

Sacramento River Preservation Trust



Sacramento, The River City Chapter



Catch More Fish. GOLDEN WEST WOMEN FLYFISHERS



### CA Save Our Streams Council



NORTH  
COAST  
RIVERS  
ALLIANCE

June 27, 2012

The Hon. Ken Salazar  
Secretary  
U.S. Department of the Interior  
Washington DC

The Hon. Rebecca Blank  
Acting Secretary  
U.S. Department of Commerce  
Washington DC

Dear Secretary Salazar and Acting Secretary Blank:

We agree with the twelve northern California lawmakers who called on Obama administration officials to delay the “imminent announcement” of the proposed “expensive and potentially damaging water diversion project” until fundamental details of the Bay Delta plan are made available. These Congressional Members warned that the unpopular plan to build a peripheral canal or tunnels – as described in a recent briefing in Washington and public meetings in Sacramento –

*“raises far more questions than it answers, and appears to turn the maxim of ‘policy before plumbing’ on its head.”*

Departments of Interior and Commerce are poised to join with the State of California to recommend the construction of a multi-billion dollar plumbing project before defining how much it will cost, how it will be operated, or how much water it will produce without environmental damage. The State of California proposes construction of two world-record-size tunnels capable of taking nearly all of the average freshwater flow of the Sacramento River – 15,000 cubic feet per second—away from the San Francisco Bay Delta Estuary. Recent briefings indicate diversion would initially be limited to 9,000 cubic feet per second. And proposed exports levels from the San Francisco Bay Delta Estuary as high as 5.3 and 5.9 million acre feet—higher than either state water board officials or federal scientists have determined are safe to protect public trust resources.

The Sacramento River is at the heart of the federal Central Valley Project and is the most pristine source of water for the remaining Central Valley salmon runs and the estuary. Its diversion would have devastating ecological and economic impacts on Sacramento Valley communities, farms, streams, and myriad species. Despite that, the proposed project is being called the “Bay Delta Conservation Plan” or BDCP. Its primary purpose is to deliver the Sacramento River water through Federal and State pumps to provide subsidized irrigation to agricultural operations on the western side of California’s San Joaquin Valley and in the name of conservation, dewater the Delta estuary.

The proposed double tunnel project is designed to give a federal assurance of water to south of the Delta irrigators. As proposed the plan will give a federal guarantee of increased water to be taken from the San Francisco Bay Delta estuary. This proposed higher diversion will create chronic drought conditions and environmental devastation in the estuary. Over the past decade, the current high diversions have degraded fish habitat, leading to dramatic fish declines that in turn led to court-ordered reductions in water exports in order to protect salmon and other endangered fish of the estuary.

The National Academy of Sciences issued a scathing review of the BDCP. The independent science panel declared that the BDCP’s scientific analysis is inadequate. Scientists with the Departments of Interior and Commerce have raised “red-flag” warnings about the biological impacts of the project.

As of today, the BDCP has no feasibility report, no operations plan and no blueprints. It is likely to further endanger salmon and some 20 other species that depend on the San Francisco Bay Delta Estuary and are already in trouble. If costs are fairly assessed, it cannot provide cost-effective water supplies, even to its intended beneficiaries. A recent analysis by the University of Pacific’s Eberhardt School of Business, Business Forecasting Center says the costs of the tunnel would be 2.5 times larger than its benefits.

The verbal briefings without written documents make any agreement to proceed tantamount to signing on to a blank check. When will the true costs be disclosed? And, when will ratepayers and/or taxpayers be given the opportunity to vote on this scheme?

The twelve Members of Congress who wrote and requested “policy before plumbing” reported that, when briefed by federal officials, almost every question was answered with a “we-don’t-know” OR a “we’ll-have-to-get-back-to-you” response. Such responses from the Departments of Interior and Commerce are justification enough for the delay requested by these Members of the California Congressional Delegation.

The Department of the Interior, Bureau of Reclamation and other Federal agencies should not embark on a massive construction program when so many critical questions remain unanswered. We request, before any decisions are made or pronouncements issued that basic questions are fully and comprehensively answered and Californians are allowed to know what’s being proposed.

1. How much will it really cost? We’re being told that just the record size tunnels project costs are estimated at least \$12.691 billion, but this does not include operation and maintenance which ups the cost to \$17 billion, add in financing and the costs reach \$51 billion according to BDCP documents. [See Chapter 8 BDCP documents (p. 8-86 & p. 8-88)]. Governor Brown estimates the costs at \$14 billion.
2. Who pays for it? Who REALLY pays for it? And the impacts? The State of California last week released a “Benefit Analysis of the BDCP” that suggests the project makes economic sense for the south of the Delta water contractors, but only if huge costs are shifted to others and benefits not part of the project are counted. The sponsors concede that no true statewide or other cost benefit analysis has been prepared or is planned for this massive public works project. How does this failure to conduct a benefit cost analysis comply with federal law?  
<http://baydeltaconservationplan.com/Files/June%202012%20Public%20Meeting%20Presentation%206-20-12.pdf> The “others” in this case are statewide, but focused most intensively in Northern California where entire communities and their jobs and resources would suffer with the inevitable decline of the San Francisco Bay Delta Estuary. [see Dr. Michaels analysis, Director of the Business Forecasting Center, Eberhardt School of Business at  
<http://valleyecon.blogspot.com/2012/06/is-bdcp-good-deal-for-water-agencies.html> ]
3. How much “new” water will be produced annually? 250,000 AF? 500,000 AF? 1 MAF? 1.5 MAF? What is the source? What are the real export levels and how were they determined?

4. When will this “NEW” found water be available – 2018? 2020? 2023? 2026? 2030? 2050? What is the date of the first drop of water from completed construction?
5. How will this “new” water pie be divided? Who gets what? How and when will that be determined?
6. What are the upstream impacts of this project on flows, temperatures, fisheries protection and reservoir operations?
7. Scientists report that climate disruption will impact California – its coastline, sea level, weather patterns, precipitation rates and a growing list of other conditions. The current proposed plan indicates climate assumptions will be “forthcoming”. Can you guarantee that multi-billion dollar expenditures for plumbing being recommended will have meaningful utility in 2020, 2030, 2050, and beyond?

Twelve Members of the California Congressional Delegation requested that you not proceed at this time. They are right. Californians deserve a more forthcoming Department of the Interior and Department of Commerce. Full disclosure – and “policy before plumbing” should be provided to all Californians and every taxpayer. Absent responsible policy firmly in place, this proposal looms as a giant unfunded Federal mandate and a recipe for a boondoggle, not one for reliable water service.

Sincerely,



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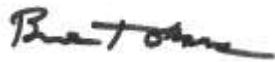
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Interested Parties