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BDCP Comments
Mr. Ryan Wulff NMFS
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Mr. Ryan Wulff,

I am writing in regards to the BDCP/CEQA Preferred Alternative. First I want to express my appreciation for the opportunity to comment on this project. I am deeply concerned about the effect this twin tunnel plan will have on the fish species of the delta, and primarily the striped bass. I am a life long resident of the S.F.Bay, and delta region. Since I was a child growing up on the peninsula I have always enjoyed pursuing striped bass. As a sport fishing charter boat Captain striped bass was also one of my customers most sought after prize. Now I am President of the Board of Directors for the California Striped bass Association. As President I represent the concerns of anglers from all over Northern Calif. I fear this project will be the downfall for many of the bay and delta's species.

My concerns specifically regarding striped bass fall into three areas.

First is the effect on the spawn and the ability for striped bass to reproduce. The striped bass spawn in two areas of the delta, the San Joaquin River, and the Sacramento River.[1] The spawn on the San Joaquin has contributed to the striped bass population less and less since the export of delta water commenced in the south delta. The primary cause of this decline is that the screens on the pumps can screen fish but not fish eggs. These fertilized eggs are drawn through the pumps, rather than hatch in the river and survive.

The current striped bass population is being supported by the spawn that occurs in the Sacramento River primarily in the Colusa area, beyond the effects of the current pumping system. I greatly fear that by putting a second intake on the Sacramento River, the same effect will occur on the spawn of striped bass in that area, as has happened to the spawn on the San Joaquin. No amount of habitat restoration or habitat creation will keep striped bass eggs out of an additional intake.

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[1]Turner, Jerry L. 1976. Striped Bass Spawning in the Sacramento and San Joaquin Rivers in Central California from 1963 to 1972. Calif. Fish and Game, 62(2): 106-118.

Second is the removing of fresh water that dilutes the effects of harmful discharges from cities and agriculture Dr. David Ostrach has published[2] scientific research that shows the harmful effect of various pollutants on the survival rate of fertilized striped bass eggs. Without increased controls on the releases of these contaminates, the removal of fresh water's diluting effect these harmful influences will increase and be a further detriment to the striped bass ability to reproduce.

The creating of new "habitat" from existing farmland will do nothing to protect or restore the delta ecology or help the striped bass population. This creation of new habitat may sound good, and seem to fulfill the "co-equal" goal of restoration of the ecology of the delta, but the reality for most of the species of the delta is little or no effect. The habitat that needs to be restored to it's pre-pumping conditions, that would have the biggest positive effect for both striped bass and sturgeon would be the Suisun Bay marshland. The Suisun Marshes are traditionally a brackish water estuary where the salinity varies with the tides. This has been a nursery of sorts for juvenile striped bass and sturgeon as they acclimate from the fresh water of their birth to the salt water they will spend part of their lives in. At the current level of pumping in the delta the Suisun Marshes and the Eastern end of San Pablo Bay have become salt water. This condition has existed for the last ten years. This can be documented by the fact that when the Cal. Dept of Fish and Wildlife do their trawl for sturgeon as part of the population estimate they have found mostly saltwater species in these areas. The only way this habitat can be restored is to allow more fresh water to flow through to the bay, not less.

The species listed in CEQA Preferred Alternative that this plan would some how protect are all native species. Yet as Dr. Ostrach has said the fish of the delta are 90% non-native species. Aren't all the species of the delta worthy of protection? Current estimates show that the activity of fishing brings in over 780 million dollars per year to the economy of the delta. It is our opinion that this plan does little or nothing to protect the fish species of the delta, native or non-native.

The demands for a better water system for California are obvious, but the people of California deserve a better plan than this. Plans such as the RX plan submitted by the Environmental Water Caucus, should be given more attention. The third goal set forth by the Assembly (Reliable Water Source, Restore the Ecology of the Delta, LESS RELIANCE ON DELTA WATER) has largely been ignored. The members of the California Striped Bass Association endorse any plan that reduces exports from the delta, encourages the investment in local sources, invests in rain water capture, and invests in water recycling. We can do better than this!

Respectfully,
James R. Cox

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[2]Ostrach, D. J., J. M. Low, K.J. Eder, S.J. Whiteman and J.G. Zinkl. Maternal Transfer of Xenobiotics and Effects on Larval Striped Bass in the San Francisco Estuary (2008). Proceedings of the National Academy of Science, volume 105, (49), p. 19353 – 19358 (http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2614765/).