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July 28, 2014

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

RE: BDCP Comment

Dear Ryan:

The Contra Costa Taxpayers Association would like to comment on the proposed BDCP project.

In the BDCP, Chapter 8, 8-12 to 8-13, facility construction costs are estimated in the following manner:

Construction management is estimated at \$14.4 billion. Direct construction costs are at \$9.2 billion. Salary cost figures are not organized. How do we know if salary and pension costs rise within 2 to 10 years? What about increases in construction costs, especially seeing that this document uses 2011 dollars. The figures for the project can be higher with no concrete information to where the funding comes from. More importantly, there is no detailed finance plan as to who is paying for construction, operations, and interest. According to an article dated July 23, 2014 in the San Jose Mercury News entitled, "Property taxes could pay for \$25 billion Delta tunnels without public vote"

Major water districts in California are quietly considering using property taxes -- and possibly raising them without a vote of the public -- to help fund Gov. Jerry Brown's \$25 billion plan to build two massive tunnels through the Sacramento-San Joaquin River Delta.

Why should property taxpayers be encumbered with higher taxes for a water project that will mainly support large interests in the San Joaquin Valley? Why don't property taxpayers have a say as whether or not they want to support this project?

Is a Habitat Conservation Plan like BDCP required to identify funding for its implementation? Funding must be sufficient for all proposed activities and all financial contributions and planned

allocation of funds must be allocated. The proposed habitat conservation plan that goes along with tunnel construction will be paid for by general obligation bonds. Why are California taxpayers being asked to pay for mitigation of the tunnels project that will not benefit the general taxpayer? And what if taxpayers vote against these general obligation bonds? Will the mitigation simply be forgotten and will the Delta be left as an industrial eyesore after construction?

With over 50 significant and unavoidable adverse impacts, the BDCP violates the intent of the 2009 Delta Reform legislation to protect the Delta as listed in Table 31-1 on pages 31-9 to 31-13 of Chapter 31 of the draft EIR/EIS. These impacts will destroy Delta communities thereby dramatically reducing their property tax base.

The Delta Reform legislation of 2009 called for meeting the coequal goals of water supply reliability and ecosystem restoration but said, “The policy of the State of California is to reduce reliance on the Delta in meeting California’s future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency (Water Code Section 85021).” The impacts listed in this table make it clear that Delta communities are not to be treated in an equal manner.

If you have any questions, please feel free to contact me at (925) 289-6900.

Sincerely,

Alex Aliferis
Executive Director