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Sent: Wednesday, July 30, 2014 8:52 PM
To: BDCP.comments@noaa.gov
Subject: Comments on Draft BDCP and EIR/EIS
Attachments: Let twin tun 7-14-14.doc

attached please find our comments.
South Fork Trinity Up-River Friends

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BDCP Comments
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Via Email to: BDCP.Comments@noaa.gov
July 11, 2014:

Subject: Comments on the Draft BDCP and Draft BDCP EIR/EIS

We oppose the Bay Delta Conservation Plan in concept. Our review of the Draft BDCP Plan and its Draft EIR/EIS only heightens our opposition to the project, reinforcing our view that this project must not go forward.

Originally, the BDCP plan was conceived as a collaboration among south of Delta water export agencies. Their object was to increase exports from the Delta, using water supply “reliability” and ecosystem restoration as their stalking horse. Given the political power and influence of these large state, federal, and special district agencies¹, claims by BDCP officials that the Twin Tunnels will not increase water exports must be taken with many grains of salt. Our comments, attached, demonstrate that BDCP’s Twin Tunnels project will increase contract-based deliveries in wetter years, and will increase Delta exports in dry and drought years as the Tunnels increase water transfer opportunities for California’s water market. The Bay Delta “Conservation” Plan has little to do with conservation. Indeed, the very name of the project is disingenuous at best and deeply cynical at worst. Even the planned tunnels – which are essentially a means for draining the Delta of life-sustaining fresh water in the most expeditious way possible – are perversely referred to as “Conservation Measure 1.”

The BDCP project objective to export more water from the Delta is a foregone conclusion, essentially predetermined from the start of the project and advocated by major south of Delta water exporters referenced above.

Numerous scientific elements of the plan have been questioned by federal regulatory and fishery agencies, the National Research Council and the Delta Independent Science Board. All these entities emphasize that the outcomes of the BDCP are rife with uncertainties. In short, the plan puts billions of taxpayer dollars at risk, with little if any benefit for listed species. Alternative means to address California’s water future and restore the Delta and its species of concern must be examined. The current plan and preferred alternative should be abandoned.

BDCP is an even worse deal for the Delta. Purporting to restore Delta ecosystems and protect its most vulnerable fish species, BDCP would instead further reduce natural Delta outflows to San Francisco Bay, helping push listed, vulnerable salmon, sturgeon, and resident fish species into permanent oblivion. The people of the Delta, especially its poorest and most economically vulnerable, would endure a ten-year construction period only to find

that the remaining catchable fish species would be more contaminated with mercury and selenium than they now are today. They would find that their agricultural, recreational, and regional economies would be decimated by the disruption from BDCP construction activities.

While BDCP now trumpets the risks to California's water supply of massive Delta levee failures due to earthquakes and sea level rise, BDCP lifts not a finger to address these supposed seismic levee issues. At the same time, the Department of Water Resources ignores seismic risks to other components of the State Water Project underlain by active seismic faults at the San Luis Reservoir and in the Tehachapi Range crossing of the California Aqueduct. By the 2030s the Delta residents will see their levees further deteriorated from being ignored by the state, fresh water supplies exported, prime farmlands converted, and beloved fishable, swimmable and drinkable places of recreation ruined from Delta exports to San Joaquin Valley agribusinesses and southern California suburban development. Instead of the thriving regional economy the Delta is today—integrated into the state, regional and global economies—it would by the 2030s be a subject colony of the Bay Delta Conservation Plan self-appointed “authorized entities.”

BDCP and its EIR/EIS are meant to sell the project and try to limit the potential for critical thinking by an otherwise skeptical public. They conceal the Twin Tunnels' ulterior purpose of increasing the State Water Project's delivery capacity for enlarging the market for cross-Delta water transfers from Sacramento Valley “willing sellers.” They reveal that Delta exports won't just increase in the wetter years, they will rise in the drier years as the water market grows in proportion that the Delta is colonized and controlled by BDCP. But by selectively modeling only the contractual water volumes and not the non-contractual amounts transferred via the water market in drier times, BDCP would prefer the public think they are merely “protecting and restoring” supplies already under contract from the effects of climate change and sea level rise.

The BDCP fails to provide an adequate range of alternatives to new conveyance as required by the National Environmental Policy Act and the California Environmental Quality Act; the listed “alternatives” to the tunnels are simply variations on tunnel export capacities and operational rules, none of which have any basis in existing water quality and operational regulations in the Delta. Alternatives that significantly reduce exports from recent historical levels have been ignored despite support from numerous environmental and water agency organizations throughout California, and despite scientific evidence confirming reduced exports and increased outflows to San Francisco Bay directly benefit Delta habitat restoration and fisheries recovery.

Restored habitats cannot substitute for the river flows to and through the Delta that are needed for true recovery of the Delta's common wealth—its fish and its healthful, flowing waters.

Sincerely,

Karen Wilson
South Fork Trinity Up-River Friends