

RECLAMATION DISTRICT NO. 544

343 East Main Street, Suite 815

Stockton, California 95202

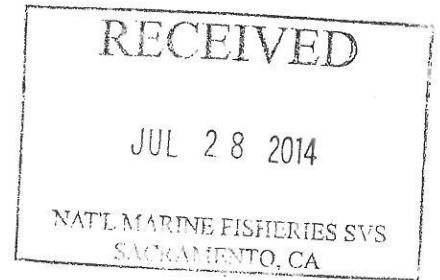
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July 25, 2014

BDCP Comments
Ryan Wulff, NMFS
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814



Re: Bay Delta Conservation Plan Comments

Dear Mr. Wulff:

Central valley reclamation districts, including Reclamation District No. 544 (RD 544) and south and central delta water agencies have consistently and continue to oppose the Bay Delta Conservation Plan (BDCP) and the construction of the proposed Twin Tunnels. Following a review of the 2013 BDCP and the EIR/EIS documents associated therewith, RD 544 steadfastly opposes, and wholeheartedly believes that this project should not proceed.

The BDCP would have a detrimental impact on Delta farmland and habitat, harm State and Federal Parks and Reserves and other established conservation lands. Many of the lands within this reclamation district have been farmed by generation after generation of the same family. In addition to the agricultural benefit these farms provide not just to California but the entire country, they also bring a substantial economic benefit to this community.

Under the Plan, ten percent (10%) of fertile delta cultivated farm land is proposed to be taken through eminent domain process for experimental mitigation efforts so that more desert lands can be irrigated. The proposed mitigation lands are composed of the lands within this reclamation district and represent a prime source for agriculture. This is a reckless proposal considering the additional water requirement per acre and delivery expense to irrigate the southern San Joaquin Valley. Furthermore, before take permits can be issued under a habitat mitigation plan, funding must be shown to be sufficient for all proposed activities, and all financial contributors and planned allocation of funds must be identified. The ability for the public to review and comment the funding plan has been stunted due to the late submittal of said plan.

The BDCP assumes, as part of its analysis, that devastating levee failures will occur over the next 50 years due to earthquake. However, no levee failure due to earthquake has ever occurred during recorded history. Additionally, UCLA researchers tried, but could not cause a levee failure with a simulated 7.0 earthquake. Furthermore, studies provide that if the Twin Tunnels are constructed the Delta residents will see their levees further deteriorated from being further ignored by the state and increased construction traffic. As the public agency assigned the task of maintaining the levees within this district, we take the stability of the levees as serious business.

RD 544 urges that other ways to store and conserve water be explored. The State's limited resources would be better spent on increasing water conservation and re-use and investing in new sources of water by way of capturing and treating storm water, new water storage facilities, desalination efforts and reducing the irrigation of desert lands in the southern Central Valley where severe drainage problems exist. RD 544 strongly encourages the State to continue it's maintenance and support of the California levee systems.

In conclusion, RD 544 respectfully request that you consider these and other comments submitted in opposition of the BDCP and the construction of the proposed Twin Tunnels.

Yours very truly,

By *Pamela A. Forbus*
Pamela A. Forbus, Assistant Secretary