

Comments:

The Tunnel project is not consistent with the Delta Plan. I'll focus on the construction phase, although I believe the entire project is inconsistent. The Delta Plan calls for attention to both sides of the co-equal goals equation. One side is to reliably export "Excess" water for beneficiary use. But the Council has repeatedly refused to accept the scientific definition of what excess is, causing continued conflicts between water exporters and the other side of the equation, protecting the Delta as a Place. But today I want to focus the majority of my comments on the construction phase of the project and the impact it will have on the Delta as a Place.

It's hard to believe anyone would plan a major construction project through the heart of the fragile estuary they are committed to protecting. Especially when they have a much better alternative - the Eastern route.

Discovery Bay is a boating community in the south Delta. The primary anchorage here is the west side of Mildred Island, flooded decades ago. It is beautiful, calm, relaxing, and draws boaters into the area to spend tranquil nights. It is one of the many features that make the Delta a boating mecca for Northern Californians. Mildred isn't even listed as an anchorage in the EIR. Probably because the next island west is Bacon Island where significant construction will occur, pile driving 24x7, flood lights, trucks causing dust and noise on the levee road - not compatible with a quiet anchorage. (It will be even worse up in Clarksburg and Hood where construction is in their backyard full time.) That story of ruining favorite recreation areas repeats itself throughout the Delta. Between barge facilities being placed where they are the most disruptive to recreation and boating, and the heavy barge traffic in all the waterways, boating will be untenable. This is not protecting the recreational values of the Delta as required by the Delta Reform Act and Water Code. Boaters will stop coming to the Delta, ruining the economy of boating communities.

That is if anyone could even get to the Delta once construction starts. If you look at a map of the Delta, it is a maze of waterways and only a few small highways. Our highways are mainly 2-lane levee roads. Highway 4 passing Discovery Bay towards Stockton has two extremely narrow bridges - so narrow that big trucks try to take turns, going one-at-a-time. The 2-lane highway is on a levee, often with no shoulder, dropping off into the sloughs on each side; a dangerous stretch of road and already a traffic nightmare. Compounding that with construction traffic will cause gridlock. Even worse, the barge plan calls to raise one bridge up to 8 times/day. It now opens only for emergencies. Similar traffic gridlock will occur on 160 and 12. Visitors to the Delta provide a direct economic impact of more than \$250 million in spending, yet they won't be able to get here due to construction traffic.

Another interesting point: All of the construction shafts in the South Delta are on Delta islands. To get there, trucks must go on the gravel roads on the top of the islands' levees. A key cost benefit in David Sunding's Financial Analysis of the

tunnels is based on the likelihood of a major earthquake shaking down all the levees and causing salt water to intrude. But if (when) that occurs, DWR will lose access to their tunnel shafts for construction and for long-term maintenance. Isn't that a risky plan?

Another risk: The DWR's own independent scientists reported five years ago that the Delta is not appropriate for tunneling through and that the project should be moved to the Eastern route. The soft Delta alluvial soils can shift when tunneling and cause settling or sink holes. Yet the tunnel will go under the main shipping channel, through the large Rio Vista Gas Fields (remember when Met was building their Castaic tunnel through gas fields and an explosion occurred killing 17 construction workers), under the Santa Fe Railroad trestle (which regularly carries freight and Amtrak trains; tunnel experts say tunneling under trestles can cause the pilings to twist), under EBMUD's water supply pipes (EBMUD is suing DWR about that), and other important infrastructure in the Delta. The Eastern route is 10 miles longer but has more stable soil to tunnel through and avoids the risks. The Eastern route has good truck access from highway 5 avoiding gridlocking rural highways, and wouldn't have the construction impact on communities, boating and recreation, Delta farm islands, communities, and fish and waterfowl. But, like the Oroville dam, DWR is ignoring the risks and impacts to communities to cut costs. They say the impacts are "significant and unavoidable." The impacts are more than "significant." They are disastrous. And they are avoidable.

The through-Delta construction plan is completely incompatible with the Delta as a Place. Please vote no.