RECLAMATION DISTRICT 999
38563 NETHERLANDS ROAD, CLARKSBURG, 95612
BDCP SCOPING MEETING 3/26/2009
CLARKSBURG

Procedural Comments

1. It is important to the people of Clarksburg area, and the people who are interested in the project from around the state, to keep our comments in the record in their entirety, and not reduce our individual comments into general or combined comments.

2. These documented and undocumented impacts of this plan directly and indirectly affect the people of the Clarksburg area, yet the people of Clarksburg carry the burdens, but get none of the benefits of this project.

3. The admirable goal or "fixing the delta" is meaningless if it, at the end of the day, just ends up creating just enough smelt to keep transferring more water to Southern California. There is nothing "co-equal" in California water politics, the delta and ITS people are always going to come last.

Water transfer should be delinked from this process and the health of the watershed should be the primary focus of these efforts, if the species that use the delta can be managed sustainably is proven, over droughts, then we begin discussing water transfer.

4. The nature and character of the delta today is recognized as valuable in this document, yet our re-development interests are specifically rejected by this document, replaced with the unbridled growth of Southern California. This is an arbitrary and capricious attempt to shift the burden of development on the very people who are themselves not able to develop.

Specific Comments

Ecology

1. What are the ecological criteria used to set the geographic boundaries, and what are the independent studies that support these rationale? (Based on the figures, it appears that there is excessive emphasis on the upper delta apparently for primary productivity and limited emphasis on the lower delta.)

2. Why is the emphasis on the upper delta providing the most habitat and the lower and middle delta providing less, given the existing communities and land values in the upper delta.

3. What is the targeted percentage of take of Delta smelt at the pumping plants? And, why?

4. With the likely percentage of take of Delta smelt at the pumping plants so high, is the peripheral canal really sufficient to reduce impacts to this species?
5. What are the impacts on rare terrestrial plants (such as San Joaquin shadseed) and how will this project not lead to fragmentation and possible extirpation of these species?

6. How many acres of rare venal wetland habitat are jeopardized by the proposed canal construction?

7. On several levels this project could lead to significantly worsening water quality, negating any positive ecological values. The only logical means of identifying and adjusting for that would require a system of continuous water quality monitors (publicly available on the web in real-time), a water master, and some ability to control water sources and routing. A monthly lag management scheme and haphazard monitoring will only lead to algal (such as Microcystis) blooms and anoxic conditions.

8. The entire issue of agricultural chemical release during project activities is unexplored and can be a significant impact to the ecological success of this project.

9. Anyone who has worked in the Delta realizes that invasive species are one of the greatest ecological problems, yet the likely impacts of invasive species on this plan are just identified and dismissed in a cursory fashion. Invasive species are likely to require tens of millions of dollars in management and direct control and require these efforts in perpetuity. Where is the endowment for these activities?

10. Enhancing primary productivity is treated as a cure-all under each scenario. The scientific understanding of eutrophication is not positive. Managing primary productivity for positive benefits is difficult at best and compounded by the urbanization of the watershed.

11. DWR has just indefinitely cancelled its Delta research grant program, a rare and cost-effective opportunity to collect independent science. This is a clear indication of the agency’s lack of commitment to the understanding of the Delta and the ecological impacts of this project. The scientific grants should be no less than 5% of the total project budget or it will remain a water exploitation effort.

12. If West Nile Virus increases in this area, it is expected to have significant impacts on native birds, how are these impacts analyzed and mitigated for?

13. Converting freshwater habitat to brackish water habitat will have negative influences on the ecosystems of the upper delta, leaving this area as one of the last reservoirs of species, such as listed turtles and birds. Now the state wants to reduce their habitat for a fish that is largely limited by Southern California’s water intakes? The sole purpose of this document is an attempt to commingle the issues of habitat restoration and water supply.
Water Use

14. How much of the total San Joaquin flow will be taken under dry and under wet years?

15. What is the basis for the design flows for the peripheral canal?

16. Why are the model baselines for water use (hydrology and ecological distribution of water) using the existing unsustainable (and un-permitted take)? This approach is biased towards the failed pumping strategy and does not provide a baseline compared to historic conditions.

A much more reasonable approach is to set the baseline for before the pumping, without pumping under current delta conditions, current with pumping, pumping with a suitably sized canal, and a canal emphasis with elimination of the lower delta withdrawals.

17. Water use efficiency is not discussed in any substantive way. The project described is simply means of bring more water to Southern California while paying lip service to the Endangered Species Act.

Engineering

18. What is the technical basis for proposing a flood bypass downstream/below the City of Sacramento? How is this not accomplished by using the existing ship channel? What is the difference in cost between improving the ship channel and creating a new bypass?

19. Creating new bypasses and flooding areas within the existing Reclamation Districts will constrain or eliminate existing water management through water elevation/level changes and underseepage. This will require redesign and operational changes throughout the region, causing tens of millions of dollars of infrastructure modifications and loss of agricultural use.

20. The project minimizes the engineering requirements to achieve and maintain water quality in the delta, and ignore the considerable engineering required to establish new flood routing and manage tidally-influenced wetlands. To realistically achieve what is being described would require an engineering feat equivalent to the Netherlands efforts at reclamation and a management system beyond the capabilities of BOR and DWR.

Instead the engineering and water management is being treated simply as a conveyance problem needed to maximize water transfer.

Alternatives

21. In addition to the water routing alternatives, why are there the same habitat scenarios for each alternative? There should be upper and lower delta habitat
alternatives for each water routing alternative. The co-equal goal should at least get some (thought) range of options.

Social
22. Tidal marsh wetlands have significant odor and mosquito problems, as anyone who has driven by one, which create objectionable and nuisance odors for the community. How will these be mitigated?

23. By improving habitat for delta smelt, other listed species could begin using the area, and potentially creating new legal issues for the community, further reducing our ability to exercise our property rights. How will the community be protected from the consequences of this likely impact? (Need a Clarksburg region Safe Harbor Agreement)

24. Loss of farmland in the delta will have ripple effects with ag equipment suppliers, truck dealers, seed suppliers, etc., where good paying stable jobs will be directly impacted and lost. How will this plan mitigate for the losses of those jobs?

25. Who is running the economic analysis? On what basis will the analysis be completed, which models, and why? What are the model criteria, multipliers, and scientific basis?