible Pumping Operations in a Dynamic Fishery Environment:** The preferred alternative continues to advance the objective of avoiding conflicts with migrating fish species. It is particularly important to embrace an adaptive management approach to project operations to resolve fall outflow requirements for delta smelt, spring outflow requirements for longfin smelt, and operating constraints for south Delta diversions. Significant improvements in water reliability may be achievable without adversely affecting habitat conditions for important fish species. Management of this system must be as dynamic as the estuary itself.
- **Delta Ecosystem Restoration:** Under the preferred alternative, this responsibility shifts from BDCP to California EcoRestore. This is proposed to be a program separate from California WaterFix. And officially, California EcoRestore is not part of this public comment process. However, this recirculation does provide an opportunity to share input. State agencies need to

better clarify their leadership roles in projects identified in California EcoRestore. Whether the state intends to be a lead agency on any given project, for example, remains to be seen. The acreage targets and timetables set forth in California EcoRestore cannot be achieved without lead agencies, expeditious planning and securing the necessary financing. While California EcoRestore is a promising and potential construct for habitat restoration, basic operational details remain unclarified. A more robust program is essential in order to demonstrate that water system investments will be matched with commensurate ecosystem improvements.

- **Seismic and Climate Change Risks:** The modified preferred alternative continues to provide the necessary design and system redundancy to reduce both seismic and climate change risks. Research into seismic risk is continuing. As an example, the potential of levee collapse due to the compaction of peat soils is a new and relatively poorly understood failure mechanism. Previous studies had largely centered on soil liquefaction. Improved scientific information and understanding demonstrate that the likelihood of levee failure due to a natural disaster appears to be increasing, rather than decreasing. Reducing these risks is paramount to water supply reliability. The conveyance improvements must be sized sufficiently to capture water when it is available. Initial proposals for a larger conveyance system were not pursued due to feedback from wildlife agencies. The final project must be sufficiently sized to adequately address these risks.
- **Governance and Adaptive Management:** As a habitat conservation plan, BDCP had been proposing a detailed governance structure in order to implement various conservation measures. The modified preferred alternative no longer proposes to advance a habitat conservation plan. However, an adaptive management process to guide future water project operations is essential to the long-term success of California WaterFix. The same holds true for advancing tidal and floodplain habitat restoration projects as mandated in the existing biological opinions for pelagic and anadromous fish species. The need for an effective governance/adaptive management structure in partnership with the public water agencies is as necessary under California WaterFix/California EcoRestore as it was under the previous BDCP construct. Such a structure must be fully detailed and agreed upon before decisions can be made by public water agencies to invest in a final project proposal.

This recirculation process represents the final milestone before advancing to a final EIR/EIS and Record of Decision. This represents the final opportunity to provide formal public comments prior to the final phase of this historic nine year planning effort. I appreciate the exhaustive efforts of both the state and federal administrations to advancing this process so that a final project and proposal can be advanced sometime next year. It is essential to expeditiously resolve outstanding issues in order for the

federal and state administrations to complete this complex process within financial and time constraints.

Thank you for your efforts and for considering BWP's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Davis". The signature is written in a cursive style with a large initial "R" and "D".

Ron Davis  
General Manager, BWP

c: City Manager  
BWP Board

---

**From:** McGinley, Lianne <LMcGinley@burbankca.gov>  
**Sent:** Thursday, October 29, 2015 1:43 PM  
**To:** BDCPcomments  
**Subject:** Burbank Water and Power Comments on BDCP/California WaterFix  
**Attachments:** Burbank Comment letter on California WaterFix.pdf

Please find attached comments on the BCDP/California WaterFix from Burbank Water and Power.

Thank you.

Lianne

**Lianne McGinley**  
Burbank Water and Power  
Legislative Analyst  
818.389.5461 Mobile  
818.238.3661 Office  
[lmcginley@burbankca.gov](mailto:lmcginley@burbankca.gov)