
From: Michael Brodsky <michael@brodskylaw.net>
Sent: Friday, October 30, 2015 4:57 PM
To: BDCPcomments
Subject: Additional comment 2015 RDEIR Save the California Delta Alliance

These additional comments are submitted by Save the California Delta Alliance.

In addition to the comments contained in our comment letter submitted earlier today, we would like to point out that we have on several occasions requested that the environmental review contain a fine grain analysis of the water quality impacts on the bays of Discovery Bay.

To our knowledge, this has not yet been done.

The south Delta pumps create reverse OMR flows. Part of the intent of the project is to lessen these reverse flows. That intent is laudable. However, the reverse flows also have some positive effects on the environment and reducing them may have significant localized adverse effects.

Discovery Bay contains several thousand waterfront residences. Virtually all of the waterfront residences have attached docks. Discovery Bay has numerous man-made bays that are fed by Indian Slough and Kellogg Creeks. The circulation system throughout the bays is gravity fed. There are no pumps.

The flows in Kellogg Creek and Indian Slough drive the circulation in the bays. There is significant increased circulation due to increased velocities of flow caused by pumping at the south Delta pumps. Now that this pumping will be eliminated at some times and reduced at others, circulation in the bays will be reduced.

These bays are the most intensively used waters of the Delta as far as human contact is concerned. Everyone swims and plays in the water. Contact is especially intense for children of all ages.

Increased residence time, reduced DO, increased algal blooms and other water quality impacts are likely going to be significant.

These impacts can be mitigated by improving the circulation system, perhaps by installing pumps or wing dams that will better direct what current there is into the bays.

Former BDCP facilitator Jerry Meral met with me in Discovery Bay to discuss these issues. In addition to the fine grain analysis, I requested that monitoring stations be placed *in* the bays of Discovery Bay, where human contact is intense, as a part of the adaptive management monitoring program. As far as I know these monitoring stations have not been included.

Secretary Meral retired shortly after our meeting. My subsequent requests to Karla Nemeth have not been responded to.

We hereby repeat our request that the Lead Agencies perform a fine grain analysis of the water quality impacts of the project, including Alternative 4A, on the waters in the bays of Discovery Bay and include monitoring stations in the Bays of Discovery Bay in the adaptive management/mitigation and monitoring plan.

We believe that protecting human health and safety should be the top priority when considering the impacts of the project on the human environment. Especially where it is known that there is intensive human contact and more especially when the health of children is at stake.

RECIRC2656

Sincerely,
Michael Brodsky