

**APRIL 7, 2017** is the deadline to send in comments to the Delta Stewardship Council about their current amendment to the *Delta Plan* which adopts the California WaterFix Delta Tunnels as part of the plan.

**Send your comments to:**

[deltaplanNOP@deltacouncil.ca.gov](mailto:deltaplanNOP@deltacouncil.ca.gov) with a BCC to: [bdcp.comments.copy@nodeltagates.com](mailto:bdcp.comments.copy@nodeltagates.com)

**Comment recommendations (rewrite in your own words):**

- 1) There are hundreds, if not thousands, of people who would like to participate in the scoping process but the Council has not provided either opportunity or notice for most people to participate.

The word has just started to get out and there were hundreds of people at the meeting in Brentwood on March 23, but hardly anybody in Sacramento on March 24. That is because it is just too difficult for people to get to two meetings in a row back to back on work days. Holding only one EIR scoping meeting for just 2 hours is not enough. **Please schedule several more workshops.** We want to participate and share important information with you. Please allow us the opportunity. The Delta Plan had 7 scoping sessions. What you are doing now is more important than anything you have done.

It is obvious from what has been produced so far that you don't have anything ready for prime time and you need a lot more scoping. It is obvious that someone is trying to rush this thing through without any real consideration. We urge you with all the earnestness at our command: don't do it; Be the honest, thoughtful steward of the Delta that you are supposed to be and slow down and get this thing right.

- 2) All alternatives considered should demonstrate quantifiable, under all possible operating scenarios, reduced reliance on the Delta as a source of water supply. Any alternative that does not show reduced reliance is not consistent with the Delta Reform Act so there is no reason to consider it.
- 3) All alternatives should demonstrate advancing the goal of preservation of Delta as Place. The Delta is not a museum. We know that. We live here. But the WaterFix will destroy the Delta we know it and love it. DWR has told us flat out that Delta as Place is not their job. But it is your job. Any new construction in all alternatives should avoid harm to Delta as Place, including locating infrastructure away from legacy communities, scenic routes, prime boating areas, and minimizing disruption of traffic and commerce in the Delta. These are primary considerations. Ten or twenty years of ill-conceived construction will obliterate the Delta in a way that it will never recover.
- 4) Alternatives do not have to include any type of conveyance feature to move water from the Sacramento River to the South Delta via multiple intakes. It is obvious to anyone that the Council has made its decision to back WaterFix without any consideration of alternatives at all. That is not your job. The Council is supposed to take a statewide perspective and balance the co-equal goals, which includes Delta as Place. But this is just a plan to satisfy DWR and the water contractors. It has no consideration of people who live in the Delta at all.

Alternatives should include at least one with no new point of diversion. Not just the no-action alternative, but a real action alternative without a new point of diversion. The Delta Reform Act says "promote options for new and improved infrastructure relating to the water conveyance in the Delta, storage systems, and for the operation of both to achieve the coequal goals." Promote options relating to the water conveyance in the Delta is a lot broader than "endorse a new point of diversion," which is what you have now. The policy need not include any new point of diversion. There is no reason for the Council to jump to attention in order to back-fit its plan to WaterFix. The fact that this is the governor's pet project is not a reason. You are supposed to exercise your independent judgment.

- 5) Alternatives should include “Big Gulp /Little Sip” alternatives that allow diversion through any new point of diversion only at times of surplus flow—not in the low flow summer months when we need the water the most in the central and south Delta.
- 6) Alternatives should include one or more combined conveyance/storage alternative. This is really the only “engineering solution” if there is to be one. We must have more storage to make use of increased conveyance capacity to “store floods to ride out droughts” as the Delta Plan itself puts it. The Delta Plan 19 principles say that “New Delta conveyance infrastructure by itself does not create any new supplies of water.” New storage can include south of Delta groundwater storage (e.g., groundwater recharge and/or restoring the Tulare Lake which use to recharge groundwater naturally), expanding Los Vaqueros, and North of Delta Off stream Storage, such as Sites Reservoir. However, storage must be an integral part of the conveyance project—not something that “we promise to do later” to make the tunnels work.

And again, all of these plans must demonstrate viability with reduced Delta reliance; does it make sense to do this when we are going to be taking less water from the Delta going forward?

- 7) Alternatives should include a portfolio alternative that combines conveyance with the whole portfolio of approaches that produce “new water” including conservation, storage, integrated water management, and conjunctive use—in one project.

Improvements to conveyance do not need to include any new point of diversion. Conveyance to transport water from the CVP and SWP to new or improved groundwater recharge facilities in the central valley squarely satisfy “Promote options for new and improved infrastructure relating to the water conveyance in the Delta.” The ability to harvest floods and store them as groundwater through new links to the California Aqueduct in the Central Valley relates to the water conveyance in the Delta because it reduces the need to convey water through the Delta to the pumps when smelt are present or when water is low. Both improving flexibility of the system.

- 8) One of the alternatives currently in the California WaterFix is Alternative 9 which proposes many gates and barriers to be located throughout the South Delta to funnel the fresh water from the north Delta down Middle River to the pumps, making the South Delta a virtual pipeline. I am against any gates or barriers in the Delta because they block navigation and destroy the freedom of wandering the sloughs, which is the heart of Delta as place. In addition, the US EPA has stated, when evaluating the “2-Gates Fish Protection Project,” that gates in the Delta harm fish, so should not be considered.
- 9) The section of the “discussion draft” that talks about evaluating construction does not pay enough attention to the impacts of construction on Delta communities, boating, recreation, traffic, etc. In other words those of us who live here and have made the Delta our way of life will be subjected to over 10 years of heavy construction if the tunnels are built. This will not just be an inconvenience. Ruining boating and recreation in the South Delta will destroy entire communities’ economy and home values. Therefore, an evaluation of the construction details should include the following:
  - a. Facilities and construction activities should be located **away from** Delta legacy communities and away from historic districts.
  - b. Facilities and construction activities should be located **away from** scenic highways and the most scenic areas of the Delta.
  - c. Facilities and construction activities should be located **away from** prime boating and anchorage areas.
  - d. Facilities and construction activities should be designed and located so that construction **avoids impacts** on recreational boating.