

July 26, 2014

BDCP1788.

✓ BDCP Comments
Ryan Wulff, National Marine Fisheries Service
650 Capitol Mall Su 5-100
Sacramento, CA 95814

Senator Darrel Steinberg
Speaker of Senate
State Capitol, Room 205
Sacramento, CA 95814

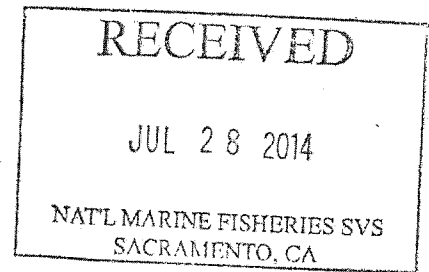
Barbara Boxer
U.S. Senate
501 I Street, Suite 7-600
Sacramento, CA 95814

Dianne Feinstein
U.S. Senate
One Post Street Suite 2450
San Francisco, CA 94104

Congresswoman Doris Matsui
6th District U.S. Congress
Robert T. Matsui U.S. Courthouse
501 I Street, Suite 12-600
Sacramento, CA 95814

Congressman John Garamendi
3rd District U.S. Congress
412 G Street
Davis, CA 95616

Assemblyman Roger Dickenson
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0007



Darian Calhoun
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Sacramento, CA 95816
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Subject: **Proposed Bay-Delta Conservation Plan (BDCP), associated Environmental Impact Report (EIR), Environmental Impact Statement (EIS) and the Implementing Agreement (IA)**

I'm writing to express my concerns/observations about and opposition to the proposed BDCP and related documents.

Summarized points:

- Funding for completion of all proposed conservation measures is not yet secured
- The BDCP should be divided into two separate/distinct projects in order to make both projects more realistic and easily managed
- Combining the "co-equal goals" in the BDCP is deceptive and makes a complex effort even more complex, difficult and costly to administer than it need be
- The Director of Business Forecasting (Jeffery Michael, Phd) at the University of Pacific has demonstrated that the proposed BDCP is not cost effective and the analysis of alternatives in the EIR/EIS is incomplete
- Promoters of the BDCP claim benefits will arise to the economy, jobs, Delta environment, covered//listed species if approved. Said benefits have been overstated to gain acceptability on the part of the public.

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- There is no guarantee that planned environmental restoration activities will be completed
- Proposed Issuance of "Incidental take permits" to SWP/CVP water contractors is unacceptable under any circumstance
- listing several alternatives in the EIR/EIS that are merely variations of the proposed alternative does not amount to real consideration/evaluation of alternatives
- The list of proposed alternatives in the EIR/EIS doesn't include alternatives outside of those proposed by DWR staff and SWP/CVP water contractors indicating a bias to the recommended solution
- A proposed agreement to reimburse county governments in the project area for Property Tax revenues lost due to conversion of real property for BDCP purposes is unacceptable
- Repayment of costs for bonded indebtedness on the part of SWP/CVP water contractors should be evidenced by a written promise to pay secured by the assets of those contractors since they will be the major beneficiaries of increased water diversions
- Uncertainty involving funding of Delta restoration is due mainly to the need for approval of three proposed bond issuances, each requiring approval by a vote of the public
- The statement that proposed diversion will average of 4.5 to 5.6 million acre feet (+ or - 10%) annually from the Sacramento River is ambiguous and unacceptable

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- Stating that Diversion of large volumes of water from the Sacramento River and the south Delta, thereby converting the Delta to a salt water marsh to benefit covered/listed species of fish is not supported by science
- When combined with upstream diversions from the Sacramento River, operations of existing SWP/CVP conveyance facilities will substantially reduce the amount of fresh water flowing through the Delta
- Releases from storage for diversion, eco-system health and/or controlling saltwater intrusion will tend to reduce the amount of water stored in reservoirs upstream of the Delta over the course of a water year
- Many Delta growers and ranchers rely on water diverted directly from the Delta
- The value of the need for redundancy in having two bores (tunnels) is overstated and attempts to rely on creating fear of a potential unanticipated, catastrophic event
- There is no mention of providing support for collection/treatment of polluted run-off from agricultural and/or industrial activities
- There is no mention of regulation of pumping groundwater for irrigation included in the BDCP

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Concerning the BDCP, the following quote sums it up for me: "There is always an easy solution to every problem - neat, plausible, and wrong." (emphasis added)

H. L. Mencken

Sincerely,

A handwritten signature in cursive script, appearing to read "Darian Calhoun", followed by a horizontal line extending to the right.

Darian Calhoun

From: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>
Sent: Wednesday, July 30, 2014 9:10 AM
To: bdcpc comments - NOAA Service Account
Subject: Fwd:
Attachments: 20140728 - Irvine Ranch Water District.pdf; 20140728 - Mario Evangelista - Stockton.pdf; 20140728 - Darian Calhoun - Sacramento (rec'd first 5 pages only - 6 to 17 not enclosed).pdf; 20140728 - City of Orange.pdf; 20140728 - Friend of the River - Disturbing Abudes of the BDCP Process.pdf

----- Forwarded message -----

From: Anita Deguzman - NOAA Affiliate <anita.deguzman@noaa.gov>
Date: Mon, Jul 28, 2014 at 3:00 PM
Subject:
To: Ryan Wulff - NOAA Federal <ryan.wulff@noaa.gov>

I have attached the following comments for your files.

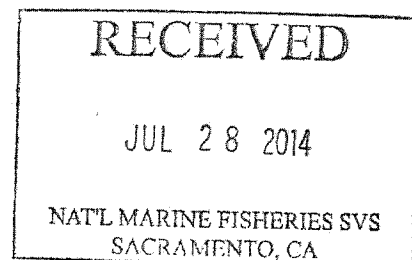
Copies have been made and are in your mailbox - original letters are up front at the reception desk.

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Anita deGuzman  
*Administrative Assistant*  
NOAA Fisheries \* West Coast Region  
U.S. Department of Commerce  
650 Capitol Mall, Suite 5-100  
Sacramento, CA 95814  
[916-930-3600](tel:916-930-3600) - main  
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[Anita.deGuzman@noaa.gov](mailto:Anita.deGuzman@noaa.gov)

January 25, 2014

To: Ryan Wuff, National Marine Fisheries Service  
650 Capitol Mall, Suite 5-100  
Sacramento, CA 95814



From: Mario Evangelista  
727 N. Monroe St.  
Stockton, CA 95203

Re: Comments to the Bay Delta Conservation Plan

## Comments to the Bay Delta Conservation Plan submitted by Mario Evangelista

I am opposed to the proposed Bay Delta Conservation Plan because the "preferred alternative", alternative 4, includes a "dual conveyance" (twin tunnels) diverting Sacramento River water under the Delta instead of through it. This plan is fundamentally flawed for at least three significant reasons.

**Point No. 1: There is no study indicating the state can accurately predict the extent of salt intrusion caused by the twin tunnels. Salt intrusions could be catastrophic. California's fresh water resources, delta habitats and delta farmland are too precious to leave to chance guesswork.**

The relationship between upstream diversions of water headed for the delta and increased salinity in the delta is well understood: decreased outflows cause increased salt intrusions. "Freshwater **inflow** into the Delta is highly correlated with salinity at Delta diversions pumps and is thus an extremely important driver." "The amount of water flowing into the Delta is the single most important determinant of salinity at the export pumps."

([http://www.waterboards.ca.gov/rwqcb5/water\\_issues/drinking\\_water\\_policy/salinity\\_conceptual\\_model/pgs28\\_38.pdf](http://www.waterboards.ca.gov/rwqcb5/water_issues/drinking_water_policy/salinity_conceptual_model/pgs28_38.pdf)) Salinity is driven by the complex interplay of many factors, some of which are out of our control. (ibid) We can monitor salt but we can't predict its future levels.

The BDCP EIR/EIS acknowledges that increased salt intrusion into the delta will be an adverse environmental consequence of the twin tunnels. But how bad will it get? We don't know. Some predict it will eliminate fresh water habitats in the eastern delta harming ducks, egrets and other wildlife, drive salmon and other anadromous fish to extinction due to lack of attraction flows, kill delta agriculture causing the collapse of the Sacramento/San Joaquin Delta regional economy, and contaminate ground water thus eliminating drinking water for the counties on the east side of the delta.



**Until a detailed study can accurately predict the full adverse consequences caused by the twin tunnel water diversions we must reject alternative 4 (twin tunnels).**

Intrusion of ocean water from the west through the bay isn't the only source of salt in the delta. Agricultural runoff brings salts (as well as selenium and other toxic substances) from the south. Ironically, California's massive water conveyance system, the largest on the planet, causes salt to recycle through the environment instead of washing out to sea. The federal Central Valley Project began delivering Northern California water in the 1930ies, primarily for irrigation in the southern portion of the Central Valley. In 1968, the pumps in Tracy began shipping more water south via the Governor Edmund G. Brown California Aqueduct. Irrigation with this water leached salts out of the soil. Some of that salt washed into the San Joaquin River which carried it to the delta. Irrigation districts in Fresno and Kern Counties now push for the twin tunnels to avoid receiving the salts *they* put into delta water!

The drought, coupled with rising sea levels, will increase salt intrusion. This is the time to *decrease*, not increase **diversions** of water nature intended for the delta. The delta is suffering from lack of inflows of fresh water. It needs all the water it can get.

**Point No. 2: BDCP dismisses desalinization as a viable option, ignoring recent technology which will make desalinization cost effective and sustainable.**

Underlying all California's water problems is a simple fact: there is not enough water. Much more water is contracted for than exists in the state. Merely moving water around does nothing to solve this basic problem. Diverting water is not only extremely harmful to the environment but unreliable and ultimately ineffective. To solve California's water problems long term we must stop moving water and start making water. **Our water management system should mandate water recycling and reuse, rain water capture, conservation, and more efficient irrigation practices. These strategies should be exhausted before any further diversions are permitted. We must also develop sustainable desalinization.**

