

Letter	Comment #	Comments	Relation to Final EIR/EIS
Save the California Delta Alliance	1	I am writing on behalf of Save the California Delta Alliance to point out legal deficiencies in the Final Environmental Impact Report/ Final Environmental Impact Statement for the Bay Delta Conservation Plan / California WaterFix ("FEIR/S"). We join with the objections presented by a coalition of environmental groups sent to you on January 19, 2017, regarding the improper attempt of the California Department of Water Resources ("DWR") to truncate the California Environmental Act ("CEQA") process. See Attachment One hereto. Attachment One is hereby incorporated into our objections as if fully set forth here. We also join with comments submitted by the Natural Resources Defense Council, Defenders of Wildlife, and the Bay Institute, dated January 26, 2016, which show that the FEIR/S is legally inadequate because recirculation is required to account for new information. See Attachment Two hereto. Attachment Two is hereby incorporated into our objections as if fully set forth here. We also join with the comments submitted by Contra Costa County on January 27, 2017. See Attachment Three hereto. Attachment Three is hereby incorporated into our objections as if fully set forth here.	This comment summarizes the comments contained in the comment letter and expresses general comments on the adequacy of the Final EIR/EIS. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	2	I. The FEIR/S Is Inadequate To Satisfy CEQA; A Legally Adequate Draft EIR Should Be Recirculated At This Point Because The 2015 RDEIR/S Failed To Comply With CEQA. The FEIR/S is legally inadequate under CEQA because it should have been offered for recirculation as a second draft environmental impact report rather than a final EIR. DWR has stated that they are only considering comments on the legal adequacy of the FEIS pursuant to California Public Resources Code section 21171(A) and that they will not respond to comments received on the FEIR/S. The comment period proposed, 30 days, is inadequate. DWR proffers the FEIR/S as the remedy for all the defects in the 2015 RDEIR/S. If such an approach were to be allowed, an adequate period for comments must be allowed and responses to comments and appropriate revisions to the FEIR/S would be required. There is also substantial new information that would require recirculation of another draft EIR pursuant to Public Resources Code section 21092.1 and California Code of Regulations section 15088.5. If the lead agencies are proffering this FEIR/S to fill all of the roles now needed in the CEQA process, it must be circulated for at least 90 days and formal responses to comments must be provided at the end of the comment period. Public Resources Code section 21003(b) requires that "[d]ocuments prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decisionmakers and to the public." See also Remy et al., Guide to CEQA, California Environmental Quality Act (11th ed. 2006) p. 411 ("EIRs must be 'organized and written in a manner that will be meaningful and useful to decision makers and to the public'" (quoting Pub. Res. Code § 21003(b))). As DWR and USBR are well aware, the 2015 Supplemental Draft Environmental Impact Statement / Environmental Impact Report ("2015 SDEIR/S") failed as an informational document. See Comments of Save the California Delta Alliance on the 2015 SDEIR/S (Recirc. Ltr. #2655), and attachment 21 thereto (Recirc 2655-57) ("Delta Alliance 2015 Comments).	This comment expresses the commenter's desire for additional recirculation of the Final EIR/EIS for public review and comment. The Final EIR/EIS does not raise any new or greater impacts than those in the Recirculated Draft EIR/EIS. New material was only used to supplement and enhance the existing analysis in the Recirculated Draft EIR/EIS. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	3	The Delta Independent Science Board ("ISB") is statutorily charged "to provide the best possible unbiased scientific information to inform water and environmental decisionmaking in the Delta," including "independent scientific peer review." (Cal. Wat. Code § 85280(b)(4)). The ISB provided a peer review of the 2015 SDEIR/S. As pointed	This comment includes excerpts from the Delta ISB's review of the Supplemental Draft EIR/EIS. These comments mostly consist of the opinion that the report was incomplete and did not provide sufficient comparison of alternatives. This comment also expresses the commenter's desire for additional recirculation of the Final EIR/EIS for public

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Save the California Delta Alliance	4	<p>II. The Responses To Comments In The FEIR/S Are Inadequate.</p> <p>The response to comments in the FEIR/S are legally inadequate with regard to the failure of the 2015 RDEIR/S to comply with Public Resources Code section 21003(b) and relevant portions of the California Code of Regulations requiring that EIRs meet minimal standards of organization, clarity, and conciseness so as to be useful informational documents.</p> <p>Master Response 38 defends the 35,000 plus word length of the 2017 FEIR/S on grounds that the BDCP / WaterFix is a large complex project. FEIR/S at 1-318. However about half of the length of the 2017 FEIR/S is due to needless word-for-word repetition of the same substance, for pages on end, in different parts of the document. For example, section 16.3.4.2 describes socio-economic impacts of Alternative 4A. FEIR/S at p. 16-276. Most of the text in section 16.3.4.2 covering impacts ECON-1–ECON-15 is</p>	<p>As included in the response to STCDA’s comments on the RDEIR/EIS (Comment 2655-3), DWR and Reclamation balanced readability with thoroughness in describing and analyzing the new alternatives in the RDEIR/SDEIS. For additional detail please see response to Comment 2655-3 on the RDEIR/S, included in Volume 2 of the Final EIR/EIS.</p> <p>Master Response 38, of Volume 2, Final EIR/EIS explains “Contrary to the suggestions of some commenters, CEQA imposes no mandatory limit on the length of a draft EIR. Although the State CEQA Guidelines encourage, but do not require, EIRs for proposals of unusual scope or complexity to “normally” be less than 300 pages, in practice the page limits recommended by the State CEQA Guidelines are frequently exceeded because CEQA places a greater focus on adequacy of the analysis and the readability of the document than on document length.”</p>

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Save the California Delta Alliance	5	<p>Master Response 38 failed to respond to the specific, detailed criticism presented by the ISB. Likewise the response to the ISB’s peer review of the EIR fails to engage the criticisms and suggestions for repair provided by the ISB. The ISB peer review and response is found at Recirc. Ltr. #2546. The ISB commented that “[t]he current draft [the 2015 RDEIR/S] lacks key information, analyses, summaries, and comparisons. The missing content is needed for evaluation of the science that underpins the proposed project. Accordingly, the Current Draft fails to adequately inform weighty decisions about public policy.” Recirc. 2546-61. The ISB comment then goes on to specify in detail what the missing content is. Recirc. 2546-61–2546-68. The Response to the ISB’s missing content observations is inadequate as shown below.</p>	<p>This comment is a summary of concerns raised below. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p> <p>For responses to comments from the DSC and Delta Independent Science Board on the RDEIR/SDEIS, see comment letter 2546, Volume 2, Final EIR/EIS.</p>
Save the California Delta Alliance	6	<p>2546-61: Missing content pointed out by the ISB is “[d]etails on adaptive management and collaborative science.”</p> <p>The response says “in regard to missing content refer to comment 2546-54.” The response to comment 2546-54 does not use the words “adaptive management” and says that “the Final EIR/EIS is not intended to be the sole document the State and federal agencies will use in its decision-making.” The FEIR/S states that it can avoid significant adverse environmental impacts through the use of adaptive management. As the ISB notes, “[t]he Current Draft relies on adaptive management to address uncertainties in the proposed project, especially in relation to water operations.” ISB DEIR/S Review at p. 5. See also FEIR/S at p. ES-35 (describing role of adaptive management).</p> <p>Yet no adaptive management plan was described in the 2015 RDEIR/S or anywhere else. As the ISB described it, the “lack of a substantive treatment of adaptive management in the Current Draft indicates that it is not considered a high priority or the proposers have been unable to develop a substantive idea of how adaptive management would work for the project.” ISB DEIR/S Review at p.5. Reviewers could not comment on this key aspect of the project in the 2015 RDEIR/S comment period because there was nothing to comment on except the absence of this key element. To</p>	<p>DWR’s direction to the commenter to reference comment 2546-54 is intended to refer the commenter to the primary objective. It is not intended to address the specific information the commenter felt was missing in this comment (in this case, adaptive management).</p> <p>The response to comment 2546-61 also refers the commenter to Comment 2546-7 (“See response to comment 2546- 7, regarding adaptive management. ”) which responds to the Delta Stewardship Council’s comment/request for an adaptive management program.</p> <p>The response to comment 2546-61 is detailed, and explains to the commenter that “An EIR/EIS does not call for a comprehensive summary of adaptive management principals. However, adaptive management has been, and will continue to be, a key component to this project. For a discussion in this Final EIR/EIS about the adaptive management and monitoring program refer to Section 3.6.4.4 of Final EIR/EIS Chapter 3.”</p> <p>Section 3.6.4.4, <i>Adaptive Management and Monitoring Program</i>, of Chapter 3 of the Final EIR/EIS describes the adaptive management anticipated for this project as requested by the commenter.</p>

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		the extent the lead agencies have begun to have an idea how adaptive management will work, the public is entitled to a comment and response period on this key aspect of the project as it is reflected in the FEIR/S.	This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	7	<p>2546-62: Missing content pointed out by the ISB is “[m]odeling how levee failure would affect operation of dual-conveyance systems. Steve Centerwall of ICF told us (Delta Independent Science Board) on August 14 that modeling of the effects of levee failure would be presented in the Final Report.”</p> <p>The Response says “in regard to missing content refer to comment 2546-54.” The Response to comment 2546-54 says nothing about levee failure or modeling. The Response to comment 2546-62 refers the reader to Appendix 6A in the final FEIR/S for information on flood protection standards and notes that levee maintenance and safety in the Delta are important. The reviewer finds that Appendix 6A directs him to Appendix 3E for information about levee failure. Appendix 3E, in turn, contains section 3E.3.4 “Potential Effects [of seismic levee failure] on SWP and CVP Water Supply.” No discussion of the modeling, or any modeling of the effect of levee failure on water supply, requested by the ISB was found in section 3E.3.4. This critical component was not available to the reviewer in 2015 and is not available now. Response to comment 2546-62 is inadequate. All the responses are cut-and-paste-mix-and-match phrases sprinkled around almost at random. A real response to the ISB’s request for the modeling it was promised would be to say that the modeling was done and where it can be found; or to say that the modeling was not done and why it was not needed.</p>	<p>DWR’s direction to the commenter to reference comment 2546-54 is intended to refer the commenter to the primary objective. It is not intended to address the specific information the commenter felt was missing in this comment (in this case, levee failure modeling).</p> <p>The response to comment 2546-62 also refers the reader to Master Response 16 of Volume 2, Final EIR/EIS, which discusses the potential for a seismically induced levee failure to affect Delta water exports and the potential for the proposed project to withstand a seismic event.</p> <p>Modeling of levee failure shows that when a Delta levee is breached, the island protected by the levee may be inundated and water quality in the surrounding waterways may be greatly affected (as described in Final EIR/EIS Appendix 3E). Master Response 16, of Volume 2, Final EIR/EIS also states “While response to salinity intrusion is not proposed as part of the project, the new conveyance facilities could add to the options available to manage an emergency response to salinity intrusion in the south and west Delta. It would be speculative however to estimate a specific response to salinity intrusion as the specific levee failure circumstances would dictate the appropriate response.”</p> <p>As stated above, assuming the conveyance facilities survive a seismic event, the operation and response to salinity intrusion (the concern for which the commenter requested modeling of operations after levee failure), would be determined based upon the specific levee failure circumstance, and it would be entirely speculative to perform modeling of these unknown scenarios.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	8	2546-64: The missing content pointed out by the ISB is “Analysis of the effects of climate change on expected water exports from the Delta.” The Response directs the reader to a “new appendix, Appendix 29D,” that provides an analysis of the effects of climate change on project operations. This is substantial new information and the public should be allowed an adequate time to comment on it and responses and possible revisions to the FEIR/S should be provided.	<p>This comment expresses the commenter’s desire for additional recirculation of the Final EIR/EIS for public review and comment of Appendix 29D.</p> <p>The Final EIR/EIS does not raise any new or greater impacts than those in the Recirculated Draft EIR/EIS. New material was only used to supplement and enhance the existing analysis in the Recirculated Draft EIR/EIS. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	9	2546-66: The missing content pointed out by the ISB is “[p]otential effects of changes in operations of the State Water Project (SWP) and Central Valley Project (CVP), or other changes in water availability, on agricultural practices in the San Joaquin Valley.” The Response directs the reader to new section 30.3.4.1. This is substantial new information and the public should be allowed an adequate time to comment on it.	<p>This comment expresses the commenter’s desire for additional recirculation of the Final EIR/EIS for public review and comment of Section 30.3.4.1.</p> <p>The Final EIR/EIS does not raise any new or greater impacts than those in the Recirculated Draft EIR/EIS. New material was only used to supplement and enhance the existing analysis in the Recirculated Draft EIR/EIS. This comment does not raise any substantive new environmental information or analysis that was not previously</p>

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Save the California Delta Alliance	10	<p>2546-67: The missing content, and one of the ISB’s biggest concerns,” is “[c]oncise summaries with informative graphics. The current draft states that comparisons of alternatives will be summarized in the Final Report ... other gaps have been rationalized by deeming impacts ‘too speculative.’” The missing information is, for the most part, still missing. The graphs purporting to compare alternatives that were added, are inadequate, false, and misleading. For example new Figure 6-0 purports to compare impacts on river flows of the project across alternatives. However, it compares only changes in flood flow conditions and shows only minor differences between alternatives (1%–3%). This is a continuation of dissembling and misleading approach to analysis employed by DWR throughout the BDCP process. How the project effects the river at flood stage is not important to most reviewers. What is important is how the project affects the flow of the river at normal and, particularly, at times of low flow.</p> <p>In fact the project proponents have admitted that the project will reduce the flow of Steamboat Slough by 35% or more at the most critical times. Attachment Four (SHR-350) hereto is a set of graphs prepared by DWR only under order from the SWRCB as a part of the WaterFix water rights change hearings and in response to the demands of Protestant Snug Harbor Resort (located on Steamboat Slough). The graphs show that in July of a dry year, the flow of Steamboat Slough will be reduced by 35% or more by all of the action alternatives compared to the no-action alternative. The charts also show that the flow of the Sacramento River downstream of Georgiana Slough will be reduced by 35% or more in July of a dry year. Other charts introduced into evidence by DWR at the SWRCB water rights hearings show project operations reducing flow of the Sacramento River from approximately 21,000 cfs to approximately 13,000 cfs. See Attachment Five (Exhibit DWR-5, p.25) attached hereto. Attachment Five is DWR’s depiction of CWF’s diversions of Sacramento River water at a time of year when diversions are restricted by operating rules that are not in place in the summer months, when an even larger percentage could be diverted. Attachment Seventeen attached hereto is a peer review of the CWF project, referred to as WaterFix Aquatic Science Peer Review, which was introduced into evidence at the SWRCB hearings as Exhibit SCDA-1. The peer review finds that CWF will “effect major changes in hydrodynamics and associated transport throughout the system downstream of the North Delta Diversions.” Attachment One at p.15.</p> <p>Figure 6-0 is misleading and inaccurate and does not respond to the ISB’s request for “informative graphics.” Likewise, new summaries at the beginning of each resource chapter along with illustrative graphics are mostly misleading and inadequately respond to the ISNB’s comment.</p>	<p>Figure 6-0 was prepared to summarize relatively complex model results presented in the text of Chapter 6 and Appendix 5A, Section C, of the EIR/EIS.</p> <p>The information presented by DWR as referred to in this comment related to CALSIM II and DSM2 model results is presented in Appendix 5A, Section C, of the Final EIR/EIS.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	11	<p>III. The FEIR/S Fails To Disclose, Analyze, and Mitigate Significant Adverse Environmental Impacts On Historic and Cultural Resources, Socio- Economics, Community Cohesion, And Delta As Place.</p> <p>A. The Northern Delta Near Intake And Related Infrastructure Construction.</p> <p>The immediate area of construction encompassing the three intakes, forebay, and</p>	<p>This comment disagrees with the location of the intakes in the Northern Delta. Commenter asserts that the towns of Locke, Clarksburg, Hood and Walnut Grove’s community identity will be permanently impacted by the project.</p> <p>As captured in the response to the commenter’s Comment 2655-26 on the Recirculated Draft, Chapter 16 of the Final EIR/EIS and RDEIR/SDEIS Appendix A (Socioeconomics) identifies the unique features of the Delta and describes the</p>

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		<p>associated construction facilities described in Alternative 4A is located in the most historic, scenic, and culturally significant area of the Delta. The massive construction effort extending over many years will destroy the fragile small-towns and community identity of this special place. The towns of Locke, Clarksburg, Hood, and Walnut Grove will be destroyed, never to regain their identity again. A letter from the The FEIR/S correctly identifies the character of the northern Delta but fails to apprehend the impact that tunnel construction and operation will have on these communities. The FEIR/S states that:</p> <p>The Delta Reform Act of 2009 designated a number of unincorporated Legacy communities in the Delta, including Bethel Island , Clarksburg, Courtland, Freeport, Hood, Iselton, Knightsen, Rio Vista, Locke, and Walnut Grove. These communities exemplify the Delta’s unique cultural history and contribute to the sense of the Delta as a place.</p> <p>FEIR/S at p. 16-3. In addition to being a legacy community, the town of Locke is a National Historic District and “the only town in the United States built primarily by early Chinese immigrants.” Cal. Pub. Res. Code § 32301(f). According to the National Park Service, Locke is the “largest, most complete example of a rural, agricultural Chinese American community in the United States.” A letter from the Chairman of the Locke Management Association, Russell Ooms, is attached hereto as Attachment Six. Mr. Ooms is the best position to judge the effect of the project on his sensitive community.</p> <p>Locke retains its original historic buildings and wooden sidewalks. It is also still home to a thriving ethnically Chinese community. Locke, Clarksburg, Hood, and Walnut Grove are all set in a gentle, quite, rural waterscape and landscape. The setting is much as it was when Locke was built in the early twentieth century. This is all one historic, culturally significant, vernacular landscape that is interwoven with the historic towns and buildings that adorn it. These are small towns where old men and old women gather at public places; at the library; at the small restaurants and cafes; at the park bench.</p>	<p>potential effects on Delta communities. Final EIR/EIS Chapter 15 contains a discussion on impacts to recreation. Impacts to agriculture are identified and discussed in Final EIR/EIS Chapter 14. Please see Master Response 24, of Volume 2, Final EIR/EIS for information on the Delta As a Place.</p> <p>As discussed in Final EIR/EIS Chapter 16, under Impact ECON-3, Changes in Community Character as a Result of Constructing the Proposed Water Conveyance Facilities, additional regional employment and income could create net positive effects while also creating negative effects. However, because these impacts are social in nature rather than physical they are not considered impacts under CEQA. Implementation of mitigation measures and environmental commitments related to those actions which would negatively effect community character are still anticipated to reduce these impacts.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	12	<p>The FEIR/S recognizes but vastly underestimates the negative impact that the project will have on these communities:</p> <p>Construction activities associated with water conveyance facilities would be anticipated to result in changes to the rural qualities of these communities during the construction period ... particularly for those communities in proximity to water conveyance structures including Clarksburg, Hood, and Walnut Grove. Effects associated with construction activities could also result in changes to community cohesion if they were to restrict mobility, reduce opportunities for maintaining face-to-face relationships, or disrupt the functions of community organizations or community gathering places. Under Alternative FA, several gathering places that lie in the vicinity of construction areas could be indirectly affected by noise and traffic associated with construction activities, including Delta High School, the Clarksburg Library, Clarksburg Community Church ... and several marinas or other recreational facilities.</p> <p>FEIR/S at p. 16-279. The CEQA conclusion states that impacts will be mitigated to a</p>	<p>This comment is similar to the one above, and expresses the commenter’s opinion that local communities will be permanently negatively impacted by construction of the project. The commenter also objects to the determination that mitigation measures will not reduce Impact ECON-3 to an insignificant level.</p> <p>As captured in the response to the commenter’s Comment 2655-26 on the Recirculated Draft, Chapter 16 of the Final EIR/EIS and RDEIR/SDEIS Appendix A (Socioeconomics) identifies the unique features of the Delta and describes the potential effects on Delta communities. Final EIR/EIS Chapter 15 contains a discussion on impacts to recreation. Impacts to agriculture are identified and discussed in Chapter 14 of the Final EIR/EIS. Please see Master Response 24, of Volume 2, Final EIR/EIS for information on the Delta As a Place.</p> <p>As discussed in Final EIR/EIS Chapter 16, under Impact ECON-3, Changes in Community Character as a Result of Constructing the Proposed Water Conveyance Facilities, additional regional employment and income could create net positive effects while also</p>

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Save the California Delta Alliance	13	<p>The mitigation measures won't work. They are cookie-cutter-cut-and-paste garble that clearly was not thought through in any intelligent way against the real situation at hand. The noise abatement plan states that "a temporary sound barrier shall be constructed between the sensitive area and the construction related noise source." Nine years is not temporary and the entire towns would have to have walls built around them. Likewise, there is no way to mitigate the noise on the river from pile driving and constant barge traffic. Activity on docks and boats will be driven away.</p>	<p>As part of Mitigation Measure NOI-1a, additional measures may be used to limit construction noise. In combination with these measures a temporary sound barriers will only be constructed in areas where construction-related noise will cause noise levels to exceed the daytime ambient level by 5 A-weighted decibels (dBA), or 60 dBA, whichever is greater, at noise sensitive receptors.</p> <p>Although construction for the entire project would occur over a period of years, in many areas along the conveyance construction would be intermittent and short-term, as components of the project are completed. Some features such as intakes would take a longer amount of time to build, but would still be a temporary effect, as the period of project construction accounts for phasing of all components of the project. In terms of noise, this will affect different areas at different times.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	14	<p>There is a pro-forma barge operation plan as a part of mitigation measures but barges are big and noisy and there will be a lot of them making frequent trips. The effect of barges on riverside and boating experiences cannot be mitigated to a level of insignificance. This is a permanent significant adverse environmental impact that is not disclosed. Riverside noise and congestion mitigations include "Provide Notification of Maintenance Activities in Waterways." FEIR/S at p.3B-12. Notification of ongoing, heavy, noisy barge work will not reduce the amount of boaters who will abandon the area permanently.</p>	<p>As stated in response to comment 2655-27, Mitigation Measure TRANS-1a would reduce impacts on marine navigation by development and implementation of site-specific construction traffic management plans, including specific measures related to management of barges and stipulations to notify the commercial and leisure boating communities of proposed barge operations in the waterways. As discussed in Final EIR/EIS Chapter 23, Noise, as part of the project, DWR would implement the noise abatement plan as outlined in Final EIR/EIS Appendix 3B, Environmental Commitments, AMMs, and CMs. Mitigation Measures NOI-1a and NOI-1b would further reduce noise impacts on sensitive land uses. Although implementation of these measures would reduce the impact, it is not anticipated that feasible measures would be available in all</p>

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			<p>situations to reduce construction noise to levels below the applicable thresholds.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	15	DWR proposes to offer the construction site as a tourist attraction. It hopes people who have abandoned the area because they go there for peace and quiet and lack of congestion and are driven away by DWR's destruction of all those qualities will come back to gawk at the construction sites from viewing platforms offered by DWR. FEIR/S 3B-79. This is absurd.	No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	16	The whole undertaking is so large and unpleasant and of such a long duration, tourists and others who now regularly visit the area will scratch it off of their list of places to visit. Residents will move away and businesses will close. The FEIR/S recognizes the possibility of abandonment but then seems to forget it. Negative "visual or noise-related effects on residential property could lead to localized abandonment of buildings." FEIR/S at p. 16-279. Abandonment, once begun, has a negative feedback loop. Entire communities could fold under the long strain.	No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	17	<p>The FEIR/S fails to disclose significant adverse impacts that will utterly destroy the most scenic and culturally rich part of the Delta. The lead agencies could not have picked a spot more vulnerable to destruction from large-scale construction activities than this one.</p> <p>A serious analysis of impacts and exploration of alternatives, such as locating the intakes elsewhere, must be undertaken. The effect of construction on the adjacent communities has not been considered as a factor in siting intakes.</p>	<p>This comment states that significant adverse impacts were not included in the Final EIR/EIS and siting of the project construction site needed additional considerations.</p> <p>As captured in response to Comment 2655-1 on the Recirculated Draft EIR/EIS, the alternatives included in the EIR/EIS represent a legally adequate reasonable range of alternatives and the scope of the analysis of alternatives fully complies with both CEQA and NEPA. The specific proposals that were considered but ultimately rejected by the Lead Agencies are discussed in Final EIR/EIS Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1. Appendix 3A thoroughly explains why various proposals were not analyzed in the EIR/EIS. In addition, Master Response 4, of Volume 2, Final EIR/EIS provides an overview of the alternatives development and screening process.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>
Save the California Delta Alliance	18	<p>B. Discovery Bay.</p> <p>The project will have undisclosed significant adverse environmental impacts on the waters of Discovery Bay, including increased water temperature, increased salinity, increased nutrient load, increased abundance of invasive aquatic species including egeria densa, curly leaf pond plan, Asiatic Clam, and toxic blue-green algae. Attachment Seven hereto is expert testimony of Michael Brodsky regarding impacts of CWF on the waters of Discovery Bay and the Delta in general. Attachment Eight hereto is the expert testimony of Tom Burke regarding the undisclosed, unmitigated, significant adverse impacts of CWF on Discovery Bay. Mr. Burke's expert qualifications are provided in Attachment Nine hereto. Attachments Eleven and Twelve hereto are respectively the expert testimony of Erik Ringelberg regarding impacts on Discovery Bay and his expert qualifications. Attachment Thirteen hereto is the expert testimony of Michael Guzzardo on the socio-economic impacts of the project on Discovery Bay. Attachments Fourteen and Fifteen respectively are the testimony of Frank Morgan and</p>	<p>This concern regarding water quality has been addressed in the response to Comment 2656-1 on the Recirculated Draft.</p> <p>Modeling concluded – "Water circulation and exchange in Discovery Bay, as with other terminal/dead-end sloughs in the Delta, is expected to be dominated by tidal effects and local withdrawals and agricultural returns. The proposed project will not have direct effects on agricultural or other water withdrawals or returns local to Discovery Bay. Reductions in pumping from the existing South Delta pumping plants will affect flows in Old River, but the effects of these changes on Discovery Bay exchange and circulation is expected to be small relative to other factors (i.e., tidal effects and local withdrawals and agricultural returns). The largest effect on water quality of Discovery Bay is expected to be the change in its source water, which is Old River, as a result of the replacement of Sacramento River water with San Joaquin River water. This change is reflected in water quality modeling results presented for Old River at Rock Slough."</p>

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		<p>Janet McCleery on the social cohesion impacts of the project on Discovery Bay.</p> <p>The large scale construction activity near Discovery Bay and in the sloughs of the south Delta will have a devastating impact on Discovery Bay. Discovery Bay is a community of waterfront homes with attached docks built on a series of bays feed by Indian Slough and Kellogg Creek. The base of Discovery Bay's economy and social cohesion is boating and watersports. There will be substantial blockage of sloughs used for watersports in the south Delta The effect will be so substantial that visitors who trailer their boats to launch at Discovery Bay will scratch Discovery Bay off of their list of places to Boat. They can go elsewhere. There is also a dry stack boat storage at the Discovery Bay Marina where people who do not live in Discovery Bay (do not have their own docks) keep their boats. Users of the Discovery Bay Marina storage facility can simply move their boats elsewhere in order to escape the Barge activity in the waters around Discovery Bay.</p> <p>The combined destruction of areas to engage in watersports and the degradation of water quality in Discovery Bay will lead to large scale abandonment of the community. As Mr. Guzzardo notes, real estate agents are already legally obligated to disclose to potential buyer of waterfront property the negative impact the tunnels will have on property values and recreational opportunities. The severe unmitigated adverse impacts on water-related recreation will translate into all of the adverse physical impacts associated with abandoned communities. No doubt there will also be a substantial increase in boating accidents when construction activities commence (before boaters abandon the area) causing serious injury and death. It is impossible to put that many barges in a heavily used recreational boating area without an increase in boating accidents. DWR has a terrible record of water safety, regularly leaving barges unlit and unattended at night. Mitigation plans cannot reduce the level of impacts on recreation and boating safety to a level of insignificance.</p> <p>Attachment Sixteen hereto are the comments of the Recreational Boaters of California providing expert analysis that the mitigation measures are inadequate to mitigate impacts on recreational boating.</p>	<p>As there is little change to the water quality in Discovery Bay there are no significant socio-economic impacts anticipated. This comment does not raise any substantive new environmental issues that were not previously addressed in Volume 2 of the Final EIR/EIS.</p>
Save the California Delta Alliance	19	<p>C. Adverse Environmental Impacts On The Delta And Delta Species.</p> <p>We joint with the other commenters and the USEPA comments on the FEIR/S noting the significant unmitigated adverse environmental impacts on species and their habitats and calling on the lead agencies to develop alternatives that do not cause those impacts.</p> <p>Thank you for considering these comments. We believe the comment period should remain open and will submit additional comments in the coming days.</p>	<p>This is a general comment requesting additional alternatives and a longer comment period. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.</p>

Letter	Comment #	Comments	Relation to Final EIR/EIS
Save the California Delta Alliance	ATT 1	January 19, 2017 OBJECTION TO 1/30/17 CLOSE OF WATERFIX REVIEW	This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S. Please see Federal Register Notice Period for the California WaterFix Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) letter regarding requests for extending NEPA cooling off comment period.
Save the California Delta Alliance	ATT 2	FW: NRDC/TBI/DOW Comments on WaterFix Final EIS/EIR	This attachment relates to the Section 7 and Biological Opinion process and associated analyses, which are separate from the CEQA/NEPA process. See Section 5, Endangered Species Compliance, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on the BiOp and 2081(b) process.
Save the California Delta Alliance	ATT 3	Re: Contra Costa County's Comments on Bay Delta Conservation Plan/California WaterFix Final EIR/EIS	See comment table for Contra Costa County. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
Save the California Delta Alliance	ATT 4	Dry Year Average (Sac Valley 40-30-30 Index) Current Climate	This attachment is Exhibit SHR-352 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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Save the California Delta Alliance	ATT 5	Sacramenot River Proposed DEC-APR NDD Bypass Flow Rules	This attachment is Exhibit DWR-5 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 6	Locke Management Association	This is a letter about Locke and an extension request that was submitted during the NEPA cooling off period. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S. Please see Federal Register Notice Period for the California WaterFix Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) letter regarding requests for extending NEPA review period.
Save the California Delta Alliance	ATT 7	TESTIMONY OF MICHAEL A. BRODSKY	This attachment is Exhibit SCDA-48 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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Save the California Delta Alliance	ATT 8	TESTIMONY OF TOM BURKE	This attachment is Exhibit SCDA-35 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 9	Qualifications of Tom Burke	This attachment is Exhibit SCDA-37 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 10	Charts accompanying Burke testimony	This attachment is Exhibit SCDA-26 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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Save the California Delta Alliance	ATT 11	Testimony of Erik Ringelberg	This attachment is Exhibit SCDA-33 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 12	STATEMENT OF QUALIFICATIONS ERIK RINGELBERG	This attachment is Exhibit SCDA-32 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 13	Testimony of Michael Guzzardo	This attachment is Exhibit SCDA-24 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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Save the California Delta Alliance	ATT 14	Testimony of Frank Morgan	This attachment is Exhibit SCDA-25 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 15	Testimony of Janet McCleery	This attachment is Exhibit SCDA-22 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
Save the California Delta Alliance	ATT 16	RBOC News letter	This is a news article about recreation and navigation. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.

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Save the California Delta Alliance	ATT 17	Independent Review Panel Report for the 2016 California WaterFix Aquatic Science Peer Review	This attachment relates to the Section 7 and Biological Opinion process and associated analyses, which are separate from the CEQA/NEPA process. See Section 5, Endangered Species Compliance, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on the BiOp and 2081(b) process.
Save the California Delta Alliance	ATT 18	Request for graphical representation of the effects on Sacramento flow of the rules for water diversion and the amount of water that will be diverted from the North Delta (Specific panel request #1)	This attachment relates to the Section 7 and Biological Opinion process and associated analyses, which are separate from the CEQA/NEPA process. See Section 5, Endangered Species Compliance, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on the BiOp and 2081(b) process.
Save the California Delta Alliance	ATT 19	Request for graphical representation of the effects on Sacramento flow of the rules for water diversion and the amount of water that will be diverted from the North Delta (Specific panel request #1)	This attachment relates to the Section 7 and Biological Opinion process and associated analyses, which are separate from the CEQA/NEPA process. See Section 5, Endangered Species Compliance, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on the BiOp and 2081(b) process.