

From: Dennis Park <dennispark1000@comcast.net>
Sent: Friday, February 14, 2014 7:12 AM
Cc: BDCP.Comments@noaa.gov
Subject: Tunnels under the Delta
Attachments: 2014_02_14_06_45_06.pdf

In case you are not on the e-mail list for updates to Jerry Brown's tunnel project, I am attaching the handouts from the Wednesday night meeting in Discovery Bay. The committee fighting this boondoggle gave an excellent brief and State Assemblymember, Jim Frazier, spoke about his bill (AB 1671) requesting financial accountability. The project has been designated the Bay Delta Conservation Plan (BDCP) thus allowing it to bypass many of the normal checks and balances (because it is a 'conservation' plan).

Frazier pointed out the potential costs are as high as \$67,000,000,000 but neither the citizens of the state or the State Legislature have any approval authority at this point. His bill, if passed, would require approval. Remember how much the Bay Bridge went over budget and time, the \$67 billion could easily approach ¼ of a trillion dollars if typical overruns occur. This for a project that neither protects the environment or generates any new water.

The rate payers in southern CA don't understand this project either. As written, southern CA rate payers have an approximate \$2,000/yr. water bill adder that they get charged even if no water is sent south due to drought (this year for example).

This kind of spending should be subject to oversight at the minimum and most likely should be cancelled. Besides destroying Discovery Bay as we know it (which I have a vested interest in), the plan takes large tracks of fertile farmland out of service forever so they can attempt to turn southern CA desert into ag land. GRRRR!

If you are at all concerned, take the simple step of writing an e-mail to BDCP.comments@noaa.gov and demanding that e-mails be posted on their website. At present, the BDCP is not posting e-mails. This is in violation of even the most basic voter rights. Our voices should be heard. By not posting e-mails/communications, they make it look like no one is against (or for) the project. The lengthy attachment can be scanned quickly as the pertinent info is in the first 4 pages, subsequent pages are directions on how to e-mail and attack this project. By the way, I actually like the proposal to place all of the muck generated in the heart of San Francisco (see attached picture).

Dennis Park

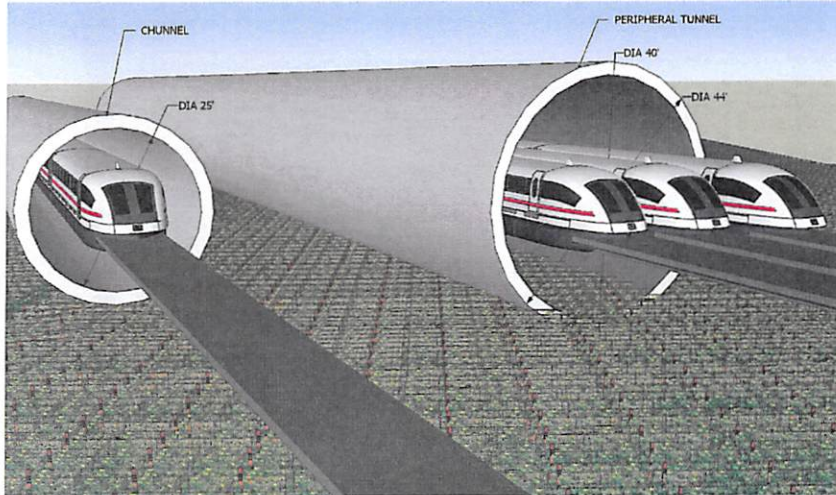
Save the California Delta Alliance
COMMENTS
DRAFT BAY DELTA CONSERVATION PLAN (BDCP)

I oppose the BDCP because:

- The proposed twin 40' diameter tunnels have little to do with habitat restoration, and should be separated from the Habitat Conservation Plan (HCP). The EIR for the tunnels should not be a HCP, and, therefore, should include all economic impacts including the impact of reduced property values and tax revenues in the 5 counties, and the impact on the local economy, both during and following construction.
- The Cost / Benefits Analysis (Table 9-32) identifies a net benefit of \$4.5 to \$5.3 billion, given an incremental cost of \$13.5 billion. There are several flaws in this analysis, including not taking into account the cost of bond interest, the cost of mitigation, which is necessary to experimentally offset the additional water take, the economic loss due to poor water quality in the south delta, and the economic loss of taking productive delta farmland out of production. The analysis uses "apples and oranges" e.g. using 60 years for the benefit, and 50 for the operating costs. The project is only 10% designed: a 37% contingency is inadequate – look at the Bay Bridge cost.
- The BDCP & EIR (Chapter 1B.1) fail to include alternatives that actually produce more water for California: Desalination, storage, and re-use. After correcting the BDCP costs noted above, the cost / acre foot exceeds \$1,000, (\$1,900 for urban rate payers) which equals the estimated cost of desalination. Given that pumps would no longer be necessary to transport delta water over the Grapevine, the energy differential is even lower.
- The Authorized Entity Group, which has jurisdiction over real-time operation of the tunnels, includes the Water Contractors. The BDCP, Chapter 7.1.5.1, has deferred the actual decision-making roles to a later date, possibly to avoid comments. Water Contractors should be non-voting members with regard to the amount of water allowed in the tunnels, and pumped out of Clifton Court Forebay, to avoid "the fox guarding the hen house".
- 10% of fertile delta cultivated farmland is proposed to be taken (Chapter 3.3.6.13.2) via eminent domain for experimental mitigation efforts, so more desert can be irrigated. This makes no sense given the additional water requirement / acre and delivery expense to irrigate the southern San Joaquin Valley.
- The BDCP assumes (as part of its Benefit Analysis, Appendix 9A Sec. 9A.5) massive levee failures over the 50 year life of the Plan (2% probability / year), yet we have never had a levee failure due to earthquake in recorded history, and UCLA researchers could not cause a levee to fail with a simulated 7.0 earthquake. Levee failures have occurred due to high water runoff, a time when pumping would not be affected. Additionally, the BDCP benefit is not reduced by earthquake risk to the tunnels, which would suffer the same liquefaction. The State would be better served by strengthening the San Luis dam and the Aqueduct over the Grape Vine, both of which actually straddle earthquake faults.
- No new water sources are identified as part of the BDCP, which makes it a waste of taxpayer / rate payer money. Instead, the State should require mandatory water conservation and re-use, and invest in new sources of water via new water storage and desalination.
- Planting of future permanent crops on desert soil should be denied as part of the BDCP, and when permanent crops are plowed under, only seasonal crops should be allowed.
- The impact of the costs to rate payers is not in the BDCP. Once they find out, support for the BDCP will dwindle.
- The impact on navigation and safety in the Delta has not been adequately addressed.
- Proposed recreation mitigation does not benefit the south Delta (EIR Chapter 15).
- Construction of the BDCP may damage the aquifers, subjecting them to foaming agents and other hazardous chemicals.

- The BDCP allows the X2 salinity line to move inland, jeopardizing water quality and the ability of communities such as Antioch to use the water for drinking or farming. Fisheries will be impacted.
- The EIR grossly understates the impact ten years of construction will have on recreation and the Delta's economy.
- The giant muck ponds are forever in the Delta, and are too close to communities like Discovery Bay.
- Citizens have attended public out-reach meetings such as the one at the Brentwood City Library, where the consultants were unable to answer any of our questions or comments. Promises that they would respond have been ignored, and the only changes made to the BDCP have made recreation near Discovery Bay worse. This is not a transparent process.
- The 57 species being covered under the BDCP excludes many species that are at exactly the same level of risk and that live in the Delta. The BDCP Plan Appendix 1-A was not updated to cover the lesser sand hill crane even though the new alignment goes through a sensitive sand hill crane reserve. The BDCP Plan also does not cover the endangered great blue heron, egrets, geese and other waterfowl that live here and could be adversely affected by water quality degradation.
- Recreation e.g., waterskiing, wakeboarding, and tubing would be effectively eliminated (EIR Ch. 15 Page 268) on the two primary recreational sloughs near Discovery Bay used for those activities: Short-term due to barges and docks; Long-term because the EIR does not include plans to repair damage done to sloughs from docks and barges (e.g., replanting the center berm(s) and levees along primary recreational channels).
- Destroying recreational boating for Discovery Bay residents will seriously impact the marine-based economy that relies on boating.
- The EIR does not adequately capture the economic impact to marinas due to construction. For example, Chapter 15 page 259 states that use of the Bullfrog Landing Marina's boating facilities would not be effected but then goes on to say it is in the construction area and boaters "would be disturbed by noise and visual disruptions and 5 mile/hour zones which could last up to 8 years, resulting in a long-term adverse effect". This shows how the writers of the BDCP know absolutely nothing about boating, fishing, etc. That marina will be affected. Boaters will move their boats to quieter marinas away from the construction zone. The marina will go broke.
- The EIR does not even identify a primary anchorage in the South Delta – Mildred Island – nor label it on any map (e.g., Chapter 15 Mapbook Figure M15-4: Sheet 5 of 8, page 31). There are barge sites planned affecting getting there from the north or the south and noise disruption through the summer will make it unusable. Not having access to an anchorage in the South Delta will affect our communities' economy.
- The BDCP has chosen the wrong alignment and in fact doesn't study the logical alignment. The goal of the Delta Plan was to preserve the scenic beauty of the Delta. A 10 to 15 year construction project through the heart of the Delta is in direct conflict with the Delta Plan. Instead, the construction should be planned in a route with less impact, such as next to Hwy 5 then across from Stockton near where the East Alignment is shown. That would avoid heavy trucks on the levees, avoid trucks on farm and small roads not adequate for heavy traffic (like Hwy 160 and Hwy 4) and construct year round. That would move the pollution to an area where there is already pollution due to high traffic volumes. Minimize the effect on Delta waterfowl and fish. Reduce the impact to Delta farms and communities. Avoid having to dewater small communities and farmers' wells for long periods of time. The muck could be used to build additional lanes for Hwy 5 in the congested area between Stockton and Sacramento.
- The BDCP marketing collateral and press releases announced that the tunnel muck is not harmful after all. Instead, it is now being called "Reusable Tunnel Material" or "RTM". The glossy brochure stated all of the possible benefits and where it could be used (fill in islands to make shallower/better wetlands, improve levees). However, the BDCP Plan Chapter 4 sections about tunnel muck are exactly the same EXCEPT the word "muck" was replaced by "RTM". Yet the write-up still talks about how the RTM needs to be stored in lined ponds so as not to pollute the groundwater and the maps still show large muck ponds.

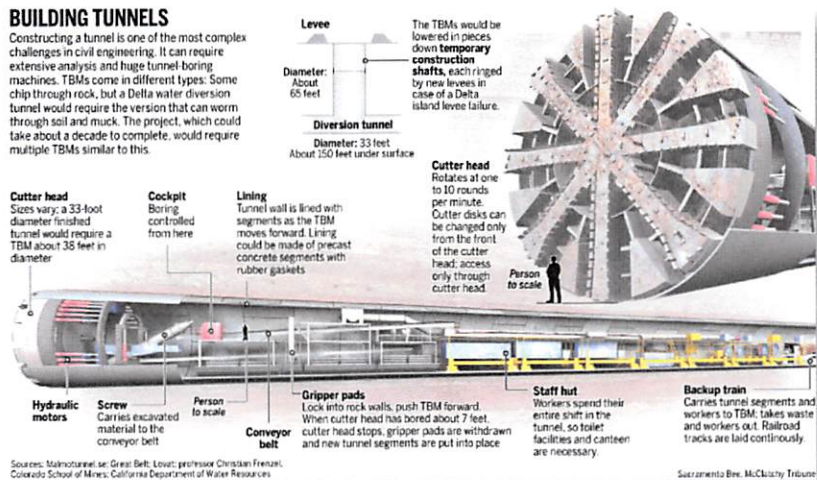
English Chunnel vs. BDCP



BDCP Boring Machines

BUILDING TUNNELS

Constructing a tunnel is one of the most complex challenges in civil engineering. It can require extensive analysis and huge tunnel boring machines. TBMs come in different types. Some chip through rock, but a Delta water diversion tunnel would require the version that can worm through soil and muck. The project, which could take about a decade to complete, would require multiple TBMs similar to this.



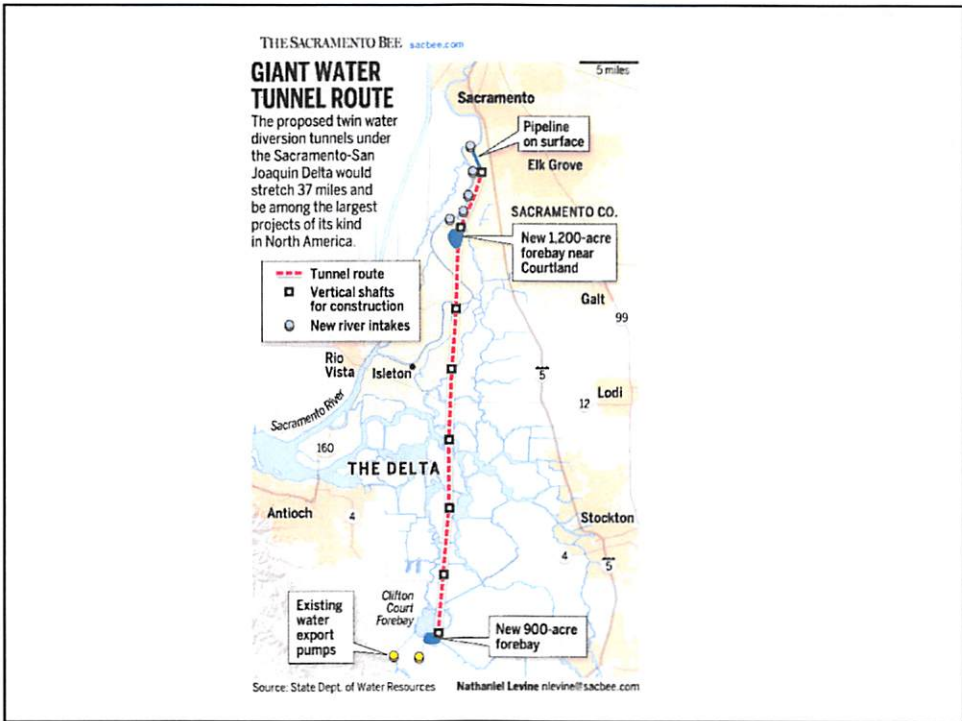
150 deep, 30+ feet wide, and 37 miles long

The tunnels will carry 9,000 CFS capacity = 75,405 gallons of water per second; 14 million gallons per day

Tunnel Muck



53 million cubic yards of tunnel muck is the same as approximately 15 Pyramids of Giza, shown in the San Francisco Financial District



COMMENTS ON BDCP DRAFT EIR/EIS

General directions for making comments: Send your comment(s) by email to BDCP.Comments@noaa.gov. You may type your comment in the body of the email or you may provide the comment as an attachment to the email. If you send the comment as an attachment, save it as a pdf file and attach the pdf file.

You may make several comments in one email or you can send several emails, each with one or two comments.

Comments are more effective if they are personalized. A good way to personalize your comment is to start off by saying a little bit about yourself. For example, "I have a waterfront home in Discovery Bay and have been boating in the Delta for over 20 years." Say as much or as little as you like about your connection to the Delta. Then begin your comment.

Everybody should make this comment:

1) It is outrageous that you have decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.

Everyone should make one or more of the following comments:

2) This is a comment on the Draft EIR/EIS. Representatives from Discovery Bay have requested at BDCP public meetings and through other channels that specific analysis of the project's water quality impacts on Discovery Bay be included in the Draft EIR/EIS. They have not been included. Discovery Bay is different than the rest of the Delta. It consists of 16 shallow water bays, ranging in size from less than an acre to several acres. There is little circulation in the bays. The impacts on water quality in nearby open water sloughs and channels do not translate to water quality impacts in the bays, where reduction in high quality fresh water will translate to much greater degradation of water quality. The EIR/EIS fails to adequately address water quality impacts in Discovery Bay. I respectfully request that site specific analysis be conducted to determine water quality impacts on the bays of Discovery Bay.

3) This is a comment on the Draft EIR/EIS. Operation of the tunnels will cause adverse water quality impacts on Discovery Bay. Representatives from Discovery Bay have requested at BDCP public meetings and in meetings with BDCP representatives that specific mitigation measures be included in the EIR/EIS to offset those negative water

quality impacts on Discovery Bay. The requested mitigation measures include weed control (*Egeria densa*), dredging, and improvements to Discovery Bay's circulation system. These mitigation measures will all improve circulation in Discovery Bay and help to offset the reduction in high quality freshwater flows that will result from BDCP operations. I respectfully request that these, and all other feasible mitigation measures, be included in order to mitigate the water quality impacts on Discovery Bay to a level of insignificance.

4) This is a comment on the Draft EIR/EIS. Much of the purported environmental benefit, and assurance that the project will not cause harm, depends on an ongoing monitoring and adaptive management program. Representatives from Discovery Bay have requested at public meetings and at other times that one or more monitoring stations be included to monitor water quality impacts on the 16 bays of Discovery Bay. Yet no Discovery Bay monitoring stations have been included. The bays of Discovery Bay are heavily used for water contact sports (swimming, sailboarding, paddle boarding, etc). The failure to include adequate monitoring of Discovery Bay water quality is unreasonable. Conditions in the bays of Discovery Bay are not reflected by existing monitoring stations in open water locations. There is much less circulation in the bays of Discovery Bay and numerous other differences in conditions. Adequate monitoring stations in Discovery Bay are required to establish an adequate mitigation and monitoring program.

5) This is a comment on the Draft EIR/EIS. The EIR depends heavily on ongoing monitoring and adaptive management. In order to have a meaningful monitoring program you need to know what the baseline conditions were before the project begins operation. There is no meaningful data included to establish what baseline conditions are in the 16 bays of Discovery Bay. The bays have a different environment and are very different in conditions from the locations of existing monitoring stations relatively nearby from which you have taken your baseline data. In order to have a meaningful monitoring and mitigation program, it is necessary to establish monitoring of Discovery Bay before project operation begins in order to establish accurate baseline conditions. The bays of Discovery Bay are probably the most heavily used area of the Delta for human contact sports. Bacteria levels may already be high at some times due to the presence of invasive weeds. Project operations may take undesirable bacteria levels to unsafe levels. This is a question of human health, particularly the health of children. Establishing adequate baseline data and a robust site specific monitoring program for Discovery Bay are essential ingredients of the monitoring, mitigation, and adaptive management plan that have been entirely overlooked!

6) This is a comment on the Draft EIR/EIS. Air quality impacts due to disruption of boating traffic have not been adequately identified and analyzed in the EIR/EIS. Boat traffic will be restricted due to construction activities and long-term operation of diversion structures and other structures. Numerous 5 mph zones will be put in place and a boat lock will be installed at the head of Old River. Boaters will change their boating patterns to avoid these areas. This will cause increased boat travel, which will increase boat emissions. Larger diesel powered boats in particular will avoid these areas and travel

father to other areas of the Delta. The impact on boat traffic patterns and attendant increase in emissions has not been identified or analyzed.

7) This is a comment on the Draft EIR/EIS. The EIR/EIS fails to analyze a reasonable range of alternatives. Where a reasonably feasible alternative exists that would lessen the adverse environmental impacts of the project the law requires that it be included, analyzed, and considered. By definition an HCP is mitigation. It mitigates the take of species due to effects of the project. Here the project is the operation of the CVP/SWP. The project kills fish because it doesn't leave enough water in the Delta for their needs. The tunnels are supposedly mitigation for the take because they will harvest and move water in a less harmful way at less harmful times than the way water is currently harvested and moved. The BDCP has advertised its "little sip, big gulp" concept as one of the ways that the tunnels will mitigate adverse impacts. When water levels are low or water is critically needed for fish populations, the tunnels will take only small amounts of water. When water is abundant or not needed for fish populations the tunnels will take larger amounts of water. Or so goes the reasoning. But the reasoning is flawed because the BDCP does not include provisions for additional storage (new reservoirs, increased ground water banking, etc). Without someplace to store water that might be harvested at times of abundance the "big gulp" concept is just an illusion. This is particularly true because during large winter storm events reservoirs are typically full and water cannot be harvested because there is no where to put it. The project as currently proposed is a "run of the river" project, not a "little sip, big gulp" project. The ability to move much more water only means that more water can be drawn away from the Delta but not at times that would be less harmful. In fact, since reservoirs are empty or low at times of critical shortage, it means more water can be taken out of the Delta only at times when it is most harmful to take it.

The EIR/EIS states that "developing new water storage" is beyond the scope of the BDCP. Draft EIR/EIS at 3A-81. I disagree. If the "little sip, big gulp" approach is within the scope of the BDCP, why would constructing the infrastructure that would actually make it possible not be within the scope of the BDCP? Is it within the scope of the BDCP to advertise "big gulp, little sip" when it is illusory (and the proponents of the project know full well it is illusory) but not within the scope of the BDCP to actually do what it takes to make the concept a reality?

The project proponents do not have the authority to simply decide that storage is something they don't have to deal with. If including storage is reasonably feasible and lessens one or more significant impacts, you are *required by law to consider it*.

The Draft EIR/EIS should be revised and re-circulated to include a reasonable range of alternatives that include various storage concepts.

8) This is a comment on the Draft EIR/EIS. The EIR/EIS is fatally flawed because it does not include any alternatives that include additional storage. Storage is the key to mitigating the impacts of operation of the CVP/SWP on the Delta and its species. Reasonably feasible storage projects that would lessen the adverse impacts of operation

of the CVP/SWP and lessen the adverse impacts of the tunnels themselves are well known. For example, the NODOS project (also known as Sites reservoir) has been extensively studied. NODOS would draw water from the Sacramento River during winter periods of high water and store it in a new reservoir. The water would be released back into the Sacramento River during periods of shortage. NODOS is well upstream of the proposed tunnel intakes. Therefore, water from NODOS storage could be released into the river, travel downstream to the intakes, and be diverted for export. This would allow diversions with *no net decrease in river flow* at times of critical need. That would clearly decrease adverse impacts of exports. Why doesn't the BDCP include this concept as part of an alternative? The only reason given is that "developing new water storage" is beyond the scope of the BDCP: Draft EIR/EIS at 3A-81. BDCP project sponsors don't have a magic wand that they can wave and make a reasonably feasible alternative "beyond the scope of the BDCP" just because they would rather not deal with it. If it is 1) reasonably feasible; and 2) would lessen adverse impacts, you are *required* to consider it.

9) This is a comment on the Draft EIR/EIS. The Draft EIR/EIS fails to analyze any alternative with a storage component. We all know that the problem in California is that we get too much rain, all at once, in the wrong place, at the wrong time, and erratically. Everyone agrees that climate change will make all of this worse. The *only* solution is to be able to harvest and store the water that comes in great bursts at times when our existing reservoirs are already full. WE NEED NEW STORAGE. Without new storage we continue to draw water from the Delta at times when water is critically low and at times when exports harm fish and other species. If we had water in storage at these times we wouldn't need to draw water (or at least as much water) from the Delta at these times. What about this is so hard to understand? But you must not understand it because none of the alternatives include new storage that would allow water to be harvested at times of abundance, stored, and used at times of shortage. Not only is an alternative, or several alternatives, that include storage reasonably feasible, it is downright unreasonable not to consider them. Please take a deep breath, go back to the drawing board, and use the many talented people at your disposal to come up with real alternatives that solve real problems by BUILDING MORE STORAGE.

10) This is a comment on the Draft EIR/EIS. In order for the BDCP to actually be a less harmful way to export water (which is the rationale for calling the tunnels a "conservation measure") you have to consider alternatives that include new storage. If you don't have storage, you can't take water at times when it is not harmful to take it, because currently at those times our reservoirs are already full. One alternative for additional storage is groundwater banking. Additional groundwater recharge is widely accepted as one of the most feasible and cost-effective means of obtaining new storage. The National Heritage Institute and others have published extensive studies showing this to be true. The California Water Plan also acknowledges that groundwater banking is an important component of solving California's water problems. Why not spend less on massive tunnels, build one smaller tunnel, and use the savings to connect the CVP/SWP to new groundwater recharge facilities throughout the state? California's network of canals connected to the CVP/SWP reaches almost every corner of the state already. The smaller tunnel could operate at capacity at times of abundance (when the currently

proposed massive twin tunnels will be shut down for lack of storage) thus diverting as much or more water with much less harm. This is a reasonable and feasible alternative that has not been included. It should be.

11) This is a comment on the Draft EIR/EIS. I haven't found where you analyze how much more water could be harvested using the existing point of diversion at Clifton Court Forebay *if* there were new storage to accept water at times of high river flow. The Draft EIR/EIS should include an alternative that shows the maximum amount of water that could be diverted at the existing point of diversion if adequate storage were available and that proposes new storage to accommodate those increased diversions. I expect that there is existing data that shows historical times of high flow and historical data of when the smelt are (and are not) present at the Clifton Court intakes. Why can't you plot these two variables and determine projected times of abundance when smelt would not interfere with pumping? Then you could calculate how much water could be exported at these times and calculate how much new storage would be required to hold it. Then you could design storage facilities. After all this is done, you might find the tunnels aren't needed or a much smaller single tunnel would do the job. This all should be considered as an alternative to the currently proposed project.

12) This is a comment on the Draft EIR/EIS. Enough water flows over the flood diversion structures at the Sacramento Weir and Fremont Weir during peak winter storm events in a few days to supply all the water needs of southern California for *several years!* We have plenty of water. We just don't have any way of capturing or storing it. The DBCP should analyze a bold alternative that captures and stores water currently diverted by these weirs. The environmental benefits would be enormous because none of this water flows through the Delta. You could meet export needs *and* drastically reduce the amount of water taken from the Delta. Expensive? Yes. But worth it? Yes. Just think of the environmental benefit of restoring almost 100% of Delta flows to environmental needs.

13) This is a comment on the EIR/EIS. This document is too long! Yes, this is a big project but an EIR/EIS is supposed to be a "concise statement." At some point the legal requirement that an EIR be "concise" has to have some meaning. It appears that this thing has *intentionally* been made so long that the public will be unable to grapple with it. You are *discouraging* meaningful informed public participation by issuing a document that is so long that no one who has a life outside the BDCP can ever get through it. The "public" has to get up in the morning and go to work, take the kids to school, and take care of a household. There is no way that an ordinary citizen can also deal with this monstrous document. The law requires public participation. Not special interest group participation or paid consultant participation, or lawyer participation. Virtually any piece of writing can be made better by editing it and making it shorter. In order to make this process meaningful, you need to cut the EIR/EIS down to one quarter its present size. Yes, editing is hard work! But you will actually find that you have a more coherent and more legally defensible document by doing so. I request that this document be withdrawn, edited, shortened, made accessible to the real public, and re-issued.

COMMENTS ON THE BDCP PROJECT

General directions for making comments: Send your comment(s) by email to BDCP.Comments@noaa.gov. You may type your comment in the body of the email or you may provide the comment as an attachment to the email. If you send the comment as an attachment, save it as a pdf file and attach the pdf file.

You may make several comments in one email or you can send several emails, each with one or two comments.

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Everyone should make one or more of the following comments:

- 2) This is a comment on the BDCP project. I oppose the construction of the twin tunnels. The entire premise of the project is dishonest. The tunnels are not a "conservation measure." They are a piece of water supply infrastructure designed to export more water to southern California-not to save fish or help the Delta. If you want to help species in the Delta recover, the only way to do it is to *reduce exports* from the Delta through conservation, desalination, developing local supplies, and banning wasteful agricultural practices such as growing cotton and rice in the desert. Any honest Habitat Conservation Plan must recognize that there simply is not enough water to allow the Delta species (Salmon, Smelt, Shad) to survive and meet the demands of the water contractors who are behind this project. You have to reduce exports. Period.

- 3) This is a comment on the BDCP project. I am against the construction of the twin tunnels. The BDCP as proposed does not comply with the Delta Reform Act. The Delta Reform Act requires that actions of the state with regard to the Delta shall “reduce reliance on the Delta.” The BDCP is a recipe for vastly *increased* reliance on the Delta. With impending reductions in the amount of water that southern California can take from the Colorado River, there will be increased pressure to take more water from the Delta.
- 4) This is a comment on the BDCP project. This project should be abandoned. It is a waste of taxpayer money and does not comply with the Endangered Species Act. The tunnels are not a conservation measure, they are water supply infrastructure. Simple labeling your project a Habitat Conservation Plan doesn’t make it one in reality and the tunnels have nothing to do with saving species.
- 5) This is a comment on the BDCP project. You have given the water contractors who benefit most from increased exports too much control over the project. The water contractors have publicly stated that they do not believe that exporting water from the Delta causes harm to the Delta. How can they be expected to manage export levels in a way that restores Delta health when they believe that exporting more water never harms the Delta? Do you honestly believe that they will act against their financial interest when it becomes obvious that export levels must be reduced to protect the Delta? Please go back to the drawing board and come up with a better plan.
- 6) This is a comment on the BDCP project. Here’s the problem: you are too clever by half. Labeling the tunnels as a “conservation measure” and putting in place an “adaptive management” plan that gives the water contractors the ability to direct management of the tunnels is a thinly disguised water grab and nothing else.
- 7) Governor Brown will pay a political price for foisting a thinly disguised water grab on the people of northern California. This is nothing but a water grab dressed up as a habitat plan. Tell the governor to get real and drop this hair brained scheme. We need real solutions: conservation, desalination, development of regional self-sufficiency. The Delta can’t support the extravagant water habits of the rest of the state. A real habitat conservation plan for the Delta must include a schedule for significantly reducing exports over the medium and long term. This doesn’t do it.
- 8) The BDCP makes much of a long stakeholder process and considering many different options before deciding on the present twin tunnel plan. But this plan is in substance the same as the disgraced 1982 peripheral canal. The idea is to grab water from far upstream so you will no longer have to be concerned about salinity levels in the lower Delta and can move the intakes away from the smelt habitat. All of that simply is designed to allow you to pump more water with fewer restrictions and no need to be concerned about the health of the Delta. You can call it a habitat conservation plan all you want but that doesn’t make it so. This is

a water grab plain and simple. In fact, it is an insult to the intelligence of the voting public that you think we will believe that a giant canal is a “conservation measure.” Governor Brown will hear about this at the polls if he ever decides to run for office again.

- 9) The simple fact is that there just isn't enough water to support exports and recover the Delta. Any meaningful habitat conservation plan must include a timetable for reducing exports. You can't recover the Delta and continue to export water at current levels, let alone the increased levels that the tunnels will allow. Curtailing exports should begin as alternative supplies, such as desalination, are implemented. The Delta Reform Act requires that reliance on the Delta be reduced. The Endangered Species Act requires that habitat conservation plans actual mitigate the take of species. To comply with law, the BDCP must include a meaningful reduction in export levels.