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500	1	As a large member agency of the largest state water contractor, the Metropolitan Water District of Southern California (MWD), the San Diego County Water Authority and its rate payers are being counted upon to pay the second largest share of BDCP costs in the State (among MWD member agencies) second only to Kern County Water Agency. Accordingly, we have requested on multiple occasions the opportunity to directly engage in BDCP cost allocation discussions and negotiation process. Those requests have gone unanswered. We renew that request with this letter. The stakes are so high for the San Diego region that the Water Authority should clearly be afforded the opportunity to directly participate in the cost allocation negotiations and be provided the information we need to assess whether the preferred alternative advocated by the BDCP program will provide water supply benefits commensurate with the billions of dollars our rate payers are being counted on to pay. We also must ensure that our rate payers are not at risk of paying costs for BDCP water supplies of other MWD member agencies or other State or Federal contractors and the costs are allocated to the participants based on the proportion of benefits received. To date we have received no assurances to these concerns. Over the past several years, I have sent several letters to officials within the California Natural Resources Agency raising a number of questions regarding the proposed project. To date, the Water Authority has received no response to those questions. I incorporate those letters attached and the petitions -- the questions they raised with this letter. We renew our request for answers raised in those letters with this letter. We strongly believe that each participant in the BDCP must have clearly delineated capital and operations and maintenance cost responsibility identified and be provided sufficiently detailed information to evaluate the cost benefit or feasibility of participating in the project. The Water Authority has previously heard Dr. David Sunding's report to the MWD board of directors that the cost benefit analyses have been produced by the BDCP for all urban and agricultural water contractors and that include cost benefit analyses for each MWD member agency including the Water Authority. The Water Authority has made multiple requests. These requests have been ignored. We renew that request with this letter.	The commenter does not raise an issue on the adequacy of the EIR/EIS or related analyses. However, DWR and Reclamation will need to work with their participating water contractors, including MWD, to develop such cost allocations and agreements regarding funding responsibility. Please see Master Response 5 regarding funding of the proposed project.

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501	1	First of all, in 2012, AB-685 was passed by state legislature and signed by the governor. That bill states that as a priority we need to provide clean, affordable water to everyone in California. Presently, 2 million people in California may not have affordable clean water. It is unconscionable for the state to consider a $24 billion project while we have 2 million people in California without their rights for clean water being supplied.	The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage. As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The project proposes to stabilize water supplies, and exports could only increase under certain circumstances. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. For more information regarding purpose and need of the proposed project please see Master Response 3.
501	2	There are several issues with regards to this project which bothers me and, I think, need to be addressed. One is that the tax for this $24 billion project may not be applicable between all the users, whether one be a farmer or using the water for municipal use. We need to make sure that the cost is distributed equitably for the amount of water we use in California. This project -- this proposed project's cost, unfortunately, will not be distributed in that manner.	The construction of the water delivery facilities is estimated to cost $14.9 billion, an amount that would be paid for by the state and federal water contractors who rely on Delta exports. The range of costs for water varies widely among contractors south of the Delta. Costs depend on the source of water, transport facilities, energy requirements, among other factors. For the agricultural customers of the CVP, prices range from $100 per acre-foot to more than $400 per acre-foot. The Metropolitan Water District of Southern California, which buys water from the SWP, estimates that the cost of the proposed project would translate into about $5.00 extra per household, per month in its service area. The final cost of water from the new

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			conveyance facilities would be determined by numerous factors. A number of these significant factors, such as the project yield and allocation of costs, have yet to be determined. Please see Master Response 5 for more information regarding costs of implementing the proposed project and information regarding funding of the proposed project.
501	3	With regards to conservation measures that this project entails, those should be independent of developing the pipeline and the diversion. The conservation measure is something we should always do, and we should not hold hostage the restoration work by having to divert additional water from the Sacramento River.	Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Although Alternatives 4A, 2D, and 5A include only those habitat restoration measures needed to provide mitigation for specific regulatory compliance purposes, habitat restoration is still recognized as a critical component of the state's long-term plans for the Delta. Such larger endeavors, however, will likely be implemented over time under actions separate and apart from these alternatives. The primary parallel habitat restoration program is called California EcoRestore (EcoRestore), which will be overseen by the California Resources Agency and implemented under the California Water Action Plan. Under EcoRestore, the state will pursue restoration of more than 30,000 acres of fish and wildlife habitat by 2020. These habitat restoration actions will be implemented faster and more reliably by separating them from the water conveyance facility implementation. For more information regarding purpose and need please see Master Response 3.
501	4	There is the issue of greenhouse gas emissions and our need to reduce water use. Conservation is the easiest way for us to deal with the water crisis, not to build additional structures, and we can do that by also reducing greenhouse gas emissions. Since our target to reduce greenhouse gas emissions is 80 percent of 1990 levels per Governor Schwarzenegger's Executive Order SO-305, we need to reduce the amount of water that we both produce or convert to those tax bases. And the best way to do that is to simply conserve our water and not have to build additional infrastructure which will damage our environment even further.	The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water

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			storage. The 2013 Draft EIR/EIS Chapter 22, Appendix A Chapter 22 (Air Quality and Greenhouse Gasses), and RDEIR/SDEIS Section 4.3.18 evaluates criteria pollutant emissions associated with the construction of each alternative. The proposed project would be implemented in a manner intended to minimize the potential for adverse health effects, such as those mentioned. There are numerous mitigation measures intended to reduce air quality effects to as low a level as possible. As described in Section 22.2.1.1, the United States Environmental Protection Agency (EPA) has established de minimis thresholds to define levels at which pollutants would not impede a region's ability to achieve air pollution goals outlined in their State Implementation Plan (SIP). Construction of the proposed project would exceed the applicable de minimis threshold for nitrogen oxides (NOX). The project will fully offset construction-related NOX emissions to net zero through implementation of Mitigation Measures identified in the EIR/EIS. With respect to human health impacts; the Air Quality and Greenhouse Gasses Chapters and Sections identified above include a health risk assessment (HRA) evaluating health impacts to all sensitive receptors, which include residences, schools, hospitals, places of worship, daycare facilities, parks, or any other facilities where people are susceptible to air pollutants. In addition, as potential impacts to human health are construction-related, construction emissions and exposure of sensitive receptors to construction-related emissions will cease once construction activities have ended.
501	5	I think the name of the project is really inappropriate. It's not really a conservation plan; it is really a diversion plan. I think that will be much more appropriate.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. For detailed responses on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5.
502	1	First of all, I think this is a project pushed by Governor Brown. I supported Governor Brown; I thought he was doing a good job. The tunnel as proposed in this Bay Delta Conservation Plan is something that would be devastating to the Delta. Governor Brown is trying to prolong or continue the legacy of his father, the former Governor Brown, in transferring the water from Northern California to Southern California.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. For detailed responses on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5.
502	2	I have seen over the years that the Department of Water Resources has not kept its promise. They say they will monitor the need for the water, but every time there is any water, the water continues without interruption. So, we lost water in the San Joaquin River and if you go back, the history of the Salton Sea was dried up and Mammoth Lake was dried up all because of the thirst for water from Southern California.	The amount of water DWR can pump from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would still be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a predetermined flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). There are numerous water quality monitoring stations at locations throughout the Delta that are currently operating and will continue to be operational in the future. These stations are operated by the United States Geological Survey, the United States Bureau of Reclamation, the California Department of Water Resources, the Interagency Ecological Program, and numerous local agencies. Monitoring locations already present in Old River near Discovery Bay are sufficient to support and inform these activities with regards to salinity (including both chloride and electrical conductivity) and organic carbon. Monitoring of mercury and selenium will be further defined in site specific monitoring and management plans associated with the

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			restoration areas. For more information regarding water supply please see Master Response 26 and Master Response 35. The San Joaquin River is being restored independent of the BDCP, so that its historic fisheries can be revived. Although the flows will not equal those that occurred prior to the construction of Friant Dam north of Fresno, the new flows under the San Joaquin River Restoration Program will represent a huge ecological improvement over conditions that have persisted over the last several decades. As discussed in the 2013 Public Draft BDCP Chapter 3, Conservation Strategy, the San Joaquin River Restoration Program monitors the physical and biological effects of flows along the San Joaquin River from Friant Dam to the confluence of the Merced River to provide sufficient fish habitat in that area. The release of water from Friant Dam for the SJRRP depends upon the amount of runoff. Using water supply forecasts for the Friant Division of the Central Valley Project, the SJRRP uses the estimated total unimpaired inflow below Friant Dam to determine an allocation. The Restoration Administrator makes recommendations on the timing of releases based on river conditions and the specific goals and objectives at that time. Prior to an increase in flow rates, the SJRRP analyzes the likely effects on the river and surrounding lands and documents the results with a Flow Bench Evaluation. Following an affirmative evaluation, the SJRRP issues a notification and changes the releases. For more information on the SJRRP please visit http://www.restoresjr.net/
502	3	There are real problems connected with the BDCP. First, you consider the fact that it will cross several earthquake faults. How are they going to mitigate that if you build this tunnel and you have an earthquake in this area? The excavation of millions of tons of earth to accomplish this twin tunnel is really against nature. It is something that will have an effect that we are not aware of. Nature has a way of coming back and taking its toll.	Based on the proposed tunnel alignments, depths, tunneling method, and the energy involved in boring, the construction of the project's tunnels is not expected to increase the chance of an earthquake. Chapter 9 of the Draft EIR/EIS and Appendix A of the RDEIR/SDEIS describes the geology and seismicity of the study area. From a review of the last 20 years of precast tunnel lining seismic performance histories, it can be concluded that little or no damage to precast tunnel lining was observed for major earthquakes around the world. It is anticipated that the Delta tunnels can be designed to withstand anticipated seismic loads. Design-level geotechnical studies would be conducted to assess site-specific hazards and appropriate mitigation measures would be implemented. Impact GEO- 1 and GEO-7 discusses the possibility of loss or damage resulting from strong seismic activity during construction and operation of water conveyance features. Overall, the proposed facilities would be designed and managed during and after construction to meet the safety and collapse-prevention requirements of the relevant state codes and standards listed in Appendix 3B, Environmental Commitments, of the RDEIR/SDEIS for the anticipated seismic loads. For specifics regarding tunnel design, see the 2013 Conceptual Engineering Report. Additionally, refer to Appendix 3E, Potential Seismic and Climate Change Risks to SWP/CVP Water Supplies, of the Draft EIR/EIS for discussion of potential consequences of an earthquake to exports under a No Action Alternative scenario and to Master Response 16 (Seismic Activity). Excavation, transport, and disposal of large volumes of soils with project implementation are discussed and analyzed in several chapters/sections of the Draft EIR/EIS and the RDEIR/SDEIS, such as but not limited to Chapter 9 (Geology and Seismicity), Chapter 10 (Soils), Chapter 19 (Transportation), Chapter 22 (Air Quality and Greenhouse Gases) of the Draft EIR/EIS.
502	4	I think the solution for Southern California is to take the water from the ocean. That is an inexpensive way to go. They will have to bite the bullet sooner or later. They need to consider taking water from the ocean rather than continue to drain water from Sacramento and San Joaquin Rivers.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on

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			a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Please see Master Response 7 regarding desalination. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage.
503	1	Initially, I heard that this water was desperately needed for Southern California and their farmers. They do not farm in Southern California. There are no farms down there. They are in Barstow and Imperial Valley. The developers want the land. The developers own land and they want all the water. The Southern California farmers had a water source of their own at one time. They abused it. They depleted it. Shame on them. They need to figure it out themselves, but they do not get a drop of our water. If they want any excess that we have, we will sell it to them, but it is going to cost them an arm and a leg. I strongly oppose the project.	The proposed project does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. For an explanation of how DWR holds water rights, please see Master Response 32. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Refer to Master Response 26 (Area of Origin). Metropolitan Water District and member agency conservation programs have permanently increased water use efficiency in Southern California. For additional detail about their water conservation programs, please see Master Response 35. Rates charged to water users by individual water agencies receiving SWP or CVP supplies are based on the independent rate-setting policies of those agencies. Implementation of the proposed project would not affect how agencies distribute water supply costs among their water customers.
503	2	I have been a life-long resident of Stockton. You can see it deteriorating from the water they ship down there now. The saltwater in the Bay Area is going to destroy that farmland just so developers can get richer and nothing more. The politicians will probably let them have their way, because they are politicians and, let us be frank with each other, they are greedy and accept bribes. My interest is not their interest.	The Lead Agencies do not have land use planning authorities (such as changing local land uses and zoning ordinances. Since 2006, the BDCP has been developed based on sound science, data gathered from various agencies and experts over many years, input from agencies, stakeholders and independent scientists, and more than 600 public meetings, working group meetings and stakeholder briefings. All of the documents, studies, administrative drafts, and meeting materials have been posted online since 2010 in an unprecedented commitment to public access and government transparency (see Master Response 41 [Transparency]). The preferred alternative is now Alternative 4A (i.e., the California WaterFix Project) and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A. The project would allow the federal and state water projects to deliver water supplies reliably in a way less harmful to fish. Refer to Master Response 3 (Purpose and Need), Master Response 18 (Agricultural Impact Mitigation), Master Response 34 (Beneficial Use of Water), and Master Response 26 (Changes in Delta Exports). The project does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. See RDEIR/SDEIS Appendix A Chapter 14, Agricultural Resources, Impact AG-1 and Impact AG-2 and their mitigation to

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			mediate important farmland in the Delta.
503	3	I was hoping that they had a map here showing me where this farmland is in Southern California that they want this water.	The Council on Environmental Quality's NEPA Regulations, 40 CFR 1502.2(a) states: "Environmental impact statements shall be analytic rather than encyclopedic." Additionally, the State CEQA Guidelines, § 15146, note: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." As noted in the Draft EIR/EIS, Appendix 1A (page 1A-19): "…there are 29 agencies and districts that have long-term contracts with DWR for the delivery of SWP water. These agencies, in turn, deliver water to wholesalers or retailers or deliver it directly to agricultural and M&I water users." Furthermore: "The amount of each contract for SWP water is specified in Table A. Table A amounts are used to define each contractor's proportion of the available water supply that DWR will allocate and deliver to that contractor. Each year, contractors may request an amount not to exceed their Table A amount. The Table A amounts are used as a basis for allocations to contractors, as the actual supply to contractors is variable and depends on the amount of water available." Farmers may also rely on other water sources, including groundwater, to supplement their water demands. It is therefore not possible to map out exactly which farmland may require SWP water in a given year or in what amounts. That is beyond the scope of the environmental analysis. However, a broad visual depiction of the conveyance facilities and areas that could receive SWP water is found in Figures 1-2, 1-3, and 1-4 of Chapter 1 (Introduction) in the Draft EIR/EIS. Additional background on the facilities and water conveyed south of the Delta can be found in Appendix 1E (Water Transfers in California) and Appendix 5C (Historical Background of Cross-Delta Water Transfers and Potential Source Regions).
504	1	I am a private citizen that is very concerned about the Delta. I grew up on the Delta and was there as a child and young adult. It is a pristine area that I feel these tunnels will ruin. There has been a lot of changes since I was a child and a young adult out there. It is still an area that should be protected.	The comment does not raise any environmental issue related to the 2013 Draft EIR/EIS or the 2015 RDEIR/SDEIS. Developed to meet the rigorous standards of the federal and state ESAs, the proposed project is intended to be environmentally beneficial. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.
504	2	They used to, when I was young, take and dredge the rivers and put the dirt on the levees to make them stronger and taller. Then the Corps of Engineers came in and said that they could not do that anymore, because it took bad things from the river into the air. They want to make two tunnels that will create millions of pounds of sediment. They will put it on somebody's property and not cover up the stuff that they are digging up out of the ground. Somebody will have to smell it, live with it and maybe it will endanger people's lives. They don't know.	The volume and anticipated character of the tunnel muck (also referred to Reusable Tunnel Material) is described in RDEIR/SDEIS Appendix A, Chapter 3, Description of Alternatives, EIR/EIS, Chapter 24, Hazardous Materials, EIR/EIS, and Appendix 3C, Construction Assumptions for Water Conveyance Facilities, EIR/EIS and recent study prepared for DWR posted on the BDCP website (see http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Reusable_Tunnel_Material_Testing_Report.sflb.ashx). See also the RDEIR/SDEIS Appendix 3B, Environmental Commitments, EIR/EIS, for discussion of how reusable tunnel material will be handled, tested and reused. Health and Safety requirements for storage and disposal of all material will be followed.
504	3	I just think that the Delta is a place to live and enjoy recreationally. Some of the farmers on the Sacramento River are families that have owned that land for hundreds of years and they will come in and take it away from them. To take water down south on the desert land that large companies like Dole, not individual farmers, own, to give them the water from these farmers up here I think is wrong. If you are against the tunnels, you need to speak up. That's my opinion.	The proposed project may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011d) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove.

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			For more information regarding beneficial use please see Master Response 34. For more information regarding changes in delta exports please see Master Response 26.
505	1	My concern is that I am not aware of a single system in the entire world that was improved by taking the water out of the river before it reached the estuary. That is exactly what the plan is in this case. It is to remove the water before it reaches the estuary.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.
505	2	I am not aware of a collaborative effort to restore an ecosystem anywhere in the world that specifically excluded the local population and the representatives the way the planning has been done for the BDCP.	Please refer to Master Response 40 for information pertaining to outreach and public involvement during the planning process.
506	1	I want to talk about two things: desalination and saltwater intrusion. The first is the document studies that I see. It has not effectively looked at desalination, besides the fact that desalination is a drought resistant source of water. It also is an additional source of water.	The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage. Master Response 4 discusses the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking

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			or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. Please see Master Response 7 regarding desalination. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage.
506	2	Once they put in the tunnels, everyone expects them to pump more water. It is going by the idea how it is not supposed to increase the water flow out of the Sacramento, San Joaquin River areas. Desalination is more bang for the buck over digging the tunnels. It will be new water and a drought resistant source of water that will always be there, drought or not. It will also add higher quality jobs and once the tunnel is done the ditch diggers are not needed. The desalination will require operators throughout.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage. Please see Master Response 7 regarding desalination.
506	3	There is still no effective analysis of the saltwater intrusion to the Delta. It is a fragile ecosystem. It is unique. There is nothing like it west of the Mississippi River. It is resilient and it can take the residents living there and the farmers living there but cannot	Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low

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		take the saltwater intrusion that will kill the ecosystem. The ecosystem is just fantastic. It provides a variety of wildlife that is only seen in places like Africa and the Amazon.	salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality objectives set by the State Water Resource Control Board protection of agricultural water supply, municipal and industrial drinking water supply, and fish and wildlife beneficial uses. See section 4.3.4 for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. Effects of the alternatives on salinity levels are described in Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, EIR/EIS and Appendix A of the RDEIR/SDEIS. Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N for specific results related to various water quality constituents (including bromide and chloride). In addition to potential effects associated with the project and alternatives, modeling results for the No Action Alternative indicate that, with or without the proposed project, rising sea levels will bring saline tidal water further into the Delta than occurs at present.
506	4	Those are my two concerns, saltwater intrusion and destroying something just because we can. That does not mean we should. It is unique and worthy of maintaining for Californians to come. The second, of course, is that desalination should seriously be looked at as an alternative to tunnels. We can do this in a smarter way.	Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality objectives set by the State Water Resource Control Board protection of agricultural water supply, municipal and industrial drinking water supply, and fish and wildlife beneficial uses. See section 4.3.4 for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. Effects of the alternatives on salinity levels are described in Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, EIR/EIS and Appendix A of the RDEIR/SDEIS. Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N for specific results related to various water quality constituents (including bromide and chloride). In addition to potential effects associated with the project and alternatives, modeling results for the No Action Alternative indicate that, with or without the proposed project, rising sea levels will bring saline tidal water further into the Delta than occurs at present. The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input

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			as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 56 regarding water storage.
507	1	Speaking of the twin tunnels and their effect on the environment. Not only do we have saltwater intrusion and not flushing of the Delta areas you will not have flushing of the Bay Areas. The San Francisco area will not get the water it needs to cleanse the Bay.	Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality objectives set by the State Water Resource Control Board. See Chapter 8, Water Quality, of the EIR/EIS for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. The proposed project only would be permitted to operate with regulatory protections, including river water levels and flow, which would be determined based upon how much water is actually available in the system, the presence of threatened fish species, and water quality standards. Current limitations and operational criteria for existing facilities can be found in DWR's State Water Resources Control Board Permit D1641 (see http://www.swrcb.ca.gov/waterrights/water_issues/programs/bay_delta/decision_1641/index.shtml) and additional limitations described in the Federal Endangered Species Section 7 Biological Opinions and take permits (see http://www.usbr.gov/mp/cvo/ocap_page.html).
507	2	The public should be informed. They are totally misinformed and not aware of the fact that if the twin tunnels were in existence right now there will still be no water. There is no snow pack in the Sierras. I believe that is a waste of money.	The analysis in Chapter 5 of the FEIR/FEIS discusses conditions and water deliveries in both wet and dry years. Detailed CALSIM model results are shown in Appendix 5A of the EIR/EIS.
507	3	We need to look at alternative technology. It would be a permanent fix and permanent solution to water problems and we need more storage areas.	While water storage is a critically important tool for managing California's water resources, it is not a topic that must be addressed in the EIR/EIS for the proposed project. This is because the proposed project does not, and need not, propose storage as a project component. Although the physical facilities contemplated by the proposed project, once up and running, would be part of an overall statewide water system of which new storage could someday also be a part, the proposed project is a stand-alone project for purposes of CEQA and NEPA, just as future storage projects would be. Appendix 1B, Water Storage, of the 2013 Public Draft BDCP EIR/EIS, describes the potential for additional water storage. Please see Master Response 4 regarding the development of alternatives. Please see Master Response 6 for information on Demand Management. For more information regarding water storage please see Master Response 37.

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507	4	I think what Governor Brown could do is put in a reason for people to be stimulated to buy fake grass. Install fake grass with a tax deduction. Just like they are doing for solar panels. We actually put one in our yard last year. All of those people here in this area will be rationing or already rationing and the people in L.A. are not yet.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The project proposes to stabilize water supplies, and exports could only increase under certain circumstances. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. For more information regarding purpose and need of the proposed project please see Master Response 3. For more information regarding alternatives to the proposed project please see Master Response 4.
508	1	I just want to say I believe that the Bay Delta Conservation Plan is a good idea, but I understand that at this time we are going through a drought and that has changed the complex.	As mentioned in Chapter 8, Section 8.4.2.2, Comparisons, in the Final EIR/EIS, the CEQA baseline "Existing Conditions" is represented by Existing Conditions modeling runs, not the historical water quality monitoring data as presented in Section 8.1.3. The modeling and impact assessment specifically included and addressed the drought period of 1987-1991. Therefore, the assessment is considered adequate and represents the best available information to assess the effects of the BDCP implementation under drought conditions. As the current drought is ongoing, the effects of the drought are not available at a level sufficient to be used at this time in the modeling and assessment for the EIR/EIS. The proposed intakes would only be permitted to operate with regulatory protections, including river water levels and flow, which would be determined based upon how much water is actually available in the system, the presence of threatened fish species, and water quality standards. Flow criteria will be applied month by month and according to water year type. More information on the ranges of water project diversions, based on water year types and specific flow criteria, can be found in BDCP, Chapter 3, Conservation Strategy. Monitoring for compliance with D-1641 requirements or any future requirements for SWP/CVP water supply operations would be conducted year-round in the future under the proposed project.
508	2	I don't believe in how the plan is moving forward because water purification is not part of the plan. It is just my understanding moving the water from one point to another is a secondary system. It is the basic plan with environmental overview with environmental benefits that the plan brings with it for certain habitat areas.	The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes

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			the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage.
508	3	The Southern Sacramento area is hoping to move some of those benefits to the San Joaquin, Stockton area as well. The fact that the farmers in this area don't trust the tunnel, because they feel they will lose control of the water that they do have control of is their issue, which is important, I believe.	Refer to Master Responses: 3 (Purpose and Need), 34 (Beneficial Use of Water), 26 (Changes in Delta Exports), 32 (Water Rights), and 18 (Agricultural Impact Mitigation). The project does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. See RDEIR/SDEIS Appendix A Chapter 14, Agricultural Resources, Impact AG-1 and Impact AG-2 and their mitigation to mediate important farmland in the Delta.
508	4	As far as our weather patterns are concerned right now, I think that moving forward, we need to have a plan to hold over for the drought that we may be facing for hopefully not too long of a time. If it happens to be longer than what we expect, we probably need to make plans and let them diggers go in San Francisco.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
508	5	They started doing water purification and desalination. As far as claiming more water than they normally would from special purification processes they had to pay more money for it but in the end it paid off, because the water was available and the cost of water did fall because of that.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage. Please see Master Response 7 regarding desalination.

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508	6	I never did agree with the original CVP Plan to transport the water above ground. Water evaporation transformation is part of our weather cycle problem, because most of the water's being evaporated in the desert where it has no real ability to affect the weather patterns in this area.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.
508	7	We have rain in our mountains and the water comes back down to the Valley up in the Bay and have the water that we need. I never did agree with the original project to pump or ship the water above ground because the water needs to evaporate in this area, large quantities of it, so it would stay cycling when it rains in this area.	See response to comment 508-6.
508	8	The fact that it is being cycled in the areas down in L.A., in the L.A. areas lots of water is going down there in the desert areas, it is not having any effect on the climate because it is not raining down there or here. It is creating a source of a stalemate, in our weather and in our atmosphere.	See response to commetn 508-6.
508	9	I know we can't pump the water back, but as far as reclaiming the water and the water that is released it needs to sit here, so it doesn't get the evaporation transformation and not in other areas, but right here where it is needed.	See response to commetn 508-6.
509	1	My name's David Hurley. I'm a third-generation Stocktonian whose roots are very deep in the Delta. My great-grandfather operated a fish market less than a mile from the site that we are sitting at right now. I am a fisherman in the Delta and I have seen the devastation that is taking place in the population. It has taken over the last ten years since the water exports have increased since the year 2000. The population of sea bass is third lowest in the history of adult sea bass.	Effects on sportfish are described in Chapter 15, Recreation, EIR/EIS (see Impacts REC-4, REC-5, and REC-9). Implementation of the project would not be anticipated to have an adverse population-level effect on any popular sportfishing species. Economic effects related to recreational and commercial fishing are described in Chapter 16, Socioeconomics, EIR/EIS (see Section 16.3.1.6 and Impacts ECON-5 and ECON-17) as well as the Draft Bay Delta Conservation Plan Statewide Economic Impact Analysis (see Section 3.5). As described in those sections, while effects of construction could affect economic activity associated with recreational fishing, long-term effects on fish abundance and commercial salmon fisheries are anticipated to be positive overall.
509	2	I do not believe this project has co-equal goals in mind. There is only one way to improve the habitat in the Delta. You cannot improve the habitat of the Delta by taking water above its source and transporting it underneath the Delta to be pumped south. In order to have the Delta, which is the largest estuary on the West coast and on the western hemisphere it has to have water.	Since 2006, the proposed has been developed based on sound science, data gathered from various agencies and experts over many years, input from agencies, stakeholders and independent scientists, and more than 600 public meetings, working group meetings and stakeholder briefings. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such the proposed project is intended to be environmentally beneficial. DWR's fundamental purpose of the proposed project is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south of the Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Please see Master Response 3 for additional information regarding the purpose and need behind the proposed project and Master Response 5 for information on the tunnels as a conservation measure.
509	3	Anything that would possibly allow for more take of water is going to devastate an already broken system. Another factor in this project is that it does not add one more drop of water to the system, it just provides a method of transporting water to avoid the Endangered Species Act.	The amount of water DWR can pump from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would still be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and

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			threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a predetermined flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage.
509	4	The damage to the environment is fairly clear that it is not an agreed export. I agree strongly that this is not the answer. We have a problem, there is no question about it. This current drought situation in California demonstrates how significant the problem is. When you have many more times the water allocated than we have water in the	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational

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		watershed, we have a problem. It depends on who gets what.	flexibility. For more information regarding purpose and need of the proposed project please see Master Response 3. The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta.
509	5	I do think the Bay Delta Conservation Plan needs to be revamped and there is no way to support anything that is this costly. It has a potential to do damage. Thank you very much. I appreciate it.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. For detailed responses on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5.
510	1	One of my big concerns is air quality. Now they are bringing in all these cats and diesels into San Joaquin Valley that will pollute the air. Southern California is already being fined by the state because we can't get our air quality low enough. I do not want to get emphysema. I do not want to get cancer from the pollutant that these tractors will be bringing into the air. I breathe them. I live in Stockton. I am very concerned about that.	The 2013 Draft EIR/EIS Chapter 22, Appendix A Chapter 22, and RDEIR/SDEIS Section 4.3.18 (Air Quality and Greenhouse Gasses, Impacts AQ-4 and AQ-9) evaluates criteria pollutant emissions associated with the construction of each alternative in the San Joaquin Valley. The proposed project would be implemented in a manner intended to minimize the potential for adverse health effects, such as those mentioned. There are numerous mitigation measures intended to reduce air quality effects to as low a level as possible. As described in Section 22.2.1.1, the United States Environmental Protection Agency (EPA) has established de minimis thresholds to define levels at which pollutants would not impede a region's ability to achieved air pollution goals outlined in their State Implementation Plan (SIP). Construction of the proposed project would exceed the applicable de minimis threshold for nitrogen oxides (NOX). The project will fully offset construction- related NOX emissions to net zero through implementation of Mitigation Measures AQ-4a and 4b. Accordingly, construction of the project would not result in an increase in regional NOX or affect the San Joaquin Valley Air Pollution Control District's (SJVAPCD) ability to implement their ozone SIP. With respect to human health impacts; the Draft EIR/EIS Chapter 22, Appendix A Chapter 22, and RDEIR/SDEIS Section 4.3.18 (Air Quality and Greenhouse Gasses, Impact AQ-12) includes a health risk assessment (HRA) evaluating health impacts to all SJVAPCD-defined sensitive receptors, which include residences, schools, hospitals, places of worship, daycare facilities, parks, or any other facilities where people are susceptible to air pollutants. As indicated in the HRA, construction of the proposed project would not exceed the SJVAPCD's chronic non-cancer or cancer thresholds and would not expose receptors to corresponding health threats. In addition, as potential impacts to human health are construction-related, construction emissions and exposure of sensitive receptors to construction-related emissions will cease once construction activities have ended.
510	2	This will have a negative impact on our state and county. I am very concerned about that. There are issues of noise pollution. You are bringing all these big trucks and cats. They make a lot of noise and it is the quality of noise pollution also. I am a light sleeper.	As stated in Chapter 23, construction noise impacts are considered to be "Significant and unavoidable". This is based on an analysis that considers worst-case conditions. For example, six pieces of construction equipment operating simultaneously and continuously in one location. These conditions would not necessarily occur on a routine basis. Although alternative haul routes for truck traffic may be an effective measure in some cases, significant impacts are still likely after mitigation.

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			From Appendix 3B, Section3B.5.5: DWR and contractors hired to construct any conveyance components of the project will implement a site-specific noise abatement plan to avoid or reduce potential construction-, maintenance-, and operation-related noise impacts. This section also includes environmental commitments to reduce noise levels where exceedances are anticipated to occur.
510	3	Concern I have is that I understand it is approximately 15 percent of prime agricultural land that will be taken away. Our economy here in the San Joaquin Valley is based on agriculture. That will have a hugely negative effect on our economy and the people who depend on agriculture for their livelihood.	Table 14-8 in Chapter 14, Agricultural Resources, EIR/EIS, identifies the agricultural conversion expected to take place as a result of constructing the proposed water conveyance facilities. Under the proposed project, approximately 5,240 acres would be affected by construction of water conveyance facilities (either permanently or temporarily), compared to approximately 395,000 acres of Prime Farmland in the study area (largely comprised of the Delta, Suisun Marsh, and Yolo Bypass), which means that approximately 1.3% of prime farmland would be affected. Conversion of agricultural land is considered a significant impact and mitigation measures have been proposed to avoid and reduce these effects, where feasible. Please see Master Response 18 for more information regarding agricultural impact mitigation. Also, please note that the new preferred alternative (Alternative 4A/California WaterFix) proposes a much smaller acreage of habitat restoration, resulting in less impact to agricultural lands. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A. Economic effects related to conversion of agricultural lands, including employment, are described in Chapter 16, Socioeconomics, EIR/EIS. Under the preferred alternative (Alternative 4A), the chapter estimates that, during construction, there would be a total employment reduction equivalent of 16 full-time positions, including direct and indirect effects. Following the construction of the water conveyance facilities, there would be a lasting reduction of 57 full-time equivalent positions related to agriculture. Although activities related to construction and implementation of all land-intensive conservation measures will reduce agricultural positions and income, they will also create substantial employment in other sectors.
510	4	Stockton: We are in poverty with huge unemployment numbers and I don't see any answer to this now. For the project, we will be bringing in workers. Where are they going to stay? One answer I heard is that they will stay in Stockton because Stockton has a large amount of vacant housing. Well, the fact of the matter is that they are building houses with new tracts over here. In some of those houses our neighborhoods' people won't want to move in there if they have children. So, that will mean more housing and more agricultural land taken out of our system.	Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. When required, DWR would provide compensation to property owners for economic losses due to implementation of the proposed project. Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft BDCP Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in the BDCP Appendix 3B, Environmental Commitments, EIR/EIS. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Bay Delta Conservation Plan Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Chapter 16, Socioeconomics, of the Draft EIR/EIS was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Chapter 16, Socioeconomics, Section 16.3.3.9, in Appendix A for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been incorporated into Appendix A. For more information regarding agricultural mitigation please see Master Response 18.

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510	5	I understand there will be some temporary economic advantage when we have these construction people coming in. Is there any guarantee that these workers will be from Stockton, San Joaquin County or Sacramento? You know, the areas that are being impacted? How many are being imported from the other states or maybe other countries? I don't have any of those answers, but those are concerns I have.	It is assumed that the majority (approximately 70 percent) of construction workers would be drawn from the five Delta counties. Approximately 30 percent of construction workers are expected to come from outside of the Delta region. For more information, please see Chapter 16, Socioeconomics, Impact ECON-2, 2013 Public Draft EIR/EIS, and Chapter 30, Section 30.3.2.1, Direct Growth Inducement, 2013 Public Draft EIR/EIS. Additionally, the Job Creation & Protection Fact Sheet reports that 155,090 jobs will be created by the 2013 proposed BDCP (a full-time equivalent job is defined as one person working full-time for one year).
510	6	I have a concern. What will be the impact of this pipe? These pipes will be 150 feet down. Now I know anything that gets engineered can break. We are an earthquake county. What happens when that point-eight earthquake hits and cracks those pipes filled with water that will definitely cause problems in our Valley? That water has to go someplace.	Chapter 9 of the 2013 BDCP Draft EIR/EIS and Appendix A of the RDEIR/SDEIS describes the geology and seismicity of the study area. Based on a review of the last 20 years of precast tunnel lining seismic performance histories, it can be concluded that little or no damage to precast tunnel lining was observed for major earthquakes around the world. Based on preliminary data, it is anticipated that the Delta tunnels can be designed to withstand anticipated seismic loads. Design-level geotechnical studies would be conducted to assess site-specific hazards and appropriate mitigation measures would be implemented. Impact GEO- 1 and GEO-7 discusses the possibility of loss or damage resulting from strong seismic activity during construction and operation of water conveyance features. For more information regarding tunnel design please see the 2013 Conceptual Engineering Report. Please see Appendix 3E, Potential Seismic and Climate Change Risks to SWP/CVP Water Supplies, of the 2013 Public Draft BDCP EIR/EIS for discussion of potential consequences of an earthquake to exports under a No Action scenario.
510	7	I had some other concerns too, like dust pollution that will be happening. We already have that problem. That problem will just be, you know, exacerbated.	The Draft EIR/EIS Chapter 22 (Air Quality and Greenhouse Gasses) evaluates fugitive dust associated with the construction of each action alternative. As described in Appendix 3B, Environmental Commitments (Section 3.C.2.35), the project will implement all applicable fugitive dust control measures, including basic and enhanced measures, recommended by the local air quality management agencies. As indicated in the Draft EIR/EIS, these strategies, which include watering and vehicle speed limits, will reduce fugitive dust generated by ground disturbance and earthmoving by approximately 75%. The project will also implement fugitive dust control measures to achieve a 70% reduction in dust from concrete batching and an 80% reduction in dust from aggregate and sand pile erosion. Finally, the project will also incorporate measures to reduce re-entrained road dust, as part of Mitigation Measure AQ-9. The San Joaquin Valley Air Pollution Control District (SJVPACD) and Bay Area Air Quality Management District (BAAQMD) have local air quality jurisdiction in the San Joaquin Valley and San Francisco Bay Area, respectively. The CEQA Guidelines adopted by these agencies have determined that implementation of the fugitive dust control measures incorporated in the RDEIR/SDEIS will reduce dust emissions to a less-than-significant level. Please refer to Impacts AQ-3 and AQ-4 (Chapter 22, Air Quality and Greenhouse Gases) for additional information. In addition, Impacts AQ-11 and AQ-12, which evaluate particulate matter (i.e., exhaust and fugitive dust) concentrations at receptors located nearby construction activities, indicate these impacts for may be reduced to less than significant with incorporation of Mitigation Measure AQ-9. The Yolo-Solano Air Quality Management District (YSAQMD) and Sacramento Metropolitan Air Quality Management District (SMAQMD) have local air quality jurisdiction in Yolo and Sacramento Counties, respectively. The agencies have established quantitative thresholds to assist lead agencies in determining the significance of fugitive dust impacts. As described in Impacts AQ-1 and AQ-2 (Chapter 22, Air Quality and Greenhouse Gases), combined dust and exhaust emissions for all alternatives not exceed the YSAQMD's and SMAQMD's thresholds with incorporation of mitigation. In addition, Impacts AQ-9 and AQ-10, which evaluate particulate matter (i.e., exhaust and fugitive dust) concentrations at receptors located nearby construction activities, indicate these impacts for may be reduced to less than significant with incorporation of Mitigation Measure AQ-9. However, while impacts related to fugitive dust are identified as less than significant within the YSAQMD and

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			SMAQMD, note fugitive dust generated by ground disturbance and earthmoving are anticipated to be reduced by approximately 75%, fugitive dust from concrete batching by 70%, and fugitive dust from aggregate and sand pile erosion by 80% with the environmental commitments identified in the Draft EIR/EIS (Appendix 3B, Environmental Commitments, Section 3.C.2.35). Finally, the project will also incorporate measures to reduce re-entrained road dust, as part of Mitigation Measure AQ-9.
510	8	One concern I have is that these two pamphlets are being published on glossy, expensive paper. How much is this costing? This could have been done cheaper. This is nothing more than an ad campaign.	To date, approximately $216 million has been spent to develop the Draft BDCP, conduct the environmental review of the BDCP and its alternatives, host numerous public outreach activities, and complete preliminary engineering and design of the proposed conveyance facilities. Please see Master Response 5. Included in these expenses were the costs associated with planning and implementing the 12 Public Open House meetings that were held around the state in January and February 2014. The meetings fulfilled the requirements of CEQA and NEPA for public meetings and to provide a means to accept public comments on the draft documents. The Public Open House Meetings were designed to be accessible to people from all regions of the state, and to provide the staff, materials, and resources needed to address the public's questions on the Draft BDCP and Draft EIR/EIS.
510	9	Also in this one it says that the cost of building the twin tunnels is $4.27 billion dollars when the actual cost will be $68 billion dollars. It is just like when you buy a house and you buy a house for $250,000 now, when you pay for it in 50 years you will actually end up paying $700-800,000 for that house. Same thing that is happening here. That initial cost will go up and because of interest we will be paying $68 billion. What else can we do with that money in our state? Improving our education system, revamping our levees, taking care of our existing water.	The proposed project is costly, but proponents have assessed the benefits as described in the proposed project funding sources. Notably, the water contractors benefitting from the proposed project and their constituents will bear all costs associated with constructing new conveyance facilities and mitigating for the impacts of those facilities. Expenditures of public money from other sources would be limited to restoration activities beyond those needed to mitigate the impacts of facility construction. Please see Master Response 5 for more information on costs and funding.
511	1	I am an appraiser and consultant. I have read the plan online, maybe not all of it but a good part of it and I am very concerned about the lack of discussion and analysis regarding the effects of creating the salt marshes that are inevitably going to occur as a result of this project. That point seems to be silent in almost every regard. Because of my background and experience, it is very clear to me that the water that is already being shipped to Los Angeles via the Aqueduct and State Aqueduct and the Delta Mendota is already creating a high level of salination in the Delta farmlands and it will be greatly accelerated by this twin tunnel project. The effect will be harmful to many farmers. Farmers are already limited to the types of crops that they can grow. The project will be even more destructive and many farmers will be put out of business, particularly those with farmlands in close proximity to the tunnels themselves in the north Delta.	The water quality assessment of the diversion of Sacramento River water under the project alternatives addresses effects on salinity-related parameters in the Delta, including electrical conductivity (EC), and compliance with related agricultural use objectives in the Bay-Delta Water Quality Control Plan and degradation relative to these uses in Impact WQ-11 in Chapter 8, Water Quality. Where significant impacts to agricultural beneficial uses would occur due to the alternative, as opposed to other forces including climate change and sea level rise, mitigation to lessen those impacts is provided. Further, the proposed project has been modified since publication of the Draft EIR/EIS to Alternative 4A, which would have less than significant impacts on salinity-related parameters.
511	2	I have a great deal of experience in litigation in court testimony, eminent domain, and this project will create a huge backlash of adverse condemnation claims from farmers who over the years will see the value of their land greatly diminished. It is astounding to me that this critical aspect of the plan is given very little, if any, discussion. Adverse condemnation will be a big part of the backlash if this project is approved and built.	As described in Chapter 3, Section 3.6.2.2, Natural Communities Protection and Restoration, conservation measures may occur on existing public land. However, where this is not practicable, land will be acquired by conservation easement or in fee. When required, the project proponents would provide compensation to property owners for economic losses due to implementation of the BDCP. Effects and mitigation measures relating to agricultural activities in the project area are described in Chapter 14, Agricultural Resources, EIR/EIS, and Chapter 16, Socioeconomics, as well as Master Response 18. Please also note that the new preferred alternative (Alternative 4A/California WaterFix) would involve fewer acres of proposed habitat restoration. Alternative 4A has been developed in response to public and agency

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			input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
511	3	The plan appears to have, in some magical sort of way, exempted itself from other environmental impacts. Its effect on endangered species seems to be magically waved away. For the next 50 years or more, no one will be able to claim any issues about negative impact that this project has on endangered species. I do not know how in the world anyone can legislate that. This is not an environmental impact report. This Bay Delta Plan is a sham. It is amazing to me that anyone can present this to the public with a straight face.	Since 2006, the proposed has been developed based on sound science, data gathered from various agencies and experts over many years, input from agencies, stakeholders and independent scientists, and more than 600 public meetings, working group meetings and stakeholder briefings. DWR's fundamental purpose of the proposed project is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south of the Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Please see Master Response 3 for additional information regarding the purpose and need behind the proposed project. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. Please see Master 5 for more information on costs and funding. The proposed project is going to mitigate for impacts and restore habitat for fish and wildlife listed in Section 4.3.7 and 4.3.8 of the RDEIR/SDEIS. The RDEIR/SDEIS addresses effects on special-status species, including non-listed species. Impacts that are going to potentially occur during the implementation timeline are fully disclosed with its associated mitigation measure to decrease the severity of said impact to covered species. Please see Appendix 1A Evaluation of Species Considered for Coverage of the BDCP for additional information on screening criteria of fish and wildlife species that were selected for the other 15 conveyance alternatives. Chapters 11 and 12 of the 2013 Public Draft BDCP EIR/EIS include in-depth, comprehensive analyses of potential effects on all endangered fish and wildlife known or expected to occur in the BDCP Plan Area.
511	4	The Plan will have devastating impacts on Delta recreation, a major industry that will be severely curtailed while under construction and certainly damaged well into the future. After the project is completed, I do not think these aspects have been adequately studied or addressed in the EIR.	The proposed project may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011d) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. When required, DWR would provide compensation to property owners for economic losses due to implementation of the proposed project. Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from

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			one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft BDCP Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in the BDCP Appendix 3B, Environmental Commitments, EIR/EIS. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Bay Delta Conservation Plan Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Chapter 16, Socioeconomics, of the Draft EIR/EIS was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Chapter 16, Socioeconomics, Section 16.3.3.9, in Appendix A for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been incorporated into Appendix A.
511	5	It is not beyond my imagination to see farmers within four, five, ten miles of this project and pipelines filing legitimate claims for damages, i.e. adverse condemnation as a result of increased salinity levels that will occur over a period of years. It may not be obvious in any one year, but when you look at the salinity levels as they increase over a period of five years or certainly ten years, the effect will be traumatic.	The water quality assessment of the diversion of Sacramento River water under the project alternatives addresses effects on salinity-related parameters in the Delta, including electrical conductivity (EC), and compliance with related agricultural use objectives in the Bay-Delta Water Quality Control Plan and degradation relative to these uses in Impact WQ-11 in Chapter 8, Water Quality. Where significant impacts to agricultural beneficial uses would occur due to the alternative, as opposed to other forces including climate change and sea level rise, mitigation to lessen those impacts is provided. Further, the proposed project has been modified since publication of the Draft EIR/EIS to Alternative 4A, which would have less than significant impacts on salinity-related parameters.
512	1	This proposed Plan by Governor Brown, in my opinion, is fundamentally flawed. What it is doing is redistributing limited water from Northern California to Southern California and there is not enough water to go around. We are in a drought situation. What we need to do is to be more creative and look at options to not redistribute water but to find ways to develop new water resources. San Diego County is currently building a desalination plant. The cost is $984 million. The plant is located in Carlsbad. It is projected to generate 500 million gallons of highly purified drinking water a day. The reason for this move is because San Diego County doesn't have enough water. California, if you look geographically, has oceanfront all the way down the state. We could negotiate with Southern California counties to develop desalination plants, for example in Monterey County, San Luis Obispo County, Santa Barbara County and Los Angeles County. We would need a couple in Los Angeles, because Los Angeles is so big. We are coming out with new filtering mechanisms that are more environmentally friendly to desalination plants. Other countries like Australia and Saudi Arabia are focusing on desalination plants. If more California counties in Southern California, which are arid in desert areas and not in Northern California, would continue to grow in population, if they developed their own water resources, that would be a good move for the entire state of California. It would be good for our economy. It would be good for local entities to have more control over their own water and it wouldn't devastate Northern California. If the state of California is not comfortable with the current desalination plant, they can allocate two, three, four million dollars to different UC systems like Cal State Monterey,	Please see Master Response 7 regarding desalination. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. In Chapter 14, Agricultural Resources, EIR/EIS, mitigation measures are proposed to avoid and reduce significant impacts to the extent feasible. See Master Response 18 for additional information regarding agricultural mitigation.

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		UC Santa Cruz. We have several UC systems that are doing research in marine environments and they could do quite a bit of research and improve on the desalination plants that are being built in San Diego. With some forethought and a creative and progressive approach, we could build desalination plants and not have to continue to rely on Northern California water. Why should we have to sacrifice Stockton? The building of these twin tunnels will lose more agricultural land through eminent domain and other means. We need to stop. Stop the taking of our agricultural lands. We need to maintain our agricultural lands and not lose them for whatever reason.	
512	2	Right now in the Delta fisheries, salmon, stripers, bass, all of which are endangered species, are real fragile right now. What they really need is more fresh water and higher water flow. We have our own water resources in the San Joaquin County and the Delta. We have our own water. We have a multibillion-dollar agricultural industry and both the fisheries and the agriculture industries will be jeopardized if we continue to allocate and take more water from this area and send it south. You do not really need to do that. That is why I am saying this is really flawed.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. For more information regarding purpose and need of the proposed project please see Master Response 3. The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. For more information regarding water supply please see Master Response 26 and Master Response 35.
513	1	This Plan to take more water from the Delta is seriously flawed for the following reasons: By taking more water, the salinity of the Delta will increase, which will impair the species who live there. Nobody has a good answer for that at this point in the draft, other than they would adjust after, which is basically saying that the patient would be dead. Let us try now to revive the patient. Nobody knows the effects of salinity. We do not know the effect that saline has on many species. Nobody knows exactly what those effects will be and how many species will suffer and die because of the increased salinity.	As noted by the comment, because salinity-related parameters have the potential to be altered by the project alternatives, these parameters, including bromide, chloride, and electrical conductivity were analyzed in detail for all alternatives in Chapter 8, Water Quality. The water quality assessment addresses effects of changes in salinity on agricultural and fish and wildlife resources due to the project alternatives via the salinity assessment (Impact WQ-11) through evaluation of compliance with agricultural and fish and wildlife objectives in the Bay-Delta Water Quality Control Plan and degradation relative to existing conditions and the No Action Alternative. In addition, the assessment of bromide (Impact WQ-5) and chloride (Impact WQ-7), other salinity-related parameters, address effects to drinking water uses via assessing concentrations relative to relevant objectives, thresholds and degradation. Where significant impacts to beneficial uses would occur due to the alternative, as opposed to other forces including climate change and sea level rise, mitigation to lessen those impacts is provided. Please also refer to Master Response 14 for additional information regarding water quality.
513	2	To take more water from the Delta than is already being taken will turn the Delta into a swamp. Those who recreate there will lose that opportunity. The farmers who make a living on their farms in the Delta region will lose their economic viability. This will be replaced with habitat areas in a highly solidified, salted area and that is not going to be a	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Proposed Project. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft EIR/EIS. Alternative 4 remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan

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		fair exchange. So what is there now?	(HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts. Although Alternatives 4A, 2D, and 5A include only those habitat restoration measures needed to provide mitigation for specific regulatory compliance purposes, habitat restoration is still recognized as a critical component of the state's long-term plans for the Delta. Such larger endeavors, however, will likely be implemented over time under actions separate and apart from these alternatives. The primary parallel habitat restoration program is called California EcoRestore (EcoRestore), which will be overseen by the California Resources Agency and implemented under the California Water Action Plan. Under EcoRestore, the state will pursue restoration of more than 30,000 acres of fish and wildlife habitat by 2020. These habitat restoration actions are expected to be implemented faster and more reliably by separating them from the water conveyance facility implementation. The BDCP aims to provide a more reliable water supply, in a way more protective of fish. It is projected that water deliveries from the federal and state water projects under a fully-implemented BDCP would be about the same amount diverted in the last 20 years. Chapter 14 of the EIR/EIS address potential impacts to agricultural lands and Chapter 16 address potential socioeconomic impacts. Please refer to Master Response 18 for additional information related to mitigation of agricultural impacts.
513	3	The cost of the project is far too great for what the outcome will be. Since the 1982 tunnel plan, which failed by the vote of the people, the people in L.A. County have not used one drop more water than they did at that time. That is because of conservation efforts, increased rate and recycling efforts. This money would be much better served if it were to shore up the existing levees, help municipality desalination plants and recycling efforts and increase the dams so that we have greater water storage. In times like these when we are in a drought situation, the second year of a drought and possibly going into a third, nobody is willing to say. Governor Brown called it a drought the other day, but we may still come out of it.	The California Department of Water Resources' Levee Repairs and Floodplain Management Office is responsible for administering levee programs through evaluation and direct rehabilitation of structural deficiencies in California's levee system. Overall levee repairs and improvement programs administered by DWR will continue with available funding. For additional information on the relationship between the proposed project and Flood protections in the Delta, please see Final EIR/EIS Appendix 6A BDCP/California WaterFix Coordination with Flood Management Requirements. The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water

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			supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage. With regard to levee maintenance and flood control in the Delta, please refer to the Final EIR/EIS Appendix 6A, BDCP/California Water Fix Coordination with Flood Management Requirements.
514	1	I am the campaign administrator for Restore The Delta. As of today, the two main reservoirs are the state and federal water projects like Lake Shasta and Lake Oroville are both at 36 percent capacity and this is just the first full year of a drought. Historically, we have multi-year droughts in California one-third of the time.	No issues related to the adequacy of the environmental impact analyses in the EIR/EIS documentation were raised.
514	2	Where do BDCP planners expect to get water for these tunnels in future drought years, since this will be permitted as a habitat conservation plan that is supposed to restore populations of endangered species like Chinook salmon?	The amount of water DWR can pump from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would still be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a predetermined flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta.
514	3	How do they plan to operate the tunnels when there is even less water than average for exporter users and the environment to share?	The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta.

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514	4	In a prolonged drought, how will this project meet the co-equal goals required by law, unless reliable considerably acknowledged to mean dramatically less than exporters have come to expect.	The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. For more information regarding the proposed project's compliance with the Delta Reform Act please see Master Response 31.
516	1	I am totally against sending water to Southern California. We do not have any water to send to anybody. We do not even have enough water here in Northern California. With the drought and this project, it is going to cost twice as much as they are telling us now that it will cost.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. For more information regarding purpose and need of the proposed project please see Master Response 3. The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. The proposed project is costly, but lead agencies have assessed the benefits as described in the BDCP funding sources. Notably, the water contractors benefitting from the proposed project and their constituents will bear all costs associated with constructing new conveyance facilities and mitigating for the impacts of those facilities. Expenditures of public money from other sources would be limited to restoration activities beyond those needed to mitigate the impacts of facility construction. BDCP Chapter 8, which deals with cost issues, and cost-benefit analysis information are available on the BDCP website. Please see Master Response 5 for more information on project costs and funding. The proposed alternative (referred to in the RDEIR/SDEIS as Alternative 4A) is estimated to cost significantly less relative to the former preferred alternative (Alternative 4 under the BDCP). The difference in cost is largely due to the reduced level of restoration specifically funded by the project, as well as other Conservation Measures that are not included under Alternative 4A. As such, the total estimated cost for Alternative 4A is $14.9 billion in undiscounted 2014 dollars. The estimated cost to implement the former preferred alternative under BDCP is $24.7 billion in undiscounted 2012 dollars.

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516	2	This project will ruin the Delta. It will ruin all the farms out in the Delta. We simply do not have any water to send anywhere. Our wells are going dry up here. We have not had any rain this year and that's even multiplying the situation. There is not enough water for the fish. It will also inhibit the boats from coming up through the Delta to the Port of Stockton and to the Port of Sacramento. What they should concentrate on is building Auburn Dam or another dam somewhere in Northern California to store water and leave the Delta alone.	The preferred alternative is now Alternative 4A (i.e., the California Water Fix Project) and no longer includes an HCP. Refer to Chapter 14 (Agricultural Resources) in the Draft EIR/EIS, along with Appendix A (Chapter 14) and Section 4 in the RDEIR/SDEIS, with respect to agricultural impacts and proposed mitigations. Chapter 7 of the Draft EIR/EIS evaluates groundwater supplies and impacts, along with Appendix A (Chapter 7) and Section 4 of the RDEIR/SDEIS. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully implemented project would be about the same as the average annual amount diverted in the last 20 years. Hence, under the stringent environmental statutes in place today, including the ESA, operation of the proposed water delivery system could not drain the Delta rivers and channels dry, including the Sacramento River, or have significant impacts to marine vessels calling at the Ports of Stockton or Sacramento. For other issues raised by the commenter including the need on building more dams, refer to the following Master Responses: Master Response 28 (Operational Criteria), Master Response 26 (Changes in Delta Exports), Master Response 37 (Storage), and Master Response 25 (Upstream Reservoir Effects).
517	1	I am a concerned citizen from Lodi, California. I was born and raised in Lodi and have been going to the Delta area since I was a kid fishing and going on picnics with my family. I have always loved this area. It's a beautiful natural habitat of California and no less beautiful than places like Lake Tahoe or Yosemite, to name a few places on the Pacific Ocean. I am very disturbed that this Plan ever came about. I think it is a preposterous idea to put two huge water pipelines 150 feet below the Delta to divert water southward. I do not care where it is going. I think it is a ridiculous idea. The Bay Delta Conservation Plan is not a conservation plan, it is a disaster. First, the ecology in the Sacramento, San Joaquin Delta will lower fresh water in the Delta Bay. There will be less fresh water in the Delta and San Francisco Bay. The Sacramento, San Joaquin Delta is what keeps the San Francisco Bay fresh and alive.	The preferred alternative is now Alternative 4A (i.e., the California Water Fix Project) and no longer includes an HCP. Developed to meet the rigorous standards of the federal and state ESAs, the project is intended to be environmentally beneficial. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Refer to Chapter 6 (Surface Water) of the Draft EIR/EIS and Section 4 and Appendix A (Chapter 6) of the RDEIR/SDEIS for information on flows and flushing action. The project does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully implemented project would be about the same as the average annual amount diverted in the last 20 years.
517	2	When they take that much fresh water out of the Delta it will extremely affect San Francisco Bay and whatever fish and bird life that go through that habitat -- humans included. It will restrict further, if not put an end to, many species of fish migration, business loss, bird and wildlife habitat. I know that there is a conservation plan that is supposed to put in effect with this, but nobody knows for sure if it will work. We already have a wildlife habitat now and I am afraid that will be destroyed by too many restrictions on recreational use. It will be lowering ground water levels and quality in the Delta area.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. Existing water diversions, including the existing State Water Project/Central Valley Project diversions in the southern Delta, can impact water flows and quality. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The project proposes to stabilize water supplies, and exports could only increase under certain circumstances. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in Ch. 4 of the RDEIR/SDEIS. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. The Cumulative Impact Analyses that was written for the 2013 Public Draft BDCP EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses.

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			Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the RDEIR/SDEIS. The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e. 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. The greatest potential for impacts to groundwater will be during the construction of the intake facilities, pump stations, forebays, and tunnel shafts. It is anticipated that construction of these facilities will require some type of groundwater dewatering immediately adjacent to the construction site while construction activities are underway. For the tunneling work itself, it is anticipated that groundwater presents minimal risk to the project since the tunneling work will be conducted with equipment that is specifically designed to operate under high groundwater conditions. Hence localized dewatering along the tunnel alignment will not be conducted as a regular component of the tunnel mining operation. Localized dewatering along the alignment will be used only in the event of certain maintenance activities, or specialized construction conditions. Geotechnical exploration work is planned in advance of dewatering well installation so that the groundwater regime at each project site can be better understood, which in turn will allow each dewatering system to be uniquely designed and operated in order to limit construction-related effects to the groundwater user adjacent to the construction sites. DWR plans to have a groundwater monitoring and management plan (Plan) in place before construction begins. The Plan will include a process by which baseline groundwater conditions are established along the project corridor, defining groundwater monitoring during and after construction, and establishing mitigation measures to be utilized. The establishment of groundwater baseline information will allow DWR and all relevant parties to develop information on groundwater conditions and consumptive usage patterns. This information will aid in determining if and when any adverse project-related effects to the groundwater during construction activities occur. The baseline monitoring process may include determining variables such as seasonal changes in groundwater level elevations and water quality, the interface of groundwater with surface water and drainage, consumptive usage patterns established by municipal, domestic, and agricultural wells, and crop utilization of the groundwater. The timing, frequency, and duration of the monitoring during and after construction would be determined before construction begins and will be dependent, in part, on the results of the pre-construction monitoring and the documented use of each resource. If a construction-related effect is identified to have occurred, the magnitude, significance, and anticipated duration of the effect will be determined and an appropriate mitigation measure will be utilized. Mitigation measures that may be considered could include deepening of existing wells, the installation of new wells, or providing an alternate source of temporary water. The most appropriate mitigation methodology applied will be determined on a case by case basis in conjunction with the impacted party. For more information see

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			Mitigation Measure GW-1 in Appendix A Chapter 7 Groundwater.
517	3	There will be loss of thousands of acres of farmland, primarily from not only the project itself, but for seeding those lands to make conservation lands.	Effects on farmland in the Delta associated with construction of water conveyance facilities as well as implementation of habitat restoration are described in Chapter 14, Agricultural Resources, EIR/EIS. Where significant impacts are identified, mitigation measures have been proposed to reduce these effects. See Master Response 18 for more information regarding agricultural impact mitigation.
517	4	There will be spiraling costs to the taxpayers and to the regional economy and the state of California. The BDCP will be a disaster to the economy of California. The cost keeps spiraling upwards for the BDCP. The State of California actually does not know how much water diversion will cost for land seized, equipment, materials, construction, construction labor, financing, interest and legal battles. Public works projects typically far exceed construction time, cost, financing and legal estimates.	The proposed project is costly, but proponents have assessed the benefits as described in the BDCP funding sources. Notably, the water contractors benefitting from the proposed project and their constituents will bear all costs associated with constructing new conveyance facilities and mitigating for the impacts of those facilities. Expenditures of public money from other sources would be limited to restoration activities beyond those needed to mitigate the impacts of facility construction. BDCP Chapter 8, which deals with cost issues, and cost-benefit analysis information are available on the BDCP website. Please see Master Response 5 for more information on project costs and funding. The proposed alternative (referred to in the RDEIR/SDEIS as Alternative 4A) is estimated to cost significantly less relative to the former preferred alternative (Alternative 4 under the BDCP). The difference in cost is largely due to the reduced level of restoration specifically funded by the project, as well as other Conservation Measures that are not included under Alternative 4A. As such, the total estimated cost for Alternative 4A is $14.9 billion in undiscounted 2014 dollars. The estimated cost to implement the former preferred alternative under BDCP is $24.7 billion in undiscounted 2012 dollars.
517	5	This project will divide the people of California. The time, effort and money will be better spent building water recreation projects throughout the state and especially in areas which do not have these facilities such as AG use areas. For example, IAG use of water in counties of Fresno, Tulare, Kern and Imperial counties. We live in a desert state. Conservation measures should be strictly adopted and enforced not only in drought periods, but all the time.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The project proposes to stabilize water supplies, and exports could only increase under certain circumstances. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. For more information regarding purpose and need of the proposed project please see Master Response 3. For more information regarding alternatives to the proposed project please see Master Response 4. For more information regarding demand management please see Master Response 6.
517	6	A 40,000 page document outlining the BDCP cannot justify or explain draining the Sacramento River. That has been done to the Colorado River and destruction of the San Joaquin, Sacramento water resource and precious wildlife habitat and farmlands. We already are taking too much water out of the Delta. The state of California can come up with a better Plan to satisfy water needs throughout the state.	The Lead Agencies acknowledge your opposition to the BDCP. Project operations will be governed and monitored consistent with permit restrictions. The BDCP analysis indicates that annual water diversions from the Delta would be within 10% of the historic 20-year average. For additional information on water operations under the proposed BDCP, please see Chapter 5, Water Supply, EIR/EIS. Please see Master Response 26 for additional discussion of changes in exports. The Delta ecosystem is in a continuing decline, which impacts protected species and long-term water supplies. Over the last 150 years, the Delta has been altered by a system of manmade levees, reservoirs, and dredged waterways constructed to support farming and urban development and to provide flood protection for local towns and cities. Many other factors affect species health in the Delta, including water quality issues, nonnative species, illegal fishing, and smaller, local water diversions. The Delta is also threatened by

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			continuing land subsidence, seismic risk, and effects of climate change. For more on the purpose and need for the proposed BDCP, please see Master Response 3. Please see Master Response 6 regarding water demand management.
517	7	I really hope and pray that this Plan does not go through. I think we need to slow down the process here and not try to rush or force this on the people of California. It is happening too quickly and as you can see here tonight there are only a few people that are coming out. I do not know how many people know that this meeting is going on. A project of this size is going to have such great effects on our state and our region, we need to give it more time. I pray that we work out the details in a better way for everyone.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/EIS documentation.
518	1	My comment deals with Chapter 8, based on what was presented to me about water quality and constituents of urgent concern, and what the effect would be as it relates to these alternatives.	Cost estimates have been developed to be as detailed as possible given the current level of design, but are based on requirements of existing statutes related to water quality and affecting constitutes (e.g., the Clean Water Act). Therefore, while the final design may differ from what is assumed here, the protective standards required by these statutes will remain the same, so that only the costs would change.
518	2	It appears that the conservation plane does now take into account all the discharge that is occurring and what the impact would be from municipalities, say, like the City of Sacramento. The conservation plan does not take into account what would be the resolution, or how to look at the cost associated with deferred maintenance, or not being to standards similar to like the City of San Jose and their discharge into San Francisco Bay. So it appears that the plan is not taking into account what those costs will be as well.	The EIR/S evaluates the impacts of the components of the project alternatives on the environment. The impacts due to discharges from municipalities (e.g., from wastewater or storm water) would be assessed, as needed under CEQA, when those municipalities undertake projects associated with the discharges.
518	3	There is also communities downstream. It would be like the City of Antioch, where they pull water out. I am aware of one community that already had to move their pumps for their municipal use. I want to say Fairfax, but I am not quite certain if it is Fairfax. That was part of my question. Based on the individuals here, and my questions to them, it did not appear that that cost element was taken into account, as well as the qualitative aspect.	The proposed BDCP Delta operations do not require the reoperation of Shasta, Trinity, or Folsom Reservoirs or any San Joaquin River and tributaries water storage facilities. All of the existing reservoir operation criteria are met with the same frequency as conditions without the proposed BDCP. Modeling shows that the coming decades likely will bring more frequently the kinds of conditions capable of depleting California's major reservoirs. The driver of those conditions is climate change, not the BDCP. The modeling indicates that the BDCP would give water project operators more flexibility to avoid "dead pool," a condition in which a reservoir is so low its water cannot drain by gravity through its outlets, and operations would not increase the frequency of its occurrence or dewater these reservoirs. Some changes in the seasonal release patterns at Oroville would occur under the BDCP proposed project, primarily related to increased spring releases and reduced summer releases. However, this change in reservoir storage release patterns does not affect long-term storage and as with the other reservoirs, does not conflict with existing applicable operational criteria. Additionally, the State Water Project and Central Valley Project are operated on a real-time basis and operations could be modified to reduce potential for reservoirs reaching dead pool levels. The proposed BDCP would not affect upstream water rights or entitlements. It aims to provide a more reliable water supply, in a way more protective of fish. It is projected that water deliveries from the federal and state water projects under a fully-implemented BDCP would be about the same as the average annual amount diverted in the last 20 years. Please see Master Response 26 for additional information on effects on northern California.
518	4	This question is not species driven, but the Delta is a recreational resource. People water ski, they fish. Some fish and consume the fish. The question is will the conservation plan include those considerations. Again, based on the fact that it appears that existing municipal discharge is occurring, the question is what that impact is.	The proposed project may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work

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			with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011d) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove. An environmental commitment has been developed that would provide a mechanism for implementing stormwater treatment measures that would result in decreased discharge of contaminants to the Delta, which is intended to reduce the amount of pollution in stormwater runoff entering Delta waterways. Please refer to Appendix 3B, Environmental Commitments, in Appendix A of the RDEIR/SDEIS. Chapter 8, Water Quality, RDEIR/SDEIS takes into consideration existing discharges from municipal facilities in its assessment of water quality impacts related to implementation of the proposed project.
519	1	We have a large number of serious concerns about the plan, and, in fact, I think we are opposed to it. We just do not believe that the removal of this much water from the Bay and Delta water system cannot result in anything other than harm to the environment there.	The comment does not raise any specific environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. However, The proposed project was developed to meet the rigorous standards of the federal and state ESAs, and as such the proposed project is intended to be environmentally beneficial. By establishing a point of water diversion in the north Delta and new operating criteria to improve water timing designed to improve native fish migratory patterns and allow for greater operational flexibility.
519	2	The bays and Delta are already in a very precarious position environmentally. It is probably not sustainable as it is, but the removal of more water in the system will make it worse. There is a number of endangered species there that will probably go extinct if this happens.	The amount of water DWR can pump from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would still be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a predetermined flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 Public Draft BDCP EIR/EIS. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in Ch. 4 of the RDEIR/SDEIS. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. The Cumulative Impact Analyses that were written for the 2013 Public Draft BDCP EIR/EIS have been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information, please see Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the RDEIR/SDEIS. For additional information regarding cumulative impacts, please see Master Response 9. For additional information regarding mitigation measures, please see Master Response 22.

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519	3	There are certainly a number of positive things about this plan that we like. It certainly is restoring the wetlands. The tidal marshes is a good idea and the increased fisheries there. But you can do that without building these giant pipelines to suck water out of the Sacramento River and send it south. We just wanted to state our opposition to the plan, as it is presently constituted.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. Existing water diversions, including the existing State Water Project/Central Valley Project diversions in the southern Delta, can impact water flows and quality. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which ecological goals and objectives would be fully satisfied. It is projected that water deliveries from the federal and state water projects under a fully-implemented Alternative 4A would be almost the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. For more information regarding purpose and need of the proposed project, please see Master Response 3.
520	1	The comment is that there is really nothing in the Bay Delta Conservation Plan about controlling or having state laws that control groundwater pumping. Because we are in a diminishing situation with our groundwater supply and at the same time, we have got urban growth taking up agriculture land, there are water demands.	The proposed project would not significantly impact local water supplies. While groundwater levels could be temporarily lowered in localized areas during the dewatering phases of construction, groundwater would return to pre-pumping levels over the course of several months following the dewatering phase. Mitigation has been proposed to maintain water supplies in areas affected by construction dewatering. Additionally, the project proponents would relocate and/or replace wells, pipelines, power lines, drainage systems, and other infrastructure that are needed for ongoing agricultural uses and would be adversely affected by project construction or operation. For additional information regarding proposed agricultural mitigation, please see Master Response 18. Construction of BDCP facilities will occur in a manner specifically designed to avoid adverse effects on groundwater. As described in Appendix 3C, Table 3C-7, of the 2013 Public Draft BDCP EIR/EIS, ponds to store reusable tunnel materials and spoils material would designed with the invert at least 5 feet above seasonally high groundwater and impervious liners along the invert and interior slopes of the ponds to avoid contamination. The tunneling operation would use biodegradable polymers that would be combined with the excavated soil to allow conveyance of the soil slurry, or reusable tunnel material. The polymers would decompose over time. In some locations within the State, groundwater is regulated through judicial review related to adjudication proceedings in the court system. Many counties and regional agencies, or groups of agencies, have adopted groundwater management plans and/or ordinances. Governor Brown recently signed into law three bills that address groundwater management in California. These bills direct local agencies to develop groundwater management plans and allow the state to monitor and intervene if local agencies fail to do so. For more information regarding groundwater impacts and their associated mitigation of the proposed project please see Section 4.3.3 Groundwater of Section 4 in the RDEIR/SDIES. Updated information on groundwater effects of BDCP water conveyance alternatives can be found in Appendix A Chapter 7 of the RDEIR/SDIES.
520	2	A lot of the land use policies that allow suburban sprawl are at the county level, so that there is no state control over suburban sprawl and land use that requires more people to move in, which requires more water.	The Lead Agencies agree with the commenter's characterization of the authority regarding local development activities. This perspective is described in Chapter 30, Section 30.1.1, Relationship between Land Use Planning and Water Supply, EIR/EIS, and Section 30.3.5, Authority to Mitigate Effects of Growth. Nonetheless, Chapter 30 includes analysis of the potential environmental effects related to growth that could be induced by the project's contributions to more reliable water supplies in SWP and CVP export service areas. The authority to regulate growth, and by extension, to mitigate the environmental effects of growth, resides

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			primarily with land use planning agencies. Neither DWR or Reclamation nor the contractors are land use planning agencies and, consequently, do not have the authority to approve or deny urban development within the study area or to impose mitigation for the environmental consequences of such development. Regarding DWR's role in facilitating demand reduction (thereby lessening the environmental effects of water supply development attributable to urban growth), refer to Conservation/Water Use Efficiency in Section 30.3.2.5, Potential for Increases in Water Deliveries to Remove Obstacles to Growth, and to Appendix 1C, Demand Management Measures, EIR/EIS.
520	3	We have got two issues, we have got the groundwater -- the need for groundwater law, like Colorado and other states have, that California has fought. At the same time, we have urban growth that requires more water, and that is under the control of county board of supervisors and city councils. Both of those operate against water or increased water demands.	The proposed project would not significantly impact local water supplies. While groundwater levels could be temporarily lowered in localized areas during the dewatering phases of construction, groundwater would return to pre-pumping levels over the course of several months following the dewatering phase. Mitigation has been proposed to maintain water supplies in areas affected by construction dewatering. Additionally, the project proponents would relocate and/or replace wells, pipelines, power lines, drainage systems, and other infrastructure that are needed for ongoing agricultural uses and would be adversely affected by project construction or operation. For additional information regarding proposed agricultural mitigation, please see Master Response 18. Construction of BDCP facilities will occur in a manner specifically designed to avoid adverse effects on groundwater. As described in Appendix 3C, Table 3C-7, of the 2013 Public Draft BDCP EIR/EIS, ponds to store reusable tunnel materials and spoils material would designed with the invert at least 5 feet above seasonally high groundwater and impervious liners along the invert and interior slopes of the ponds to avoid contamination. The tunneling operation would use biodegradable polymers that would be combined with the excavated soil to allow conveyance of the soil slurry, or reusable tunnel material. The polymers would decompose over time. In some locations within the State, groundwater is regulated through judicial review related to adjudication proceedings in the court system. Many counties and regional agencies, or groups of agencies, have adopted groundwater management plans and/or ordinances. Governor Brown recently signed into law three bills that address groundwater management in California. These bills direct local agencies to develop groundwater management plans and allow the state to monitor and intervene if local agencies fail to do so. For more information regarding groundwater impacts and their associated mitigation of the proposed project please see Section 4.3.3 Groundwater of Section 4 in the RDEIR/SDIES. Updated information on groundwater effects of BDCP water conveyance alternatives can be found in Appendix A Chapter 7 of the RDEIR/SDIES.
520	4	The cost of this is -- a significant part of it is borne by the taxpayer. At the same time, the significant part is borne by the water agencies. So that if one part of it falls through, is there -- the public is not going to be able to come back and say we made a mistake.	For more information regarding funding of the proposed project please see Master Response 5.
520	5	These water agencies, especially on the agriculture end, are huge industrial agricultural interests that have invested in permanent crops that demand water year to year, no matter what nature supplies. So should we be funding unwise investments? And agriculture needs to come clean with these permanent crops, pistachios, almonds, and other things that do not feed a hungry world. They are a luxury crop that has a high investment return.	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The proposed project Lead Agencies have no power to impose penalties on individual water users. DWR and

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			Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances. For more information regarding beneficial use please see Master Response 34.
520	6	Whereas rice, beans, other things that have -- especially beans and other crops, have much lower water demands. If you have a bad year, you have not got a multi-year investment made. You can cut back on the water use that year, if it is not available. You do not have the demand that the trees are going to die, because you have got a seasonal crop, an annual crop, whether it is lettuce, or wheat, or things that feed more people. So that -- that is not being really discussed out in the public arena.	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The Lead Agencies have no power to impose penalties on individual water users. DWR and Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances. For more information regarding beneficial use please see Master Response 34.
520	7	With climate change, the tunnels -- I think as a geologist that has dealt with climate change, and understand river processes and so on, that the tunnels are going to be a stranded asset.	The anticipated hydrologic changes due to climate change (increased temperatures and more years of critical dryness, increased water temperatures, changes in precipitation and runoff patterns, sea level rise, and tidal variations) will constrain and challenge future water management practices across the state, with or without the proposed project. The state is addressing climate change through strategies and a decision-making framework as outlined in the California Climate Adaptation Strategy and Adaptation Planning Guide. However, no single project and indeed none of the project alternatives would be able to completely counteract all of the impacts of climate change. The State of California has acknowledged that sea level rise threatens coastal and near coastal resources (such as the Delta and Delta water supplies) and that adaptation and resiliency planning to protect these resources from expected levels of sea level rise is appropriate. (OPC, 2013) http://www.opc.ca.gov/2013/04/update-to-the-sea-level-rise-guidance-document/ (CCC, 2013) http://www.coastal.ca.gov/climate/SLRguidance.html EO S-3-05. http://gov.ca.gov/news.php?id=1861 EO S-13-08 http://gov.ca.gov/news.php?id=11036 AB 32 also mentions SLR as a threat to California. California Waterfix would help to address the resilience and adaptability of the Delta to climate change through water delivery facilities combined with a range of operational scenarios, measures focused on the protection, restoration, and enhancement of the Delta ecosystem and measures to reduce other stressors (Environmental Commitments 3, 4, 6, 7, 8, 9, 10, 11, 12, 15, and 16). In addition to the added water management flexibility created by new water diversions and operational scenarios, California Waterfix would improve habitat, increase food supplies and reduce the effects of other stressors on the Delta ecosystem. By improving and expanding available habitat, the proposed project would increase resilience and adaptability to climate change by making alternative habitat available during periods of high stress, such

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			as very high or low freshwater inflow or very high salinity intrusion. Multiple analyses were performed in the proposed project to test the robustness of the alternatives to a range of potential future conditions. Water supply, aquatic and terrestrial resources were all analyzed with projected future conditions. The proposed project will likely remain in place and functional far into the future when salinity intrusion may require less frequent use of the south Delta pumps. Far from being stranded assets, the tunnels will be part of the state's strategy in adapting to climate change. More information on ways in which the BDCP/California WaterFix proposes to improve resiliency and adaptability of the Delta to climate change can be found in Chapter 29, Climate Change, EIR/EIS and Appendix A RDEIR/SDEIS and Appendix 3E, Potential Seismic and Climate Change Risks to SWP/CVP Water Supplies, EIR/EIS and RDEIR/SDEIS (in appendix A).
520	8	In drought years, they will not even be able to fill the tunnels. That means that the limited water that is needed to maintain the Delta ecosystem is -- how is that going to be adjudicated? Essentially, it is going to be tough. We are going to have to give up a species. We are going to give up the fisheries, what is left of them. The estuaries and the bay are the nurseries for what happens in the ocean.	The Proposed Project proposes to stabilize water supplies, and exports could only increase under certain circumstances in which hydrological conditions result in availability of sufficient water and ecological objectives are fully satisfied. It is projected that water deliveries from the federal and state water projects under the Proposed Project would be about the same as the average annual amount of water that would be diverted under the No Action Alternative (i.e., 2025 conditions without the Proposed Project). It is projected that Delta exports from the federal and state water projects would either remain similar or increase in wetter years and decrease in drier years under Alternative 4A as compared to exports under No Action Alternative (ELT) depending on the capability to divert water at the north Delta intakes during winter and spring months. The estimated changes in deliveries for 4A are provided in the RDEIR/SDEIS 4.3.1 and Appendix A Chapter 5 Water Supply. Although exports under the Proposed Project would be similar to the amount water exported in recent history, it would make the deliveries more predictable and reliable, while reducing other stressors on the ecological functions of the Delta. The Proposed Project would enable DWR to construct and operate new conveyance facilities that improve conditions for endangered and threatened aquatic species in the Delta while at the same time improving water supply reliability, consistent with California law (see, e.g., Cal.Wat. Code, § 85001[c]). Implementing the conveyance facilities would help resolve many of the concerns with the current south Delta conveyance system, and would help reduce threats to endangered and threatened species in the Delta, including entrainment eat the south Delta export facilities. For instance, implementing a dual conveyance system would align water operations, and their location, to better reflect natural seasonal flow patterns by creating new water diversions in the north Delta equipped with State-of-the-art fish screens, thus reducing reliance on south Delta exports during times of the year when listed aquatic species are present and most vulnerable. For more information on mitigation measures to minimize contraction and operational-related impacts to fish species, including Delta and longfin smelt, please see Chapter 11, RDEIR/SDEIS.
520	9	With a stranded asset of climate change, whose going-- we are still going to make the same decision, hopefully to maintain the ecosystem, but there is no guarantee of that with this new Bay Delta Plan. Because the government is locked in, not being able to change the agreement in favor of the environment. And the farmer certainly would never let it happen. So those are issues that need to be addressed. Agriculture, as I said earlier, agriculture has to be honest about luxury crops versus feeding a hungry world with an increasing population.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S. Chapter 29 of the EIR/EIS specifically discusses how the conservation measures including CM-1 would provide additional resilience and adaptability in the face of a changing climate. Please see Master Response 19 and Master Response 33 for additional discussion on the climate change assessment and the adaptive management process.
520	10	There is also -- I do not see any guarantee in the plan that this water that the big agricultural interests would gain would not be then sold to urban uses, or to suburban sprawl out on Mojave Desert, as has already happened with some water districts in the valley. They have sold their surface water rights to encourage urban growth, to support	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority

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		existing urban growth outside of the agricultural valley.	to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The proposed project Lead Agencies have no power to impose penalties on individual water users. DWR and Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances.
520	11	There is another issue that is probably somewhat minor, but the whole issue that is facing the state with hydraulic fracturing. The oil industry demands a large amount of water to do the hydro fracturing, and agriculture has failed to speak up about that.	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The proposed project Lead Agencies have no power to impose penalties on individual water users. DWR and Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances. State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to stipulated beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. As of the present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently working on fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is actually used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, roughly 5.2 million acre-feet of water a year have been diverted from the Delta, on average, over the last 20 years by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking.

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			For more information regarding beneficial use please see Master Response 34.
521	1	Will water from the BDCP be used to provide clean drinking water to the small communities in the valley that presently have contaminated water?	For more information regarding beneficial use please see Master Response 34.
521	2	According to the BDCP website, water from the tunnels can be used for fracking, because such water would work for an industrial use, which is considered a beneficial use. How much water will be allowed for fracking? How will this work when there is not enough water presently in the system for agricultural use for the San Joaquin Valley?	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The proposed project Lead Agencies have no power to impose penalties on individual water users. DWR and Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances. State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to stipulated beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. As of the present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently working on fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is actually used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, roughly 5.2 million acre-feet of water a year have been diverted from the Delta, on average, over the last 20 years by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking. For more information regarding beneficial use please see Master Response 34.
522	1	I am certain this whole Bay Delta Conservation Plan is a cover for political people who do not want to make a decision. They are using a committee to blind themselves from the grief of making a choice. And there's nothing.	This process has been initiated and carried forward by two Governors acting on a mandate from the voters of the State of California as a whole. No issues related to the adequacy of the environmental impact analysis in the EIR/EIS documentation were raised.
522	2	The real choice is about agriculture versus the cities who need water too. The real problem is, agriculture is not going to get any water. This is a gift of water, and they will	For more information regarding beneficial use please see Master Response 34.

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		be cutting their own long-term future short by doing that. They have to conserve more than agriculture, cut back on their yards, redrink the same recycled water everywhere in the cities. Put back pure water through three or four times treated, and then put it back chilled in the Delta. Quit picking on farmers, or taking water for farms. We need the water for farms to feed everybody else. Yeah, it is a business, but there's businesses in the Delta way, way larger than any farm in Southern California.	For more information regarding demand management please see Master Response 6.
523	1	Your display here is nice, and it looks like a lot of work. I think I read in the paper where they spent seven years with this project to build this tunnel. It is going to cost 24 billion, somebody says 51 billion. I think it was in the paper also, said 51 billion, an article that I read in the paper. Very confusing on what it is going to cost. I think I would have the tendency to believe it is going to be 51 billion.	The proposed project is costly, but proponents have assessed the benefits as described in the BDCP funding sources. Notably, the water contractors benefitting from the proposed project and their constituents will bear all costs associated with constructing new conveyance facilities and mitigating for the impacts of those facilities. Expenditures of public money from other sources would be limited to restoration activities beyond those needed to mitigate the impacts of facility construction. BDCP Chapter 8, which deals with cost issues, and cost-benefit analysis information are available on the BDCP website. Please see Master Response 5 for more information on project costs and funding. The proposed alternative (referred to in the RDEIR/SDEIS as Alternative 4A) is estimated to cost significantly less relative to the former preferred alternative (Alternative 4 under the BDCP). The difference in cost is largely due to the reduced level of restoration specifically funded by the project, as well as other Conservation Measures that are not included under Alternative 4A. As such, the total estimated cost for Alternative 4A is $14.9 billion in undiscounted 2014 dollars. The estimated cost to implement the former preferred alternative under BDCP is $24.7 billion in undiscounted 2012 dollars.
523	2	I am in disagreement with what they are doing, because I think desalination is the way to go. I mean, you have an ocean out there full of water, and you have a specific area in the State of California that would take a great grain of our water and especially agriculture.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage.

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			Please see Master Response 7 regarding desalination.
523	3	Agriculture should be the first [priority]. Everybody talks about water quality, the ecology, taking water from the Sacramento River to divert it down to the aqueduct, and all this other business. What is going to happen, in the article that I read, if you decrease the water from Sacramento going to the ocean, then you are increasing the shore, and bringing the salt water up the lake more -- up the river more, which disturbs the present ecology. So what they are studying is all the effects of all this, seems to me the department is spinning their wheels. I also feel that they have got their head in the box. Because they cannot think beyond that, they are thinking about all these possibilities.	Please see RDEIR/SDEIS Appendix A Chapter 14, Agricultural Resources, Impact AG-1 and Impact AG-2 and their associated mitigation measures for complete analysis of how the proposed project will effect and mediate important farmland in the Delta. Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality objectives set by the State Water Resource Control Board protection of agricultural water supply, municipal and industrial drinking water supply, and fish and wildlife beneficial uses. See section 4.3.4 for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. Effects of the alternatives on salinity levels are described in Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, EIR/EIS and Appendix A of the RDEIR/SDEIS. Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N for specific results related to various water quality constituents (including bromide and chloride). In addition to potential effects associated with the project and alternatives, modeling results for the No Action Alternative indicate that, with or without the proposed project, rising sea levels will bring saline tidal water further into the Delta than occurs at present. Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in Ch. 4 of the RDEIR/SDEIS. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. The Cumulative Impact Analyses that was written for the 2013 Public Draft BDCP EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the RDEIR/SDEIS.
523	4	The whole plan is based on Mother Nature, to divert water from Sacramento River. And what have you done? You're betting that the water is always going to be there, which it's not. They can't bet that.	Impacts on Delta outflows (fresh water flowing to the Bay) are not significant. Model simulation results for the proposed project alternative (4A) indicate that long-term average and wet year peak outflows would increase in winter months with a corresponding decrease in spring months because of the shift in system inflows caused by climate change and increased Delta exports as compared to Existing Conditions. In other year types, Alternative 4A would result in higher or similar outflow because of the spring outflow requirements. In summer and fall months, Alternative 4A would result in similar or higher outflow because of changes in export patterns and OMR flow requirements and export reductions in fall months, and also because of the Fall X2 requirements in wet and above normal years. The incremental changes in Delta outflow between Alternative 4A and Existing Conditions would be a function of both the facility and operations assumptions (including north Delta intakes capacity of 9,000 cfs, less negative OMR flow

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			requirements, enhanced spring outflow and/or Fall X2 requirements) and the reduction in water supply availability due to increased north of Delta urban demands, sea level rise and climate change. Results for the range of changes in Delta Outflow under Alternative 4A are presented in more detail in Appendix 5A, BDCP EIR/S Modeling Technical Appendix, of the Draft EIR/EIS. For a more detailed response regarding impacts beneficial uses of water, please see Master Response 34.
523	5	The State of Washington had a drought a few years ago. Oregon had a drought a few years ago. Washington and Oregon had droughts, so the Shasta Reservoir made from rivers McCloud, the Sacramento and the Pit River -- and there is one more. Well, the Pit River seems to be the one that surprised me, that supplies the most water to the reservoir. Surprised me. You know, and so desalination is the only way to go. Santa Barbara did it. They built a plant, because they were really suffering. I happened to be there. I was taking my wife to treatments at the clinic down there, so I saw Santa Barbara. It was dry and miserable. So when they voted to do this, it was expensive. When they built it, Mother Nature turned on the water faucets, so they didn't have a chance to use it. But since then, they have used it. So I am saying that since we have all that water out there, we can start with bringing up desalination up the Sacramento River through pipes. Pump the water into the aqueduct.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage. Please see Master Response 7 regarding desalination.
523	6	Try to think about filling that dam we have just outside of Dos Palos -- not Dos Palos, but -- oh, I cannot think of the little town there, they have the dirt dam. Anyway, it is a huge reservoir. That thing is a puddle of water and Kennedy came out in 1961 and dedicated it to the farmers, now this thing is a puddle of water. All of our reservoirs currently, Shaver, Millerton, all puddles of water.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives that were not carried forward for analysis in this document due to the fact that they required actions beyond the scope of the proposed project. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage. Please also see Master Response 37 regarding why an alternative focused on creating additional storage, either in the Delta or elsewhere, was not included in the EIR/EIS.
523	7	If you can use desalination, pump the water into these reservoirs, get the rivers up, you will talk about jobs. You would have so many jobs you would not know what to do with.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility

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			of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage. Please see Master Response 7 regarding desalination.
523	8	I am saying, bottom line is, the state is spinning their wheels on this project, and the laypeople speaking here, have nothing -- I do not have any great knowledge of what I am saying, but if the layperson's speaking, it does not have a chance in hell, because the whole program is built around Mother Nature and how much water the Sacramento River can produce.	Since 2006, the proposed has been developed based on sound science, data gathered from various agencies and experts over many years, input from agencies, stakeholders and independent scientists, and more than 600 public meetings, working group meetings and stakeholder briefings. DWR's fundamental purpose of the proposed project is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south of the Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Please see Master Response 3 for additional information regarding the purpose and need behind the proposed project. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. Please see Master Response 5 for more information on costs and funding.
524	1	I want to meet with the committees and to get on to some of these groups to explain some answers and solutions I have for that -- for the organization and development of these plans. One of them is, we have an electrical state-of-the-art plan to make electricity that we can use for the distribution of water for drinking water, and using surface water for the people that are down through the San Joaquin Valley.	Since 2006, the Proposed Project has been developed based on sound science, data gathered from various agencies and experts over many years, input from agencies, stakeholders and independent scientists, and more than 600 public meetings, working group meetings and stakeholder briefings. The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate

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			change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The official public review process for the Public Draft EIR/EIS and Recirculated Draft/Supplemental Draft EIR/EIS provided this commenter an opportunity for formal public comment on the Proposed Project and project alternatives. Public and agency comments will likely lead to further refinement of the Proposed Project."
525	1	I am unable to locate on the BDCP web site a copy of the Environmental Justice Community Survey Summary report cited in Chapter 28 of the BDCP EIR/EIS. Can you direct me to it on the BDCP web site, or provide me with a copy? It was done for DWR in 2010, it appears.	As required by CEQA guidelines, all materials including the references cited in the Draft EIR/EIS were available electronically at the DWR repository located at 3500 Industrial Blvd., Room 117, West Sacramento, CA 95691.
526	1	The EIR/EIS is a 22,000 page document. How can I be expected to know everything it contains?	Please see Master Response 38, which explains why the document is so large, and Master Response 39, which discusses the lead agencies' extensive public outreach effort to make the documents' contents accessible to the general public.
526	2	How is water taken out of the Sacramento River? When can the water be taken? 15,000 cfs of water is a lot of water.	Based on the DWR's DAYFLOW data over a 20 year period from Water Year 1993 through Water Year 2013, annual exports at the federal and state pumps in the South Delta ranged from 9 to 42 percent of the total Delta inflow, depending on the hydrologic condition. The proposed California WaterFix facilities, including water intakes and pumping plants would be operated in accordance with permits issued by the State Water Resources Control Board, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Department of Fish and Wildlife. The proposed project only would be permitted to operate with regulatory protections, including river water levels and flow, which would be determined based upon how much water is actually available in the system, the presence of threatened fish species, and water quality standards. More information on the ranges of water diversions, based on water year types and specific flow criteria, can be found in Chapter 5 in the FEIR/EIS . Current limitations and operational criteria for existing facilities can be found in DWR's State Water Resources Control Board Permit D1641 (see http://www.swrcb.ca.gov/waterrights/water_issues/programs/bay_delta/decision_1641/index.shtml) and additional limitations described in the Federal Endangered Species Section 7 Biological Opinions and take permits (see http://www.usbr.gov/mp/cvo/ocap_page.html). As described in Chapter 3 of the EIR/EIS, the proposed north Delta intake diversion rules in December through June would not allow major diversions to begin until the Sacramento River flow was greater than a specified threshold in all alternatives in the EIR/EIS (generally 5,000 cfs). These bypass rules control how much of the Delta exports are diverted from the north Delta intakes. While the physical facilities and capacities are specified for each action alternative, these bypass rules could be modified in the future under the adaptive management program as the results of fish monitoring in the vicinity of the new intakes are evaluated.
526	3	Where did the preparers of the document obtain the figures 9,000 cfs and 15,000 cfs?	The 9,000 cfs and 15,000 cfs flow amounts are contained in the alternatives, which are discussed in Chapter 3 of the EIR/EIS.
526	4	The main problem facing the Delta is the exportation of water out of the system.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
526	5	Rip rap is not a great solution to the levee issues. Levee issues are numerous and should	Please see Chapter 2, FEIR/EIS, for the BDCP/CWF purpose and need, and Appendix 6A Section 6A.3.2 for discussion on existing levee improvement programs and funding mechanisms, which would not be affected

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		be addressed prior to determining any conveyance system.	by the BDCP/CWF.
526	6	Part of the Delta problem is the amount of pumping by the state and federal government.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
526	7	This document is not a true EIR.	The lead agencies believe the EIR/EIS is fully sufficient in its analysis of the proposed project under CEQA. For more information regarding CEQA/NEPA compliance please see 1.1.5 of Section 1 Introduction of the RDERI/SDEIS.
526	8	There are damages to [my] property caused by seepage out of Clifton Court Forebay.	The existing seepage conditions are consistent with the results of the modeling for EIR/EIS alternatives with expanded storage near Clifton Court Forebay. As described in Section 7.3.3.2 of Chapter 7, Groundwater, additional storage near Clifton Court Forebay could increase groundwater elevations up to 10 feet due to seepage from the reservoir to the adjacent lands.
526	9	What is Department of Water Resources going to do with the dredged Forebay materials?	As described in Appendix 3B, Section 3B.1.19, Disposal and Reuse of Spoils, Reusable Tunnel Material (RTM), and Dredged Material, the BDCP proponents will develop site-specific plans for the beneficial reuse of this material, to the greatest extent feasible.
527	1	Is it too late for San Luis Obispo County to connect to the American Aqueduct?	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
528	1	The amount of water taken at the Intake at Courtland will require very large long fish screens. Nowhere on the Sacramento River is there any facility that takes anywhere near the amount of water that will be taken. Even if the intake was built there is no guarantee that it would be problem free. Why not place the intake across the river from Rio Vista where there is a much larger source of water. The placement anywhere above Rio Vista has much less water causing fish to be exposed to the screens more often. The Rio Vista location would allow flow in both the Sutter and Steamboat Sloughs before water is taken. The Courtland location is too concentrated, and will be a problem for the Salmon fingerlings, that are not an existing problem in Byron. The Courtland idea stems from the Peripheral Canal concept where the canal needed to be built on land rather than going under the sloughs of the Delta with tunnels. I have swam and skied on all parts of the Delta, and yes the water in the Courtland area is the better quality than Rio Vista, but Rio Vista is better quality than Byron.	A potential alternative that included an intake at Decker Island (near Rio Vista) was considered in Section 3A.11.3 of Appendix 3A, Identification of Water Conveyance Alternatives Conservation Measure 1. Another potential alternative included an intake at Sherman Island. The ability to divert water in the western Delta (e.g., near Rio Vista, Decker Island, or Sherman Island) could be limited due to the presence of delta smelt in the winter and spring months by requirements of the U.S. Fish and Wildlife. In July through November, salinity could be too high for diversion into the SWP and CVP facilities, especially as sea level rise progresses through the end of the BDCP study period in 2060. Therefore, these alternatives were not evaluated in detail in the EIR/EIS. For more information regarding alternatives to the proposed project please see Master Response 4.
528	2	Why build a 40' diameter tunnel. The tunnel industry has developed a very efficient transit tunnel of about 23' diameter. That is the diameter to use. If repairs are needed in the cutterhead, access can be had using compressed air, as opposed to the shaft now being built to make repairs to the machine in Seattle. Three or four tunnels of the smaller diameter would be more economical. Also theses tunnels need to be flushed out to prevent the buildup of silt.	The tunnels are a component of the overall water conveyance system, and their size and capacity is closely tied to the overall operating permits and the capacity of the intakes, sedimentation basins, pumping plants and forebays. As a complete system, the water conveyance facilities are designed to move up to 9,000 cfs and cannot be operated at higher levels without significant changes to the physical facilities, and modifications to the operational permits. Additionally, the tunnels are sized and designed to optimize such factors as: the geotechnical conditions in the Delta, minimizing internal pressures, and reducing long-term energy costs by using gravity flow. The dual-bore 40-foot-inside-diameter tunnel constructed under the preferred alternative would be wider than tunnels constructed for the alternatives under the pipeline/tunnel alignment to facilitate the gravity-fed system proposed under the preferred alternative (instead of being pressurized and pumped through an intermediate pumping plant). The Department of Water Resources released in 2013 the Conceptual Engineering Report that describes design details of the modified pipeline/tunnel option (MPTO). For more information regarding tunnel research and design please see

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			http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Conceptual_Engineering_Report-Modified_Pipeline_Tunnel_Option.sflb.ashx.
529	1	I am writing to you today to ask you to oppose Governor Jerry Brown's BDCP tunnel water project. This is an unnecessary, damaging, and outrageously priced project. Jerry Meral, deputy secretary at the CA Natural Resources Agency said the tunnel plan will not ultimately help the Delta. How could it help the Delta when millions of acre-feet of water are diverted? CA voters defeated the Peripheral Canal and now we seem to have lost any say in stopping this terrible idea. I respectfully urge you to take whatever actions are in your power to oppose this water-grab!	The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. For more information regarding the differences between the proposed project and the peripheral canals please see Master Response 36.
530	1	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. Overall we are glad you are addressing invasive plants. We are glad that you included prevention in the discussion of methods as it has been shown by numerous studies to be the most cost-effective method of reducing the spread of invasive plants. p. 3.4-211, line 14 -- The heading of the section is Invasive Plant Control but the first paragraph uses the term nonnative plants. This may be confusing to readers (and decision makers) who are not familiar with the distinction between these terms. We suggest using invasive plants because 1) most nonnative plants do not have strong ecological impacts and therefore are not invasive and 2) federal Executive Order 13112 gives a definition of invasive plants. We also suggest defining invasive plants here or referencing a definition earlier in the document, if there is one.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft EIR/EIS. Alternative 4 remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts. The originally proposed habitat restoration measures and related Conservation Measures (CMs) (i.e., CM2 through CM21) would not be included as part of the Proposed Action, except to the extent required to mitigate significant environmental effects under CEQA and meet the regulatory standards of ESA Section 7 and California Endangered Species Act (CESA) Section 2081(b). However, portions of the actions proposed under CM3, CM4, CM6–CM12, CM15, and CM16 would be included in the non-HCP alternatives. These repackaged and limited elements of the original BDCP Conservation Measures are instead referred to as "Environmental Commitments". The larger restoration actions that are independent of Proposed Action will continue to be pursued as part of existing projects and programs. Examples of these include the 2008 and 2009 USFWS and NMFS BiOps (e.g., Yolo Bypass improvements and habitat enhancements, 8,000 acres of tidal habitat restoration), (2) California EcoRestore, and (3) the 2014 California Water Action Plan. The Final EIR/EIS is consistent with the definition of invasive plants in Executive Order 13112.
530	2	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-211, footnote 32 -- Our California Invasive Plant Inventory is not updated on a specific five-year schedule. It is updated periodically. However, five years is a reasonable interval for an evaluation and revision of invasive plant plans.	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See also Response to Comment 530-1.
530	3	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-211, footnote 34 -- Suggest you reference our online Inventory rather than the 2007 report listed here, as the online version includes updates after 2007. The online Cal-IPC Inventory database is available at http://www.cal-ipc.org/ip/inventory/index.php.	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See also Response to Comment 530-1.
530	4	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.

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		Measure 11. p. 3.4-212, line 13 -- Cal-IPC's CalWeedMapper website (calweedmapper.cal-ipc.org) is another resource that might be included. It includes statewide maps of 200 invasive plants, synthesis of data, and climate modeling results for 79 species.	See also Response to Comment 530-1.
530	5	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-212, line 14 -- Typo in "Eradication"	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See also Response to Comment 530-1.
530	6	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-213, line 1 -- Overall, we feel that the section on Invasive Plant Guidelines and Techniques should emphasize using an Integrated Pest Management strategy that incorporates the method or combination of methods that are most effective while reducing impacts to non-target species (see http://www.ipm.ucdavis.edu/GENERAL/whatisipm.html for example).	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See also Response to Comment 530-1.
530	7	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-213, line 5 -- Prevention: It is also important not to move existing invasive plants within reserves, in addition to preventing new species from entering.	The importance of prevention is noted; no change was made to the Final EIR/EIS. See also Response to Comment 530-1.
530	8	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-213, line 14 -- Manual control also includes cutting.	The Final EIR/EIS refers to the option of using manual control as part of Conservation Measures 11/Environmental Commitment 11. See also Response to Comment 530-1.
530	9	The following comment refers to Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11. p. 3.4-213, line 27 -- Use of livestock must be considered carefully because they can also spread invasive plants and eat desirable native plants.	The comment is noted. See also Response to Comment 530-1.
530	10	In Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11, p. 3.4-213, line 30: We have a number of concerns about this paragraph. We recommend that someone who is licensed by the California Department of Pesticide Regulation review this section and the later section on pesticides. This paragraph is somewhat confusing because it starts by describing chemical control as something that is necessary mostly for large infestations but ends by saying BDCP will use herbicides only for eradication, which implies they will be used on small populations.	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. The intent remains, herbicides will be used sparingly when other means of removal are not effective. See also Response to Comment 530-1.
530	11	In Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11, p. 3.4-213, line 30: We have a number of concerns about this paragraph. We recommend that someone who is licensed by the California Department of Pesticide Regulation review this section and the later section on pesticides. What is the basis of the statement that herbicide is most successful when used with other methods? This seems to be using a definition of Integrated Pest Management that	The comment on the use of an Integrated Pest Management Strategy instead of herbicides is noted. The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See Response to Comment 530-1.

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		considers chemical control the method of last resort. We would prefer to see a focus on using the best method or combination of methods that are effective and reduce negative ecological impacts.	
530	12	In Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11, p. 3.4-213, line 30: We have a number of concerns about this paragraph. We recommend that someone who is licensed by the California Department of Pesticide Regulation review this section and the later section on pesticides. The beginning of the paragraph implies that herbicides should be used only when infestations are too large for other methods to work. To the contrary, in many cases using a targeted application of herbicide on small populations, either alone or as part of an Integrated Pest Management strategy with other methods, will prevent the spread of infestations and thereby reduce the ecological impacts of the invasive plants.	The comment on the use of an Integrated Pest Management Strategy instead of herbicides is noted. The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See Response to Comment 530-11.
530	13	In Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11, p. 3.4-213, line 30: We have a number of concerns about this paragraph. We recommend that someone who is licensed by the California Department of Pesticide Regulation review this section and the later section on pesticides. Many state and federal regulations govern the use of herbicides, especially around water. These should be referenced rather than simply stating that great caution will be used. Specifically, refer to the California Department of Pesticide Regulation (http://www.cdpr.ca.gov/index.htm).	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See Response to Comment 530-11.
530	14	In Conservation Strategy Chapter 3 - Part 2, Conservation Measure 11, p. 3.4-213, line 30: We have a number of concerns about this paragraph. We recommend that someone who is licensed by the California Department of Pesticide Regulation review this section and the later section on pesticides. Saying that herbicides use will be reserved for instances where no other eradication techniques are effective does not match the usual process of invasive plant management. First, at what scale of eradication does this mean? Statewide or at a particular site? Second, many invasive plants have seed banks that can germinate new plants for several years, necessitating control for multiple years. Third, in many cases populations of invasive plants cannot be fully eradicated.	The comment does not raise specific issues related to the text in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. See Response to Comment 530-11.
531	1	The California Delta is a wonderful place for agriculture, recreational boating, fishing, spawning of new generations of salmon, striped bass, and steelhead, bird habitat, living, and businesses affiliated with all the above. The proposed tunnels put all this in great jeopardy. I see an environmental disaster in the making. Salt water intrusion will destroy the rich agricultural lands used for growing vast quantities of fruits and vegetables. The fish populations will lose their natural habitat for reproduction. Recreational and tournament fishermen will lose their favorite pastime and in many cases some of their food supply and income. Boaters will lose their favorite routes for recreation and will have to travel farther to enjoy their sport. Safety on the water will be a greater concern as more boaters seek out the same distant areas for water skiing, wave running, fishing and swimming. Homes and communities such as Discovery Bay will lose their property values as water levels decrease in their backyards. Boating, water sports, and fishing in its many bays will become impossible without fresh water flow and present water levels. Too, the Eugeria	Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Proposed project impacts are discussed in each Resource Area Chapter in the FEIR/EIS with applicable mitigation measures. Please see Appendix 3B for Environmental Commitments. For more information regarding purpose and need of the proposed project please see Master Response 3.

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		Densa plant will clog the bays due to plants getting more sunlight with lowered water levels. With all the government money spent on the Department of Fish and Game and Department of the Interior to protect fish populations, the tunnels would be counterproductive in preserving fish and wildlife.	
531	2	People in the Central Valley and Northern California want to see a major effort to store water from the snow pack and rain water from storms. At present so much water is lost in runoff and flow to the ocean. Stored water and its overflow could be used in drought years and for irrigation.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. .Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage. Please also see Master Response 37 regarding why an alternative focused on creating additional storage, either in the Delta or elsewhere, was not included in the EIR/EIS.
531	3	Desalination should be top priority. It has proven to work in the Saudi Arabian desert and so it is a definite source of water for California as well. As for cost, the BDCP is required by law to put much effort into determining the cost of water storage and also desalination plants as our best and safest options for obtaining more water. The tunnels would be a financial disaster for the state with an enormous and destructive environmental impact to the California Delta.	The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination and water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. See Master Response 7 for a more detailed discussion of various desalination projects under consideration and in development at this time. For more information regarding water demand management and water storage please see Master Response 6 and 37, respectively.
532	1	It is appalling to see Southern California - a natural desert- with green lawns and fountains. Zerophobic [sic] plants and rationing are in order. Also planting crops in the valley that are not water intensive are key to conservation methods. Let us not forget what overwatering did to Kesterson!	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. State constitutional restrictions require the reasonable and beneficial use of water and state law requires that water supplied from the Delta be put to beneficial uses. The Lead Agencies do not have the authority to designate what water deliveries are used for. Please refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and water conservation. For more information regarding beneficial use please see Master Response 34.
532	2	Before the double barrel approach is adopted at the peril of the Delta habitat and impending salinity incursion, let us work on covering the aqueducts (10% savings) and educating LA on the true environment in which they live - a desert where water conservation is a must! (20 to 30% savings), and planting crops that are eco-friendly.	Effects of the proposed project's alternatives on salinity levels are described in Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, FEIR/EIS Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N of the FEIR/EIS for specific results related to various water quality constituents (including bromide and chloride). The issue of crops and water use is beyond the scope of the proposed project. For more information please refer to the updated draft 2013 California Water Plan's strategy for agricultural water use efficiency, which describes the use and application of scientific processes to control agricultural water delivery and use. Also,

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			refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and conservation. For more information regarding purpose and need of the proposed project please see Master Response 3.
533	1	Appendix 3E figures are not on the website, can these please be loaded so they can be reviewed?	Appendix 3E figures were posted to the website in mid-December 2013 in an errata document.
536	1	We were considering buying a beautiful home in Discovery Bay, but now that we have learned of the tunnel plan, we probably won't buy there. Our concern is that, although we have not read the official document ourselves, we have been told that building these tunnels and disrupting the sludge will cause carcinogens to be released. We were told that a one mile radius around the excavation would be determined, with all homeowners having to leave during this time, due to the danger of cancer exposure. Can you please explain to me if this is true? We love the delta and would love to purchase this home, but not if it puts my family in jeopardy. We were to make an offer today, but will wait for your answer. Please contact us as soon as possible.	A health risk assessment (HRA) was developed in support of Chapter 22, Air Quality and Greenhouse Gases, of the Bay Delta Conservation Plan (BDCP)/California WaterFix Environmental Impact Report/Environmental Impact Statement (EIR/EIS). This HRA evaluates the human health risks resulting from construction emissions produced by the proposed water conveyance alternatives. HRA evaluates the human health risks resulting from exposure to construction emission produced by each alternative. Construction activities generate toxic air contaminants (TACs) that include exhaust emissions from diesel and gasoline fuel combustion. In addition to TAC emissions, this analysis also evaluates PM2.5 concentrations resulting from PM2.5 emitted by exhaust from both diesel and gasoline engine combustion and from fugitive dust generation. Additionally, in Chapter 22, where the impact analysis determines that there would be a significant impact related to changes in air quality such that sensitive receptors would potentially experience excess cancer risk as a result of constructing the water conveyance facilities, Mitigation Measure AQ-16 would be implemented. As part of this mitigation, To avoid exposing sensitive receptors to substantial DPM concentrations, DWR will provide individuals residing in areas where construction activities associated with the proposed project would create DPM concentrations in excess of air district cancer risk thresholds the opportunity to relocate either temporarily during the construction period or permanently, at the discretion of the affected individuals. Otherwise, there would be no need for residents in proximity to the water conveyance facilities to evacuate their homes due to increase cancer risk. With regard to disruption of river sediment (e.g., during intake construction), as indicated in Chapter 24, Hazards, the composition of the sediment with regards to pesticides, mercury and other bioaccumulative constituents is unknown. However, standard best management practices for sediment control and turbidity control, and for disposal and reuse of spoils, reusable tunnel material, and dredged material would help avoid/minimize potential hazards associated with sediment disturbance during in-water construction.
537	1	On behalf of the Association of California Cities-Orange County (ACC-OC) Board of Directors and our membership of cities, county and regional agencies, business leaders, non-profits and the academic community, I am proud to submit this letter of support for the Bay Delta Conservation Plan and Alternative 4 contemplated in its associated environmental documents. For more than a year, the ACC-OC has been deeply involved in the planning and study of this Plan. -We have facilitated more than a dozen meetings between state officials and local water provider s, elected officials, city staff as well as the non-profit , business and academic community in Orange County. -We have studied the Plan and its draft Environmental Impact Report and draft Environmental Impact Statement in detail. -We have toured the state of California, talking with small business owners, local, state and federal elected officials, water providers and farmers to hear their perspective on the need for a sustainable, statewide water solution.	The commenters support for Alternative 4 is noted. Please note that Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft EIR/EIS. Alternative 4 remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.

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		-We have discussed the project extensively amongst Orange County leader s to ensure it was right for our region. The overwhelming message that emerged from this due diligence was: we need this project Specifically, we believe the project outlined in Alternative 4 - twin tunnels at 9,000 cfs- is required at a statewide level to secure California's water and economic futures. This Alternative provides for the maximum balance of secure water supplies, environmental restoration, economic gain and cost-efficiency. While we understand the discussion for larger or smaller cfs alternatives as well as different conveyance methods and configurations, Alternative 4 meets the ACC-OC's standard that this project works to ensure all Californians, and especially Orange County residents, can access a secure source of water for decades to come.	
537	2	Importantly, we Association of California Cities - Orange County believe that this Plan should be funded through equitable user fees, with costs fairly distributed amongst the beneficiaries of its development. And its ultimate governance must reflect southern California's -- and more specifically, Orange County's -- leadership and innovation with regards to water resource management.	See Master Response 5 regarding BDCP funding and the governance structure.
537	3	[ATT 1: Model City Council Resolution for voluntary 20% reduction of water usage]	This comment describes an attachment to the comment letter endorsing the BDCP.
538	1	The follow up I have for Parviz relates to statements at our meeting that water quality impacts of project operations on the bays of Discovery Bay would be no more than a 15% variance from baseline conditions. 1) Do I remember that correctly? 2) What, if any, modeling was done specifically to determine water quality impacts on Discovery Bay. My point at the meeting was that generalized modeling of central/south Delta conditions might not capture specific effects on Discovery Bay because hydraulic residence times in the shallow water bays of Discover Bay are much greater than in the Delta in general, the existing baseline condition that the presence of egeria densa in the shallow water bays of Discovery Bay restricts circulation more than in even nearby channels and sloughs. I think Brian answered my question about inclusion of monitoring stations in the bays of Discovery Bay as a part of the proposed mitigations/monitoring program: that there are currently no proposed monitoring stations specifically to capture the bays of Discovery Bay included in the EIR/EIS. Do I have that statement right?	The water quality analysis presented in the RDEIR/RDEIS sections covering the new proposed Alternatives and Appendix A provide a thorough analysis of important water quality constituents of concern at multiple locations throughout the Delta to present the potential water quality effects that could result from implementing the project alternative.
541	1	I am a resident of Los Angeles. I am a homeowner in Los Angeles. I own a small business. I have children in the schools. And, specifically, I want to make comments on behalf of an organization that I'm a founding CEO, and that's the LA County Business Federation or Biz Fed. We're a grassroots alliance of over 120 top business associations throughout LA County and all 88 cities. We represent almost 270,000 businesses who employ nearly 3 million people right here in Southern California. And we're here to express our total support of the Bay Delta Conservation Plan, and, specifically, we like Alternative 4 as outlined in the draft Environmental Impact Report, Environmental Impact Statement. Following the passage of California's comprehensive water package in 2009, Biz Fed has closely watched the Bay Delta Conservation process. We're encouraged by the release of	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.

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		the public draft of the plan and environmental documents. The outcome of BDCP's multi-year effort reflects collaboration of public water agencies, state and federal fish and wildlife agencies, business and agriculture stakeholders, local governments, and the public.	
541	2	The draft plan and accompanying environmental documents identify several options for addressing the current challenges of California's water supply, delivery system, and the Delta ecosystem. We believe that Alternative 4 which provides for three new intakes on the Sacramento River in the Northern Delta, a 9,000 cubic feet tunnel system to convey that water to the existing aqueduct system, coupled with the comprehensive habitat conservation plan for the Delta is indeed the best alternative to meet California's co-equal goals of water supply reliability and the Delta ecosystem restoration.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
541	3	The construction of new water intakes and related conveyances is an essential element of the BDCP. The proposed twin-tunnel system will protect water supplies if a seismic event were to trigger levee breaks and cause salt water to intrude from the San Francisco Bay.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
541	4	The new intakes in the Northern Delta will reduce conflicts between water systems and migrating fish species such as salmon. Habitat improvements will provide native species with the healthy ecosystems they need to survive.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
541	5	Fifty years of regulatory stability will protect an estimated 1.1 million jobs throughout the state and create more than 177,000 jobs from the construction projects and environmental restoration.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
541	6	Southern California's rebuilding its aging infrastructure to ensure water supply's reliability. We need the same kind of investment to safeguard our imported supplies. A project of such magnitude will require some difficult decision and compromises between stakeholders with varying priorities. However, California cannot sit idly by and wait.	The comment does not raise any environmental issue related to the 2013 DEIR/EIS.
541	7	We support Bay Delta Conservation Plan, specifically, Alternative 4, as a workable draft proposal that can lead to the final successful plan of action because it offers the best solution to minimize seismic risk to our state's water supply infrastructure while restoring the Delta's ecosystem.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
542	1	My general comment is I came to get information. I was not able, necessarily, to talk to somebody about the formal justice issues I wanted to. I am overwhelmed by the volume of information. My request is that they extend the comment period time.	The public comment period for the 2013 Public Draft BDCP and EIR/EIS was extended to July 29, 2014. Please see Master Response 39 for more information about the public review period. For more information regarding the document's length and complexity please see Master Response 38.

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543	1	I am with the Environmental Water Caucus, and we have already gone on record as opposing the BDCP project.	Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A. The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
543	2	I would like to know how the tunnels improve the reliability of the water supply, with the emphasis on reliability.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. For additional detail on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5.
543	3	Listening to the scientific panel this past week at the Delta Stewardship Council, it is clear that there are an excess, an extremely high amount, of uncertainties related to the restoration activities. I would like to know how we can or BDCP can justify investment in the tunnels with that amount of uncertainty relating to the other dual co-equal part of restoration?	The Lead Agencies acknowledge that uncertainty is inherent in any planning effort of this geographic and temporal scale. However, DWR strived to use the best available science throughout the effects analysis, consistent with the requirements of the ESA. Additionally, the official public review process for the proposed project provides an opportunity for formal public comment on the proposed project and project alternatives. Public and agency comments on the public draft have led to further refinement of the proposed project, as evidenced in the RDEIR/SDEIS. The originally proposed habitat restoration measures and related Conservation Measures (CMs) (i.e., CM2 through CM21) would not be included as part of the Proposed Action, except to the extent required to mitigate significant environmental effects under CEQA and meet the regulatory standards of ESA Section 7 and California Endangered Species Act (CESA) Section 2081(b).
545	1	I represent the San Gorgonio Pass Water Agency, Regional Water Agency, and State Water Contractor in Riverside County, with the service area of approximately 85,000 residents that depend on the state water project for supplemental water to replenish our local ground water basins. The region has grown substantially since 2000 and will continue to grow rapidly when the housing market fully returns. Some of the communities within our service area are disadvantaged. We are nowhere close to the Northern California stereotype of the Southern California community that desperately needs Northern California water to fill all of its swimming pools and water its lush gardens. Indeed, a growing portion of our population consists of senior communities with very small lots, very minimal irrigation, and very few swimming pools. Because of our distance from the original state water district facilities, approximately 20 miles east, our elevation 1,000 feet higher than our delivery point at Dapple Canyon, and our small tax base, it was primarily an agriculture area until the '90s. We did not get state water project water delivered to our service area until 2003 because we could not afford the infrastructure until then. Even at that point, we could only get about half of our amount because we had only enough money to construct pipes so big, thus, forcing a bottleneck in the conveyance system. We are now in the process of fixing that bottleneck, along with our partner San Bernardino Valley Municipal Water. The planning stations for the San Gorgonio project of a new paired pipeline and pump station began ten years ago, and we are still two years away from the complete construction that will enable us to receive, when it is available, our full allocation of water from a delta. Obtaining this water from the Delta was a financial struggle for our region. We have the	The EIR/EIS alternatives were analyzed assuming that SWP and CVP water users, such as San Gorgonio Pass Water Agency, would be able to receive up to their water contract amount in wetter years, as described in Appendix 5A, Section A, Modeling Technical Appendix.

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		highest property tax rate of any state water contractor. We send approximately $13 million per year to Sacramento to pay for debt service, operation and maintenance of the project. That number will increase to nearly $29 million per year when we finish the bottleneck project. We have invested in the state water project, and we are investing even more today. The total cost of this pump station will be over $200 million. As I said, the San Gorgonio Pass Water District planning began ten years ago. Biological issues restricted flows in the Delta before climate change became an everyday word and before the BDCP process. Again, in addition to the San Gorgonio Pass $200 million project with the San Bernardino Valley, our agency will break this year on a new $8 million construction on a ground water facility. The primary purpose of this facility is to import and restore more local water in. Completion of the BDCP will ensure that we will, every once in a while, get a wet year. In fact, that is one of the primary purposes in the BDCP, according to your web site. Without it, without the BDCP, there is much doubt as to whether we will be able to use this ground water facility to take advantage of these wet years because they might not happen. Again, the BDCP helps protect the local investment in local storage. We are doing the right thing by investing in our water supply on our end. This will only work if the BDCP is not impotent on the other end. We are hopeful that we can tell tax payers and rate payers when your region will open. If the BDCP is not completed and the tunnels are not constructed, we will have spent over $200 million, and that's just in the last ten years, with very little to show for it. As SWP reliability in the future falls below 50 percent without Delta facility, our investments in the pump line and construction may very well turn out to be poor ones. The State of California and federal government have invested over seven years and $200 million in this project. I know because the residents of my agency paid a portion of the $200 million. We must see it through to completion. Let us invest in our future as well as the future of 25 million Californians, 3 million acres of agriculture, and the Delta itself.	
546	1	I live in Claremont, here in Southern California, and I am highly supportive of this plan. I am particularly sensitive and concerned about the effects of climate change and the ability of California to maintain an economy and the capacity for the large populations that live here in Southern California to survive in a semi-arid region in the light of potential increasing temperatures, more irregular water flows, less reliable snowpack, and the potential for losing the water from the State Water Project because of earthquakes, potentially destroying the capacity to collect water in the Delta with the system of dikes that is up there now.	Chapter 9 of the 2013 BDCP Draft EIR/EIS and Appendix A of the RDEIR/SDEIS describes the geology and seismicity of the study area. Based on a review of the last 20 years of precast tunnel lining seismic performance histories, it can be concluded that little or no damage to precast tunnel lining was observed for major earthquakes around the world. Based on preliminary data, it is anticipated that the Delta tunnels can be designed to withstand anticipated seismic loads. Design-level geotechnical studies would be conducted to assess site-specific hazards and appropriate mitigation measures would be implemented. Impact GEO- 1 and GEO-7 discusses the possibility of loss or damage resulting from strong seismic activity during construction and operation of water conveyance features. For more information regarding tunnel design please see the 2013 Conceptual Engineering Report. Please see Appendix 3E, Potential Seismic and Climate Change Risks to SWP/CVP Water Supplies, of the Public Draft EIR/EIS for discussion of potential consequences of an earthquake to exports under a No Action scenario. Please see Master Response 16 for more information regarding seismic impacts. For more information regarding climate change and GHG please see Master Response 19.

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546	2	I have driven through the Delta and understand how fragile that system is. I think the concept of putting two pipes that are more resistant to earthquake damage in that area is a great idea, as is the concept of having two flow systems, one to protect the ecology in the Delta and the other to supply water to the State Water Project.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
546	3	If we were to lose the State Water Project for long periods of time because of earthquake or because of drought such as we are suffering now, the economic and political damage that would be done to California is, in my perception, immense. And for these reasons, I am highly supportive of the project and will be pleased to do what I can to be supportive.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
547	1	It is essential to all of Southern California that the Delta be retained as a major source of water, as long as we have rainfall and snow. So if we do not have it, we are obviously in trouble.	The proposed BDCP would allow the Delta to remain a source of water for Southern California. The BDCP aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. Establishing a point of water diversion in the north Delta and establishing new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented BDCP would be about the same as the average annual amount diverted in the last 20 years.
547	2	We think it is terribly important that the public be helped to think of the necessity of them helping conserve water. When we speak of conservation, or the public speaks of conservation, we're meaning how we use water. We are not talking about the restoring of the Delta's conservation areas for the habitat, though that is important too. That is part of the Delta problem. So we think that it is very important for the public to learn to conserve more water and to use less.	The project proposes to stabilize water supplies, and exports could only increase under certain circumstances. Water deliveries from the federal and state water projects under a fully-implemented Alternative 4A are projected to be about the same as the average annual amount diverted in the last 20 years. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. For more information regarding alternatives to the proposed project please see Master Response 4. For more information regarding demand management please see Master Response 6. No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised.
547	3	It is very important to follow the state water plan which is for the increase of using of local water supplies, and we are trying for our [the Water Task Force of the league & Women Voters] part in Claremont to increase the yield of our Aqua-Flo [aquifer] so we will not need quite so much state water.	The Natural Resources Agency and DWR staff will continue seeking improvements and refinements to the current proposal in order to enhance species benefits and to avoid, reduce or mitigate for negative impacts to people, communities, sensitive species and habitats. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Water Demand Management, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply

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			including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage.
547	4	The EIR that is presently being promoted is pretty impressive, and we think it answers a lot of the questions we would have about how it is going to work.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
547	5	We think in the long run, clearly, since we did not have a Peripheral Canal, we need those tunnels in spite of the fact we recognize opposition to doing anything that costs money. However, for the long run, we have got to do some long run aids to saving water.	The No Action Alternative and all alternatives include assumptions that water conservation will be implemented by 2060 in accordance with State law as described in Section 30.1.3, Urban Land Use and Water Use by Hydrologic Region, of Chapter 30, Growth Inducement and Other Indirect Effects, of the EIR/EIS.
547	6	We want to point out the importance of thinking about the fact that we are in a period of drought. We are in a time of global warming. We may never go back to the water that we had at one time, and California will suffer for this, and we have got to mitigate that in all the ways that we can, not just one or two.	No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.
547	7	So we are hoping your EIR and your plans for the Delta move ahead, and we are firmly behind educating the public about what's going on. I appreciate your books and catalogs, they are wonderful.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
548	1	I love the concepts of this helping the fish and the Delta, which has to be done. And I walked the whole room around, and the greatest concern that I have is because Hemet has a beautiful Diamond Valley Lake, and it is beautiful, but now it is almost dry. And I am here because just trying to live five days without water would be a terrible thing, so I do not want to see that happen. In this room is part of the puzzle, but the biggest part of the puzzle has not been solved and that's the place where if we had California, had a 50-year drought, what would happen if we had even a ten-year drought right now in the climate change? So my idea is why not grab some source of water, and especially the Columbia River where three days' outfall, and this has been discussed even in the Sunday paper, why not grab three days out of it and take care of Southern California for a whole year? I heard from that table over there that Washington would not let us have that outfall, but we need water. And the supply is what I am worried about, and I do not think we have any really reliable supply right now.	Accessing Columbia River water is beyond the scope of the proposed project. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives that were not carried forward for analysis in this document due to the fact that they required actions beyond the scope of the proposed project. Please see Master Response 3 for a discussion of the purpose and need of the proposed project.
550	1	We are wondering about public access to files from CVHM-D, the model developed by CH2M Hill and used for groundwater analysis as described in Appendix 7A. If they are available, how would we go about obtaining them?	This request for information was addressed by the BDCP public outreach team prior to the close of the 2013 public comment period.
551	1	What you are proposing in your recent BDCP proposal is not enough. The State of California must undertake a project to produce additional potable water using existing	Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency

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		technology and know-how. An alternative to the current BDCP proposal could be the investment of public resources (money) into two efforts: First….The addition of potable water from desalination sources and second: The requirement that all water districts recycle as much of the existing water supply as possible.	input. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Please see Master Response 6 regarding demand management and Master Response 7 regarding desalination.
551	2	Historically, diversion of natural water sources has been practiced. Naturally produced potable water has been diverted to where significant human populations live. It is time to consider producing potable water from sea water…which is already done in the Mid-East (Israel, Saudi Arabia, Abu Dhabi, etc.). Begin by investment into a pilot project which uses electric power (generated by solar panel on home rooftops, let us say in San Diego & Los Angeles. The electricity produced would blow backwards through existing circuitry to distribution centers which could send it to desalination plants built near the seashores (easy access to seawater). At these desalination plants, existing technology and know-how could be used to desalinate sea water using reverse osmosis, filtration, electrophoresis, & distillation methods). The sunlight and seawaters are in plentiful supply and free. This approach adds reliable production of potable water to the existing unreliable and unpredictable natural water sources which depend upon the right weather patterns. Global warming has seriously impacted the traditional sources (rivers, snow banks, reservoirs & diversion conduits). The large investment is in equipment (solar panels, windmill generators, and electric conduit/circuitry) and the desalinization plant. Commitment to the creation (at first with a pilot project approach to determine economic cost and feasibility), then a full production system which would add potable water to existing sources. A requirement would be to have all components and skilled labor be provided within the State of California. Silicon Valley (and other locales) could produce the needed solar panels; windmill driven generators, and construct the desalinization plants. Production, operations, quality testing, and management jobs would be created…..and as already stated, the product, potable water, would be produced in addition to the natural sources already almost 'tapped out' and certainly unreliable as in the current drought.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. As described in Appendix 3A, Section 3A.7, Results of Initial Screening of Conveyance Alternatives, EIR/EIS (2013), desalination was included as part of Alternative B7. Issues related to desalination include land use impacts, costs, and substantial energy use requirements. Advances in technology have improved feasibility of desalination and as a statewide water use planning component; it will be evaluated by water agencies on a local/regional level. Desalination, the process of removing salt and other minerals from seawater to make it suitable for drinking or irrigation, is being implemented in several California communities. However, it has not proven viable to secure adequate water supplies to meet California's needs due to high costs and energy demands. Today, desalination creates an estimated 84,000 acre-feet of potable water a year in the state, mostly through treatment of brackish groundwater, which is less salty and cheaper to treat than sea water. In comparison, the proposed project would secure an estimated 4.7 to 5.2 million acre-feet of water to supply more than 25 million people and 3 million acres of farmland. Although the proposed project would not increase the overall volume of Delta water exported, it would make the deliveries more predictable and reliable, while restoring an ecosystem in steep decline. Local water agencies will need to invest in additional strategies and technologies, including desalination, to meet future water demand. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions, including recycling, desalination, water conservation and storage. Please see Master Response 7 regarding desalination.
551	3	Recycle as much sewage/waste water as existing know-how permits. All existing water districts must be required to capture, clean up, and return to the reservoirs or natural aquifers as much potable water as may be possible. Such approaches exist now in Santa Barbara, Orange, San Diego and Santa Clara Counties. Near Fresno agribusiness has invested in a system which recycles brackish waters which originated from irrigation efforts. The cost is about $500 per acre-foot (San Francisco Chronicle report earlier this spring). The High Speed Rail project could be expanded north from Sacramento to the Shasta Dam	The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta. The proposed project is one part of a diverse portfolio of strategies needed to meet California's overall water management needs. It is not a substitute for increased commitments to other water supply solutions,

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		area. Objective is to encourage a higher population occupancy in Northern California. Let us save the existing Sacramento River waters for that population growth ... which would reside where land is not that expensive now, and right of way could be bought and set aside for future development. This could slow down the very dense populations of Southern California (San Diego/Los Angeles, etc.), and may reduce the need to have the Delta Tunnel Project at all.	including recycling, desalination, water conservation and storage. Please see Master Response 6 regarding demand management.
552	1	The BDCP makes faulty assumptions about the amount of water that Nature will provide. With climate change, the supply of water will become even more unreliable and uneven. We are already taking so much water from the Bay that fish populations are in catastrophic decline and the irreplaceable aquifers are collapsing as water is pumped out of them. We cannot sustain this imbalance. We must not rely on the Bay Delta as much as the BDCP does.	The proposed project aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. Establishing a point of water diversion in the north Delta and establishing new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. For more information regarding climate change and GHG please see Master Response 19.
552	2	We must look to other strategies for the best use and best management of the water that we do have. Below are some suggestions. All California water users should have water meters -- farmers, residents, businesses -- so the State Water Control Board would know who is using how much water. Getting the information is a start at better management. See how other states do it and learn from successful programs. Ideally, residential districts would have tiered rates.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. The lead agencies do not have any authority to impose mandatory water rationing on a statewide basis. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta.
552	3	We must look to other strategies for the best use and best management of the water that we do have. New development should meet high green standards for water conservation.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. The lead agencies do not have any authority to impose demand management actions on a statewide basis. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta.
552	4	Since agriculture uses 80% of the water, smart sustainable farming could do much to ease the demand. Perhaps CA could provide low-cost loans for installing water sensors and drip irrigation for some crops, for learning to use mulch and rotation planting to build up the soil so it retains water, and to decrease the water-polluting use of industrial fertilizer. See the Union of Concerned Scientists "Healthy Farms" initiative. Http://www.ucsusa.org/assets/documents/food_and_agriculture/The-Healthy-Farm-A-Vision-for-US-Agriculture.pdf	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. Although components such as desalination plants and demand management measures have merit from a statewide water policy standpoint, and are being implemented or considered independently through the state, they are beyond the scope of the proposed project. It is important to note that the proposed project is not intended to serve as a state-wide solution to all of California's water problems, and it is not an attempt to address directly the need for continued investment by the State and other public agencies in conservation, recycling, desalination, treatment of contaminated aquifers, or other measures to expand supply and storage. Please refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and conservation.
552	5	Since much agricultural land has been taken from former wetlands and grasslands, migrating birds now depend on private agricultural lands for their food and water. Habitat restoration, a proper concern of the BDCP, would include private lands being managed to support these populations, a project of the Audubon Society, which BDCP should support.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. Numerous comments were received that focused on various elements of the BDCP. Where the comments focused on elements of the BDCP that overlap with the elements of Alternatives 2D, 4A, or 5A (e.g., CM1 as it comprises of the North Delta Diversions, tunnels,

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			and supporting facilities), specific responses are presented. Where comments raised issues as to whether the BDCP and other HCP/NCCP alternatives in the 2013 Draft EIR/EIS were potentially feasible and could function as an alternative for purposes of meeting CEQA and NEPA's requirements to analyze a reasonable range of alternatives to the proposed project (e.g., issues regarding the BDCP Effects Analysis or financial feasibility), responses are presented generally in Master Response 5. Where comments submitted on the BDCP were focused on elements outside the scope of the environmental analysis or viability of the BDCP and other HCP/NCCP alternatives within the context of CEQA/NEPA (e.g., request of specific revisions to the BDCP related to mapping or references), no specific responses are provided and further consideration will be given to these comments, and any revisions to the Draft BDCP would only be made, if an HCP/NCCP alternative was ultimately approved at the conclusion of the CEQA/NEPA process.
552	6	Is it true that some organizations with rights to agricultural water are selling it to developers? This is not the highest use. We need much better monitoring of where the water goes.	As described in Section 5.1.2.7 of Chapter 5, Water Supply, water transfers occur under California water law and Federal Central Valley Project Improvement Act. Historic water transfers have included water provided by agricultural water users to entities that will use the water for development (for more information please see the State Water Resources Control Board website at waterboards.ca.gov).
552	7	The controversial use of water for fracking - which renders water undrinkable - needs another look.	State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to stipulated beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. As of the present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently working on fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is actually used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, roughly 5.2 million acre-feet of water a year have been diverted from the Delta, on average, over the last 20 years by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking.
553	1	My complaint deals with Chapter 22 -- Air Quality and Greenhouse Gases -- of the latest Bay Delta Conservation Plan's EIR/EIS. Under paragraph 22.3.1.1-Construction of the Water Conveyance Facility-it reads, "Construction of the water conveyance facility (CM1) would generate emissions of criteria pollutants (ROG, NOX, CO, PM10, PM2.5), and CHG's (CO2, CH4, N2O and SF6) that would result in short-term effects on ambient air quality in the air quality study area. Emissions would originate from mobile and stationary construction equipment, exhaust, employee vehicle exhaust, dust from land clearing and earthmoving, electrical transmission, and concrete batching from onsite plants." The paragraph ends with hilarity by allowing that "these emissions would be temporary,	The comment quotes information from Draft EIR/EIS Chapter 22, Air Quality and Greenhouse Gases. With respect to the statement regarding the "short term" nature of construction activities; construction would require approximately 14 years. This is considered short-term relative to the operational timeframe of typical large scale development projects, which often exceed 30 to 40 years. Characterizing construction emissions as short term is consistent with CEQA guidance provided by all four Plan Area air districts. Applicable rules and regulations are summarized in Section 22.2 in Draft EIR/EIS Chapter 22. Consistent with federal requirements, project emissions are evaluated against de minimis levels outlined in the General Conformity regulation (40 CFR Parts 5, 51, and 93). Pursuant to the General Conformity Regulation, a General Conformity Determination for the applicant preferred alternative (Alternative 4A) was prepared and is presented in Appendix 22E, General Conformity Determination. Project emissions are also evaluated relative to local air district thresholds, which were adopted to assist lead agencies in determining the

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		i.e. "limited to the construction period" -- which is 10 years or more! Paragraph 22.2 - [Of Chapter 22] Regulatory Setting - states that "The study area is subject to air quality regulations developed and implemented at the federal, state, and local levels," i.e., the federal and state Environmental Protection Agencies. Paragraph 22.1.2 - Background Information on Criteria Air Pollutants - states that "the federal and state governments have established national ambient air quality standards and California ambient air quality standards, respectively, for six criteria pollutants." They are "ozone, Carbon monoxide, lead, nitrogen dioxide, sulfur dioxide and particulate matter (PM) which consists of PM 10 microns in diameter or less and PM 2.5 microns in 32 diameter or less." Paragraph 22.1.1.1 - Sacramento Valley Air Basin - states that "The highest frequency of air stagnation occurs in the autumn and early winter when large high-pressure cells collect over the Sacramento Valley. The lack of surface wind during these periods and the reduced vertical flow caused by less surface heating reduce the influx of outside air and allow air pollutants to become concentrated in a stable volume or air. The surface concentrations of pollutants are highest when these conditions are combined with temperature inversions (warm air over cool air) which trap pollutants near the ground." Paragraph 22.2 - Regulatory Setting - sub-paragraph General Conformity Regulation - states that "If the conformity evaluation indicates that emissions are in excess of any of the General Conformity de minimis thresholds, the applicant must perform a conformity determination. A conformity determination is made by satisfying any of the following requirements:" 1. Showing that the emission increases caused by the federal action are included in the State Implementation Plan [SIP]. 2. Demonstrating that the state agrees to include the emission increases in the SIP 3. Offsetting the action's emissions in the same or nearby area. 4. Mitigating to reduce the emission increase.	significance of environmental effects with regards to local attainment of state and federal ambient air quality standards. The project will implement Mitigation Measures AQ-1a, 1b, 3a, 3b, 4a, and 4b to offset construction-related nitrogen oxides (NOX) and reactive organic gases (ROG) to net zero. These offsets would be purchased through local air district offset programs or through a DWR-sponsored program (not the California Cap-and-Trade Regulation). All offsets purchased through Mitigation Measures AQ-1a, 1b, 3a, 3b, 4a, and 4b must achieve a 1:1 reduction with construction emissions to ensure claimed offsets meet the required performance standard. All offsite reductions must also be quantifiable, verifiable, enforceable, and satisfy the basic criterion of additionality (i.e., the reductions would not happen without the financial support of purchased offset credits). Please note that Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft EIR/EIS. Alternative 4 remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts. Please see also Chapter 22 of the Final EIR/EIS and associated appendices for analysis of GHG for alternative 4A. Please refer to Master Response 19 for additional discussion of climate change GHG.
553	2	Paragraph 22.2.1.2 - Environmental Protection Agency Endangerment and Cause and Contribute findings - states "...the current and projected concentrations of the six key well-mixed GHG's-CO2,CH4, N20, PFC's, SF6 and HFC's in the atmosphere threaten the public health and welfare of current and future generations. Sub-paragraph - State CEQA Guidelines - states "...measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision [are] "...implementation of project features, project design, or other measures which are incorporated into the project to substantially reduce energy consumption of AGHG emissions, offsite measure, including offsets that are not otherwise required, to mitigate a project's emissions and measures that sequester carbon or carbon-equivalent emissions.	See response to comment 553-1.
553	3	Testimony of Steve Centerwall, ICF International	As described in Draft EIR/EIS Chapter 22, Air Quality and Greenhouse Gases, the project will implement Mitigation Measures AQ-1a, 1b, 3a, 3b, 4a, and 4b to offset construction-related nitrogen oxides (NOX) and

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		At Delta Stewardship Council Meeting, Dec. 19, 2013 Speaking for the Bay Delta Conservation Plan, Mr. Centerwall related that the effect of construction on air quality can increase criteria pollutants such as carbon monoxide, reactive organic gases and dust and that project on-site measures will be implemented such as electrifying equipment, making sure equipment runs well and other standard measures that are taken to reduce air quality emissions. (He did not elaborate or say what equipment would be electrified or how that would come about.) Mr. Centerwall: "In addition, there was off-site mitigation to basically off-set any additional emissions that we couldn't reduce to net zero, and that's really the bottom line for air quality. We're going to reduce it to net zero." (He did not elaborate) My complaint It is evident all through the BDCP's Air Quality Chapter of their EIR/EIS that to "zero out" over pollution in the Delta workplace will depend upon "off-sets." This is a benign word until it is explained and the EIR/EIS carefully avoids any explanation. There are good reasons why. Off-setting over-pollution of the workplace is based upon buying carbon credits under the "Cap & Trade" law from an AQMD district that has significantly lower pollution. They can buy them from any AQMD in the world who wants to sell! However, buying carbon credits only zeros-out over-pollution on paper! The fact of over-pollution remains. This does not leave the Delta zeroed out at all. Workmen who have jobs in construction with the BDCP will still have to work in an over-polluted atmosphere at the construction site, subjecting themselves to all the horrific contaminants found there, To use this tactic in order to "zero-out" pollution during construction of the BDCP's tunnels in the Delta is an untruthful statement in fact! It is clear from the BDCP's own documents that the only way they can zero-out harmful pollution at the workplace is through off-setting by purchasing carbon credits. Without this ability, the BDCP cannot even begin to fulfill its mission in the Delta. Therefore, the EIR/EIS of the Bay Delta Conservation Plan should be denied and the whole plan scrapped. We are looking to the BDCP to make good on its promise of protection of workers and Delta residents from harmful pollutants as it is evident the BDCP can only think about ways to make it appear that protection is there while it really isn't.	reactive organic gases (ROG) to net zero. These offsets would be purchased through local air district offset programs or through a DWR-sponsored program (not the California Cap-and-Trade Regulation). Air district offset programs have operated in California for several decades and have achieved considerable emissions reductions. For example, the Sacramento Metropolitan Air Quality Management Districts (SMAQMD) Heavy-Duty Low-Emission Vehicle Incentive Programs (HDLEVIP) awards more than $7 million annually to emissions reduction projects in the Sacramento Valley. The San Joaquin Valley Air Pollution Control District's (SJVAPCD) Voluntary Emission Reduction Agreement (VERA) program has operated since 1992 and has a proven track record of reducing ozone precursors in the Central Valley. All offsets purchased through Mitigation Measures AQ-1a, 1b, 3a, 3b, 4a, and 4b must achieve a 1:1 reduction with construction emissions to ensure claimed offsets meet the required performance standard. All offsite reductions must also be quantifiable, verifiable, enforceable, and satisfy the basic criterion of additionality (i.e., the reductions would not happen without the financial support of purchased offset credits). These requirements will be outlined in the Mitigation Monitoring Report Protocol (MMRP) and considered a condition of project approval. With respect to the achieved reductions, all offsets must come from projects located within the same air basin as the generated emissions. Reductions must also be achieved (contracted and delivered) by the applicable year in question (i.e., emissions generated in year 2016 would need to be reduced offsite in 2016). As noted by the commenter, the project may purchase carbon offsets to reduce construction-related greenhouse gas (GHG) emissions to net zero. As noted in Mitigation Measure AQ-21, carbon offsets purchased by the project must also achieve a 1:1 reduction with construction emissions and satisfy the basic criterion of additionality. Finally, with respect to the project commitments that will reduce onsite criteria pollutant emissions, refer to Appendix 22A, Section 22A.1.11. The air quality environmental commitments go above and beyond state and local requirements and will reduce onsite emissions to the greatest extent feasible (refer to the table of comments and responses within the Final EIR/EIS). Please see also Chapter 22 of the Final EIR/EIS and associated appendices for analysis of GHG for alternative 4A. Please refer to Master Response 19 for additional discussion of climate change GHG.
553	4	Thank you for this opportunity to respond to the BDCP document concerning the Economic and Fiscal Impact Statement. This statement concerns assessments, fees and charges that will be applied to individual and businesses, but most of the charges are unknown. In a sense, this is understandable, but the most grievous error is in omitting charges for the BDCP tunnels which will be incorporated into the Delta Plan. The document says: "...costs to the state or local agency proposing a covered action could be passed on to specific private businesses and individuals through assessments, rates, fees or other charges." The Private Sector Cost Impacts you list are mostly unknown whereas you should be able	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis.. Where comments submitted on the BDCP were focused on the implementation costs and funding sources of the BDCP, responses are presented generally in Master Response 5. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft EIR/EIS. A Draft Statewide Economic Impact Report has also been published, which indicates that the proposed project would result in a substantial economic net benefit to the State of California. When required, DWR would provide compensation to property owners for economic losses due to implementation of the proposed project. Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from

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		to estimate the impact (Beneficiaries Pay) that the Delta Plan (including the construction of the twin tunnels) will have on all water rate-payers. This is necessary because of the private funding of the tunnels by the Association of State and Federal Water Contractors, the authorized funding authority that will provide the revenue stream to the Department of Water Resources to construct the tunnels. I am concerned that because this is not a state agency they can set rates of return on their investment that could be so high as to be considered usury! These rates should be known before any ground is broken. These rates should be part of the Delta Plan.	one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the 2013 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in Appendix 3B, Environmental Commitments, EIR/EIS. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Chapter 16, Socioeconomics, of the Draft EIR/EIS was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Chapter 16, Socioeconomics, Section 16.3.3.9, in Appendix A for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been incorporated into Appendix A. Please see also Master Response 31 and Appendices 3I and 3J of the Final EIR for discussion of consistency with the Delta Reform Act.
553	5	After Gov. Pat Brown's State Water Project (SWP) brought Sacramento River water down to Los Angeles, the Southland quickly developed a taste for it. The Metropolitan Water District took note and soon our river water became known as sweet water and there developed a growing demand for it in that dry, desert big city. As time went on, it was found that as our clean, fresh Sacramento River water meandered through the Delta on its way to the Clifton Court Forebay to be pumped south, it picked up a lot of strange contaminants, toxic chemicals, microorganisms and all kinds of perverse fluids which were dumped into the Delta by businesses along the way. Of course, the people in LA complained, so the Metropolitan Water District (MWD) invested in five huge ozone generators which bubble ozone gas through untreated water to disinfect it and improve its taste. These Ozone generators work fine except for one thing: keeping them all going 24/7 costs a lot of money! The energy costs are staggering. Of course the rate-payers are footing the bill for the Ozone generators and are evidently happy to do so.	The comment does not raise any issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. Please note that the EIR/EIS assumes no changes in water treatment facilities operations for SWP and CVP municipal and industrial water users because those facilities are not part of Project Objectives or Purpose and Need, as described in Chapter 2 of the Final EIR/EIS.
553	6	This brings us to the proposed second Forebay planned to be right next to the present Clifton Court Forebay. This is where Sacramento River water is going to be collected before it is pumped south. This second Forebay is to keep Sacramento water that arrives from the twin tunnels from mixing with run-of-the-mill Delta water in the regular Clifton Court Forebay. Two things stand out here: one is that the tunnel water will have no fish in it so it will go through and come out of the pumps still in pristine condition. The second is that this water is ideal for fracking purposes in the valley--a financial bonanza for the water agencies that make such sales. Third, by importing fresh and pure Sacramento River water into LA, the Metropolitan Water District will be able to cut down their energy costs considerably by not having to run their Ozone generators as much, if at all! This will save them millions of dollars! Of course, these benefits are not written down in the BDCP's EIR/EIS or anywhere else for that matter or in any public statement of the MWD. In fact, it is hidden from public view.	Please note as described in response to comment 553-1, that Alternative 4A is now the preferred project. State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to stipulated beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. At present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently developing fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, over the last 20 years roughly 5.2 million acre-feet of water a year, on average, have been diverted from the Delta

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		So much for transparency! So the bottom line is that the MWD customers in the Southland will be paying through the nose for years for their part of the twin tunnels fiasco while the MWD will be saving loads of money on water purification. And Big Oil will have all the pristine water they need for fracking!	by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking. Refer also to Master Response 34 (Beneficial Use of Water). See also response to comment 553-4 for discussion of socioeconomic effects of the alternatives.
554	1	The Peripheral Canal, pardon me, tunnel has an astronomical cost. The presently estimated $24,700,000 will, if judging from recent public capital estimates and final costs, will balloon to almost $100,000,000. Most of this would be paid for by the public water agencies receiving the tunneled water. Their costs will, presumably, be passed on to their customers. If the price of water goes so high that it costs $5000 to fill a swimming pool and $50 for enough water to grow a head of lettuce or a bale of alfalfa, they won't use much of the water. Then who recoups the cost of the tunnel? I remember hearing of a couple of similar stories. There is an Erskine Bridge across the River Clyde in Glasgow, Scotland. It is toll free. A new bridge was built, with a toll to pay for it. Few vehicles use the new bridge, opting instead to cross the Erskine Bridge. There is a Lake Pontchartrain, north of New Orleans. A bridge was built across it, with a toll to pay for it. Few vehicles use it, opting instead to drive around the lake.	For more information regarding cost and funding of the proposed project please see Master Response 5.
554	2	Besides the tunnel's cost, and assuming that water customers will buy the water, how will it change the ecology of the Delta? When I was a wee lad, living at McNears Beach on San Pablo Bay, I remember that every fall and winter, seaweed would start to grow on the rocks. Every spring it would disappear. After Shasta Dam was built, the seaweed never disappeared.	The BDCP (Alternative 4) and now the preferred California WaterFix Project (Alternative 4A) propose to improve water supply reliability and improve the Delta ecosystem by constructing a 9,000 cfs water diversion point in the north Delta, where operations will provide for improved flows and operational flexibility. The proposed project would better protect water supplies for two-thirds of California's population, support local farming and improve the Delta ecosystem through habitat restoration and other conservation measures designed for these benefits. Restoration of tidal natural communities in particular is expected to benefit a large number of covered species including delta smelt, longfin smelt, salt marsh harvest mouse, California black rail, and Suisun thistle. Refer to Master Responses for a general overview: Master Response 25 (Upstream Reservoir Effects), Master Response 5 (Overview of Restoration and Enhancement Activities, Conservation Measure 1 as a CM). For more details, the commenter is referred to Chapter 11 (Fish and Aquatic Resources) of the Draft EIR/EIS and Section 4 and Appendix A (Chapter 11) of the RDEIR/SDEIS.
555	1	On behalf of the Valley Industry and Commerce Association (VICA), we urge you to support Alternative No. 4 of the Bay Delta Conservation Plan. Alternative 4 will restore and protect the Delta environment, while ensuring that California has a reliable water supply for years to come. The construction of a new water conveyance facility -- specifically the twin tunnel system -- is an essential element of the BDCP. Until a reliable conveyance system is built to separate a portion of water from the fragile Delta levees, the California business community is at risk of losing a key source of water. California's water system -- including the largest estuary on the West Coast, the Sacramento-San Joaquin Delta -- is highly vulnerable. It is time for California to abandon the status quo and advance the BDCP, with the right plan option. As the CEQA-preferred alternative, No. 4 will ensure that our state's water infrastructure is renovated with a twin	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.

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		tunnel system in a timely manner. We ask that you go forward with Alternative No. 4.	
556	1	Before take permits can be issued under a habitat conservation plan, funding must be shown to be sufficient for all proposed activities, and all financial contributors and planned allocation of funds must be identified. You should be very skeptical of any Implementing Agreement that BDCP planners eventually submit, given the fact that they have been unable to give the public a reasonable amount of time to evaluate the funding proposal before the close of the EIR/EIS comment period.	Please see Master Response 5 for a summary of the BDCP Funding plan and how cost for BDCP would be allocated among water contractors and the state and federal government. Numerous comments were received that focused on various elements of the BDCP. Where comments raised issues as to whether the BDCP and other HCP/NCCP alternatives in the 2013 Draft EIR/EIS were potentially feasible and could function as an alternative for purposes of meeting CEQA and NEPA's requirements to analyze a reasonable range of alternatives to the proposed project (e.g., issues regarding the BDCP Effects Analysis or financial feasibility), responses are presented generally in Master Response 5. Refer to Master Response 39 regarding the public review period. Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
556	2	The state and federal water contracts argue that the twin tunnels should be built because they have spent a quarter of a billion dollars on producing a Bay Delta Conservation Plan draft and environmental documents, including paying millions of dollars to consultants, holding years of meetings, and making dozens of presentations. However, they admit that the engineering for the actual tunnels is only 10% complete. This provides a poor basis for estimating the cost of building the twin tunnels that are the centerpiece of this habitat conservation plan.	Please see Master Response 5 regarding the estimated cost and the adequacy of the proposed project funding strategy. It is typical for environmental impact analysis to be performed on project designs that are at approximately 10% design. Refer to response 556-1 regarding the change in preferred alternative to Alternative 4A.
556	3	It is not surprising that urban and agricultural users that would be the beneficiaries of BDCP are balking at paying for these tunnels that cannot guarantee them more water. Now that the whole state sees the effect of prolonged drought, it is obvious to users that the tunnels could not even guarantee a more reliable supply of less water, even if water quality protections for fish and people are suspended. Metropolitan Water District member agencies in Southern California do not have take or pay contracts; some are looking for their own water supply alternatives and could opt out of taking State Water Project water, making MWD unable to meet its financial obligations. Similarly, agricultural users in the San Joaquin Valley have made it clear that they will not be able to afford the cost of water delivered by the tunnels. If contractors cannot meet their financial obligations for the project once it is built, taxpayers will end up paying.	Refer to Master Response4 5 regarding funding. This comment relates to funding for the BDCP and possible decision outcomes that would occur following completion of the Final EIR/EIS. Refer to response 556-1 regarding the change in preferred alternative to Alternative 4A. No issues related to the adequacy of the environmental impact analysis in the EIR/EIS were raised.
556	4	As far as funding the actual habitat restoration portion of the plan, the water contractors have redefined ecosystem work as a public benefit and are counting on federal assistance and bond funding to pay for it. But there is absolutely no guarantee that Californians will approve a water bond this year or in the future, or that any bond they do approve will include funding for BDCP. Similarly, there is not guarantee that the federal government will come up with the $3.5 billion that BDCP is counting on from that source. No one wants to pay for this ill-conceived infrastructure project, so I encourage the fisheries agencies to refuse to issue permits that would enable it to go forward.	Please see Master Response 5 for a discussion of project funding. Numerous comments were received that focused on various elements of the BDCP. Where comments raised issues as to whether the BDCP and other HCP/NCCP alternatives in the 2013 Draft EIR/EIS were potentially feasible and could function as an alternative for purposes of meeting CEQA and NEPA's requirements to analyze a reasonable range of alternatives to the proposed project (e.g., issues regarding the BDCP Effects Analysis or financial feasibility), responses are presented generally in Master Response 5. Refer to response 556-1 regarding the change in preferred alternative to Alternative 4A.
558	1	From my understanding, the Bay Delta Conservation Plan (BDCP) is a balance between promoting environmental conservation, and improving water management in California. Everyone is aware of the fact that California is facing an extreme drought after three consecutive years of below average rain fall. With reservoir levels far below their historical averages, the state is in desperate need of a plan to uphold water conservation strategies ["Conditions for Major Reservoirs." California Data Exchange	The project is one component, among many, of the California Water Action Plan. In its efforts to achieve the co-equal goals of water supply reliability and ecosystem restoration, the proposed project seeks to protect dozens of species of fish and wildlife in the Delta while also securing reliable water deliveries for two-thirds of California. The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before

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		Center--Reservoirs. California Department of Water Resources.20 Apr. 2014. Web. 21 Apr. 2014. http://cdec.water.ca.gov/cdecapp/resapp/getResGraphsMain.action]. When Governor Jerry Brown announced the Water Action Plan, he not only called for citizens to make a voluntary effort to reduce water consumption by 20%, but he also noted the BDCP as one of the measures to improve the state's water management strategies. After reading through some of the goals and proposals, I developed an understanding of how water management strategies will be affected by the BDCP, but I failed to see how this plan would actively conserve water. While I agree that the Delta is in need of ecological repair, I do not think that this plan can be justly labeled and identified with the Water Action Plan because I don't think that it supports Governor's Brown call to action.	us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. The increased occurrences of "dead pool" conditions in the future either with or without the proposed project are primarily attributable to sea level rise, climate change and higher demands associated with water rights (primarily in El Dorado, Placer, and Sacramento counties), and not due to proposed project. Please see Master Response 19 and 25 for more information regarding climate change and GHGs and upstream reservoir effects respectively. The proposed project would not affect upstream water rights or entitlements.
558	2	Why does the current design exist? This plan actually shares several characteristics with the origins of the current Delta watershed which was developed back in the early 1900s. Settlers of the San Joaquin Valley immediately planted vegetation, not realizing the inconsistent periods of rainfall (or lack thereof), while those in the Sacramento Valley struggled to control the flooding of the Sacramento River. The Central Valley Project (CVP) was enacted in 1933, calling for the construction of the dams and canals that we currently have today, to distribute water more equitably throughout the land. The goal was to improve water access to farmers south of the Delta, and control floods so that cities could form along the banks of the Sacramento. The CVP was not overly concerned with environmental conservation or the protection of California native fish, like salmon and steelhead. These fish once migrated up the Sacramento and San Joaquin Rivers to lay their eggs, but the dams along these rivers and along many of their tributaries prevent most of them from reaching their breeding ground, thus ending the once awesome Central Valley salmon run and endangering these fish species ["Central Valley Project." Reclamation: Managing Water in the West. U.S. Department of Interior, Bureau of Reclamation. Web. 21 Apr. 2014. http://www.usbr.gov/projects/Project.jsp?proj_Name=Central+Valley+Project]. Similarly, the goals of the BDCP are also to improve water access to farmers, but there is definitely a much heavier emphasis on fixing the problem of endangered wildlife that the CVP created.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. Refer to Appendix 3A, FEIR/EIS, for information on the development of water conveyance alternatives in the EIR/EIS.
558	3	In the current design of the Delta, every 2 out of 3 fish trapped near the pumps that transport water from the northern reservoirs to the farmlands south of the Delta are killed [Mulkern, Anne C. "Drought: Calif.'s 5-Year Plan Emphasizes Water Conservation." Greenwire. 28 Jan. 2014. Web. 5 May 2014]. With this problem in mind, I can see why fish take priority in the BDCP when it comes to water management. As stated in the public draft, fish movements will dictate the diversion rates of water from rivers into the diversion tunnels to encourage salmonid migration upstream to their breeding ground. In theory, this would help to save the species from the edge of extinction. However, I am hoping that the design of this plan would also respond to an increase in human demand for water, even during times when the fish population is dense near the tunnels; otherwise, I fail to see how this measure would improve water access to farmers. It seems to have the potential to limit water access during the months when the salmonids migrate.	The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. For more information regarding water demand management and growth inducement please see Master Response 6 and Chapter 30 of the FEIR/EIS. The project's proposed dual conveyance facilities would allow water to be moved through the Delta when conditions permit, and allow water to be diverted from the Sacramento River in the northern Delta when conditions in the south Delta do not permit diversions from the existing State Water Project and Central Valley Project facilities. The location of the north Delta diversion facility is less vulnerable to salinity intrusion, a potential impact of sea level rise, or levee failure, in the future. By establishing an alternative diversion point for exports, a great deal of water management flexibility is added. This added flexibility would provide more options for adaptively managing the Delta so that conditions can be optimized to provide the greatest benefits across all Delta water uses and habitat conditions.
558	4	From the BDCP draft, it was not clear if a study had been done to determine how much the water levels in the rivers would vary depending on the flow rates exiting the river. I	The effects of operating new surface water intakes in the Sacramento River in the north Delta area were evaluated in the EIR/EIS (see Appendix 11C, CALSIM II Model Results Utilized in the Fish Analysis). This

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		propose that an ecologist conduct this study and use the data to assess if any plant or animal species along the shores would be adversely affected by this variation. The fluctuation in water levels could lead to fragmentation of ecosystems, alter life-history schedules, and impact biodiversity along the shores of these rivers [Lake, P.S. "Ecological Effects of Perturbation by Drought in Flowing Waters." Freshwater Biology. July 2003. 48: 1161-1172]. While these affects will likely occur as a result of the drought, regardless of whether the BDCP is implemented or not, I would not want these effects to be exacerbated by the BDCP. Yes, the main purpose of this project is to save native fish, but why should that come at the expense of other ecosystems.	analysis predicted increases and reductions in flow levels in the Sacramento River, both upstream and downstream of the proposed river intakes, depending on location and water year type. Below the intakes, flow decreases of as much as 11-27% were predicted in some months and water year types compared to the No Action condition. Based on a review of the anticipated duration and timing of these flow reductions, their effect on water levels in the river, and the natural variation in river flow associated with changes in water year type, it was concluded that operation of the water conveyance system would not result in a substantial change in the condition and acreage of the natural communities that exist immediately downstream of the proposed intake locations (see pages 12-190 and 12-191 of the Draft EIR/EIS for the analysis of effects on riparian vegetation associated with Alternative 1A water conveyance operations). Impacts on other natural communities and from other alternative operational scenarios are addressed throughout the Chapter 12 impact analysis.
558	5	I found it unclear as to what type of barriers (physical or non-physical) would keep fish out of the intake streams, regardless of whether there were dense fish populations present or not. In order to control the intake flow rate, I suppose there would need to be some type of physical barrier to block the flow. But when this barrier is open, what will prevent fish from accidentally entering these channels? I propose that a combination of physical and non-physical barriers, as described in Conservation Measure (CM) 16, be implemented to keep fish out of the tunnels. Even if these physical gates will be closed during the months of heavy salmonid migration, fish will be still be present in these areas year round when these barriers are opened. To divert these fish away from the tunnels, it seems logical to take precautionary actions such as installing strobe lights, acoustic, bubbles, and/or electric field barriers. One of these non-physical barrier devices alone would not be as effective as if a combination of these technologies were installed. Research has shown that no one technique completely blocks all fish from taking a certain path, and that the effectiveness of a technique also depends on the size and type of fish species [Noatch, Matthew and Cory Suski. "Non-Physical Barriers to Deter Fish Movements." Environmental Reviews. 2012, 20:71-82].	Intakes for the north delta diversions will be screened to avoid and minimize the entrainment of fish. The diversion of water and the distance between the screens and the intakes will be such that water velocities in and near the screens shall not exceed the swimming speed of covered fish species. Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP or Conservation Measure 16, although it does include a non-physical fish barrier at Georgianna Slough. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
558	6	The Central Valley Project has already destroyed some of the main functions of California's natural floodplains, which were to serve as a natural area for flood control, facilitate clean water, and provide other natural resources such as timber and fisheries [Tockner, Klement and Jack Stanford. "Riverine Flood Plains: Present State and Future Trends." Environmental Conservation. Sept. 2002, 3:308-330]. Now we are trying to engineer our way around this problem that our ancestors created, to restore the functionality of these lands. Before the CVP began in the 1930s, the Sacramento River used to flood regularly, naturally creating these floodplains. But by creating dams and reservoirs to control these floods and re-route the watershed, the natural floodplain ecosystems are struggling to stay afloat. The BDCP calls for the modification of the Yolo Bypass to increase the frequency, duration, and magnitude of floodplain inundation to benefit the existing ecosystems. I can see the headlines now: "California uses remaining water to save floodplains while crops suffer." If the public is expected to make substantial voluntary reductions to their water usage, then should not there also be some kind of water conservation effort here as well, even when it comes to something as important as preserving the environment. I am all for promoting and restoring these fragile floodplain ecosystems, but I foresee a lot of backlash coming from public perception of wasting water. The public would likely benefit from this restoration, but I think the issue here is more about the timing of this project. Water is already becoming a difficult resource to come by	Please see Appendix 6A of the FEIR/EIS for impacts from restoration-related environmental commitments and conservation measures, including the removal of Conservation Measure 2 from the new proposed project, Alternative 4A. Instead, Yolo Bypass Enhancements would be assumed to occur as part of the No Action Alternative because it is required by the existing BiOps. Also, see Chapter 2 for the BDCP/CWF purpose and need. For impacts to water supply under all project alternatives, please see Chapter 5, FEIR/EIS.

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		in most regions of California, and I do not think that implementing this plan to improve water quality will help the issue of scarcity. I agree with the intentions and motivation behind this measure, but California has become too dependent on using all of the water that the CVP made available to farmers and other residents. We cannot afford to water the wetlands in the midst of this extreme drought.	
558	7	The endangerment of fish (in particular the delta smelt, Chinook salmon, and steelhead, which are referred to as covered species in the draft of the project) seems to be one of the main drivers of the BDCP. These fish populations are dwindling due to the maze of dams and pumps that they must try to avoid on their migration upstream to return to their breeding ground. It seems justified to try to protect these endangered species; however, the systematic elimination of predatory fish, like catfish and large-mouth bass, in local areas seems almost like a form of fish genocide. However, looking at the big picture, I realize that in order to save these endangered species, predatory fish populations must be monitored. The methods described in the BDCP to remove these predator species include electrofishing, hook-and-line, passive trapping, fishing tournaments, and modifying the habitat. I am skeptical of this last technique in particular. In the process of trying to eliminate the predator species there is a possibility that altering the habitat could negatively impact the covered species that the BDCP is trying to protect. In all of these cases, actually, there is the potential to unintentionally harm covered species, but it does seem that the overall net effect of these actions would encourage the growth of endangered populations. This plan has significant potential to achieve its goal, but the BDCP does not distinctly outline the limitations that would be set to control how many predatory fish are removed. Once the salmon and steelhead populations eventually rise, some kind of predator will be needed to keep the food chain within the ecosystem in balance, and prevent overpopulation. Even though it may take several years, maybe even decades, to restore the populations of these endangered species, I think it is critically important that we do not overlook the possibility that the removal of too many predator species could also harm the balance of the food chain. Another concern related to this measure (from more of an administrative standpoint) is what would happen to all of the fish that are removed from the rivers. Which party would be responsible for disposing of these fish, and where would they be disposed of? This issue could potentially lead to an opportunity for the governing agency to recover some of its program implementation expenses by selling these large predator fish. For example, if a fishing tournament is organized (where competitors are restricted to catch only particular predatory species), tournament officials could collect and sell all of the fish caught by the competitors and sell them to local markets. This would help to offset costs and make the program more sustainable.	The FEIR/FEIS acknowledges that there is high uncertainty in the meeting the purpose of Environmental Commitment 15, which is to reduce local piscivorous fish populations. The environmental commitment will involve discrete study projects and research actions coupled with an adaptive management and monitoring program (Section 3.4.7, Collaborative Science and Adaptive Management and Monitoring Program) to evaluate effectiveness. The environmental commitment does not seek to remove every predator from the system and only focuses on specific geographical hotspot such that the commenter's concern that too many predators being removed to the point that no predators are left is not realistic. Fish that are removed could be moved to other nearby water bodies, as has been done in 2016 with predatory fish removed from Clifton Court Forebay and moved to Bethany Reservoir. For more information regarding Environmental Commitments please see Appendix 3B of the FEIR/EIS.
558	8	Non-physical fish barriers (CM 16) Research has shown that there are many different types of non-physical barriers that can guide fish along a preferred path. Some examples are bubble walls, acoustic barriers, strobe lights, electric fields, magnetic fields, and even chemical barriers. However, not all of these techniques are effective against all sizes and types of fish species. Based on results from the Old River Project, the combination of underwater strobe lights, sound, and bubbles affects salmonids, but not some other types of fish species ["Sound, Air, and Light Barrier Keeps Chinook Out of Old River." Science News. CALFED Science Program.	Please note that the preferred alternative is now Alternative 4A and no longer includes an HCP or Conservation Measures. Alternative 4A would no longer pursue a 50-year permit. Alternative 4A contemplates ESA compliance through Section 7 of the ESA and Section 2081 of CESA, rather than through ESA Section 10 and NCCPA Section 2835. Restoration would still occur under 4A in the form of environmental commitments, but on a more limited scope than the conservation measures. The preferred alternative includes a physical barrier at the Head of Old River, and a nonphysical barrier at Georgiana Slough. There has been no indication that predation increases at the pilot nonphysical barriers at Georgiana Slough. However, implementation of nonphysical barriers and predatory fish reduction would be subject to

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		Dec. 2009. Web. 2 May 2014. http://www.science.calwater.ca.gov/publications/sci_news_1209_bubble.html]. Using these types of barriers to guide salmonids along paths where they are most likely to reach their breeding ground sounds like a great idea in theory, but there are some adverse effects that may need to be considered. As observed in the Old River Project, predatory fish adapted to these new barriers and actually used them as herding tools. Soon after the barriers were implemented, researchers found an increased number of predators in the surrounding area, negating the benefits of the barriers. This may seem like a blow to the design of this plan, but this unintended side effect could also be used to our advantage to eliminate these predatory fish. If predators tend to aggregate in these areas, then targeting these locations with the removal strategies described in CM 15 could significantly improve survival rates of salmonids and other covered species.	monitoring and adaptive management as necessary.
558	9	There is a possible adverse side effect that could be studied before this measure [CM 16] would be implemented: how would the diversion of fish from certain tributaries affect those ecosystems? There would most likely be a substantial impact on the food chain of those ecosystems, and it could also change fishing patterns in surrounding areas, affecting local economies. I think that the BDCP proposal could give a more holistic view of how implementing non-physical barriers to guide salmonids along specific routes would affect surrounding areas, not just salmonid survival rate.	The preferred alternative is now Alternative 4A and no longer includes an HCP or Conservation Measure 16, although it does include a non-physical fish barrier at Georgianna Slough. However, this measure is still proposed as a conservation measure in the BA and is also currently implemented as a pilot. While the commenter's point is well taken, fish assemblages in the Delta are dominated by non-native resident fishes, providing ample prey for predatory fishes, particularly relatively non-migratory species such as largemouth bass. Therefore nonphysical barriers would not be expected to result in considerable effects to predatory fishes occurring in areas such as in the interior Delta.
558	10	Recreational Users Invasive Species Program (CM 20): I appreciate the fact that California is making an effort to prevent the spread of invasive species. Water hyacinth and hydrilla are two invasive species particularly relevant to the San-Joaquin Delta region ["Aquatic Plants of the State of California Region." California Invasive Plant Council. Web. 22 Apr. 2014. http://www.cal-ipc.org/landscaping/dpp/plantpage.php?region=state&type=Aquatic+plants]. Both are fast growing plants that form dense mats on the surface of the water, impeding water flow and blocking sunlight from penetrating into the depths of the water to reach plants in the sand bed. This inhibits photosynthesis, which thereby decreases the amount of oxygen in the water, negatively affecting both native plants and animals ["Harmful Aquatic Hitchhikers: Plants: Water Hyacinth." Protect Your Waters. Web. 22 Apr. 2014. http://www.protectyourwaters.net/hitchhikers/plants_water_hyacinth.php]. Clearly the introduction of either of these species would have a substantial impact on an ecosystem. These species are very commonly spread when stem fragments or buds stowaway on boats and trailers. When boats are not cleaned when they are removed from a body of water, these invasive species may be transferred to other bodies of water where the watercraft is next launched.	The prevalence of non-native species in the Delta is described in BDCP Section 2.3.4, where each natural community description contains a subsection describing the prevalence and ecological consequences of non-native species in that natural community. The proposed project will incorporate existing Conservation Measures from the BDCP as Environmental Commitments (ECs) to further address the issue of non-native species (RDEIR/SDEIS Appendix 3B Section 3B.5). EC 11 - Natural Communities Enhancement and Management - describes how non-native vegetation will be disturbed or removed. Restoration ECs may have non-native weed control through operation and maintenance of restored sites (EC 3, 4, 7, 8, 9, 10). EC 15, Localized Reduction of Predatory Fish, does not intend to entirely remove non-native predators at the north and south Delta export facilities. It is intended to reduce localized abundance of fish predators of salmonids at these two locations through active capture methods. Division of Boating and Waterways' Aquatic Weed Control Program helps suppress and control Water Hyacinth and Egeria densa.
558	11	I noticed that the Aquatic Nuisance Species Task Force and 100th Meridian Initiative were two model programs that the BDCP's Implementation Office was going to collaborate with before starting a program in the Delta ["Conservation Measure 20 Recreational Users Invasive Species Program." Bay Delta Conservation Plan: Conservation Strategy. California Department of Water Resources. Nov. 2013. 3.4:333-339]. The Lake Tahoe Invasive Species Program, which requires watercraft to be cleaned and then inspected by trained professionals before entering and exiting the site, may also provide valuable information on how to effectively organize this type of initiative ["Lake Tahoe Boat Inspections." Lake Tahoe EIP. Web. 2 May 2014. http://tahoeboatinspections.com/]. While their program is focused on preventing the spread of zebra mussels, similar	An MMRP has been developed for the Final EIR/EIS and will utilize information and performance action suggestions from the best available resources. Under Environmental Commitment: Develop and Implement a Barge Operations Plan, and AMM7: Barge Operations Plan, monitoring during construction will include observation of barge landing, loading or unloading, and departure of one or more barges at each active barge landing site and the condition of both river banks at each landing site, pile driving, and other in-water construction activity as directed by DWR, and visual inspection for invasive aquatic species on in-water equipment such as barges and small work boats. Additionally, under Avoidance and Minimization Measure 11: Covered Plant Species, to minimize the spread

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		techniques (cleaning, draining, and drying the boat) would also prove effective for any other type of invasive species.	of nonnative, invasive plant species from restoration sites, DWR will retain a qualified botanist or weed scientist prior to clearing operations to determine if affected areas contain invasive plants. If areas to be cleared contain invasive plants, then chipped vegetation material from those areas will not be used for erosion control; in these cases the material will be disposed of to minimize the spread of invasive plant propagules (e.g., burning, composting). To minimize the introduction of invasive plant species, construction vehicles and construction machinery will be cleaned prior to entering construction sites that are in or adjacent to natural communities other than cultivated lands, and prior to entering any project restoration sites or conservation lands other than cultivated lands. Vehicles working in or travelling off paved roads through areas with infestations of invasive plant species will be cleaned before travelling to other parts of the Plan Area. Cleaning stations will be established at the perimeter of project activities along construction routes as well as at the entrance to reserve system lands. Biological monitoring will include locating and mapping locations of invasive plant species within the construction areas during the construction phase and the restoration phase. Infestations of invasive plant species will be targeted for control or eradication as part of the restoration and revegetation of temporarily disturbed construction areas. DWR will determine during implementation the most effective and cost-efficient means to minimize the unintentional spread of invasive plants through vehicle travel. While Environmental Commitments and AMMs will be implemented to minimize the introduction and spread of invasive species through construction vehicle travel, there are no plans for a recreational users invasive species program under Alternative 4A. The project proponents acknowledge the benefit of such a program but regret to inform the commenter that at this time no program will be implemented as part of Alternative 4A.
558	12	The Uniform Minimum Protocols and Standards for Watercraft Interception Programs for Dreissenid Mussels in the Western United States [Zook, Bill and Stephen Phillips. "Uniform Minimum Protocols and Standards for Watercraft Interception Programs for Dreissenid Mussels in the Western United States." Jan. 2012. Pacific States Marine Fisheries Commission] (on which the BDCP's inspection program would be based) did not specify how recreational boaters would be held accountable for avoiding inspection sites. I am assuming that there are other locations in the Delta besides just the seven inspection sites that this measure would fund, and what is to prevent people from simply bypassing inspection sites to avoid the fees and inconvenience of it. Outreach and education would of course appeal to the morals and good judgment of most, but consider how many people litter even when in the vicinity of a trash can? Even if adequate information and opportunity are provided to prevent the spread of invasive species, people may still not comply with regulations, and there should be some form of consequence. A ticket or fine, for example, would hopefully discourage boaters from simply avoiding inspection sites altogether. Perhaps local officials in regions of the Delta could monitor boats on the water to determine if any watercraft does not have the necessary permits signifying that it had passed inspection. In order for this plan to work though, the boats that pass inspections would need some kind of visible marker, like a brightly colored flag, to distinguish them from violators. Other questions that remain unanswered include, "Who will be running these inspection stations? Would governance of these programs depend on whether the existing launch site was run by the city, county, or state?" I suppose any revenue from inspection fees and fines incurred by violators could go toward sustaining these inspection programs, and that any additional funds could be used to extend outreach and education to other areas.	When CM20 is incorporated, it is incorporated at a programmatic level, and therefore lacks project-level details. The analysis for CMs 2-22 was completed at a programmatic level, as described in Section 4.1.2 of Chapter 4, Approach to the Environmental Analysis. Additional Alternatives 4A, 2D and 5A, does not include CM20.

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558	13	One of the most frequently asked questions on the BDCP's website is "Will the BDCP affect upstream reservoirs or cause dead pool conditions?" According to the response given on the site, some sort of modeling has shown that the BDCP will allow water managers more flexibility when it comes to draining water from reservoirs to avoid dead pools (where the water level in the reservoir falls so low that it can no longer drain by just gravity power). The provided answer on the site also points out that the main cause of reservoir depletion would be primarily due to climate changes, and that the BDCP would only affect reservoir levels at certain times of the year to accommodate fish. This would still result in a 10% decrease in the amount of water delivered compared to the average amounts over the last 20 years ["Your Questions Answered: Surface Water and Storage." Bay Delta Conservation Plan. Web. 2 May 2014. http://baydeltaconservationplan.com/AboutBDCP/YourQuestionsAnswered.aspx]. This may not seem like a lot, but in this drought, every drop of water counts. Governor Brown declared the drought as an official state of emergency on January 17, 2014, and the first order given was for the Department of Water Resources (DWR) to promote the Save the Water campaign to encourage Californians to conserve at least 20% of their usual water consumption ["Governor Brown Declares Drought State of Emergency." Office of Governor Edmund G. Brown Jr. State of California. Http://gov.ca.gov/news.php?id=18368]. If the governor is asking for voluntary actions by citizens to reduce consumption by 20%, how can the BDCP then justify a reduction in the amount of water available for use by 10%. Sure, the main driver of decreased reservoir levels would be climate change rather than the BDCP, but the project definitely would not help the state save any water, and would only add to the existing stress on water supplies.	The projected water demands in the No Action Alternative and all of the EIR/EIS alternatives include the assumptions that water conservation will be implemented by 2060 in accordance with State law, as described Section 30.1.3 of Chapter 30, Growth Inducement and Other Indirect Effects, of the EIR/EIS, including a reduction of water demand by up to 20 percent. Reductions in water deliveries could result in additional measures by water users to either further reduce water demands or develop alternative water supplies, such as described in Appendix 1C, Demand Management Measures, of this EIR/EIS. The "dead pool" conditions presented in the CALSIM II model results in the EIR/EIS are developed from calculated monthly average reservoir volumes. Because the model only calculates and reports SWP and CVP water operations at an average monthly basis, the model cannot simulate changes that occur on a weekly basis by water users and SWP and CVP operations. In addition, the model cannot make decisions that occur in real-time, such as drought operations during the ongoing drought. Instead the model includes average operating criteria for all dry periods, and does not reflect specific changes. The dead pool conditions occur in the No Action Alternative as compared to the Existing Conditions because the model includes changes in precipitation without making changes in water diversion patterns. The EIR/EIS analysis considers changes between the frequency of dead pool conditions under the alternatives and the No Action Alternative (both with the same climate change assumptions) to determine if the changes are adverse or beneficial.
558	14	While the BDCP was "designed to restore and protect ecosystem health, water supply, and water quality," I mostly saw proposals to "conserve ecosystems in a sustainable manner and contribute to the recovery of threatened and endangered species" ["Bay Delta Conservation Plan Public Draft: Executive Summary: Overview." Bay Delta Conservation Plan: Conservation Strategy. California Department of Water Resources. Nov. 2013. 1-3]. While one of the goals is to improve water access for farmers, it appears as if the main interest of this project lies more with environmental adaptive management and ecological conservation strategies. The plan is currently not well supported by California Congressmen, with strong negative feedback coming from several representatives from districts surrounding the Delta, including George Miller (District 11), John Garamendi (3), Ami Bera (7), and Doris Matsui (6) ["Find a Senator or Representative." GovTrack. Web. 2 May 2014. https://www.govtrack.us/congress/members/CA]. These officials are concerned that the plan does very little to actually encourage water conservation, and believe that the costs of implementing this plan do not outweigh the benefits ["Bay Delta Conservation Plan Remains Deeply Flawed." Congressional Documents and Publications. 10 Dec. 2013. Federal Information & News Dispatch, Inc.]. I do not believe that these representatives are against restoring the habitats and native species of the Delta, rather they feel as if it should not be considered as a part of the state's Water Action Plan. This association is misleading because the plan seems to do very little to conserve water. These officials would rather that California focus its time and money on implementing a plan or policy more concerned with protecting one of its most precious resources, water, in this state of emergency. Once the drought has subsided, these Congressmen may be more inclined to adopt the BDCP. Although at a high cost of $19 billion ["Undiscounted Capital Outlays by Plan Implementation Phase and Element." Bay Delta Conservation Plan Chapter 8: Implementation Costs and Funding Sources. California Department of Water Resources.	The proposed project is one component, among many, of the California Water Action Plan. In its efforts to achieve the co-equal goals of water supply reliability and ecosystem restoration, the proposed project seeks to protect dozens of species of fish and wildlife in the Delta while also securing reliable water deliveries for two-thirds of California. Please see Master Response 4 for additional detail on the BDCP and the alternatives involving an HCP component. Please refer to Master Response 5 regarding costs of the project and Master Response 3 regarding the Purpose and Need for the proposed project.

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		Nov. 2013. 62], it may be more feasible to expect just a few of its measures to be approved at a time, perhaps adopting sections of it in stages.	
558	15	I appreciate the intent of the BDCP to improve environmental conditions for endangered native fish while simultaneously making it easier for farmers south of the Delta to get access to water. However, I would have to agree with the politicians on this one: I do not think that now is the right time to implement an expensive water management plan that does not actively conserve water. I fail to see how the BDCP could be considered part of California's Water Action Plan, and I do not think that California should expend its resources on this project when the state is facing a much more serious water crisis. In the future, I would definitely support a plan like this if it were installed in stages, rather than all at once, to spread out the high costs over a longer period of time.	The proposed project is one component, among many, of the California Water Action Plan. In its efforts to achieve the co-equal goals of water supply reliability and ecosystem restoration, the proposed project seeks to protect dozens of species of fish and wildlife in the Delta while also securing reliable water deliveries for two-thirds of California. Please see Master Response 4 for additional detail on the BDCP and the alternatives involving an HCP component. P Please refer to Master Response 5 regarding costs of the project. For more information regarding purpose and need of the proposed project please see Master Response 3.
559	1	This kind of thinking about water policy is last century. California cities need to begin spending their money developing local infrastructure for groundwater storage, recycling and replenishment-- not this boondoggle approach to above- ground storage/river diversion that will mostly benefit corporate agriculture and the frackers on the Monterey shale.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination or water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. Also, refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and conservation. Please see Master Response 37 regarding why an alternative focused on creating additional storage--surface and groundwater--either in the Delta or elsewhere, was not included in the EIR/EIS. Finally, see Master Response 34 regarding beneficial use of water. For more information regarding purpose and need please see Master Response 3.
561	1	Increased bromide levels: Antioch (51% increase), CCWD's Mallard Slough (41% increase) in months intakes most likely utilized, and North Bay Aqueduct (40-98%) almost entirely from Alt. 4 ops. Water quality degradation for 7 constituents: bromide, chloride, salinity, mercury, organic carbon, pesticides, selenium.	Impact WQ-5 in Section 4.3.4, Water Quality, of the RDEIR/SDEIS examines the potential effects on bromide concentrations resulting from facilities operations and maintenance of the proposed project. Increases in exceedances of the 100 µg/L assessment threshold concentration for protecting against the formation of disinfection byproducts in treated drinking water would be 6% or less at all locations assessed, which is considered to be less than substantial long-term degradation of water quality. Further, the use of seasonal intakes for municipal water supply is opportunistic in the areas affected (Antioch and Mallard Island), largely driven by acceptable water quality, and opportunity to use these intakes would remain. As such, the levels of bromide degradation that may occur under the Alternative 4A would not be of sufficient magnitude to cause substantially increased risk for adverse effects on any beneficial uses of water bodies within the affected environment. Bromide is not CWA Section 303(d) listed and thus the minor increases in long-term average bromide concentrations would not affect existing beneficial use impairment because no such use impairment currently exists for bromide.

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		Chloride increases may be greater in western Delta locations from increased salinity intrusion caused by increased tidal exchange volumes in the Delta from creation of tidal habitat restoration under CM4. EIR Impacts WQ-5, 7, 11, 14, 18, 22, and 26.	
561	2	46 [sic] unavoidable adverse Delta impacts: Water Quality (7 constituents: bromide, chloride, salinity, mercury, organic carbon, pesticides, selenium); Soils (2); Land Use (1); Agriculture (4); Recreation (2); Aesthetics (5); Cultural (7); Transportation (5); Public Services & Utilities (2); Air Quality (4); Noise (3); Hazards & Hazardous Materials (1); Public Health (1); Paleantologilocal (1). This is not co-equal. Unavoidable is unacceptable.	As a plan prepared to meet the rigorous standards of the federal and state Endangered Species Acts, the proposed project is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. For more information regarding purpose and need of the proposed project please see Master Response 3. Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in Ch. 4 of the RDEIR/SDEIS. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. The Cumulative Impact Analyses that was written for the 2013 Public Draft BDCP EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the RDEIR/SDEIS. RDEIR/SDESIS 4.3.4 (4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts. Additionally, adding intakes in the North Delta will allow for operational flexibility that can improve natural flow in the Delta and avoid impacts to migratory fish based on real time data and operations For more information regarding the proposed project's compliance with the Delta Reform Act please see Master Response 31.
561	3	7 significant and unavoidable adverse impacts on Delta water quality: bromide, chloride, salinity, mercury, organic carbon, pesticides, selenium is not coequal.	RDEIR/SDESIS 4.3.4 (4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts.

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		Substantially degrading Delta water quality so at least 4 urban intakes cannot pump water without spending millions to upgrade treatment facilities to meet drinking water health standards is not coequal. Increasing bromide concentrations 40 - 98% and chloride up to 33% while reducing concentrations for export water by 45% is not coequal. What good are water rights without water quality?	Additionally, adding intakes in the North Delta will allow for operational flexibility that can improve natural flow in the Delta and avoid impacts to migratory fish based on real time data and operations Impact WQ-5 in Section 4.3.4, Water Quality, of the RDEIR/SDEIS examines the potential effects on bromide concentrations resulting from facilities operations and maintenance of the proposed project. Increases in exceedances of the 100 µg/L assessment threshold concentration for protecting against the formation of disinfection byproducts in treated drinking water would be 6% or less at all locations assessed, which is considered to be less than substantial long-term degradation of water quality. Further, the use of seasonal intakes for municiple water supply is opportunistic in the areas affected (Antioch and Mallard Island), largely driven by acceptable water quality, and opportunity to use these intakes would remain. As such, the levels of bromide degradation that may occur under the Alternative 4A would not be of sufficient magnitude to cause substantially increased risk for adverse effects on any beneficial uses of water bodies within the affected environment. Bromide is not CWA Section 303(d) listed and thus the minor increases in long-term average bromide concentrations would not affect existing beneficial use impairment because no such use impairment currently exists for bromide. Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality objectives set by the State Water Resource Control Board protection of agricultural water supply, municipal and industrial drinking water supply, and fish and wildlife beneficial uses. See section 4.3.4 for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. Effects of the alternatives on salinity levels are described in Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, EIR/EIS and Appendix A of the RDEIR/SDEIS. Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N for specific results related to various water quality constituents (including bromide and chloride). In addition to potential effects associated with the project and alternatives, modeling results for the No Action Alternative indicate that, with or without the proposed project, rising sea levels will bring saline tidal water further into the Delta than occurs at present. The Sacramento Regional Wastewater Treatment Plant (SRWTP), which discharges treated effluent into the Sacramento River south (downstream) of the City of Sacramento, is not an element of the BDCP project. The Sacramento County Regional Sanitation District (SRCSD), which operates that facility, is implementing its EchoWater Project which will bring extensive improvements to the SRWTP treatment processes to meet more stringent permit requirements that were adopted by the Central Valley RWQCB. For more information about the EchoWater Project and its Final EIR please visit http://www.regionalsan.com/reports. A large fraction of ammonia in the Sacramento River will be removed due to planned upgrades to the Sacramento Regional County Sanitation District's Sacramento Regional Wastewater Treatment Plant (SRWTP) which will result in >95% removal of ammonia from the effluent discharge from this facility. Following the SRWTP upgrades, levels of ammonia in Sacramento River are expected to be similar to background ammonia concentrations in the San Joaquin River and San Francisco Bay (See Section 8.3.3.1, Impact WQ-1) (RDEIR/SDEIS Chapter 8 Section 8.3.1.7 Constituent-Specific Considerations Used in the Assessment).

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562	1	We are waterfront on the Georgiana Slough. I am strongly against the Tunnels. This will damage the Delta and all the habitat forever. It will also lower all our property values of residents who have lived on the Delta for many years.	When required, DWR would provide compensation to property owners for economic losses due to implementation of the project.
562	2	If Southern California needs water then make them spend the money on a desalinization plant down south. Do not ruin the Delta at the expense of [sic] water hungry Southern California. If they do not have enough water they should put a moratorium on all new construction in Southern California.	The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination and water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions.
563	1	The farmers cannot water crops with salt water, and, if they keep re-routing Delta water, the bay water comes further upstream.	The water quality assessment of the diversion of Sacramento River water under the project alternatives addresses effects on salinity-related parameters in the Delta, including electrical conductivity (EC), and compliance with related agricultural objectives in the Bay-Delta Water Quality Control Plan and degradation relative to these uses in Impact WQ-11 in Chapter 8, Water Quality. Where significant impacts to agricultural beneficial uses would occur due to the alternative, as opposed to other forces including climate change and sea level rise, mitigation to lessen those impacts is provided. Further, the proposed project has been modified since publication of the Draft EIR/EIS to Alternative 4A, which would have less than significant impacts on salinity-related parameters.
563	2	The Department of Water Resources gives water rights to people or business, but that does not prevent water rights from being sold to other states or other countries.	More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed project aims to provide a more reliable water supply, in a way more protective of fish. However, the project proponents have no authority to designate what water is used for. One of the State Water Resources Control Board's (State Water Board's) charges is to ensure that the State's water is put to the best possible use and that this use is in the best interest of the California public. This charge is reflected in part by the designation of beneficial uses established through the State Water Board's planning process. These beneficial uses are identified in each Water Quality Control Plan (Basin Plan) issued by the State Water Board. The proposed project Lead Agencies have no power to impose penalties on individual water users. DWR and Reclamation have contracts with various entities, some of which sell water to water retailers, who have individual policies and programs to motivate ratepayers to conserve water. Different districts have the right to take different approaches depending on their individual circumstances. For more information regarding beneficial use please see Master Response 34.
564	1	I am a homeowner on a tributary of the Sacramento River, as well as a working professional. I believe that this plan will undermine the value of my home and interfere with my happiness. I depend on the River to soothe the anxieties of modern life, to provide a good incentive to lead an active life and stay healthy, and to bring beauty to everyone who lives on or visits the Delta. Please do not approve this plan. The people who live and visit here have a right to continue to enjoy the value of the River and the River environment. Our happiness should not be the cost of every glass of water	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.

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		for those who have chosen to live in the desert.	
564	2	I am also shocked and amazed that these comments are not posted publicly as is usual. Shame on you.	July 10, 2015 and continues through October 30, 2015. Public comments submitted during the official public comment period and the previous comment period for the 2013 Public Draft will be made available to the public upon the release of the Final EIR/EIS. The Final EIR/EIS will include all comments received during the official comment period and responses to substantive comments. The obligations of California public agencies under Article 1, section 3(b)(1), of the California Constitution and under the Public Records Act, do not include any obligation to post comments on draft environmental documents on agency websites as such comments come in from the public and interested agencies. Rather, those statutes deal with the obligation for public agencies to hold certain kinds of meetings of public bodies and public officials in public, and to make non-privileged documents of various kinds available to members of the public in response to formal requests. To date, neither the California Legislature nor Congress has required Lead Agencies for CEQA and NEPA documents to post comments on draft environmental documents on their websites during the public review periods for those draft documents. This is consistent with the requirements of the California Environmental Quality Act (CEQA Guidelines §15088) and the National Environmental Policy Act (Council on Environmental Quality § 1503.4) and policies held by all Lead Agencies governing the implementation of CEQA and NEPA. Please see Master Responses 40 for additional detail on the public outreach that has been done for stakeholders and Master Response 42 regarding treatment of public comments. For more information regarding the transparency of the project and communications please see Master Response 41.
565	1	All efforts relating to the California water crisis should be focused on creating and saving more usable water. Spending any money on simply redistributing existing water does not solve the problem and takes the resources and focus away from what is really needed.	The California Water Action Plan recognizes that all Californians have a stake in the future of our state's water resources, and that a series of actions are needed to comprehensively address the water issues before us. The five-year agenda spells out a suite of actions in California to improve the reliability and resiliency of water resources and to restore habitat and species — all amid the uncertainty of drought and climate change. For more information regarding future developments of the California Action Water Plan please follow http://resources.ca.gov/docs/Final_Water_Action_Plan_Press_Release_1-27-14.pdf. Future committees for the Proposed Project implementation may provide future opportunities for innovative input as well. The California Water Plan evaluates different combinations of regional and statewide resources management strategies to reduce water demand, increase water supply, reduce flood risk, improve water quality, and enhance environmental and resource stewardship. Follow the California Water Plan here: http://www.waterplan.water.ca.gov/. Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the proposed project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed, Master Response 7 regarding desalination, Master Response 6 regarding demand management and Master Response 37 regarding water storage.
565	2	California has the best technology experts in the world. Let us challenge them to creatively resolve this issue with a sustainable water project. These very smart guys and	The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The

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		gals could do more than we can imagine. Whatever they come up with will be of great value to the world. We could sell the solutions to other locations and get a return on our investment.	proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta. Although components such as desalination plants and demand management measures have merit from a statewide water policy standpoint, and are being implemented or considered independently through the state, they are beyond the scope of the proposed project. It is important to note that the proposed project is not intended to serve as a state-wide solution to all of California's water problems, and it is not an attempt to address directly the need for continued investment by the State and other public agencies in conservation, recycling, desalination, treatment of contaminated aquifers, or other measures to expand supply and storage. Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination or water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. Also, refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and conservation. The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. . Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination or water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. Also, refer to Master Response 6 and Appendix 1C for further information on demand management measures, including increasing agricultural water use efficiency and conservation.
565	3	Please stop all this moving around of such a limited resource and begin to seriously focus on solutions. All money and priority should be to make more usable water. Anything short of that is an expensive distraction and delays what should be done right now. This crisis is an opportunity to make California great (and possibly wealthy!).	The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta. For more information regarding purpose and need please see Master Response 3.
566	1	I am outraged that your organization has decided not to post all comments online as they come in so everyone can see what others are commenting. This can only be aimed at thwarting informed public participation because no legitimate purpose is served by keeping everyone in the dark about what others are saying. Posting comments in an online docket during an EIS process is standard federal government procedure. Why has this highly controversial project been selected for special treatment? I demand that all comments be posted online in an easily accessible format and that the comment period be extended for the length of time that comments were not posted online.	Please refer to Master Responses 12 and 41 for information related to outreach, transparency of the planning process and stakeholder engagement. For information pertaining to how comments have been considered and addressed, please refer to Master Response 42. The standard process for publishing comments submitted on CEQA and NEPA documents is to include them with the responses to comments in the Final EIR/EIS. Posting comments online is not a requirement of or a standard policy for CEQA or NEPA processes.
566	2	I also demand an explanation for the following: "The Brown Administration admits the tunnels would have '52 Significant and Unavoidable Adverse Impacts' on the Delta region, including permanently degraded groundwater quality, long-term reduction of navigation opportunities, and exposure to unhealthy air quality bad enough in Byron to require people to move in order to avoid an increased cancer risk," said RTD Executive Director Barbara Barrigan-Parrilla. "Hidden deep in the 40,000 page project proposal, and further buried in a footnote (p.31-13,	Please see Master Response 3 on Purpose and Need, and Master Response 27 on Environmental Justice.

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		AQ-13 and fn 6), is the news that Byron area children, elderly and people with conditions like asthma will be so threatened by air toxins from the tunnels project that they would have to leave town. What about the thousands of people just up the road in Brentwood and Discovery Bay?" There will be hell to pay if any work begins on a water diversion system that will destroy the ground water resources that I need for my home, or result in higher salt content in the Delta.	
567	1	Does the Bay Delta plan increase the total amount of water available for California? I am led to believe it re-directs water but does not increase the amount to mitigate the Central Valley and Southern California water deficits.	The project aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. Please see Master Response 35 regarding water use in Southern California and Master Response 34 regarding the potential uses of water delivered via conveyance facilities.
568	1	I have owned a home on the Sacramento River since 1986, across from Isleton. Prior to 1986, I boated and rented a small Island in the South Delta. I have boated the entire delta area and up the Sacramento River to Verona. I began boating in the Delta in the late 50's and since that time I have observed the water quality diminish and the fishery decline! The Twin Tunnel Project is no better than the Peripheral Canal of 1986--- With this project, Brown has the opportunity to adjust California's historic relationship to water. As he does so, he should keep these principles in mind: Moving water is not a sin, but using it to favor big farms over family farms is unacceptable. And protecting Southern California's water future is commendable, but it shouldn't come at the expense of the Delta's. This Project is very bad for the fisheries and the people who live in and around the Delta.	The project proposes to secure California water supplies and improve the Delta ecosystem by implementing a 9,000 cfs water diversion point in the north Delta, where its operations will provide for improved flows. Constructing new water diversion points in the north Delta with state-of-the-art fish screens and providing a means to transport water supplies under the Delta, rather than through sensitive natural channels, would help maintain reliable water deliveries for two-thirds of California's population while balancing the needs of the Delta ecosystem. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years.
568	2	It is time to push for more water storage and better farming methods that use less water. No one wants to pay for this ill-conceived infrastructure project, so I encourage the fisheries agencies to refuse to issue permits that would enable it to go forward!	While water storage is a critically important tool for managing California's water resources, it is not a topic that must be addressed in the EIR/EIS for the proposed project. This is because the proposed project does not, and need not, propose storage as a project component. Although the physical facilities contemplated by the proposed project, once up and running, would be part of an overall statewide water system of which new storage could someday also be a part, the proposed project is a stand-alone project for purposes of CEQA and NEPA, just as future storage projects would be. Appendix 1B, Water Storage, of FEIR/EIS, describes the potential for additional water storage. Please see Master Response 4 regarding the development of alternatives. Please see Master Response 6 for information on Demand Management. Please see Master Response 37 regarding water storage. The issue of crops and water use is beyond the scope of the proposed project . For more information please refer to the updated draft 2013 California Water Plan's strategy for agricultural water use efficiency, which describes the use and application of scientific processes to control agricultural water delivery and use. Also, refer to Master Response 6 and Appendix 1C for further information on demand management measures,

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			including increasing agricultural water use efficiency and conservation.
569	1	I really need to know how I am supposed to interpret and accept the following: "The Brown Administration admits the tunnels would have '52 Significant and Unavoidable Adverse Impacts' on the Delta region, including permanently degraded groundwater quality, long-term reduction of navigation opportunities, and exposure to unhealthy air quality bad enough in Byron to require people to move in order to avoid an increased cancer risk," said RTD Executive Director Barbara Barrigan-Parrilla. "Hidden deep in the 40,000 page project proposal, and further buried in a footnote (p.31-13, AQ-13 and fn 6), is the news that Byron area children, elderly and people with conditions like asthma will be so threatened by air toxins from the tunnels project that they would have to leave town. What about the thousands of people just up the road in Brentwood and Discovery Bay?"	The 2013 Draft EIR/EIS Chapter 22, Appendix A Chapter 22 (Air Quality and Greenhouse Gasses), and RDEIR/SDEIS Section 4.3.18 evaluates criteria pollutant emissions associated with the construction of each alternative. The proposed project would be implemented in a manner intended to minimize the potential for adverse health effects, such as those mentioned. There are numerous mitigation measures intended to reduce air quality effects to as low a level as possible. As described in Section 22.2.1.1, the United States Environmental Protection Agency (EPA) has established de minimis thresholds to define levels at which pollutants would not impede a region's ability to achieve air pollution goals outlined in their State Implementation Plan (SIP). Construction of the proposed project would exceed the applicable de minimis threshold for nitrogen oxides (NOX). The project will fully offset construction-related NOX emissions to net zero through implementation of Mitigation Measures identified in the EIR/EIS. With respect to human health impacts; the Air Quality and Greenhouse Gasses Chapters and Sections identified above include a health risk assessment (HRA) evaluating health impacts to all sensitive receptors, which include residences, schools, hospitals, places of worship, daycare facilities, parks, or any other facilities where people are susceptible to air pollutants. In addition, as potential impacts to human health are construction-related, construction emissions and exposure of sensitive receptors to construction-related emissions will cease once construction activities have ended.
569	2	The financial interests of a few wealthy So Cal residents would forever contaminate one of the most beautiful delta areas on earth, and it happens to be where I have my home. This will not be taken lightly. I have no intention of having to move, and there should be no program allowed in CA that would knowingly (or NOT) contaminate the ground water that thousands of residents depend on. To destroy the Delta of the fresh water it needs so that permanent crops can be grown in Kern County and other desert areas south of us is simply an insane proposal. There is not enough water from Northern California to satisfy Southern California's interests so Southern California simply needs to find other sources; such as desalination.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S. See Master Response 7 for a more detailed discussion of various desalination projects under consideration and in development at this time.
570	1	I urge you to reject the proposal for the tunnel project to redirect water from the Sacramento River. This project will cost billions of taxpayer dollars at a time when our state cannot afford it. An entire river should not be redirected for the sake of large-scale, unmetered agriculture and the oil industry. The tunnels are unnecessary and fiscally irresponsible.	The amount of water DWR can pump from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would still be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a predetermined flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). For more information regarding funding of the proposed project please see Master Response 5.
571	1	The Central Valley is a desert. It is not responsible to have large agriculture in a desert. The Central Valley farmers should switch to lower water tree crops and the money should be invested in water savings rather than the tunnel.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter.

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			The issue of agribusinesses is beyond the scope of the proposed project. The project was developed to meet the rigorous standards of the federal and state ESAs, and as such it is intended to be environmentally beneficial. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply, including increasing agricultural water use efficiency and conservation. While these elements are not part of the BDCP, the Lead Agencies recognize that they are important tools in managing California's water resources.
572	1	Money could be used to help farmers use water more efficiently!	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. The BDCP/CWF is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The BDCP/CWF is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and improving ecological conditions in the Delta. Although components such as desalination plants and demand management measures (e.g. improving water use efficiency) have merit from a statewide water policy standpoint, and are being implemented or considered independently through the state, they are beyond the scope of the BDCP/CWF. Please see Appendix 1C for more information on demand management measures.
573	1	Farmers have already worked to update their water usage to a minimum and by the time this tunnel is done the drought might be long over. If we are allowing fracking in California, those companies can import the water from the ocean. Why should fresh water resources be wasted on oil? Have oil [companies] make a way to pull sea water and use it, not fresh water; they have the resources. If I have to limit my water use, so should all businesses. Agriculture has a valid water use and tends to reuse water runoff as they invest in wells to collect the ground water.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to stipulated beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. As of the present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently working on fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is actually used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, roughly 5.2 million acre-feet of water a year have been diverted from the Delta, on average, over the last 20 years by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water

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			Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking. For more information regarding beneficial use please see Master Response 34.
574	1	In Davis and Woodland our aquifers are depleted and of poor quality. We agreed to divert water from the Sacramento River. An access deal was made and construction for the water treatment plant alone will raise our water prices by 3-5 times in five years. Two entire crews will maintain the new source and the groundwater wells, too. I have nightmares about this region becoming like the lower Colorado. The Sacramento is fed from the shrinking glaciers and erratically negligible snowpack of the Sierras. Like tomatoes? They grow in fields all around here. For now. Fracking in an earthquake State means pushing enormous amounts of water into unstable earth; this is just as bad as the potential for pollution. I came from near Youngstown OH where fracking caused an earthquake where there never was one before in my long lifetime.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
575	1	Tunnels are not the answer. Money for the tunnels could be better spent on other alternatives such as desalination. Come on California. We should be leading the way to better water use, not destroying the environment for overpopulation and overuse of our natural resources.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. The proposed project was developed to meet the rigorous standards of the federal and state Endangered Species Acts, as such it is intended to be environmentally beneficial, not detrimental. By establishing a point of water diversion in the north Delta and new operating criteria to improve water volume, timing, and salinity, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility. See Master Response 7 for a more detailed discussion of various desalination projects under consideration and in development at this time. Although components such as desalination plants and water demand management have merit from a statewide water policy standpoint, and are being implemented or considered independently through the state, they are beyond the scope of the proposed project. The proposed project cannot impose obligations on third parties that are not applicants under the proposed project. It is important to note that the proposed project is not intended to serve as a state-wide solution to all of California's water problems, and it is not an attempt to address directly the need for continued investment by the State and other public agencies in conservation, recycling, desalination, treatment of contaminated aquifers, or other measures to expand supply and storage. For more information regarding purpose and need please see Master Response 3.
576	1	Why not direct water from regions with surplus water like Oregon to help Northern California? Why are we going to suck dry our rivers when we know that we will be experiencing a dry period for the next couple years. Rain will be scarce in the coming years, we have to think ahead, and not use up what little water resources California has.	This comment letter is in part a form letter that has been submitted by many commenters. To locate the response to the form letter portion of the comment, please refer to the index of commenters in Chapter 4 of Volume II of the Final EIR/EIS, and cross reference the Form Master letter number shown there with the index of Form Masters also provided in Chapter 4 of Volume II of the Final EIR/EIS. The text below responds to the specific substantive portions of the comment letter that were submitted by the commenter. Please refer to Section 3.6.4.2 in the FEIR/EIS for information on operational criteria included in the project alternatives analyzed in the EIR/EIS. Implementation of the project alternatives would not "suck dry" the rivers but instead be operated in a way that is consistent with state and federal laws and regulations to minimize potential effects to listed fish species, in addition to improving water supply reliability. The lead agencies do not have authority to move water from the State of Oregon.

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577	1	Section 8.3 "Regulatory Setting" (pages 8-112 to 8-126) lists plans, policies, regulations from federal, state, and other bodies that apply to the Project. Recommendation: This section should include a discussion on future scheduled changes to these items and identify any proposed and/or draft regulations that may be implemented in the future. The EIR/EIS should ultimately discuss the risks of future regulation that is more stringent than existing regulation (e.g. endocrine disruptors). In the case of Total Maximum Daily Loads that are to be established within the Project Area and in affected areas, there should be an evaluation of how these TMDLs (once established) may modify thresholds of significance and/or change assumptions used in the EIR/EIS.	Pursuant to the state CEQA Guidelines, it is not appropriate to consider such speculative actions in an impact analysis, including future potential regulatory changes. TMDLs are established only for waters that have previously been placed on the State's 303(d) list of impaired water bodies. For constituents in water bodies that are currently on the State's 303(d) list, evaluations include the threshold of significance that states that an impact would be considered significant if implementation of an alternative would "[f]urther degrade water quality by measurable levels, on a long-term basis, for one or more parameters that are already impaired and, thus, included on the State's Clean Water Act Section 303(d) list for the water body, such that beneficial use impairment would be made discernibly worse" (Draft EIR/EIS Chapter 8, Section 8.4.2.3, Effects Determinations). This is the most sensitive threshold of significance, in that any measurable degradation of water quality on a long-term basis is considered a significant impact. Thus, implementation of a TMDL will not substantively affect whether the impact of the project on a given constituent, if any, is considered significant. In some instances, TMDLs that are in development are qualitatively assumed to contribute to future decreased levels of a given constituent (see Draft EIR/EIS Chapter 8, Section 8.4.3, Effects and Mitigation Approaches, Impact WQ-26 and Impact WQ-13,). In these instances, the effect of these TMDLs on the assessment of adverse/significant effects is described. Please note that this comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft EIR/EIS. Alternative 4 remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
577	2	The EIR/EIS does not clearly identify what the beneficial changes are in the quality of water delivered to the export areas under the proposed alternatives. Recommendation: For better public transparency and improved regional planning among stakeholders of affected areas, each alternative should explicitly compare the water quality of the water taken from the proposed intake structures to that of the current system. This would entail the inclusion of a table showing the average values for various water quality parameters. In all likelihood the quality of water taken from the alternatives will be better in many aspects--however, this information is also valuable to the public and should be clearly presented in the report.	The amount of water that can be diverted from the new north Delta facilities is set by Federal regulating agencies, ESA compliance and project design, and not by the water contractors. Operations for the proposed project would be consistent with the criteria set by the FWS (2008) and NMFS (2009) BiOps and State Water Resources Control Board Water Right Decision 1641 (D-1641), subject to adjustments made pursuant to the adaptive management process as described in the 2008 and 2009 BiOps (RDEIR/SDEIS Executive Summary ES.2.2). In addition to permitting constraints on daily operations of the SWP and CVP, DWR must maintain proper performance and bypass flows across fish screens when endangered and threatened fish species are present within the north Delta facilities area. The intake fish screens drive the overall size of the intake structure on the riverbank, and have been numbered and sized to permit water to flow through the screens within a permitted flow regime set by California Department of Fish and Wildlife and NMFS fish screen criteria (BDCP Appendix 5B Section 3.B.3.3). RDEIR/SDESIS Section 4.3.4 (evaluating Alternative 4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, RDEIR/DEIS Section 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to

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			address those impacts. Additionally, adding intakes in the North Delta will allow for operational flexibility that can improve natural flow in the Delta and avoid impacts to migratory fish based on real time data and operations
577	3	The qualitative methods used to analyze water quality were ambiguous and particularly noncommittal. The readers are left to imagine what their specific tactics were, and whether these strategies can be trusted as reliable. With little transparency or reporting about the methodologies, it makes it hard to draw a conclusion regarding the validity of the report's findings. Best available assumptions might have been collected from experiments that are extremely old, and thus no longer accurate, or from those that utilized faulty/unreliable technologies. Recommendation: Each qualitatively based conclusion should be accompanied with a brief description of the processes used that led to their determinations.	RDEIR/SDESIS Section 4.3.4 (Alternative 4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, RDEIR/DEIS Section 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts. For additional discussion of the use of qualitative water quality assessments in the Delta region please refer to Master Response 14.
577	4	All construction-based impacts were solely measured by manipulating expectations regarding the duration, scope, location, and overall conditions of construction. They use speculative information about the chemicals they think will be utilized as well as the locations for storage, disposal, and production of manufacturing equipment; none of which are disclosed anywhere in the text. Though it is standard to use approximations for such values, it is imperative to list these assumptions in the EIR and allow the public to review their estimations and conclusions. This is especially true since a change in these expectations can trigger a significant change in water qualities near construction sites. Recommendation: The assessment should also report, or at least consider, multiple construction practices, time schedules, and locations; and document how these factors could alter their construction-based impact conclusions.	Construction assumptions are listed in Final EIR/EIS Appendix 3C. Assumptions are made by construction managers and engineers experienced in the type of work proposed and are based on anticipated construction methodologies, durations, scope of work, and locations of work. Assumptions are based on information known at the current level of planning and design. The construction schedule assumes that many construction activities occur simultaneously, which can limit or shorten the construction period during which impacts occur. An alternative study with increased sequencing of the work is expected to result in increased impacts due to an extended duration of the project. Assumptions on the types of chemicals utilized during construction are based on anticipated materials to be used in the work, such as fuels, oils, lubricants, other petroleum products, cement, paints, solvents and other contaminants that may contain harmful chemicals. Such assumptions are typically general at this stage of planning and design. More detailed procedures and requirements for chemicals and other hazardous materials handling will be required in the mitigation measures for permits from various governing agencies, such as the California Regional Water Quality Control Board, California Department of Fish and Wildlife, U. S. Department of Fish and Wildlife, and U. S. Army Corps of Engineers. As described in Draft EIR/EIS Chapter 3, development of individual plans prior to construction, such as Storm Water Pollution Prevention Plans (SWPPPs; Appendix 3B.1.5), Erosion and Sediment Control Plans (ESCPs; Appendix 3B.1.6), Hazardous Material Management Plans (HMMPs; Appendix 3B.1.12), and Spill Prevention, Containment, and Countermeasure Plans (SPCCP; Appendix 3B.1.13), will reduce the potential for chemical or other impacts from hazardous materials and runoff due to construction activities. Such plans are typically developed during the pre-construction phase of the work after planning and designs are complete and specific potential impacts are known. For additional discussion of water quality please refer to Master Response 14.
577	5	Some of the parameters examined qualitatively include some of the most important substances including ammonia, pesticides and pathogens. In the case of pesticides, concentration values are heavily dependent upon assumptions about future pesticide market growth and local demand. However, again we find no explanation as to how these proposed growth quantities were determined. Recommendation:	RDEIR/SDESIS 4.3.4 (Alternative 4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, Section 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts. For additional discussion of the use of qualitative water quality assessments in the Delta region please refer

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		Expected market demand and usage of pesticides should be disclosed and justified.	to Master Response 14.
577	6	The Delta Bay conservation plan is a vast project with the ability to affect an extremely large region, one containing various different ecosystems and structures. Thus, it is important that the measurements taken for water quality testing purposes accurately represent all of the project's area of influence, including key locations. Some of the testing sites should include zones next to waste treatment plants, fragile or protected habitats, and water extraction facilities for municipal tap water. We find this Environmental Impact Statement is lacking in that it only tested water in 11 different locations, whereas a project of this magnitude should have significantly more test sites. Recommendation: Conduct a much more comprehensive and all inclusive study by considering a wider array of water quality testing locations.	Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in RDEIR/SDEIS Chapter 4. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. See also Master Response 5 for discussion of the BDCP effects analysis. The Cumulative Impact Analyses that was written for the 2013 Draft EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are included to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see RDEIR/SDEIS Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs. Please see also Master Response 9 for additional information on the cumulative impact analysis. Numerous water quality monitoring stations currently operate at locations throughout the Delta and will continue to operate in the future. These stations are operated by the United States Geological Survey, the United States Bureau of Reclamation, the California Department of Water Resources, the Interagency Ecological Program, and numerous local agencies. Monitoring locations already present in Old River near Discovery Bay are sufficient to support and inform these activities with regards to salinity (including both chloride and electrical conductivity) and organic carbon. Monitoring of mercury and selenium will be further defined in site specific monitoring and management plans associated with the restoration areas.
577	7	Water quality values and contaminant concentrations in lakes can be extremely erratic and irregular. We cannot asses the consequences of altering flow patterns without measuring water qualities at areas that are sufficiently close in proximity. If data about a parameter was not available at a particular site, then it would have been prudent to either attempt to gather the data from a field study or use some best available approximations. These would have been better than omitting the site altogether. This issue holds especially true in regards to parameters that were analyzed through qualitative methods, since a greater number of quality control locations could also imply less speculation and minimize the margin of error. Recommendation: In appendix 8B, this EIR lists the 23 different environmental settings for which they found available data. We believe that their testing sites should have included all of these locations. They offer a greater variety in terms of ecosystems and flow models. They also explore water quality in some key locations such as next to water treatment plants.	Please see responses to comment 577-3 and 577-6, and Master Response 14 regarding presentation and use of data in the Environmental Setting section of Final EIR/EIS Chapter 8.
577	8	This environmental assessment does not factor in climate change into its analysis of water quality. Though it does contain a section dedicated to the purpose of examining global warming as it relates to their plan, it does not include a thorough exploration of water quality. Even the slightest change in temperature can severely affect the quality of water. Factors such as sedimentation and rate of decomposition are extremely temperature dependent, and cannot be appropriately quantified without first assessing temperature changes. For instance, the chemical reactions that occur in pesticides, and that oftentimes create even more harmful and pervasive byproducts, are almost always a factor of	Contrary to the commenter's assumption, the water supply and Delta hydrodynamic modeling conducted for the EIR/EIS specifically considered and included potential future climate change to hydrologic and water quality variables. Climate change, which is anticipated to increase ambient air temperatures and affect precipitation patterns, was accounted for in the hydrologic modeling of the project alternatives, as described in Final EIR/EIS Appendix 5A, Modeling Technical Appendix. Thus, the water supply and water quality assessments in Final EIR/EIS Chapter 5 and Chapter 8, respectively, account for climate change effects on precipitation and runoff.

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		temperature. Additionally, the rate of soil-water partitioning and volatilization are similarly bounded by thermal conditions. Recommendation: The EIA should incorporate some data indicating how their projected water quality values might change in the face of unexpectedly warm or cold temperatures.	Temperature changes were estimated for the EIR/EIS (see Draft EIR/EIS Chapter 11 and Appendix 29C). To the extent that these temperature changes would be expected to have a substantive effect on water quality constituents, they were considered in the water quality assessment in Draft EIR/EIS Chapter 8 and RDEIR/SDEIS Section 4.3.4. This is the case for dissolved oxygen. For other constituents (e.g., pesticides), either the expected temperature changes were too small to make any substantive difference, or the effects of temperature changes are not able to be predicted, and incorporation into the assessment would be speculative.
577	9	The fate and transport of water contaminants are interconnected with currents and the fluid dynamics within the Delta. These movements dictate the interactions between precipitation, runoff, and sedimentation; and are directly affected by temperature changes. Though the intricacies of these issues make it nearly impossible to accurately predict near exact values, their effects are relevant enough to call for some further degree of consideration. Recommendation: Include a section explaining how their data might change in the face of drastically changing seasonal temperatures.	See response to comment 577-8.
577	10	One of the water quality aspects that the EIR/EIS evaluates is the salinity of the water in the Delta. [It is actually the electrical conductivity (EC) of the water that is measured and modeled and the salt content of the water is extrapolated from that.] Changes in the salinity of the Delta waters could have wide ranging impacts on the flora and fauna of the ecosystem, as well as on the local agriculture dependent upon the Delta for water. Issue discussion: A key part of the balance between fresh and salt water in the Delta is the amount of fresh water coming into the Delta. The amount of fresh water that comes into the Delta has a direct impact on the amount of fresh water that flows out of the Delta into the seawater bays to the west. And the outflow of fresh water from the Delta to the bays has a direct impact on the amount of corresponding sea water that flows into the Delta from the bays. Therefore, when the preferred alternative (Alternative 4) of the BDCP predicts that it will export 36% more freshwater (4705 MAF in Alternative 4 vs. 3446 MAF under existing conditions) from the Delta versus existing conditions, certain conclusions must be drawn. Specifically, with 36% less fresh water unavailable to the Delta each year, there will be far less freshwater to balance the incursion of sea water from the bays. More sea water flowing into the Delta means higher salinity levels in the Delta's waters. Recommendation: The authors of the EIR/EIS must address how increasing the amount of freshwater taken from the Delta by 36% results in an insignificant impact to the salinity of the Delta waters. Ideally, this will be done using numerical results from an effective modeling tool.	The proposed project does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. The water quality assessment of the diversion of Sacramento River water under the project alternatives addresses effects on salinity-related parameters in the Delta, including electrical conductivity (EC) and compliance with related agricultural and fish and wildlife objectives in the Bay-Delta Water Quality Control Plan and degradation relative to these uses in Impact WQ-11 in Final EIR/EIS Chapter 8, Water Quality. The assessment relied on output from the hydrologic model CALSIM II and hydrodynamic model DSM2, as described in Final EIR/EIS Section 8.3.1, Methods for Analysis, of Chapter 8, Water Quality. Alternative 4A would result in substantially lesser water quality impacts to salinity-related parameters, including EC as compared to the preferred alternative in the Draft EIR/EIS. Alternative 4A would still have significant impacts to EC; however, feasible mitigation measures were introduced to reduce the identified impacts to less than significant levels to protect beneficial uses and achieve compliance with SWRCB D-1641 standards. See also Master Response 14 for additional discussion of Water Quality.
577	11	Chapter 8 of the EIR/EIS discusses water quality issues in detail across 15 possible contaminants and to do so it relies upon the DSM-II QUAL computer model. This model is in turn fed hydrodynamic data from the CALSIM II computer model. Appendix 8H shows the detailed results of salinity (EC) measurements in 11 key locations based on the DSM-II QUAL model.	Salinity in the Delta is a function of the amount and timing of freshwater input from the major tributaries, tidal action from San Francisco Bay, and exports from the Delta. During the late winter and spring months of seasonally elevated flows, and in wet years, seawater intrusion is limited and the Delta has mostly low salinity. During low-flow summer and fall months, and during dry years, lower freshwater flows result in greater amounts of seawater intrusion. Staff from DWR and USBR constantly monitor Delta water quality conditions and adjust operations of the SWP and CVP in real time as necessary to meet water quality

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		Issue discussion: The data in Appendix 8H (Table EC-4) for the preferred alternative (#4) shows that salinity (EC) levels in 63% of the measurement sites are out of compliance at least 10% of the time. Further, the model shows 27% of the measurement sites are out of compliance 25% of the time. This demonstrates a significant impact to the Delta in terms of salinity, as stated in the appendix. However, the appendix then goes on to state that even though the model results show a significant salinity impact to the Delta environment, due to a problem with the model overestimating salinity levels in the Delta, there actually is no impact after all. It is very convenient to dismiss these unfavorable results by citing a flaw in the model. However, if the model is admittedly flawed, then it calls into question how much the other results of the model can be trusted. In other words, the writers of the EIR/EIS cannot have it both ways. Either there is a significant salinity impact in the Delta that must be mitigated, or the model is flawed and its results must be called into question. Recommendation: There are two approaches to address this issue, either of which would suffice. The first recommended approach is to stand by the results of the model and accept that the salinity impacts predicted in the Delta must be properly mitigated, or a non-impactful alternative must be chosen. The second recommended approach would be to accept that the model results are incorrect and that the model must either be corrected or replaced.	objectives set by the State Water Resource Control Board protection of agricultural water supply, municipal and industrial drinking water supply, and fish and wildlife beneficial uses. See RDEIR/SDEIS Section 4.3.4 for a discussion on the proposed projects effects on water quality, salinity and electrical conductivity. See also Master Response 14. Effects of the alternatives on salinity levels are described in Final EIR/EIS Chapter 8, Water Quality, and Appendix 8H, Electrical Conductivity, and RDEIR/SDEIS Appendix A. Modeling results indicate that the implementation of the water conveyance facilities may positively or adversely affect in-Delta water quality, depending on a number of factors including location, time of year, and hydrologic conditions. See tables in Appendices 8E through 8N for specific results related to various water quality constituents (including bromide and chloride). In addition to potential effects associated with the project and alternatives, modeling results for the No Action Alternative indicate that, with or without the proposed project, rising sea levels will bring saline tidal water further into the Delta than occurs at present. RDEIR/SDESIS Section 4.3.4 (Alternative 4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, Section 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts.
577	12	The EIR/EIS describes that the data used in completing the Water Quality chapter extends to 2009. Data after 2009 was not used. Issue discussion: The State of California is in an unprecedented drought, which causes numerous water quality issues, such as higher metals concentrations and salinity. Given that this drought event could have unforeseen impacts on the Project, data after 2009 should be obtained and included in the study. Recommendation: It is recommended that additional data after 2009 be considered as part of the study.	The data that the commenter is referring to is data used to describe the Environmental Setting/Affected Environment in Chapter 8, Section 8.1.3 of the EIR/EIS. As mentioned in Draft EIR/EIS Chapter 8, Section 8.4.2.2, Comparisons, the CEQA baseline "Existing Conditions" is represented by Existing Conditions modeling runs, not the historical water quality monitoring data as presented in Section 8.1.3. The modeling and impact assessment specifically included and addressed the drought period of 1987-1991. Therefore, the assessment is considered adequate and represents the best available information to assess the effects of the BDCP implementation under drought conditions. As the current drought is ongoing, the effects of the drought are not available at a level sufficient to be used at this time in the modeling and assessment for the EIR/EIS.
577	13	The EIR/EIS provides a discussion on probable selenium impacts to the Bay Area as a result of the Project. However, more detail needs to be included on possible selenium leaching from excavation caused by the Project, particularly as the Bay Area basin is an area with naturally elevated selenium concentrations in the native soils. Issue discussion: Selenium leaching is a widely experienced problem in heavy earthwork projects, especially in areas where soils are naturally selenium-rich. Exposing soils from excavation could create selenium heavy runoff. For example, in 1984-85 wildlife at the Kesterson Wildlife Refuge experienced death or deformity from selenium laden runoff caused by the incompleted San Luis Drain.	Impact WQ-31 addresses water quality effects resulting from construction related activities. The assessment acknowledges the potential for trace constituents (including metals/selenium) in soil. The assessment assumes that all construction activities will be conducted in conformance with applicable federal and state regulations. Additionally, Appendix 3B of the Final EIR/EIS identifies Environmental Commitments to be implemented by the project proponents. These commitments will be specifically designed as part of final design to avoid, prevent, and minimized potential discharges of constituents of concern. For additional discussion regarding the selenium effect analysis please refer to Chapter 8 of the Final EIR/EIS and Appendix 8M. See also Master Response 14.

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		Recommendation: It is recommended that additional evaluation be conducted to explore potential selenium leaching scenarios, as may be caused by potential delays in construction or excavations of areas with high selenium concentrations. Furthermore it is recommended that the construction Stormwater Pollution Prevention Plan contain language to focus on selenium control for the Project.	
577	14	The EIR/EIS describes dioxins/furans as a potential constituent of concern for water quality. However, no atmospheric modeling (the most common transport mechanism through which dioxins/furans are introduced into surface water) was conducted. Issue discussion: Dioxins/furans pose a significant threat to both human and environment, and should be considered with more scrutiny as related to water quality impacts on the Project. Recommendation: It is recommended that further evaluation be conducted, either through atmospheric modeling, or a more robust defense of why exclusion of modeling is acceptable, for dioxins/furans.	Atmospheric transport was not considered in the assessment of dioxins/furans because the BDCP activities would not affect such sources. The available water data for dioxins/furans reflects the aerial deposition that currently occurs, and information is not available to accurately consider potential future changes in the water concentrations of these constituents. Construction of the proposed California WaterFix water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft EIR/EIS and RDEIR/SDEIS. As part of the planning and environmental assessment process, the project proponents will incorporate environmental commitments and best management practices (BMPs) into the action alternatives to avoid or minimize potential adverse effects (a NEPA term) and potential significant impacts (a CEQA term). The project proponents will implement these environmental commitments as part of the project construction activities. In other words, these commitments will be satisfied even if not separately imposed by the permitting agencies. If permitting agencies impose additional measures or modifications, those will also be adhered to as part of the permit(s). The project proponents will coordinate planning, engineering, design and construction, operation, and maintenance phases of the alternative with the appropriate agencies. For more information regarding Environmental Commitments please see RDEIR/SDEIS Appendix 3B.
577	15	The EIR/EIS does not contain any information on the effect that fracking may have on the project, the public, and/or the environment. This is critical since fracking has been shown to have a detrimental effect on people and the environment. Issue discussion: Fracking is relevant to BDCP because the Monterey Shale in San Joaquin Valley is believed to contain 15 Million barrels of oil. Tapping this oil requires a copious amount of high pressure water laced with toxic chemicals to be injected into the well to break the rock and release the fossil fuels. It is estimated that each well uses an average of 5 million gallons of water over the life of the well, which was not considered in the EIR/EIS. Not considered also are the effects that the chemicals have on the public and the environment. Although a law passed recently to require the State to study fracking safety, it does not prevent new wells from being dug. The petrochemicals released during this process can contaminate the surrounding air and water for many miles. Finally, the wastewater injection performed post-fracking has triggered slips in preexisting faults in many states, including Texas, Ohio, Oklahoma, and Arkansas as well as in British Columbia. These slips are believed to cause earthquakes as large as 5.0 on the Richter scale. This is especially critical in California, because large scale fracking has yet to take	State constitutional restrictions require the reasonable and beneficial use of water, and state laws require that water pumped from the Delta be put to beneficial uses. Beneficial uses include agricultural, municipal, and industrial consumptive uses; power production; and in-stream uses including fish protection flows. Fracking – or "hydraulic fracturing" -- presumably could be an "industrial" use of water. As of the present, hydraulic fracturing is a lawful use of water, as state law generally permits oil and gas operators to engage in "the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells[.]" (Cal. Pub. Resources Code, § 3106[b].) The state Department of Conservation is currently developing fracking regulations and rules passed by the Legislature have been sent to the governor. Through the rule-making process, the state will better understand how much water is used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal. The Department of Conservation estimates that statewide, about 270 acre-feet of water per year is used for hydraulic fracture stimulation activities. For comparison's sake, roughly 5.2 million acre-feet of water a year have been diverted from the Delta, on average, over the last 20 years by the federal and state water projects for farms and cities. The State Water Resources Control Board could modify water permits to balance and protect beneficial uses of water. If the Legislature declared fracking to be unreasonable, it would potentially trigger the State Water Resources Control Board to revise water right permits in such a way as to restrict Delta water from being used for fracking. Refer also to Master Response 34 (Beneficial Use of Water).

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		place in such active earthquake territory. Recommendation: It is recommended that further investigation be conducted not only on fracking safety and environmental effects but also on a buffer zone to see how far away fracking needs to be from BDCP so that the infrastructure is not affected.	
577	16	Chapter 8 discusses water quality impacts during standard planned maintenance requirements for continued operation. Appendix 3E.2.6.2.1 discusses water quality degradation due to earthquake causing a levee breach and projected salinity increase in BDCP. Issue discussion: No discussion of full or partial system failures of BDCP at inlet(s), at tunnel(s), at pumping station(s), etc. due to such unplanned events. These unplanned events could be caused by a natural disaster (e.g., earthquake, flood) or by humans (e.g., accidental or sinister activities). Impacts to system performance and hence impacts to water quality (and perhaps other chapters within the EIR/EIS) are not discussed. Recommendation: EIR/EIS shall expand discussion of analyses to include: 1. Risk identification for unplanned outages beyond planned maintenance. Such risk assessment shall address both probabilities of occurrence as well as impacts on the system if risk is realized. 2. Risk mitigation plan that identify actions that are to be taken which will have an environmental impact. That is, what are the plans to react to unplanned partial system failures. 3. Assessment of impacts to water quality analyses when such outages occur. This shall include partial system failures and the impacts they have on water quality (and perhaps other chapters in the EIR/EIS). For instance, if one inlet suffers a catastrophic failure due to an earthquake, discuss how water quality (and other chapters within the EIR/EIS) would be affected until repairs could be implemented and flow restored.	CEQA and NEPA do not require the project proponents to speculate regarding issues that are not reasonably foreseeable. There are very likely a multitude of events that are not reasonably foreseeable, so it is not clear what type of water quality analysis could be conducted. Additionally, facilities are being designed to prevent or avoid impacts on water quality. The risks due to unplanned outages caused by natural disasters such as seismic and flood events and the associated impacts will be addressed during the design process. Risk mitigation plans for partial system failures will be developed during the design and permitting process. Surface water quality will not be impacted in the event of a catastrophic failure of an intake. During a system failure the intake can be isolated from the Sacramento River with valves or stoplogs thereby preventing backflow into the river. Also, the conveyance system has built-in redundancy (i.e. multiple intakes, dual tunnels, continued use of South Delta Facilities) to continue operations even if one intake shuts down.
577	17	In section 8.1.1 Overview the EIR/EIS reads: The chapter is divided into three main sections. - 8.1 Environmental Setting/Affected Environment - 8.2 Regulatory Setting - 8.3 Environmental Consequences Recommendation: The numbering should be changed to 8.2, 8.3, and 8.4, respectively.	In Draft EIR/EIS Chapter 8, Section 8.0.1 is the Overview. Numbering of the subsequent Chapter 8 sections matches the numbering in other resource chapters.

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577	18	Page 8-421, lines 23-28 state that "[t]he substantial changes in long-term average bromide predicted for Barker Slough under all operational scenarios of Alternative 4 could necessitate changes in treatment plant operation or require treatment plant upgrades in order to maintain Disinfection by Products compliance. The model predicted change at Barker Slough is substantial and, therefore, would represent a substantially increased risk for adverse effects on existing Municipal and Domestic Supply beneficial uses should treatment upgrades not be undertaken. The impact is considered significant." Recommendation: In this impact analysis, it does not mention specifically which water districts, purveyors, etc. would be affected. The EIR/EIS should explicitly state what water purveyors are likely to be impacted by this predicted impact. Further, the EIR/EIS should identify what treatment plants would have to treat this water; list what treatment processes are used at these plants; and evaluate what treatment changes may be necessary.	Impact WQ-5 in RDEIR/SDEIS Section 4.3.4, Water Quality, examines the potential effects on bromide concentrations resulting from facilities operations and maintenance of the proposed project. Increases in exceedances of the 100 µg/L assessment threshold concentration for protecting against the formation of disinfection byproducts in treated drinking water would be 6% or less at all locations assessed, which is considered to be less than substantial long-term degradation of water quality. Further, the use of seasonal intakes for municipal water supply is opportunistic in the areas affected (Antioch and Mallard Island); use is largely driven by acceptable water quality, and opportunity to use these intakes would remain. As such, the levels of bromide degradation that may occur under the Alternative 4A would not be of sufficient magnitude to cause substantially increased risk for adverse effects on any beneficial uses of water bodies within the affected environment. Bromide is not CWA Section 303(d) listed and thus the minor increases in long-term average bromide concentrations would not affect existing beneficial use impairment because no such use impairment currently exists for bromide. See also Final EIR/EIS Chapter 8 and Appendix 8E and Master Response 14.
577	19	Mitigation Measure WQ-5 for Bromide states that BDCP proponents will conduct additional evaluations and modeling to define the extent at which modified operations could reduce or eliminate bromide increases. However, if operational changes are not possible, then the impact remains. Recommendation: As written, Mitigation Measure WQ-5 is vague and does not state what types of operational measures may be undertaken to reduce bromide increases caused by the alternative. The reader has no idea as to what type of flexibility exists under the modified operations. The measure should at least state what options/parameters are within control, and examples of what types of changes could be done to lower bromide concentrations.	See response to comment 577-18. Alternative 4A would result in lesser water quality impacts to salinity-related parameters, including a less than significant impact to bromide, as compared to the preferred alternative in the Draft EIR/EIS. See Final EIR/EIS Chapter 8 and Appendix 8E and Master Response 14.
577	20	In the discussion of bromide impacts, the EIR/EIS references Appendix 3B for environmental commitments BDCP proponents have made to address. Section 3B.2.1.3 states some concepts that could be considered to address effects of DBP's [disinfection by-products] -- which is an identified impact of increased bromide concentrations. The section lists the option to "Provide funding to implement treatment for DOC [dissolved organic carbon] and/or DBPs in water treatment facilities ... this could include pre-treatment of DOC or modification of disinfection facilities to minimize DBP formation, or post-disinfection treatment for DBPs or modifications to distribution systems to limit DBP formation. Recommendation: This Mitigation Measure should include and explicitly state how much of an environmental commitment BDCP proponents would take. As it is presently construed as a concept, there are no concrete assurances as to what extent this environmental commitment entails. There should be discussion of this in the bromide mitigation discussion to directly and outline address how and to what extent impacts will be mitigated.	Alternative 4A would result in substantially lesser water quality impacts to salinity-related parameters, including EC as compared to the preferred alternative in the Draft EIR/EIS, including less than significant impacts to bromide such that mitigation for bromide is no longer required. See response to comment 577-18. See also Final EIR/EIS Chapter 8 and Appendix 8E and Master Response 14.
577	21	"The primary Greenhouse gases generated by the alternatives would be CO2, CH4, N2O, and SF6. Each of these gases is discussed in detail below. Note that PFCs and HFCs are not discussed as these gases are primarily generated by industrial processes, which are not	The EIR/EIS does not implicitly exclude hydrofluorocarbons (HFC) emissions from leaking on-road air conditioners. As noted on page 22A-12 in Draft EIR/EIS Appendix 22A, emissions from on-road vehicles were determined by dividing the estimated CO2 emissions by 0.95. This statistic is based on EPA's

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		anticipated as part of the project." (page 22-7 in Chapter 22) Comment: The overlook of PFCs and HFCs in this project is improper. The EIR/EIS should provide enough evidence to demonstrate the project has no risks of PFCs and HFCs emissions. Otherwise, they should include these two GHGs impacts considerations. Analysis: Perfluorinated compounds [PFCs] are a large group of manufactured compounds that are widely used to make everyday products more resistant to stains, grease, and water. For example, PFCs may be used to keep food from sticking to cookware, to make sofas and carpets resistant to stains, to make clothes and mattresses more waterproof, and may also be used in some food packaging, as well as in some firefighting materials. Because they help reduce friction, they are also used in a variety of other industries, including aerospace, automotive, building and construction, and electronics. (National Institute of Environmental Health Sciences (NIEHS)) http://www.niehs.nih.gov/health/materials/perflourinated_chemicals_508.pdf Hydrofluorocarbons, or super greenhouse gases, are gases used for refrigeration and air conditioning, and known as super greenhouse gases because the combined effect of their soaring use and high global warming potential could undercut the benefits expected from the reduction of other greenhouse gases such as carbon dioxide. Used as refrigerants, they were introduced by the chemical industry to replace ozone destroying CFCs (chlorofluorocarbons) which have (almost) been phased out by the Montreal Protocol. However, HFCs production is rising by 15% per year. HFCs are 3,830 times more potent than CO2 with a lifetime of 14 years. (ThinkGlobalGreen) http://www.thinkglobalgreen.org/hfc.html The predominant refrigerant currently in use is HFC-134a, a hydrofluorocarbon and a powerful greenhouse gas (GHG). It can slowly leak out of the MAC system in a manner that may occur with any closed high-pressure system such as permeation through hoses, and leakage due to compromised connections and deterioration of parts, seals, and fittings. Larger leaks may occur during accidents, maintenance and servicing, and vehicle disposal at the end of useful life. (CalEPA Air Resources Board) http://www.arb.ca.gov/cc/hfc-mac/hfc-mac.htm Ninety percent of HFCs today are used in refrigeration and air conditioning units. So it is not surprising that these are the two main sources of global HFC emissions. Automobile air conditioning tops the list. Unlike CO2 that is emitted as a product of burning fossil fuels to generate energy, most HFCs are contained within equipment. Any emissions are the result of old equipment, faulty maintenance, leakage during maintenance, or escape at the end of the product's lifetime. One would expect the US government to have a network of HFC recycling plants and recapture centers, as well as increased efficiency standards and maintenance regulations. This is not the case. Recapture regulations are on the books but enforcement is difficult and underfunded. Industry data show that 59% of HFC 134a ever produced has already been released into the atmosphere (along with 80% of the main HCFC in the market, HCFC 22). According to recent investigations, about 60% of HFC emissions arise from routine leaks from refrigeration and air conditioning. (GREENPEACE) http://www.greenpeace.org/international/Global/international/planet-2/report/2009/5/	recommendation that CH4, N2O, and other GHG emissions, including HCFs from leaking air conditioners, account for approximately 5% of on-road emissions (see http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100CZFN.PDF). The text has been revised in Appendix 22A to define the words "other GHG" as CH4, N2O, and HCFs. As discussed in Draft EIR/EIS Section 22.1.3.2, the primary sources of HFCs are associated with industrial activities. HCFs within the transportation sector only represent about 3% of total on-road emissions (see http://www.epa.gov/ttnchie1/conference/ei16/session5/davies_pres.pdf). Given their small contribution, the text in Section 22.1.3.2 focused on CO2, CH4, N2O, and SF6, which are the primary GHG emissions associated with the project. However, the text in Section 22.1.3.2 in the RDEIR/SDEIS has been revised to add background information on HFCs and to clarify that emissions from leaking on-road air conditioners may result during project construction and operation. As cited by the commenter, PFCs are predominantly associated with the manufacturing industry. While the NIEHS document identifies "construction" as a potential source of PFCs, this is likely a reference to the use of PFCs as an intermediate in the production of other materials required for construction, namely aluminum. Analysis of GHG emissions from key industrial sectors conducted by the United States Environmental Protection Agency (EPA) indicates that only the aluminum and semiconductor industries have measurable PFCs emissions (see https://www3.epa.gov/climatechange/Downloads/ghgemissions/US-GHG-Inventory-2015-Main-Text.pdf). This is further evidenced by the EPA's emissions reduction analysis of the construction sector, as well as the EPA's 2013 GHG inventory for the United States. Neither of these studies identify PFCs as a component of the construction sector's direct emissions profile (see https://www.epa.gov/sites/production/files/2015-12/documents/us-ghg-inventory-2014-chapter-executive-summary.pdf and https://archive.epa.gov/sectors/web/pdf/construction-sector-report.pdf) While one could argue a link between PFC emissions and the construction industry through the consumption of aluminum, these would be lifecycle emissions and to attempt to characterize and assign these emissions would be speculative and is therefore outside the scope of environmental analysis. Attributing PFC emissions to construction activities is also inconsistent with the EPA's reporting and characterization of GHG emissions. (see https://www.epa.gov/sites/production/files/2015-12/documents/us-ghg-inventory-2014-chapter-executive-summary.pdf and https://archive.epa.gov/sectors/web/pdf/construction-sector-report.pdf). Accordingly, including PFC emissions in EIR/EIS analysis would be inappropriate.

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		HFCs-Fgases.pdf From the evidence we provide, it is improper to omit the impacts of PFCs and HFCs as greenhouse gases. Although PFCs are commonly used in industrial fields, they can also be found in building and construction. Because of their super large global warming potential (GWP) and long lifetime, a few present in the project could be significant. As for HFCs, about 60% of emissions arise from routine leaks from refrigeration and air conditioning, and larger leaks may occur during accidents, maintenance and servicing, and vehicle disposal at the end of useful life. Trucks, passenger cars, and other vehicles used in the plan area have their mobile air conditioning (MAC), so there are potential leak risks from those cars. Moreover, in EIR/EIS, there is no evidence that all vehicles are purely new and there will be no leaks. If the vehicle which leak HFCs are not used in the plan area, they will also bring adverse impacts for other projects. Right, indeed. But BDCP owes so many vehicles working for, the impacts of these two super greenhouses gases should not be overlooked. [sic]	
577	22	[From ATT1: Perfluorinated compounds table] (GHG Lifetimes and GWPs, For ozone-depleting substances and their replacements) http://www.climatechangeconnection.org/emissions/documents/GWP_AR4.pdf	The comment describes an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	23	[From ATT2: Hydrofluorocarbons table] (GHG Lifetimes and GWPs, For ozone-depleting substances and their replacements) http://www.climatechangeconnection.org/emissions/documents/GWP_AR4.pdf	The comment describes an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	24	"The primary Greenhouse gases generated by the alternatives would be CO2, CH4, N2O, and SF6." "Construction of the water conveyance facility (CM1) would generate emissions of criteria pollutants (ROG, NOX, CO, PM10, PM2.5), and GHGs (CO2, CH4, N2O, and SF6) that would result in short-term effects on ambient air quality in the air quality study area." "Operation of the water conveyance facility would generate long-term (permanent) emissions of criteria pollutants (ROG, NOX, CO, PM10, PM2.5), and GHGs (CO2, CH4, N2O, and SF6) that would result in long-term effects on ambient air quality in the air quality study area." (page 22-7, 22-31, 22-34) NEPA Effects: GHG (CO2, CH4, N2O, and SF6) emissions resulting from construction of Alternative 1B 5 are presented in Table 22-33 Comment: The EIR/EIS does not provide the calculation method for SF6. From the graph above, we can see the GHG emissions for each year as total CO2e, CH4 and N2O can be altered as CO2e by their GWP in modeling, but the model does not include SF6. So how SF6 emissions are calculated is not clear in the EIR/EIS. Analysis: "CalEEMod analyzes the type of construction activity and the duration of the construction period to estimate emissions (GHGs and criteria pollutants)." (page 22-31) The GHG emissions (CO2, CH4, N2O, and SF6) are analyzed by CalEEMod software according to the EIR/EIS, while this model does not consider SF6 in it. So CO2 Equivalent GHGs (CO2e) in the final report of the model will not include SF6. We cannot find the	As described in Draft EIR/EIS Appendix 22A, neither the EPA nor the University of California Davis has a published an emission factor for SF6. Accordingly, statewide SF6 emissions in 2008 were used to calculate an SF6 emission factor per megawatt-hour by dividing total statewide SF6 emissions by the total electricity generation in California. This “top-down” approach is accepted practice in absence of published emission factors. Please also note that CalEEMod was not used to estimate electricity-related GHG emissions. As noted on page 22-32 and 22A-8, emissions were quantified by multiplying the expected annual electricity usage by regional emission factors developed by EPA. The EPA factors were used given the regional nature of BDCP electricity consumption (i.e., the project spans multiple utilities). Please refer to Table 22B-17 for the SF6 emission factor used in the analysis, and a corresponding summary for how the factor was developed.

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		calculation method for SF6.	
577	25	[From ATT3: Table 22-33. GHG Emissions from Construction of Alternative 1B (metrics tons/year)]	The comment describes a table in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	26	[ATT4: CalEEMod screenshot of analyzed construction activity and duration of construction period to estimate emissions.]	The comment describes an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	27	"The National Ambient Air Quality Standards are divided into primary and secondary standards; the former are set to protect human health within an adequate margin of safety, and the latter to protect environmental values, such as plant and animal life. Table 22-5 summarizes the NAAQS." (page 22-13, 22-14) "Local monitoring data (Table 22-3) are used to designate areas as nonattainment, maintenance, attainment, or unclassified for the NAAQS and CAAQS." (page 22-11, 22-12) Comment: Moreover, in EIR/EIS the thresholds of significance all used primary standards. Is it necessary to consider the secondary standards for some certain contaminants such as Volatile Organic Compound's? Since some VOCs will confuse the wildlife including birds and insects using particulates communicate with others. [sic] Analysis: The predation rate was higher in the herbivore trees than in the control trees. This confirms that birds use cues from trees to locate insect-rich trees in the wild. The herbivore trees had decreased photosynthesis and elevated emissions of many VOCs, which suggests that birds could use either one, or both, as cues. There was, however, large variation in how the VOC emission correlated with predation rate. Emissions of E-DMNT [E-4,8-dimethyl-1,3,7-nonatriene], beta-ocimene and linalool were positively correlated with predation rate, while those of highly inducible green leaf volatiles were not. These three VOCs are also involved in the attraction of insect parasitoids and predatory mites to herbivore-damaged plants, which suggests that plants may not have specific adaptations to signal only to birds.(From plants to birds: higher avian predation rates in trees responding to insect herbivory) http://www.ncbi.nlm.nih.gov/pubmed/18665271 The reference tells that the concentration of VOCs which produced naturally by herbivore tress, affects the birds' predation rate. While the project will also produce a certain amount of VOCs, whether the total amount of VOCs has impacts on birds and other wildlife is vague. So we think the secondary standards should also be included.	As discussed in Draft EIR/EIS Chapter 22, Air Quality and Greenhouse Gases, ozone is formed through a photochemical reaction with nitrogen dioxide and volatile organic compounds (VOC) (denoted as "ROG" in the Draft EIR/EIS).There are no ambient air quality standards (neither primary nor secondary) for these ozone precursors. However, all air districts in the Plan Area have adopted ROG and NOx thresholds to assist lead agencies in evaluating a project's potential to induce ozone formation as a result of ROG and NOx emissions. Chapter 22, Air Quality and Greenhouse Gases, quantifies ROG and NOx emissions generated by construction and operation of the project, and compares those emissions to adopted air district thresholds in the Plan Area. The research referenced by the commenter considers the emission of VOCs by trees and its relationship to predation of herbivores in these trees. A correlation relative to three specific VOCs and the rate of bird predation on herbivores infesting the trees is reported. However, the study's findings also point out that the research conducted in Finland does not support VOC causality of increased predation by insectivorous birds. There is no reference to the possible effects of increased ambient levels of VOCs in the environment on bird predation of herbivores in trees. While there may be some signals between birds and trees relative to the presence of herbivore insects, there is nothing in the literature to suggest modified VOC levels caused by construction and operational activity would adversely affect bird populations. The use of secondary air quality standards to predict adverse effects on birds does not seem warranted. As stated above, there is no secondary standard for VOCs. See also Final EIR/EIS Chapter 22 and Master Response 19.
577	28	In the draft BDCP EIR/EIS, developing a California cap-and-trade program that links with other Western Climate Initiative 29 partner programs to create a regional market system. (Page 22-22 Chapter 22) Comment: The BDCP EIR/EIS does not provide specific development of cap-and-trade program.	The California Cap-and-Trade Regulation applies to "covered entities", which are defined by the California Air Resources Board (ARB) as "an entity within California that has one or more of the processes or operations and has a compliance obligation as specified in subarticle 7 of the Cap-and-Trade Regulation; and that has emitted, produced, imported, manufactured, or delivered in 2008 or any subsequent year more than the applicable threshold level specified in section 95812 (a) of the Regulation." Examples of covered entities include Carbon Dioxide Suppliers, Electricity- In-state Generators, Hydrogen Production, Petroleum Refining, and other large-scale manufacturers and/or fuel suppliers. Neither DWR nor the proposed project

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		Analysis: The enforceable compliance obligation began on January 1, 2013, for greenhouse gas (GHG) emissions. California emits 447 million metric tons of carbon dioxide a year, according to CARB, which has been collecting and monitoring emissions data since 2008. The biggest chunk, 38 percent, comes from the transportation sector, largely from cars and trucks. 21 percent comes from electric power plants. 19 percent comes from industrial factories. 10 percent comes from commercial and residential buildings; the rest comes from agriculture and natural events like wildfires. Because transportation emits huge amount of carbon dioxide, BDCP EIR/EIS should provide how much allowance they will purchase from the cap-and-trade program.	and associated emissions (including transportation-related) are considered covered entities (pursuant to the Cap-and-Trade Regulation) and are therefore not subject to the GHG compliance obligations. Text has been added to Final EIR/EIS Chapter 22 to clarify that the project is not subject to the Cap-and-Trade Regulation. Please note that construction-related GHG emissions will be offset to net zero through Mitigation Measure AQ-15, whereas operational emissions from SWP pumping will be offset through modifications to DWR's Renewable Energy Procurement Program (REPP). These reductions are independent of the California Cap-and-Trade Regulation, but are noteworthy. Refer to Final EIR/EIS Chapter 22, Air Quality and Greenhouse Gases, for additional information and Master Response 19.
577	29	[ATT5: Table of Compliance Periods (2013-2020)]	The comment describes a table in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	30	[ATT6: Chart of Annual Compliance Obligation of 2013 Covered Emissions Due November 1, 2014]	The comment describes a chart in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	31	[ATT7: Table of eligible allowance vintages for annual and triennial compliance obligations.]	The comment describes a table in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	32	In the draft BDCP EIR/EIS, the Central Valley Project is operated using energy generated at CVP hydroelectric facilities and therefore results in no GHG emissions. (Page 22-83 Chapter 22) Comment: Hydropower generated by CVP is also a source of greenhouse gases. A lot of carbon dioxide and methane is emitted from decaying vegetation. Analysis: Large amounts of carbon tied up in trees and other plants are released when the reservoir is initially flooded and the plants rot. Then after this first pulse of decay, plant matter settling on the reservoir's bottom decomposes without oxygen, resulting in a build-up of dissolved methane. This is released into the atmosphere when water passes through the dam's turbines. In effect man-made reservoirs convert carbon dioxide in the atmosphere into methane. This is significant because methane's effect on global warming is 21 times stronger than carbon dioxide's. From 2007 IPCC, GHG emissions vary with reservoir location, power density (W capacity per m2 flooded), flow rate, and whether dam or run-or-river plant. Recently, the GHG footprint of hydropower reservoirs has been questioned (Fearnside, 2004; UNESCO, 2006). Some reservoirs have been shown to absorb CO2 at their surface, but most emit small amounts as water conveys carbon in the natural carbon cycle (Tremblay, 2005). High emissions of CH4 have been recorded at shallow, plateau-type tropical reservoirs where the natural carbon cycle is most productive (Delmas, 2005). Deep water reservoirs at similar low latitudes tend to exhibit lower emissions. Methane from natural floodplains and wetlands may be suppressed if they are inundated by a new reservoir since the	Long-term research on GHGs from hydroelectric power generation is limited, with much of the literature demonstrating mixed results with respect to net impacts. The longest study chronicling pre- and post-flood emissions from the same hydroelectric reservoir occurred over a period of seven years in northern Quebec (see the net carbon footprint of a newly created boreal hydroelectric reservoir, published in Global Biogeochemical Cycles Volume 26, Issue 2, June 2012). Similar to the literature cited by the commenter, the study demonstrates that GHG emissions vary depending on the depth of reservoir (shallow has higher emissions; deeper has lower), the amount of organic material/plant material decaying under anaerobic conditions, the source water to the turbines, and the underlying climatic conditions (e.g., tropical vs. temperate zones). Ultimately the researchers conclude that the reservoir initially resulted in a net source of CO2 (i.e., during the first post-flood year) (2270 mg C m−2 d−1) and a small source of CH4 annually thereafter (0.2 mg C m−2 d−1). As noted in Chapter 21, Energy of the Draft EIR/EIS, the proposed project would not result in the construction of any new power plants, including hydroelectric dams. Accordingly, the project would not require flooding of new reservoirs, which as noted above, results in the majority of GHG emissions from hydroelectric reservoirs. Potential GHGs would therefore be isolated to annual CH4 emissions, which as shown by Teodoru et al (2012), would be negligible. While some of the project alternatives would increase the demand for CVP generated electricity, it would be speculative to quantify GHG emissions for the following reasons: 1. The electricity would originate from a number of hydroelectric facilities. The amount of electricity generated by each facility, as well as the GHG flux rates from their reservoirs is currently unknown. 2. There are very few studies on reservoirs comparing pre- and post-emissions and thus a definitive conclusion on net GHG emissions is speculative. 3. Published studies confirm that GHG flux rates are highly dependent on local factors (e.g., amount of plant

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		methane is oxidized as it rises through the covering water column (Huttunen, 2005; dos Santos, 2005). Methane formation in freshwater produces by-product carbon compounds (phenolic and humic acids) that effectively sequester the carbon involved (Sikar, 2005). For shallow tropical reservoirs, further research is needed to establish the extent to which these may increase methane emissions. References: http://www.ipcc.ch/publications_and_data/ar4/wg3/en/ch4s4-3-3-1.html http://www.newscientist.com/article/dn7046-hydroelectric-powers-dirty-secret-revealed.html#.U1rKV_ldWPw http://www.epa.gov/cleanenergy/energy-and-you/affect/hydro.html	material, power density). Extrapolating flux rates from reservoirs around the world to CVP hydroelectric facilities would therefore be inappropriate. 4. While flow rates may affect reservoir emissions, it is uncertain how the incremental increase in CVP power demand would affect flow rates at individual hydroelectric facilities. For these reasons, quantifying CH4 during turbine operation and attributing those emissions to the proposed project would be speculative and is therefore excluded from the EIR/EIS. However, text has been added to Final EIR/EIR Chapter 22 to qualitatively discuss this issue and the state of published literature. Refer to Final EIR/EIS Chapters 21, Energy, and 22, Air Quality and Greenhouse Gases, for additional information and Master Response 19.
577	33	The Draft EIR/EIS does not point out that greenhouse gases contribute air pollution that may endanger public health or welfare. Analysis: USA Environmental Protection Agency released the 133-page proposed "endangerment finding" in response to a 2007 Supreme Court decision that ordered the agency to reconsider whether greenhouse gases are pollutants subject to regulation under the Clean Air Act. EPA's proposed endangerment finding is based on rigorous, peer-reviewed scientific analysis of six gases -- carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride -- that have been the subject of intensive analysis by scientists around the world. Concentrations of these gases are at unprecedented levels as a result of human emissions, and these high levels are very likely the cause of the increase in average temperatures and other changes in climate. The scientific analysis also confirms that climate change impacts human health in several ways. Findings from a recent EPA study titled "Assessment of the Impacts of Global Change on Regional U.S. Air Quality: A Synthesis of Climate Change Impacts on Ground-Level Ozone," for example, suggest that climate change may lead to higher concentrations of ground-level ozone, a harmful pollutant. Additional impacts of climate change include, but are not limited to: * increased drought; * heavy downpours and flooding; * frequent and intense heat waves and wildfires; * greater sea level rise; * intense storms; * harm to water resources, agriculture, wildlife and ecosystems.	Draft EIR/EIS Section 22.2.1.2 summarizes the United States Environmental Protection Agency's (EPA) Endangerment and Cause or Contribute Findings for GHG under Section 202(a) of the CAA. The text identifies the EPA's findings that GHG threaten the public health and welfare of current and future generations. However, as noted by the commenter, GHG emissions do not directly impact human health. Rather, elevated GHG concentrations in excess of natural levels induce large-scale climate shifts, which can expose individuals to increased public health risks. For example, increases in ambient temperature can lead to heat-related illnesses and death, whereas changes in disease vectors may lead to increased risk of infectious disease. Text was added to Final EIR/EIS Chapter 22 to specifically highlight these threats and the link between elevated GHG concentrations and climate change risks. Draft EIR/EIS Chapter 22, Air Quality and Greenhouse Gases, evaluates how GHG emissions from construction and operation of the project would contribute to elevated GHG concentrations and associated public health threats induced by climate change. As discussed in Impacts AQ-21 and AQ-22, construction emissions will be offset to net zero through Mitigation Measure AQ-21, whereas operational emissions from SWP pumping will be reduced through modifications to DWR's Renewable Energy Procurement Program (REPP). Offsetting construction emissions ensures the project would not contribute to elevated GHG concentrations and associated climate change risks during construction. Likewise, reducing operational emissions consistent with DWR's Climate Action Plan ensures the project would not conflict with DWR's ability to achieve its 2050 GHG reduction goal. In addition to offsetting project-generated GHG emissions, the project may also increase the resiliency and adaptability of the Plan Area to inevitable climate changes. For example, as described in Chapter 29, Climate Change, the project would enable continued water supply benefits and support ecosystem conditions that maintain or enhance aquatic and terrestrial plant and animal species. Refer also to Final EIR/EIs Chapter 22 and Master Response 19 (Climate Change and GHG).
577	34	"Power plants located throughout the state supply the grid with power, which will be distributed to the study area to meet project demand. Power supplied by statewide power plants will generate criteria pollutants. Because these power plants are located throughout the state, criteria pollutant emissions associated with all the Alternatives electricity demand cannot be ascribed to a specific air basin or air district within the study	As discussed in Draft EIR/EIS Section 22.2.3, local air districts throughout the State and responsible for issuing permits to stationary-source facilities, including power plants, to reduce air pollution and to attain (or maintain) the ambient air quality standard. The project would not require any new power generating facilities (see Draft EIR/EIS and Final EIR/EIS Chapter 21, Energy). Accordingly, energy supplied to the project would originate from existing power plants, which would be subject to air district permitting

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		area. Comparing emissions to thresholds shown in Table 22-9, which are established to manage emissions sources under the jurisdiction of individual air districts, would therefore be inappropriate. Criteria pollutant emissions from electricity consumption are therefore provided for informational purposes only and are not included in the impact conclusion." (page 22-46) Comment: However, this does not mean that nothing could be done for this emission problem. We think it is necessary to have monitoring programs designed for the electricity consumption, such as recording daily electricity usage and its source. If monitoring activities indicate that these power plants are located in certain air districts and the emissions of criteria pollutants have significant impact, these emission reduction measures and the strategy of power supplying should be re-evaluated and updated. Analysis: Taking Table 22-85 Total Criteria Pollutant Emissions from Electricity Consumption during Construction and Operation of Alternative 4 for example, the emission of NOx in 2021 is estimated to be 140 tons per year. If the electricity comes from 10 air districts at or near the study area, each air district will get 14 tons per year of NOx emission, in average. There will be significant environmental impact for these air districts. With all the mitigation measures and the emission reduction plan mentioned in this chapter, it seems to be promising that the criteria pollutant emissions from the electricity consumption will be reduced in the future for this project. However, it is not safe to say that the situation stated above will not happen. Therefore, monitoring programs may help to prevent this emission problem from being overlooked.	requirements, including standards to implement Best Available Control Technology (BACT) (e.g., the installation of emissions control equipment or implementation of administrative practices to reduce emissions). Existing power plants may also be required to offset emissions in order to maintain and/or renew permits. A footnote has been added to all relevant tables indicating that emissions generated by existing power plants would be addressed through local air district permit requirements. In addition, assigning emissions to air districts from which electricity is derived (i.e., assigning 140 tons per year to 10 air districts for 14 tons per air district) would not present a meaningful analysis, as such an approach would be speculative in nature due to the specific characteristics of each power generating facility (e.g., how each facility produces energy) which do not allow for the averaging and assigning of emissions.
577	35	"Once the cofferdam is installed, the area within the cofferdam would be dewatered using pumps with screened intakes... While the number of fish affected is unknown, entrapment could include a few hundred fish (total of all species)... Fish removal would result in handling stress and possibly in some physical injuries or incidental mortality" (11-187). "The number of individuals affected is expected to be limited, based on the fact that delta smelt are typically present at low densities in the affected habitats during the in-water work window" (11-255). Issue Discussion: There is no research or evidence to support the claim that the entrapment will only include a few hundred fish. Statements are made in what seems to be a purely assumptive manner. The statements simply assume that fish will not be present, rather than properly addressing the potential impacts, should they be present during the work window. Recommendation: The authors should perform a field study on a smaller scale to model the percentage of fish that will leave the area when noise occurs, or cite specific literature that indicates such evidence.	Evidence for the limited number of delta smelt occurring in the cofferdams is based on the general distribution of the species, as shown in existing distribution data. The fish rescue and salvage plan would aim to minimize the potential for effect and, as noted in the description (Appendix 3.C, Section 3.C.2.8 in the public draft BDCP), this plan will be submitted to the fish and wildlife agencies for their review and acceptance and revised accordingly based on that review. Also, see Final EIR/EIS Appendix 3B, for additional information on fish salvage and rescue plans.

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577	36	"The tunnels would be drilled from portals that would provide access for equipment and materials. These portals are located in upland areas and would not affect the aquatic environment. The areas would be designed to minimize the potential for storm water runoff to surface waters" (11-190). Issue Discussion: It is possible that even though the portals are located in upland areas, they can still effect the aquatic environment due to the adjacent land being altered. Recommendation: The document should provide more information as to what degree the storm water runoff to surface waters will be reduced, and should clarify the standards that will be employed to minimize the runoff.	As described in Draft EIR/EIS Chapter 6, Surface Water, Mitigation Measure SW-4: Implement Measures to Reduce Runoff and Sedimentation, BDCP proponents would demonstrate no-net-increase in runoff due to construction activities during peak flows by implementing measures to prevent an increase in runoff volume and rate and to prevent an increase in sedimentation in the runoff from the construction area as compared to Existing Conditions. Drainage studies would be prepared for each construction location. Based on study findings, if it is determined that onsite stormwater detention storage is required, detention facilities will be located within the existing construction area. The maintenance of water quality during construction as well as the standards that would be employed are addressed in Draft EIR/EIS and Final EIR/EIS Chapter 8, Water Quality and in Appendix 3B, Environmental Commitments. These materials review the construction regulatory requirements; construction techniques; as well as avoidance, minimization and mitigation measures. See Section 8.4.1.6 for a Summary of Methods Used to Assess Water Quality Changes Related to Construction Activities. Chapter 8 also evaluates the construction water quality impacts for each alternative. For example, see Impact WQ-31: Water Quality Effects Resulting from Construction-Related Activities (CM1-CM22) for Alternative 1A and equivalent impact discussions for the other alternatives. In Appendix 3B see Section 3B.1.6 Develop and Implement Erosion and Sediment Control Plans; Section 3B.1.11 Develop and Implement Hazardous Materials Management Plans; Section 3B.1.13 Develop and Implement Spill Prevention, Containment and Countermeasures Plans; Section 3B.1.16 Conduct Environmental Training; and Section 3B.1.19 Disposal and Reuse of Spoils, Reusable Tunnel Material (RTM), and Dredged Materials.
577	37	"Vibratory driving does not result in underwater sound great enough to injure fish" (11-192). "Impact pile driving produces underwater sound levels that have the potential to harm fish, while vibratory pile driving does not" (11-250). Issue Discussion: Based on a notice published by the National Oceanic and Atmospheric Administration, it seems that vibratory driving may result in harassment to wildlife up to 3 miles from the source (NOAA 2013). Recommendation: We suggest citing supportive research/modeling to validate the statement.	The RDEIR/SDEIS includes a revised analysis of underwater noise effects in Chapter 4, Section 4.4.7.
577	38	"Installation of sheet pile for cofferdam," "Increased suspension of bottom sediments and turbidity," and "Section 404 and Section 10 permits would require implementation of [Best Management Practices] BMPs to minimize suspension of bottom sediments" (11-197, Table 11-10). Issue Discussion: Table 11-10 states that best management practices will be employed. However, even with these management practices we can assume that there will still be some degree of suspension and turbidity issues associated with the overall environmental impact. Simply stating that BMPs will be employed is not sufficient evidence to discount the effects on wildlife. Many covered species and species habitats are extremely sensitive to changes in turbidity and suspension of bottom sediments. Recommendation:	Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in RDEIR/SDEIS Chapter 4. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. See also Master Response 5 for further discussion of BDCP effects analysis. The Cumulative Impact Analyses that was written for the 2013 Public Draft BDCP EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see RDEIR/SDEIS Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the

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		The authors should specifically identify what measures will be taken to prevent impacts to species from the suspension of bottom sediments, and provide evidence illustrating the efficacy of such measures.	RDEIR/SDEIS and Final EIR/EIS. RDEIR/SDESIS Section 4.3.4 (Alternative 4A) describes whether concentrations of various water quality constituents are expected to increase or decrease with the project, relative to existing conditions and the No Action Alternative. To the extent that concentrations of various water quality constituents are expected to increase, 4.3.4 describes whether these increases are expected to result in impacts to beneficial uses of water in the Delta. For constituents for which adverse impacts were expected, mitigation and other commitments, such as additional evaluation and modeling and consultation with water purveyors to identify additional measures to avoid and minimize or offset these impacts, were introduced to address those impacts. Additionally, adding intakes in the North Delta will allow for operational flexibility that can improve natural flow in the Delta and avoid impacts to migratory fish based on real time data and operations.
577	39	"Pile Driving" "Increased suspension of bottom sediments and turbidity" "Suspension of toxic-contaminated sediment" (11-197, Table 11-10). Issue Discussion: In Table 11-10, no discussion is provided in the column, "Avoidance and Minimization Measures" for Pile Driving. Recommendation: The authors should provide measures to mitigate at least a portion of the anticipated environmental impacts as a result of pile driving. Additional research should be done to determine the potential effects on wildlife, if necessary.	Table 11-10 has been revised and is now Table 11-13 in the Final EIR/FEIS. It now includes relevant AMMs addressing increased suspended sediments, turbidity, and suspension of contaminated sediment associated with pile driving. See also response to comment 577-42.
577	40	"Accidental spills (from construction equipment)" and the "small discharge of petroleum products" would be avoided or minimized by "pollution prevention plans" (11-197, Table 11-10). Issue Discussion: Accidental spills are likely unavoidable, even with pollution prevention plans. Recommendation: There should be more discussion as to what pollution prevention plans will include. In addition, an action plan should be developed that clearly indicates how the spills will be addressed, and what will be done to minimize impacts to species once a spill has occurred.	As described in Final EIR/EIS Appendix 3B, Environmental Commitments, spill prevention and avoidance measures will be implemented both through multiple Stormwater Pollution Prevention Plans (SWPPPs), Barge Operations Plan, Spill Prevention, Containment, and Countermeasures Plans (SPCCPs), and Hazardous Materials Management Plans (HMMPs). Additionally, the AMMs have been developed to avoid and minimize effects on natural communities and covered species that could result from implementation of the project. See also Master Response 22. The Lead Agencies will be responsible for ensuring coverage under the Construction General Permit for Construction and Land Disturbance Activities (Construction General Permit [CGP]) (Order 2010-0014-DWQ or any more recent version) issued from the State Water Resources Control Board. The Construction General Permit requires that a SWPPP be developed and implemented. For all action alternatives, a series of separate, site-specific, but related SWPPPs will be prepared and implemented and will take into consideration the “risk level” (Levels 1, 2, or 3, or Types 1, 2, or 3 for linear underground/overhead projects) of the construction activities covered by a given SWPPP. Project risk levels determine the level of protection (i.e., BMPs) and monitoring that is required for the project and is based on construction activities, and site sediment and receiving water risk. Accidental spill prevention and response measures are required to be included in a SWPPP regardless of risk level, and specific measures will vary according to risk level. The commenter is referred to Appendix 3B, Environmental Commitments, Section 3B.1.5 for the types of best management practices that are required to be implemented as part of an SWPPP. Measures specific to site and construction activity will be developed during the development of the SWPPPs for the project. Further, multiple SPCCPs will be prepared for construction activities for the action alternatives. Each SPCCP will take into account site-specific conditions and will be developed in accordance with the regulatory requirements of Title 40 of the Code of Federal Regulations, Part 112 (40 CFR Part 112). 40 CFR Part 112, or

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			the Spill Prevention, Control, and Countermeasure Rule, includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The commenter is referred to Appendix 3B, Environmental Commitments, Section 3B.1.13, for detail on what measures and practices the SPCCPs will include. In coordination with Lead Agencies, contractors will develop and implement a HMMP before beginning construction. It is anticipated that multiple HMMPs will be prepared for the construction activities associated with an action alternative, each taking into account site-specific conditions such as hazardous materials present on site. Based on these variables, each HMMP will provide detailed information on the types of hazardous materials used or stored at all sites associated with the water conveyance facilities (e.g., intake pumping plants, maintenance facilities); phone numbers of applicable city, county, state, and federal emergency response agencies; primary, secondary, and final cleanup procedures; emergency-response procedures in case of a spill; and other applicable information. The plan will include appropriate practices to reduce the likelihood of a spill of toxic chemicals and other hazardous materials during construction and facilities operation and maintenance. A specific protocol for the proper handling and disposal of hazardous materials will be established before construction activities begin and will be enforced by the project proponents. Final EIR/EIS Appendix 3B, Environmental Commitments, Section 3B.1.12 contains further detail on the types of measures/practices that would be included in these HMMPs.
577	41	"A recent record of maintenance activities indicates that it would be reasonable to expect that approximately 1 million cubic yards (MCY) of sediment may be removed within 1 mile of the weir an average of every 5 years" (11-199). Issue Discussion: A citation to a specific source is not provided to support the validity of the statement. Recommendation: The authors should provide a citation here to allow the reader to understand why this sediment removal rate is a reasonable expectation.	This text was removed from Chapter 11 in the RDEIR/SDEIS.
577	42	"However, adverse effects on covered fish species under this alternative from pile driving would be avoided or minimized through project-specific [Avoidance and Minimization Measures] AMMs, Best Management Practices, environmental commitments and/or mitigation measures, which could include seasonal timing restrictions on in-water activities; the use of vibratory pile drivers when possible; the use of noise attenuation devices; and limitations on the duration of impact pile driving activities" (11-222). "However, take of fish related to construction and maintenance activities would be minimized by implementation of project-specific AMMs, BMPs, environmental commitments and/or mitigation measures, which could include seasonal timing restrictions on in-water activities, and implementation of species-specific fish rescue and salvage plans. As a result, effects are not expected to be adverse" (11-223). Issue Discussion: The language seems to assume that since AMMs and BMPs will be in place, no adverse effects are anticipated. Recommendation: The authors should provide more detailed information regarding the AMM and BMP	Note on page 11-12 of the Final EIR/EIS, it states: "In-water and near-shore construction activities also have the potential to cause adverse effects on covered species through water quality degradation from increased turbidity, inadvertent spills of hazardous materials, and disruption of contaminated sediments. However, these adverse effects will be effectively avoided and minimized by isolating much of the in-water work inside cofferdams, constructing in areas that have limited use by the covered species, adhering to the approved in-water work windows, activity-specific timing restrictions, and by implementing environmental commitments and Best Management Practices (BMPs). These commitments are described in Appendix 3B, Environmental Commitments which include Conduct Environmental Training; Develop and Implement a Stormwater Pollution Prevention Plan (SWPPP); Develop and Implement an Erosion and Sediment Control Plan; Develop and Implement a Hazardous Materials Management Plan (HMMP) that includes a Spill Prevention, Containment, and Countermeasure Plan (SPCCP); Dispose of Spoils, Reusable Tunnel Material, and Dredged Material; Develop and Implement a Fish Rescue and Salvage Plan; and Develop and Implement a Barge Operations Plan. These environmental commitments would reduce the amount of turbidity from in-water construction activities and would guide rapid and effective response in the case of inadvertent spills of hazardous materials. These environmental commitments would be expected to protect covered fish species from adverse water quality effects resulting from project construction." See also Master Response 22. The Final EIR/EIS contains a thorough analysis of the effects of pile driving in Chapter 11. Under each alternative, starting with Section 11.3.3, the effects of construction (including pile driving) of the water

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		projects to show how the projects support these statements.	conveyance facilities are presented and analyzed. Under each alternative, impacts associated with the Construction and Maintenance of CM1 are discussed for each of the 12 covered fish species (e.g., delta smelt, Pacific lamprey, etc.). These species-specific discussions include an analysis of pile driving impacts, including water quality and noise, along with applicable environmental commitments and BMPs.
577	43	"Water operations in the [No Action Alternative] NAA are not expected to substantially or consistently affect spawning habitat for most covered fish species" (11-230). Issue Discussion: This statement implies there is no need to conduct the project, since the NAA water operations are not expected to substantially or consistently affect spawning habitat for most covered fish species. If the current water operations are not expected to substantially or consistently affect spawning habitat for most covered species, then why is the project being conducted? Recommendation: The authors should clarify the language in the draft.	Please see Impact AQUA-NAA4 in Appendix A, Chapter 11, RDEIR/SDEIS, for a revised spawning analysis of the No Action Alternative (NAA) in the late long term (LLT). Also, see Impact AQUA-NAA4, Section 4, RDEIR/SDEIS, for the NAA spawning analysis in the early long term (ELT). Overall, impacts to spawning habitat as a result of the NAA (ELT) are not expected to be significant relative to existing conditions. While the NAA (ELT) analysis indicates there will not be significant impacts to spawning habitat under current operations in the future, benefits from a dual conveyance system (as described in the Proposed Project), including reduced south Delta entrainment and operations that promote more natural flow patterns through the estuary, will lead to overall improved in-delta conditions for listed species compared to existing conditions and the NAA.
577	44	"However, species such as Delta and longfin smelt have evolved and adapted to life in turbid waters to avoid predators and to successfully forage on prey organisms, so increases in turbidity are expected to generally improve habitat conditions for these species" (11-239). Issue Discussion: No evidence for this statement is provided in the text. Further, the draft earlier stated that increases in turbidity would be minimized (11-197). Recommendation: A citation to scientific literature should be provided to validate the statement that increases in turbidity generally improves habitat conditions for delta and longfin smelt. In addition, the text should be clarified to address the earlier discrepancy regarding expected increases in turbidity.	There is no discrepancy in the statements; turbidity increases would be minimized, but turbidity increases that did occur would not be expected to adversely affect smelt species. The analysis text in Chapter 11 has been revised, including addition of references as the commenter suggests. By establishing a point of water diversion in the North Delta and new operating criteria, the proposed project is designed to improve native fish migratory patterns and allow for greater operational flexibility.
577	45	"Maintenance activities are not likely to result in turbidity impacts sufficient to adversely affect delta smelt because smelt prefer turbid conditions and because all in-water maintenance activities would occur during approved in-water work windows, when smelt are least likely to be present near the facilities" (11-257). Issue Discussion: What are the expected turbidity conditions? What turbidity conditions are smelt tolerant of? While smelt may prefer more turbid conditions than other species, that does not necessarily mean they are tolerant of infinite increases in turbidity. When will the in-water work windows be? Has a study been conducted to illustrate the smelt will be less likely to be present near the facilities? Recommendation:	The timing of in-water work windows are described in Chapter 3, and would be in the late spring/summer/fall which, based on survey data collected over many years, is the time period during which delta smelt are least likely to be in the areas undergoing maintenance activities. Turbidity changes because of in-water work would be limited with the environmental commitments described in Appendix 3.B, in particular in relation to limiting changes compared to background conditions (see, in particular, Appendix 3.B, Section 3.B.1.19). See also response to comment 577-44.

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		Please provide a reference to scientific literature to support these statements.	
577	46	"While these mechanisms are possible, the likelihood of smelt exposure would be low due to the nature of the affected habitats and the timing of maintenance activities. Delta smelt use main channel areas and the upper water column, which limits exposure to suction dredging" (11-258). Issue Discussion: Has a study been conducted to illustrate the areas the delta smelt use? Can further support be provided regarding the low likelihood of delta smelt exposure? It would be more conservative and protective of the species to assume that the likelihood of delta smelt exposure would be high, and design the maintenance activities to still be protective, instead of seemingly assuming they would not be impacted. Recommendation: Please provide a reference to scientific literature to support these statements.	A reference has been added to Final EIR/EIS Chapter 11 to support these statements.
577	47	"Maximum Water Temperature Criteria for Covered Salmonids" "Winter- and spring-run spawning and egg incubation" "56 degrees F" (11-321, Table 11-1A-11, and corresponding table for all subsequent alternatives). Issue Discussion: Sources such as Myrick and Cech (2004) and Bureau of Reclamation (2004) indicate the tolerance of winter-run Chinook salmon to water temperatures depends on life stage, acclimation history, food availability, duration of exposure, health of the individual, and other factors, such as predator avoidance. According to Myrick and Cech 2004, "temperatures between 6 and 12° C appear best suited to Chinook salmon egg and larval development." This corresponds to a range of to 42.8 to 53.6° F. Further, according to Myrick and Cech 2001, Sacramento R. winter-run eggs experienced increased mortality as water temperature increased from 13.3 to 17.8°C (56 to 64° F). Recommendation: The authors should use the more conservative temperature criteria recommended in the specific literature studies for each species. According to Myrick and Cech 2004, a maximum temperature of 53.6° F and should be used for the Chinook Salmon analysis.	Temperature thresholds used in the analysis were determined using the best available science and input from fishery experts and agencies, including NMFS. DWR participated in a collaborative effort with aquatic resource experts to reach a consensus on the best temperature thresholds to use in the salmon impact analyses. While certain studies may show slightly different results as it relates to water temperature limits on salmon, DWR feels the threshold values incorporated into the analyses are representative of scientific literature and empirical evidence on the physiological constraints to salmon spawning and egg incubation.
577	48	"Maximum Water Temperature Criteria for Covered Salmonids" "steelhead spawning and incubation" "56 degrees F" (11-321, Table 11-1A-11, and corresponding table for all subsequent alternatives). Issue Discussion: According to Myrick and Cech 2001, Temperatures between 6 to 10°C (42.8 to 50°F) are needed to maximize saltwater survival. In addition, Myrick and Cech 2001 indicate that cooler temperatures also reduce the risk of predation and disease, both of which are enhanced at higher temperatures.	Temperature thresholds used in the analysis were determined using the best available science and input from fishery experts and agencies, including NMFS. DWR participated in a collaborative effort with aquatic resource experts to reach a consensus on the best temperature thresholds to use in the salmon impact analyses. While certain studies may show slightly different results as it relates to water temperature limits on salmonids, DWR feels the threshold values incorporated into the analyses are representative of scientific literature and empirical evidence on the physiological constraints to steelhead spawning and egg incubation.

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		Recommendation: The authors should use the more conservative temperature criteria recommended in the specific literature studies for each species. According to Myrick and Cech 2001, a maximum temperature of 50° F and should be used in the Central Valley Steelhead analysis to maximize survival.	
577	49	"Table 11-1A-12. Number of Days per Month Required to Trigger Each Level of Concern for Water Temperature Exceedances in the Sacramento River for Covered Salmonids and Sturgeon Provided by National Marine Fisheries Services and Used in the BDCP Effects Analysis" (11-322, Table 11-1A-12, and corresponding table for all subsequent alternatives). Issue Discussion: Myrick and Cech (2001), recommend that water temperatures between the Bend Bridge and Keswick Dam (Sacramento R.) not exceed 13.3°C during the incubation period to prevent excessive mortality among developing winter-run eggs. However, according to the table, it is only considered a "red" level of concern if the maximum of 13.3°C or 56° F is exceeded by 1° F for more than 20 days in a given month. When the maximum water temperature is defined, any exceedance of the maximum should be considered significant. Recommendation: The authors should revise the analysis such that any exceedance of the defined maximum water temperature is considered significant.	Because exceedance of a specific water temperature threshold does not mandate imminent death for any fish exposed to this temperature, especially if the exceedance is minor, and due to limitations and uncertainty in the physical models used for this analysis, the agencies chose to use a “level of concern” approach for this analysis, in addition to other approaches for analyzing potential water temperature effects in upstream rivers.
577	50	"Table 11-1A-12. Number of Days per Month Required to Trigger Each Level of Concern for Water Temperature Exceedances in the Sacramento River for Covered Salmonids and Sturgeon Provided by National Marine Fisheries Services and Used in the BDCP Effects Analysis" (11-322, Table 11-1A-12, and corresponding table for all subsequent alternatives). Issue Discussion: Justification for the number of days used to trigger a level of concern should be provided through citation to scientific literature. Recommendation: A specific citation to the NMFS recommendation or scientific literature on the number of days per month required to trigger the levels of concern should be provided.	A citation to the NMFS recommendations has been added to Final EIR/EIS Chapter 11 (NMFS pers. comm.).
577	51	"Potential effects on steelhead from accidental spills are similar to those described for delta smelt (see Impact AQUA-1). Depending on the type and magnitude of an accidental spill, contaminants can directly affect the growth and survival of steelhead. Implementation of the environmental commitments discussed for delta smelt (see Impact AQUA-1) and contained in Appendix 3B, Environmental Commitments (Environmental Training; Storm water Pollution Prevention Plan; Erosion and Sediment Control Plan; Hazardous Materials Management Plan; Spill Prevention, Containment, and Countermeasure Plan), specifically the Spill Prevention, Containment, and	As described in detail under the Draft EIR/EIS Appendix 3B Environmental Commitments and RDEIR/SDEIS Appendix 3B Section 3B.2.13, Spill Prevention, Containment, and Countermeasures Plans (SPCCP [related to AMM5]) will be developed before project construction activities begin. Each SPCCP will take into account site-specific conditions and will be developed in accordance with the regulatory requirements of Title 40 of the Code of Federal Regulations, Part 112 (40 CFR Part 112). 40 CFR Part 112, or the Spill Prevention, Control, and Countermeasure Rule, includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The commenter is referred to 2013 BDCP Appendix 3B, Environmental Commitments, Section 3B.1.13, for detail on what measures and

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		Countermeasure Plan, would minimize the potential for introduction of contaminants to surface waters and provide for effective containment and cleanup should accidental spills occur. Pertinent measures included in these plans are discussed under Impact AQUA-1 for delta smelt" (11-430). Issue Discussion: There needs to be a plan ahead of time for spill response in the Delta. This applies to all aquatic species, not just the Central Valley steelhead. Recommendation: How will potential spills be dealt with? Perhaps a company can be contracted to deal specifically with this possible problem.	practices the SPCCPs will include. In coordination with Project proponents, contractors will develop and implement a Hazardous Materials Management Plans (HMMP) before beginning construction. It is anticipated that multiple HMMPs will be prepared for the BDCP construction activities, each taking into account site-specific conditions such as hazardous materials present on site. Based on these variables, each HMMP will provide detailed information on the types of hazardous materials used or stored at all sites associated with the water conveyance facilities (e.g., intake pumping plants, maintenance facilities); phone numbers of applicable city, county, state, and federal emergency response agencies; primary, secondary, and final cleanup procedures; emergency-response procedures in case of a spill; and other applicable information. The plan will include appropriate practices to reduce the likelihood of a spill of toxic chemicals and other hazardous materials during construction and facilities operation and maintenance. A specific protocol for the proper handling and disposal of hazardous materials will be established before construction activities begin and will be enforced by the Project proponents. The commenter is referred to 2013 BDCP Appendix 3B, Environmental Commitments; Section 3B.1.12 for further detail on the types of measures/practices that would be included in these HMMPs. Additionally, pursuant to the requirements of the Construction General Permit for Construction and Land Disturbance Activities (Construction General Permit [CGP]) (currently Order 2010-0014-DWQ) and the National Pollutant Discharge Elimination System (NPDES [pursuant to Section 402 of the Clean Water Act]) permit, Project proponents will prepare multiple Stormwater Pollution Prevention Plans (SWPPPs) in advance of construction. A series of separate but related SWPPPs will be prepared and implemented and will take into consideration site-specific conditions (e.g., site sediment and receiving water risk) and site-specific construction activities. Accidental spill prevention and response measures are required to be included in a SWPPP and specific measures will vary according to project site. Measures specific to site and construction activity will be developed during the development of the SWPPPs for the project. The commenter is referred to Appendix 3B, Environmental Commitments, Section 3B.1.5 for the types of best management practices that are required to be implemented as part of an SWPPP.
577	52	"Water temperature modeling was not conducted in the San Joaquin River" and "Water temperature modeling was not conducted in the Mokelumne River" (11-454). Issue Discussion: Why was water temperature modeling not conducted in the San Joaquin River and in the Mokelumme River? How is the reader able to discern if this is significant or not? Recommendation: A reason/justification for not conducting water temperature modeling in the San Joaquin River and Mokelumme River should be provided in the text.	The results of the CALSIM2 operational model indicate that there would be no changes in operations of either San Joaquin River or Mokelumne River and therefore, there is no mechanism for temperature-related changes. Please see Appendix 5A of the FEIR/FEIS for additional modeling details and Master Response 30.
577	53	"CEQA Conclusion: In general, Alternative 1A would reduce migration conditions for steelhead relative to the Existing Conditions" (11-461). Issue Discussion: How much will this actually reduce migration conditions? For example, is it approximately 5% or more like 30%? Recommendation:	Alternative 4A no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The information requested can be found by continuing to read the subsequent section (pp. 11-461 through 11-470), including mitigation measures.

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		Further study should be conducted to understand to what level migration conditions will be reduced, such that an actual economic impact on the steelhead fishery can be determined.	
577	54	"NEPA Effects: CM17 Illegal Harvest Reduction would be applied to Chinook salmon, Central Valley steelhead, green sturgeon and white sturgeon and are expected to have positive effects on these species. The effects on steelhead would be beneficial, by reducing the loss of potential spawners" (11-474). Issue Discussion: How will illegal harvest reduction on the fishery be enforced? There are already many game wardens that patrol the Delta and it does not do much to stop poaching. Adding more game wardens is expensive and will not necessarily have a strong impact as poachers will simply adapt. Recommendation: The authors should specify exactly how illegal harvest reduction on the fishery will be enforced, such that strong beneficial impacts over existing conditions will actually be achieved.	More details on CM17 can be found in Chapter 3 (Description of Alternatives) on page 3-160. The Draft EIR/EIS notes that there are key uncertainties on whether increased enforcement would reduce illegal harvest and whether increased enforcement has beneficial effects on anadromous fish stocks. However, with monitoring and adaptive management activities in place, implementation of CM17 would then be modified, as appropriate, to maximize its effectiveness and alter this strategy if needed. Other references to CM17 are found in the 2013 BDCP Plan on page 3.3-144. Please note that the new preferred alternative, the California WaterFix Project (Alternative 4A), would not include CM17 except to the extent required to mitigate significant environmental effects under CEQA and meet the regulatory standards of ESA Section 7 and CESA Section 2081(b) (refer to page 4.1-1 in the RDEIR/SDEIS).
577	55	"Potential entrainment at the north Delta intakes occurs only under the action alternatives, including Alternative 1A, because there are no north Delta intakes operational under No Action Alternative. The north Delta intakes would be screened, and analysis indicates that splittail larvae less than 10 mm long would be vulnerable to entrainment (BDCP Effects Analysis -- Appendix 5B Entrainment, Section B.6.2.4, hereby incorporated by reference). Very little is known of splittail densities in this area, so monitoring will determine their extent. The project's adaptive management plan includes monitoring of the new screens to determine their effectiveness. If the screens are not meeting expectations, additional measures may be implemented to improve screen performance, such as modifications to the screens or other structural components at the intakes, or changes in water diversion operations to reduce entrainment or impingement." (11-484). Issue Discussion: It would be better to build a bench-scale set of sample screens similar to what would be implemented in the project, such that the effects can be determined prior to project implementation. Bench-scale experiments could be conducted at a flow velocity comparable to the average assumed by the screens for the completed project to determine the unknown effectiveness of the screens. Not only is this potentially better for the environment and the affected species, but will likely also be overall less costly to the project. Recommendation: Bench-scale experiments should be conducted at the predicted intake flow velocity to determine the effectiveness of the new intake screens, such that any necessary modifications can be made prior to implementation.	Numerous studies are proposed to refine and complete the actual screen design prior to construction to ensure that the final design meets the biological standards. Additionally, testing during initial operations, adaptive management over time, and real-time operations and monitoring will be implemented.

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577	56	"Red boxes indicate that water temperatures under the alternative are more than 5% greater than water temperatures under the baseline" (11D.1 through 11D.9, Table 2: "Differences between Pairs of Model Scenarios in Mean Monthly Water Temperatures" for all alternatives, at all locations). Issue Discussion: What is the basis for highlighting alternative scenarios with only 5% or greater change? When conditions are already near their limit, a significant impact can be expected, independent of the percent change. For example, when a species can only survive up to a maximum temperature, and the current temperature is already near the maximum, even the slightest increase will be enough to cause significant impacts. Recommendation: The analysis should be revised to include consideration of the species sensitive temperature in the analysis of impacts as a result of increased water temperature.	Draft EIR/EIS Section 11.3.2.2 Flow, Passage, Salinity, and Turbidity Analysis provides a general discussion of the use of the 5% value to identify differences between model results. Section 11.3.3 Determination of Effects describes the thresholds for adverse or significant effects within the NEPA and CEQA context, respectively, including leaving room for expert judgment and application to numerous aspects of the alternatives and the multiple species evaluated. The temperature evaluations are applied for each species based on their requirements or tolerances for specific biological needs (e.g. spawning, incubation or migration) as well as for specific rivers or reaches within rivers. Consequently, the commenter's recommendation is the analysis that was conducted. However, it should be noted that the models available for use in evaluating changes in operations and effects on temperature, are comparative tools, and should not be compared to absolute values. As such, the 5% comparison across alternatives is meant to identify where a potential difference may occur.
577	57	Appendix 11D -- Sacramento River Water Quality Model and Reclamation Temperature Model Results Utilized in the Fish Analysis. Issue Discussion: A figure set specifically for the Appendix 11D is necessary, as it is difficult for a user to piece together the locations used in the model to determine which locations will be particularly sensitive to temperature changes based on their location along the particular rivers. While some locations are depicted on the general site plan figures (e.g. Keswick, Red Bluff), many of the locations in the temperature model analysis are not plotted anywhere on the figures accompanying the draft. Recommendation: A series of figures should be prepared to accompany Appendix 11D to illustrate the locations used in the temperature model analysis. For example, a figure for the Sacramento River, Trinity River, Feather River, American River, Stanislaus River locations.	All data necessary to produce such a figure are presented in Final EIR/EIS Appendix 11D.
577	58	"Egg mortality (according to the Reclamation egg mortality model) in drier water years, during which winter-run Chinook salmon would already be stressed due to reduced flows and increased temperatures, would be up to 42% greater under Alternative 4, including climate change, compared to the CEQA baseline" (11-1325). "Egg incubation conditions according to the Sacramento River Ecological Flows Tool model are predicted to be 26% lower under H3, including climate change, than under the CEQA baseline" (11-1325). "Further, the extent of spawning habitat predicted by SacEFT would be 60% lower under H3, including climate change, compared to the CEQA baseline" (11-1325). "Exceedances above NMFS temperature thresholds would be substantially greater under Alternative 4 relative to the CEQA baseline" (11-1325). "This impact is found to be less than significant and no mitigation is required" (11-1325).	As explained in the text of the impact assessment for several CEQA evaluations, the effects of climate change are not included in the existing conditions model, but are included in the alternative model run. As such, the differences reflect both the potential changes from the alternative as well as from climate change. In these instances, the assessment relies on the NEPA comparison, which teases out the climate change effects to show only the incremental changes from the alternative itself. Where the alternative-induced change is less than significant, the CEQA conclusion reflected the NEPA assessment.

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		Issue Discussion: The findings of the analysis, as quoted above, do not seem to support the finding that the impacts to the species will be less than significant. Recommendation: Please provide further justification for the reason these impacts are considered less than significant.	
577	59	"These results are primarily caused by four factors: differences in sea level rise, differences in climate change, future water demands, and implementation of the alternative. The analysis described above comparing Existing Conditions to H3 does not partition the effect of implementation of the alternative from those of sea level rise, climate change and future water demands using the model simulation results presented in this chapter" (11-1325). "The additional comparison of CALSIM flow and reservoir storage outputs between Existing Conditions in the late long-term implementation period and H3 indicates that flows and reservoir storage in the locations and during the months analyzed above would generally be similar between future conditions without the alternative (NAA) and H3. This indicates that the differences between Existing Conditions and Alternative 4 found above would generally be due to climate change, sea level rise, and future demand, and not the alternative. As a result, the CEQA conclusion regarding Alternative 4, if adjusted to exclude sea level rise and climate change, is similar to the NEPA conclusion, and therefore would not in itself result in a significant impact on spawning habitat for winter-run Chinook salmon" (11-1325). Issue Discussion: The text does not indicate that the alternative will in fact be beneficial to the covered species, but rather that it will be generally no worse than the current conditions that would be expected should there be no action. According to the BDCP website, the current conditions are recognized as unacceptable, and the purpose of the project is to be protective of and beneficial to the covered species. Recommendation: Please further clarify how the selected alternative will be beneficial to the species under the CEQA conclusion, as required per the project description. If necessary, consider revising the CEQA conclusions to a significant impact, and list the expected benefits from the conservations measures as mitigation for the anticipated impacts.	The EIR/EIS analyzes potential project impacts against Existing Conditions and the No Action Alternative consistent with NEPA and CEQA permitting requirements. As described in the referenced text, the Existing Conditions baseline does not include the effects of climate change and other assumptions used in the modeling for the project and no action alternatives. Thus, in many cases, differences between Existing Conditions and a project alternative are primarily due to climate change and other future assumptions. A comparison between the No Action Alternative and a project alternative provides an apples-to-apples comparison because each include the same future assumptions. DWR's fundamental purpose of the proposed project is to make physical and operational improvements to the SWP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south of the Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations. The project would help to address the resilience and adaptability of the Delta to climate change through water delivery facilities combined with a range of operational flexibility. In addition to the added water management flexibility created by new water diversions and operational scenarios, the project would improve habitat, increase food supplies and reduce the effects of other stressors on the Delta ecosystem. Please see Final EIR/EIS Chapter 11, Fish and Aquatic Resources and associated appendices and Master Response 17. Please see also Master Response 19 for discussion of Climate Change and GHG.
577	60	Section 5.1 of the California Bay Delta Conservation Plan outlines the geographic areas studied by the BDCP team to evaluate impacts. Lines 19-22 explain that Tulare Lake, an area fed by the Delta, has been left out of the analyses. Tulare Lake was once the largest freshwater lake west of the Mississippi. Though the lake has run dry from agricultural usage and engineered diversion of its tributary waters, it does still receive Delta water. Tulare Lake has been considered by many to be a phantom since its 1930s demise however for the purposes of long-term planning, the construction of the BDCP, and in the face of changing California water resources as a result of climate change and swelling populations, Tulare Lake should be incorporated in the evaluation of BDCP water supply.	The sentence presented in Lines 19 through 22 on Page 5-1 of Chapter 5, Water Supply, of the Draft EIR/EIS is referencing that the Tulare Lake portion of the Central Valley does not drain towards the Delta, and therefore, is not in the Delta watershed. The study area does include the Tulare Basin, including SWP and CVP water deliveries to that area. The Existing Conditions, No Action Alternative, all alternatives, and cumulative analyses in the EIR/EIS assume that the current agricultural land uses of the Tulare Lake bed will continue into the future, in accordance with the Project Objectives or Purpose and Need, as described in Chapter 2 of the Final EIR/EIS.

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		Heavy rains in 1983 brought water levels in the lake to almost twice their normal levels and controlled drainage of the lake proceeded for four years following. Farmers have explained that when large 10 or 15 year flood events hit, the lake rises from its slumber flooding acres of farmland in its path. While the land covered by Tulare Lake may be classified as a desert because of its dry bed and miniscule annual rainfall levels, with the new water control mechanisms implemented by the BDCP and the unpredictable water supply conditions in the state of California, it is recommended that the BDCP consider the Tulare Lake area in its water supply assessment.	
577	61	There are four reservoir lakes that have been analyzed for the change in reservoir storage. The results for changes in May and September reservoir storage under Alternative 4 compared with existing conditions are shown in Table 1. [ATT8] According to the result of change in State Water Project and Central Valley Project reservoir storage under Alternative 4 (all scenarios) that BDCP provided, the average annual end of September storages in 4 lakes decrease significantly in over 90% of the year, especially in Shasta Lake and Lake Oroville. The average annual storage under Alternative 4 H3 decreases more than 500 Thousand Acre Feet in almost all of the year. It is questionable that SWP and CVP reservoir storage under Alternative 4 will be enough for increasing future demand.	As shown in Figures 5-6 through 5-12 of Chapter 5, Water Supply, of the Draft EIR/EIS, reservoir storage would decline between the Existing Conditions and No Action Alternative primarily due to climate change, increased water demand upstream of the Delta, and response of SWP and CVP operations to sea level rise in the future. Reservoir storage under Alternative 4 would be similar, slightly lower, or greater than under the No Action Alternative, except for Alternatives 4H2 and 4H4 in the spring at Lake Oroville when reservoir storage would be reduced due to increased spring Delta outflow. However, changes in upstream operating criteria are not proposed under the preferred alternative (4A), and modeling of upstream reservoir operations in the EIR/EIS did not include real-time operational adjustments that would likely occur in the future to meet future water demand and to adapt to changing hydrological conditions (i.e. climate change). It is recognized in the Final EIR/EIS that SWP and CVP water supplies would not fully meet future water demands (please see Appendix 1C, Water Demand Management, in the Final EIR/EIS).
577	62	[From ATT8: Table 1. Change in SWP and CVP reservoir storage under Alternative 4]	The comment describes a table in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	63	In impact WS-1, the NEPA effects mentioned that there is no effect of construction to the timing or amount of water exported from Delta through State Water Project and Central Valley Project facilities. The CEQA conclusion also mentioned that the Alternative 4 water conveyance facility would not impact the operation of existing SWP and SVP facilities. The conclusion in this impact WS-1 is unclear. Why construction does not impact the operation, timing, and amount of water exported is not explained. The construction plan as well as the schedules and time of construction should be provided and explained briefly to clarify how BDCP plans to avoid the impacts during the project. It is impossible that the construction would not affect the whole operation, timing and water exported. Moreover, for impact WS-2, it is also unclear why Alternative 4 scenarios provide operational flexibility compared to existing condition.	As summarized in Table 3-5 and the related text in Section 3.4.1.1 of Chapter 3, Description of Alternatives, in the Final EIR/EIS, no construction would occur at the existing SWP and CVP reservoirs and south Delta intakes, CVP Delta Cross Channel gates, or the SWP temporary barriers in the central and south Delta. Therefore, these existing facilities would continue to operate throughout the construction period. Also, as described in Chapter 3 of the EIR/EIS, SWP and CVP operational criteria would not change until the new BDCP conveyance facilities were fully constructed. Therefore, operations of SWP and CVP would not be interrupted during construction of the BDCP alternative facilities. Alternative 4A would provide operational flexibility, primarily in the winter and spring months, by allowing for diversion of water from the north Delta intakes during periods of time that water diversions are restricted at the existing south Delta intakes to provide protection for fish and other aquatic resources, such as when juvenile salmon are migrating from the San Joaquin River watershed into the south Delta in the spring.
577	64	Facilities construction of Alternative 5 would be similar to those described for Alternative 1A. It is nearly impossible to build something exactly the same with different capacity. The draft does not mention whether this would be an underground or above ground construction. Either one gives many variables depending on the season of year due to unstable weather. Also, there are no specific plans or schedules pertaining to this construction. Referring to Appendix 5A, where it states the BDCP EIR/EIS Modeling, using CALSIM II, which is a generalized water resources simulation model for evaluating operational alternatives of large, complex river basins and a linear programming solver for efficient water allocation decisions, was used to show results. Its purpose is to provide a comprehensive modeling tool for water resource systems simulation. It is the latest	Please see Chapter 3 in the EIR/EIS and Appendix A Draft EIR/EIS, Description of Alternatives, Section 3.5.10, for a description of facilities that would be constructed under Alternative 5. As described in that section, "Alternative 5 would comprise physical/structural components similar to those of Alternative 1A, but would entail a single 3,000 cubic feet per second (cfs) fish-screened intake between Clarksburg and Walnut Grove. Water would be conveyed through a single-bore rather than a dual-bore tunnel from the intermediate pumping plant to a new Byron Tract Forebay adjacent to Clifton Court Forebay. The intermediate forebay and Byron Tract Forebay would have smaller capacities than those under Alternative 1A. Use of existing SWP/CVP south Delta export facilities would continue." Further details and references to figures are referenced in this section. The construction schedule for this alternative is described in Draft EIR/EIS Appendix 3C, Construction Assumptions for Water Conveyance Facilities. As discussed in response to comment 577-1, Alternative 4 remains a potentially viable alternative and is

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		application of the generic CALSIM model to simulate State Water Project/Central Valley Project operations.	being carried forward in this RDEIR/SDEIS because it represents the original HCP/NCCP alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 Public Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts. Please see also Appendix 5A of the FEIR/FEIS for additional modeling details and Master Response 30.
577	65	Questions regarding data accuracy of Alternative 5: There is an issue of accuracy. It is questionable whether the data proposed is accurate. It is somewhat speculated in terms of dependent variables. The period of time for these channel gates from October to November is not constant because they would be closed if fish are present. From December to June, gates would be closed and from July to September, gates would be open for 3 months. Even if these periods of time are constant, months of October and November can vary and affect the result. Further research is necessary.	The commenter appears to be referring to the Delta Cross Channel Gate Operations Criteria described in Chapter 3, Description of Alternatives, EIR/EIS. The description of operations in October and November ("Delta Cross Channel gates closed if fish are present [for modeling, assumed closed 15 days per month; may be longer depending upon actual presence of fish]") reflects that fact that the real-time presence of fish would govern operations under this alternative. However, in order to analyze the effects of implementing this alternative, an assumption for gate closure was required for the purposes of modeling. It was assumed that the gates would be closed 15 days per month (in November and December). Please see also response to comment 577-64.
577	66	No details on construction details for Alternative 5: The chapters do not seem to have proposals and scope of work for building the facilities. According to Appendix 5A, there were some dimensions given for the gates but none of the proposed constructions had specific details on schedules, estimates, and other details. These are massive [pieces of] construction that would transport water from one place to another. If there are no plans proposed on how to build these, it is not a good beginning.	Conceptual Engineering Reports have been made available on the project website. Project plans have not advanced yet to the point where engineering and design work are complete. Environmental review is typically conducted based on less complete plans, because complete engineering and design work is not required for impact assessment.
577	67	Lacking visual aids on Alternative 5: Part of Alternative 5 has many comparisons in figures and percentages. However, it is hardly legible to notice differences in these comparisons without any visual effects. There are charts presented towards the end of the documents but not everyone can easily understand and observe the data.	Please refer to Master Response 38 for information pertaining to the readability of the document.
577	68	[ATT9: Four graphs comparing Alternative 5 with Existing Condition, No Action Alternative, and Alternative 1A.]	The comment describes four graphs in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	69	State Water Resources Control Board flow objectives: The SWRCB is currently in the process of creating flow objectives for Delta priority tributaries. This could dictate how much water the Delta will receive which would in turn directly relate to which of the proposed alternatives is best for the Delta. However because SWRCB started this process after the notice of preparation for this EIR/EIS, it is not required for analysis here. We would just like to have it noted that the decisions of the SWRCB at the end of their process will dictate the efficiency of the Bay Delta Conservation Plan and should be included in the cumulative analysis.	As described in Section 6.3.4 of Chapter 6, Surface Water, of the Final EIR/EIS, the State Water Resources Control Board is conducting a current program to update the Bay-Delta Water Quality Control Plan. Since this program is still under development and the potential outcomes are not known at this time, this program is not included in the analysis. Following completion of the updated Bay-Delta Water Quality Control Plan, SWP and CVP operations would need to be reviewed to determine if the operations continued to comply with the new regulations.
577	70	Those preparing the BDCP correctly assess the importance of rigorous technical modeling to back up SWP/CVP delivery estimates in the Near-Term (~2015), Early Long-Term (~2025), and Late Long-Term (~2060). It is important that stakeholders and the public be afforded the opportunity to review the BDCP's impact at these planning horizons.	For detailed responses on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5. For more information and specific modeling results for all Alternatives, please refer to Chapter 5, Water

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		Unfortunately, a number of problems exist with the methods used to determine projected deliveries as well as with the dissemination of this critically important information. Per the DWR, the State Water Project (SWP) serves 20 million Californians and irrigates some 600,000 acres. The Central Valley Project (CVP) provides drinking water to some 2 million consumers and irrigates over 3 million acres of farmland. Together they represent the water resources for 49.9% of California's 7.2 million acres of irrigated farmland and drinking water provider for 57.8% of California's 38 million residents. Modeling for BDCP is inaccessible, not easily repeatable by stakeholders -- need for WebGIS portal for display of information. Modeling of NT [Near Term], ELT [Early Long Term], and LLT [Late Long Term] deliveries through the State Water Project and Central Valley Project were performed using CALSIM II, a large-scale optimization model that uses inputs written in Water Resources Simulation Language (WRESL) to optimize the movement of water through a linear programmer. CALSIM II is one of 3 main modeling tools used by Department Water Resources. Of the three, it is the oldest and the most abstract; CALSIM II only models management decisions, whereas models such as WRIMS 2 (Water Resource Integrated Modeling System 2) and IWFM (Integrated Water Flow Model) provide a more comprehensive modeling capacity, improved ease of use, and in the case of the latter, ArcGIS integration. Both IWFM and WRIMS 2 would provide a clearer picture of how diversions due to the BDCP will increase groundwater extraction and impact hydrological conditions. The importance of GIS, particularly WebGIS for allowing users to explore spatial datasets cannot be understated. That the BDCP would place calculations and figures detailing the impact on access to water for approximately half the population of the state in the appendix to a chapter of a 3000+ page EIR instead of utilizing the existing DWR Integrated Water Resources Information System portal seems shortsighted at best and negligent at worst. The BDCP ought to add layers to IWRIS, which allows users to examine flows through the SWP/CVP based on estimated yearly flows.	Supply, and Appendix 5A, BDCP/California WaterFix EIR/S Modeling Technical Appendix. Detailed Mapbooks are available to illustrate footprint impacts. The geographical information system (GIS) data used for the analysis is available as part of the administrative record.
577	71	Modeling for BDCP uses incomplete methodology, and does not fully characterize yearly flows. Modeling for the BDCP EIR relies on two major assumptions for projection of NT [Near Term], ELT [Early Long Term], and LLT [Late Long Term] scenarios. The first is sea level rise due to climate change. We take no issue with the current NT, ELT, and LLT estimates of sea level rise. The second major assumption is the characterization of available water. The majority of CA DWR's modeling relies on the utilization of an 82 year (1922-2003) modified historical hydrology. This contains monthly (and where available/interpolated daily) records of inflows and outflows to parameterize the CALSIM II model. Future demand is calculated by imposing projected land use on historical hydrological and meteorological conditions. Allocations for delivery are generated using rule-based algorithms (called 'rule curves'), which then translate into contractor allocations. Most reservoir operations and releases are governed by inflows to the reservoirs. It is unclear how the EIR determined the exact hydrological inflows used to project available water storage; most likely the EIR is averaging the 82-year historical record and abstracting an amount of water that may in fact never be available. Looking at Figure A-7:	The hydrologic analysis used in the EIR/EIS does analyze changes in the alternatives as compared to the Existing Conditions and No Action Alternative by water year types and 10-percent exceedance increments. Alternative 4A, the proposed project, will maintain compliance with Delta outflow regulatory requirements for all water years with the use of the North Delta intakes, as described Final EIR/EIS Chapter 5, Water Supplies, and Chapter 6, Surface Water. A detailed discussion of the specific Delta outflows under a range of seasons and water year types is contained in Final EIR/EIS Appendix 5A. This information is presented in detailed tables for 35 major categories in Appendix 5A, Section C, CALSIM II and DSM2 Modeling Results. To improve readability EIR/EIS Chapter 5, Water Supply, only summarizes the results for average annual conditions.

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		Mean daily flows by Water Year-type for Sacramento River at Freeport, it is clear that five different hydrological regimes exist within California: Wet, Above Normal, Below Normal, Dry, and Critical. Rather than perform a single analysis for an average water-year based on the historical record, the BDCP EIR needs to sort years within the 82-year historical record into these five categories, averaging hydrologic flows within each category and performing a separate analysis for each hydrologic regime.	
577	72	[From ATT10: Figure 1 -- A-7: Mean daily flows by Water Year Type for Sacramento River at Freeport]	The comment describes a figure in an attachment to the comment letter. The attachment does not raise any additional issues related to the environmental analysis in the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS that are not already addressed in comment referencing the attachment or the Final EIR/EIS.
577	73	San Joaquin Valley groundwater extraction due to reduced State Water Project/Central Valley Project deliveries: According to Chapter 7, groundwater supplies 75% of water for users on the valley floor. In Section 7.3.3.9 Impact GW-8, the EIR concludes that groundwater pumping will be greater than under existing conditions due to decreased SWP/CVP deliveries, especially under Alternative 4 Scenario H4, which could result in decreased groundwater levels of up to 50 feet, with a further decline possible if reduced stream flows are inadequate to meet surface water diversion requirements. Current groundwater yield within the San Joaquin basin is in the neighborhood of 730-800 TAF/year, well above the estimated safe yield of 618 TAF/year. Continued withdrawal in excess of safe yield is contributing to inelastic land subsidence in the region due to overpumping in areas where Corcoran Clay is present. An increase in extraction or even continued extraction at current levels irreversibly reduces groundwater storage capacity. By proposing a project, which will pass the buck to local watermasters and all but force this to occur, the BDCP effectively is ensuring the continued destruction of groundwater storage in the San Joaquin Valley and other areas forced to increase extraction to compensate for reduced deliveries.	As described in Chapter 7, Groundwater, of the Draft EIR/EIS, groundwater pumping would increase under the No Action Alternative and Alternatives 2, 4H2, 4H3, 4H4, 5, 6, 7, 8, and 9 as compared to the Existing Conditions. However, this would occur in most of these comparisons due to climate change and sea level rise as compared to implementation of the alternatives (see Impact GW-8 for each of the alternatives in Chapter 8 of the Draft EIR/EIS). To understand the effects of the alternatives, the model results for each of the alternatives are compared to the No Action Alternative because all alternatives would include identical climate change and sea level rise assumptions. As described in Chapter 7, groundwater pumping would only increase under Alternatives 4H4, 6, 7, 8, and 9 as compared to the No Action Alternative. As described for Impact GW-8 for Alternative 4, the impacts would be significant and unavoidable under the CEQA analysis. As described in RDEIR/SDEIS Chapter 4, Impact GW-8 for Alternative 4A would also be significant and unavoidable.
577	74	Farmers may be unfamiliar with the legal process. Introduction: Mitigation measure AG-1 (DEIR/EIS Chapter 14) involves developing an Agricultural Land Stewardship Plan (ALSP) to maintain agricultural productivity, and mitigate for loss of important farmland, lands subjected to Williamson Act contracts, or lands located in farmland security zones. The Draft EIR/EIS states "Where the BDCP proponents, despite a good faith effort, cannot succeed in achieving the consensus necessary to carry out a feasible Optional Agricultural Land Stewardship Approach, they shall undertake instead, where necessary and feasible, a Conventional Mitigation Approach based on the purchase of property interests in agricultural lands, ... requiring the preservation and/or enhancement of other land of similar agricultural quality." Issue Discussion: The problem with this aspect of the mitigation plan is that farmers may be unfamiliar with the legal process, which leaves room for unjust compensation. The agencies and government entities that will acquire the land from affected landowners have the resources to participate in the process adequately, but this may not be the case with the average landowner. The legal system is designed in a way that benefits the party that has better representation. Eminent domain cases, just like any other legal battle, would require hiring a good attorney in order to ensure a fair compensation. With good	DWR would provide landowners with information regarding the acquisition process, regardless of whether the eminent domain process is being considered. For example, a pamphlet entitled “Real Estate Branch Property Acquisition Information” is provided to landowners contacted regarding potential acquisitions. The pamphlet discusses many important features contained in the California Relocation Assistance and Real Property Acquisitions Guidelines found in Title 25, Division 1, Chapter 6, Subchapter 1 of the California Code of Regulations. It also gives general information about public acquisition of real property. The existing DWR Right of Way contact information contains details on the process of acquiring interests in real property, including a process description and a recommendation to have legal representation. This information is necessarily general in nature, since DWR cannot provide legal advice to any other party in any action or proceeding.

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		representation comes the farmer's ability to fully exercise their rights as a landowner. This also translates into the ability to obtain fair compensation for lost land and damaged property. One agricultural based newspaper known as AgAlert, has posted articles on how farmers in California are currently being affected by the eminent domain process. The paper urges farmers to familiarize themselves with the eminent domain process in order to ensure that they receive just compensation. The paper sums up the issue farmers are faced with by stating, "You have to be prepared early on in the process, because there are steps along the way that you want to take that are crucial to perfecting your ability to get what the Constitution guarantees you, and that is just compensation. You may or may not get that through the process, depending on how well you are represented." Recommendation: The DEIR/EIS needs to address creation of a program to ensure that farmers are made aware of their rights as land owners. Farmers are more likely to benefit from this knowledge if it is provided ahead of time as opposed to finding out at the last minute. This would give them a head start to acquire good legal support, knowledge of the process and legitimate documentation for court where it is needed. Since the mitigation plan is based on purchasing land of similar agricultural quality, the EIR/EIS mitigation plan could be enhanced by re-evaluating the new land location. This is because it might be hard to tell if the new land would support agricultural production, without cultivating the land and analyzing the production results. Compensation could be provided for poor results due to temporary unforeseen land conditions. A replacement could be provided if the new location turns out to be unfavorable for the purpose it was intended for. 1. "The Power Of Eminent Domain And California Farmers And Ranchers Today." Eminent Domain . California Farm Bureau Federation, n.d. Web. 12 May 2014. <http://www.cfbf.com/eminentdomain#justcompensation>. 2. Souza, Christine. "For farmers facing eminent domain, preparation pays." For farmers facing eminent domain, preparation pays. AgAlert, 20 Oct. 2010. Web. 12 May 2014. <http://www.agalert.com/story/?id=1620>.	
577	75	Plans for seepage issues does not mention what actions will be taken for cases where mitigation measures fail. Introduction: In addressing areas that could be subjected to seepage, Mitigation measure GW-5 mentions that such cases will be monitored after construction, and mitigation measures will be performed where necessary to restore fields to conditions existing before construction. Thus the DEIR/EIS states, "These measures may include installation or improvement of subsurface agricultural drainage or an equivalent drainage measure, as well as pumping to provide for suitable field conditions (groundwater levels near pre-project levels). Such measures shall ensure that the drainage characteristics of affected areas would be maintained to the level existing prior to project construction." Issue Discussion: The issue with this mitigation plan is that it does not mention what actions will be taken for cases where mitigation measures fail to effectively reduce the impact on agricultural production. There is always the possibility that some portion of the mitigation procedures could be	As described in Mitigation Measure GW-1 in Draft EIR/EIS Chapter 7, Groundwater, there may be instances in which mitigation of seepage and other impacts on agricultural drainage may be infeasible due to factors such as costs that would be imprudent to bear in light of the fair market value of the affected land; and the impact is considered to be significant and unavoidable under the CEQA analysis and would not involve purchase of the land.

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		unsuccessful. For instance, piezometers and water pumps could fail, or overall seepage control plans could produce inadequate results. In such cases, agricultural production could be significantly affected leading to a loss of revenue to farmers. In such cases, it would be fair to compensate the farmer for damages or losses incurred due to seepage. Recommendation: The mitigation plan for dealing with seepage issues should be enhanced to account for scenarios where seepage impacts result in agricultural production loss. It would be fair to compensate the farmer for cases where seepage issues from the project have an adverse effect. This would be similar to Mitigation measure GW-1 that addresses mitigation measures for disruption of farm irrigation systems. The plan explains the different steps that would be taken to handle these impacts on agricultural production arising mainly from project construction or implementation. This measure lays out conditions for compensation in cases where mitigation measures fail to produce an acceptable solution. Thus the EIR/EIS states, "If deepening or modifying existing wells is not feasible, the BDCP proponents will secure a temporary alternative water supply or compensate farmers for production losses attributable to a reduction in available groundwater supplies." Further steps could be taken for serious cases where seepage issues cannot be resolved. Ideally plans should be made for relocating agricultural activity to a new location. The EIR mentions that natural occurrences (such as climate changes and rise in sea levels) will also contribute to water level issues. Thus another cause for concern in handling the effect on agricultural production is a means of differentiating between issues caused by implementing the BDCP project and by natural occurrences. It is safe to assume that the project will not be liable for impacts from the later, but there is a possibility that issues could occur due to a combination of both factors. Thus I suggest the project should take this possibility into consideration when designing a mitigation plan. There should be guidelines or policies for determining how the project plans to handle such cases.	
577	76	Salinity economic impact analysis may fail to accurately portray the magnitude of the impact. Introduction: Impact ECON-12 (EIR/EIS Chapter 16) mentions that changes in crop acreage were used to estimate the associated changes in economic values (EIR/EIS table 16-46).The EIR/EIS states, "Total value of irrigated crop production in the Delta region would decline on average by $3.8 million per year during operation and maintenance, with total irrigated crop acreage declining by about 4,500 acres." Issue Discussion: The issue here is the salinity economic impact analysis may fail to accurately portray the magnitude of the impact. This is because the analysis makes exclusions such as the Suisun Marsh area, and areas that might be converted due to urbanization in the near future. The BDCP Statewide Economic Impact Report mentions the exclusion of the Suisun Marsh area, thus stating, "The analysis is confined to the Statutory Delta and thus excludes Suisun Marsh (which contains only 2.3% of agricultural lands in the Plan Area)." However, there is no explanation why the analysis is confined to an area that excludes the Suisun Marsh. The fact that the Suisun Marsh area only contains 2.3% of agricultural land still accounts for a significant amount of prime farmland or land covered by the Williamson act and/or security zones.	Changes in Suisun Marsh are not part of the proposed project under Alternative 4A. Impact ECON-12 accurately reflects predicted changes in agricultural economics, because it does include changes in salinity resulting from the project. Predicted changes resulting from other likely projects in the area are included in the cumulative analysis in Final EIR/EIS Chapter 16, Socioeconomics, however.

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		The report makes a case for removing areas that have a high potential for being converted by land urbanization. It does this by stating, "When forecasting future land use changes in the Delta, it is important to take into account the effects of urbanization around the borders of the agricultural regions ... Areas categorized as having a high or very high probability of urbanization were assumed to be removed from agricultural production in the future, and are thus excluded from the salinity impacts analysis that follows." Although the prediction is based off of research data from a credible source (UC Berkeley Resilient and Sustainable Infrastructure Networks (RESIN) project.), I feel there is a need to at least show how the impact would change if these areas are included in the analysis. Urbanization is most likely to occur in the predicted areas, but it is still not a total guarantee. Hence adding these areas to the analysis would show a better representation of a worst case scenario, and better inform people who are concerned with how the project might affect the Bay Delta region. Throughout the analysis, salinity changes from operation are taken into consideration for the economic impact, but not climate change and construction. The Economic Impact report indicates that the DSM-II module was used to compare the salinity levels associated with high flow scenarios for the existing and the BDCP conveyance systems. However these scenarios are related to operation phases of the water conveyance systems and therefore the construction phase of the BDCP project is not accounted for. This could make a significant difference since the current conveyance system is already in commission, and the effect from implementing the impact would be even greater once construction is accounted for. Overall, the main issue is the exclusions made for performing the economic impact analysis would portray a lower loss of revenue due to less land areas being considered. There are already more hidden costs that are not mentioned in the analysis that might result from the implementation of the project. For example, the likelihood of irrigation cost, taxes, and overall operation cost going up after the project is completed. It is possible a good amount of the project operation and construction costs will be deferred to agriculture. Recommendation: The Economic Impact Analysis should incorporate the currently excluded areas into study. It would be nice to include an explanation for why the Suisun Marsh area has been excluded and why this is feasible for the salinity economic impact analysis. Although the agencies and parties involved with the project may not see the need to, the public might feel the impact is significant once the results are available. The reports should also account for the construction phase of the project. Although factors like climate change are bound to have an effect on agricultural production, construction only has an impact when a new project is implemented. If this has been deliberately left out from the analysis, the report should at least mention the reason. It would be nice to know if there is no practical means of accounting for salinity changes during the construction, or if construction would not affect salinity levels all together. In general, adding all the excluded areas would give a better account of a worst case scenario. If the report wishes to justify their intentions for making these exceptions, it should at least offer a comparison between the current analysis and an analysis with these areas included. This would help to give the public a chance to give opinions on whether these omissions are actually insignificant. References	

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		1. Hecht, John , and David Sunding. "BAY DELTA CONSERVATION PLAN STATEWIDE ECONOMIC IMPACT REPORT." . N.p., 1Aug. 2013. Web. 12 May 2014. <http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_ Economic_Impact_Report_8-5-13.sflb.ashx>.	
577	77	Assumptions regarding direct and indirect labor force impacts to communities during construction phase are inadequately supported in BDCP Draft EIR/EIS. Introduction: The above stated issue relates to two of the stated DEIR/DEIS Socioeconomics impacts in Chapter 15, "Econ-1" and "Econ-2". "Impact Econ-1:Temporary Effects on Regional Economic s and Employment in the Delta Region during Construction of the Proposed Water Conveyance Facilities" describes effects on direct and total employment and income during Construction Phase of implementation of BDCP Alternative 4 relative to No Action Alternative and Existing Conditions resulting from implementation-related spending. The BDCP DEIR/DEIS states the region will have "substantial economic activity" if Alternative 4 is implemented (BDCP DEIR/DEIS, p16-160). "Impact Econ-2: Effects on Population and Housing in the Delta Region during Construction of the Proposed Water Conveyance Facilities" describes the impact of construction activities and employment to housing and local populations of the five-county region. Issue Discussion: According to the California Employment Development Department (CA EDD), all five counties in the BDCP area have cyclical unemployment rates, with winter increases between 2-5% (CA EDD, 2014). As recreation and agriculture are large employment sectors for this region, the cyclical trend of changes in unemployment may be related to the cyclical nature of these two activities. The BDCP DEIR/DEIS includes direct and total employment impacts as well as agriculture-specific labor impacts, though does not specifically address any loss of direct and indirect permanent or seasonal recreational or seasonal agricultural employment due to BDCP construction. Additionally, as stated in the BDCP DEIR / DEIS, it is assumed that 70% of the required construction-related labor force will be supplied by local labor and only an estimated 30% of the total construction-related labor force will be served by out-of-region laborers (BDCP DEIR/DEIS, p16-163). While the BDCP DEIR / DEIS does conclude in Chapter 30 (Growth Inducement and Other Indirect Effects) that growth inducement resulting from the BDCP is not out of line with existing projected regional growth, the stated estimates of labor from both in and out of the region cannot be guaranteed without supporting labor contracts. Therefore, direct growth estimates resulting from BDCP Alternative 4 construction stated in the BDCP DEIR/DEIS are unreliable and may have negative impacts not discussed in the document. Recommendation: Lead Agencies responsible for the BDCP need to address the above stated issues to mitigate for both direct and indirect job displacement. It is highly recommended that the Lead Agencies along with local Bay Delta government agencies create and implement a Developer Agreement / Community Benefit Agreement that stipulates a local hiring policy to maintain the 70% in-region construction labor force as stated in the BDCP DEIR/ DEIS. Such an agreement would include job training and placement priorities for displaced, unemployed, and under-employed persons in the region interested and physically able to participate in BDCP construction, operations,	While it is true that the Final EIR/EIS assessment of employment effects in Chapter 16, Socioeconomics, was not able to quantify potential recreation sector employment effects, the estimates of employment losses in the agricultural sector account for both permanent and seasonal employees, although seasonal employment is not specifically identified. The estimates of how many workers may migrate into the Delta region during construction of water conveyance facilities was based on the reasonable assumption that approximately 30 percent of workers would come from out of state, considering the specialized nature of some of the jobs and the size of the regional construction labor force. As discussed in Section 30.3.2.1, Direct Growth Inducement, EIR/EIS, construction employment in the four counties has fluctuated substantially over the past 20 years. After experiencing strong growth in construction jobs from the mid-1990s to a peak in 2005, counties in the Delta region lost 34,300 construction jobs between 2005 and 2009 (the BDCP base year); jobs continued to be lost between 2009 and 2010, although at a slightly slower rate. Considering the effects of the economic downturn on construction employment in the Delta region, it is reasonable to assume that a majority of the construction workers would be drawn from the local labor pool, and that the employment opportunities afforded by BDCP would not require a substantial influx of workers from outside the area to fill them. As a result, the growth estimates presented in the EIR/EIS are considered reasonably reliable, and evaluating scenarios involving local-hire labor contracts is not required to provide reasonable estimates of growth effects. The commenter recommends adopting a local hiring policy and implementing employment-services programs as part of mitigation for adverse employment effects. Please note, however, that the displacement of agricultural workers during the construction phase of the project was estimated at 16 full-time-equivalent positions under Alternative 4, which would represent a very small percentage of the agricultural labor force in the Delta Region. Recreation effects of construction, while adverse, are also not anticipated to be large relative to regional employment levels. Substantial employment would be generated in the region's construction sector by construction of water conveyance facilities, which could provide employment opportunities for some of the workers displaced by construction. Also note that CEQA does not require mitigation for socioeconomic effects, such as employment losses, unless they would result in reasonably foreseeable adverse physical changes to the environment. [Under CEQA social or economic effects alone shall not be treated as significant effects (State CEQA Guidelines §§ 15064(f), 15131).] The total change in employment is not, in itself, considered an environmental impact. Significant environmental impacts would only result if the changes in regional employment cause physical impacts. Such effects resulting from construction of water conveyance facilities are discussed in other chapters throughout the EIR/EIS. The relatively minor decrease in agricultural employment, and the anticipated minor decrease in recreation-related employment, are not anticipated to lead to adverse physical changes to the environment and therefore would not require mitigation. For more information regarding impacts to socioeconomics and growth inducement please see Final EIR/EIS Chapters 16 and 30, respectively.

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		and/or maintenance. Additionally, for residents of the five-county area who are uninterested or unable to participate in BDCP activities and are incurring job loss as a direct or indirect impact of BDCP implementation, the Developer Agreement / Community Benefit Agreement should include job placement and relocation services.	
577	78	Additional analysis is needed for short-term and long-term impacts to housing: Introduction: In "Econ-2", the BDCP DEIR/DEIS states that housing for the estimated 30% out-region laborers can be accommodated by the approximate "53,000 available housing units" in the area (BDCP DEIR/DEIS, p16-163, lines 15-18), and "construction of the proposed conveyance facilities is not expected to substantially increase the demand for housing within the five-county region" (p16-163, lines 21-23) . Issue Discussion: The NEPA Conclusion states "Within specific local communities, there could be localized effects on housing. However, given the availability of housing within the five-county region, predicting where this impact might fall would be speculative. In addition, new residents would likely be dispersed across the region, thereby not creating a burden on any one community." (p16-163, lines24-27). The BDCP DEIR/DEIS analysis of implies that because the housing supply is dispersed throughout the region, no community will be unfairly burdened by the influx of relocating laborers. While the supposed availability and lack of any locational information of "53,000 housing units" in the region is of concern, the analysis only includes information regarding relocating laborers directly associated with the construction of BDCP, and does not include housing analysis for indirect increase in regional employment. As shown in Table 16-41: Regional Economic Effects on Employment and Labor Income during Construction (Alternative 4) (p16-161), indirect Full Time Equivalent (FTE) jobs for Year One is approximately 13,500, and the total FTE jobs is over 16,000. Socioeconomic software models cannot predict if these jobs will be filled by local residents or if the possibility of indirect BDCP employment will draw out-of-region laborers to the region. The BDCP Draft Statewide Economic Report analysis of induced employment from the Top Ten IMPLAN Sectors concludes that over 63,000 jobs will be the direct result from the construction of the water conveyance facilities alone, not including any indirect FTE jobs (Draft Statewide Economic Report, Table 5-2-5:Employment Creation by Top Ten IMPLAN Sectors for CM1 Construction). There are no stated measures in the BDCP that will prevent these job opportunities from locating within the project area, and unless thoroughly addressed, potential growth of the Bay Delta Region may result in radically different environmental and socioeconomic impacts than presented in the BDCP DEIR/DEIS. Additionally, the BDCP DEIR/DEIS has no stated scenarios for BDCP -induced community growth post-construction. Recommendation: BDCP Lead agencies need to thoroughly investigate multiple scenarios of growth and population migration both into and throughout the Bay Delta Region in order to adequately assess both short- and long-term impacts to housing as well as impacts to the environment and all other socioeconomic factors.	The potential impacts on housing resulting from indirect population effects were not addressed in Draft EIR/EIS Chapter 16, Socioeconomics due to the amount of speculation required to address those indirect effects. The numbers of jobs to which the commenter refers has been updated in the RDEIR/SDEIS. In the new preferred alternative, 4A, a peak of 8,673 jobs are estimated to be generated in Year 12 by construction of the water conveyance facilities. Only 2,248 of these jobs would be direct. The difficulty with assessing how indirect and induced employment could affect the demand and supply of housing in the Delta region lies in 1) determining how many new residents might be drawn to the region to fill these temporary indirect and induced jobs, and 2) where these new residents would locate within the region. Some of the indirect and induced jobs may not actually represent new jobs, as demand for goods and service creates pressure on employers to lengthen employee hours for existing employees or to transition existing part-time jobs into full-time jobs. It is also reasonable to assume that many direct and indirect jobs would be filled by currently unemployed residents or by existing residents newly entering the labor force. These factors would limit the in-migration of workers seeking to fill indirect and induced jobs temporarily generated by construction, limiting the related demand for housing to an unknown extent. Additionally, indirect and induced jobs would be spread across several sectors of the regional economy as dollars spent for construction are re-spent and filter through the economy. Finally, the indirect and induced jobs temporarily generated by construction would be much less likely to be concentrated in any one part of the region than would be the direct construction jobs. The indirect and induced jobs would be spread throughout the region, and it is reasonable to assume that the 53,000 available housing units, not to mention any new housing developed over the project construction period, would be adequate to absorb any new workers drawn by indirect and induced jobs without creating a burden on local communities. Because of these many variables that would play into an evaluation of indirect and induced demand for housing, developing multiple scenarios to assess potential housing impacts would require an undue amount of speculation and would not likely provide information useful to the public or project decision makers.
577	79	Data is required for No Action Alternative. Introduction: The EIR draft states that the No Action Alternative would result in an array of effects on existing visual quality and characters in the Delta. The following factors were considered when evaluating the potential impact on visual/aesthetic resources: changes to land use, local population growth (i.e., it would convert agriculture landscape into developed landscape), land subsidence, sea level rise, catastrophic levee failure, and the	The joint RDEIR/SDEIS was prepared in compliance with the requirements of CEQA and NEPA. Before the selection and approval of an alternative considered, the Lead Agencies must comply with the necessary state and federal environmental review requirements. The RDEIR/SDEIS, along with the BDCP Draft EIR/EIS, and expected Final EIR/EIS are intended to provide sufficient CEQA and NEPA support for approval of the proposed project or any of the action alternatives for either compliance strategy. As implementation of the proposed project or any of the action alternatives will require permits and approvals from public agencies other than the Lead Agencies, the CEQA and NEPA documents are prepared to support the various public

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		ongoing projects (including the restoration and environmental enhancement projects). The EIR draft states that implementing on-going programs and projects under No Acton Alternative would result in the potential for temporary and permanent effects on the study area visual environment that are not expected to substantially change visual resource elements in the Delta because of the current restrictions on development in the primary zone and city and county ordinances to preserve the visual quality of the Delta. The potential impact is considered less than significant and no mitigation is required. The DEIR also states that the climate change impacts with and without the BDCP are provided in Chapter 3. Issue Discussion: The problem with this aspect is that the assumptions that are hidden behind are not necessarily valid. These assumptions are: 1) the on-going programs and projects that comply with NEPA, the federal Endangered Species Act, and other federal laws and regulations would not lead to significant impact. 2) the array of effects that caused by the factors mentioned above would be less than significant. 3) the climate change effects in the long term would not necessarily lead to significant impact on visual resources. For the first assumption, the on-going programs/projects, including the restoration and environmental enhancement projects may have interactive effects on the visual resources. Although these projects are supposed to comply with the environmental laws and regulations, they may still have adverse impacts that are considered not significant on the visual resources. These impacts might interact with each other, which may cause further degradations on the visual resources to reach a significant level. For the second assumption, the array of effects mentioned in the Chapter is not necessarily significant. The EIR draft did not provide us convincing evidence to support this claim. As to the last one, supporting data for this statement is missing. The potential effects of weather changes in a long term are not clearly stated, especially for the permanent effects. Moreover, there is no quantitative analysis for the influence of the visual and aesthetic changes on recreation income. Recommendation: In accordance with the above discussion, our recommendations are listed as follows: 1) the potential effects that caused by mutual interactions between the on-going projects needs to be considered. 2) the visual quality ratings caused by the aforementioned factors should be given to provide a quantitative overall assessment on the visual resources. 3) the climate change effects on the visual quality should be incorporated to the analysis model and the quantitative analysis for the influence of climate changes should be provided.	agency permit approvals and other discretionary decisions. These other public agencies are referred to as responsible agencies and 20 trustee agencies under CEQA (State CEQA Guidelines Sections 15381 and 15386) and cooperating agencies under NEPA (e.g., USACE and EPA). For more information please see 1.1.5 of Section 1 Introduction of the RDEIR/SDEIS. The Proposed Project has been developed with the goals of minimizing and avoiding incidental take of listed species to the maximum extent practicable. Final EIR/EIS Chapter 11, Fish and Aquatic Resources, and Chapter 12, Terrestrial Biological Resources, describe effects of the Proposed Project and several alternatives on fish and wildlife species in the Plan Area. Section 7 of the Federal Endangered Species Act requires that federal agencies, in consultation with the federal fish and wildlife agencies ensure that their actions are not likely to jeopardize the continued existence of species or result in modification or destruction of critical habitat. Where the alternative does not include preparation of an HCP, ESA compliance for construction and operation of water intakes in the north Delta and associated conveyance facilities would be achieved solely through Section 7. For these alternatives, USFWS and NMFS would not issue a permit and would not act as a lead agency for NEPA compliance. Where Section 7 is the ESA compliance strategy, USFWS and NMFS will assume roles as cooperating agencies for purposes of the NEPA review. Reclamation would be the lead federal action agency for Section 7 compliance where a non-HCP alternative is selected. Reclamation's Section 7 compliance would be expected to also address the Section 7 compliance needs for the USACE permit actions. In cooperation with DWR, Reclamation would prepare a biological assessment (BA) for submission to USFWS and NMFS requesting formal consultation under ESA Section 7. A biological opinion is not required prior to the release of the Draft BDCP/CWF EIR/EIS. For the Proposed Action, the USFWS and NMFS will conduct an internal ESA section 7 consultation prior to issuance of a Section 10(a)(1)(B) permit for the Proposed Action. These federal agencies will coordinate the ESA consultation process and other environmental review processes, such as the National Environmental Policy Act (NEPA), consistent with federal regulations. In addition, the USFWS and NMFS isconsulting with the United States Bureau of Reclamation (Reclamation) to complete biological opinions or a joint biological opinion prior to federal action to carry out the BDCP. For more information please see 1.1.5.2 of Section 1 Introduction of the RDEIR/SDEIS. Discussion of the main environmental attributes affecting individual covered species is provided in Appendix 2.A of the 2013 public draft BDCP. Effects of the proposed water conveyance and associated restoration activities on general resource areas are discussed in Ch. 4 of the RDEIR/SDEIS. Resource areas are addressed separately under sections for each of the new project Alternatives, including surface water, groundwater, water quality, fish and aquatic resources, terrestrial biological resources, agricultural resources, air quality and greenhouse gases, public health, and others. Where impacts are determined to be significant, environmental commitments will be implemented to avoid and/or offset these effects, where possible. The Cumulative Impact Analyses that was written for the 2013 Draft EIR/EIS has been revised to include the impacts associated with the new proposed project alternatives and also updates past analyses. Environmental Commitments are to minimize effects to the Delta and its inhabitants and mitigate for loss of habitat to the ecosystem and its species. For more information please see Section 5 Revisions to Cumulative Impact Analyses, Appendix A Chapter 11 Fish and Aquatic Resources, Appendix A Chapter 12 Terrestrial Biological Resources, and Appendix 3B Environmental Commitments, AMMs, and CMs of the RDEIR/SDEIS.

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			Construction of the proposed California WaterFix water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the EIR/EIS and RDEIR/SDEIS. As part of the planning and environmental assessment process, the project proponents will incorporate environmental commitments and best management practices (BMPs) into the action alternatives to avoid or minimize potential adverse effects (a NEPA term) and potential significant impacts (a CEQA term). The project proponents will implement these environmental commitments as part of the project construction activities. In other words, these commitments will be satisfied even if not separately imposed by the permitting agencies. If permitting agencies impose additional measures or modifications, those will also be adhered to as part of the permit(s). The project proponents will coordinate planning, engineering, design and construction, operation, and maintenance phases of the alternative with the appropriate agencies. For more information regarding Environmental Commitments please see Appendix 3B of the RDEIR/SDEIS. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. Compensation to property owners for economic losses due to implementation of the proposed project will be pursued as identified . Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft BDCP Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in the Final EIR/EIS Appendix 3B, Environmental Commitments. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Bay Delta Conservation Plan Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Draft EIR/EIS Chapter 16, Socioeconomics, was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Final EIR/EIS Chapter 16, Socioeconomics for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been incorporated into Chapter 16.
577	80	Quantitative analysis is required. Introduction: The EIR draft states that construction of conveyance facilities (including under Alternative 4) would result in substantial alteration of the existing visual quality or character in the vicinity of project elements that can be viewed from local sensitive receptors and public viewing areas. The words in the EIR draft used to describe the impact of construction of conveyance facilities on the visual resource are too vague. For example, the EIR draft states that the impact associated with Intake 2 would be adverse. Issue Discussion: The words adverse, negative are too vague for readers to understand the actual impacts of each construction activities. As mentioned in this Chapter, the	The analysis utilizes a combined visual analysis approach using the three most-accepted visual assessment methodologies used by Federal agencies including the Federal Highway Administration (FHWA), Bureau of Land Management (BLM), and USDA Forest Service (USFS) that have overlapping assessment principals. The Federal Lead Agencies and DWR have adopted this combined approach for reasons explained below. FHWA approach, by itself, did not seem appropriate for the BDCP. The FHWA utilizes both a qualitative and quantitative (visual quality rating) approach. The concepts of intactness and unity a, as used in this approach, are often confused by the general public and, commonly, by practitioners applying the methodology. For this reason, the BDCP Lead Agencies concluded that Therefore, using the FHWA visual quality rating approach used for highway projects would as not deemed to be effective or user-friendly in

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		Scenic Quality Rating system (ranging from A-F) was used in the impact analysis model. However, when describing the impacts of facilities constructions, no quantitative analysis or specific visual quality rating was given. Meanwhile, the influence on the recreations economy is not quantified. Recommendation: We would recommend the EIR to provide some analysis or predictions data for each alternative, especially Alternative 4 and its potential effects on the recreations economy. For example, a visual quality ratings system can be incorporated when evaluating the impact caused by construction of each facilities, and a final rating value of the overall impact after implementing BDCP could be provided to give the readers a quantitative concept.	expressing visual impacts associated with the BDCP and its proposed facilities Project. Another factor supporting the Lead Agencies' conclusion in this regard is that In addition, FHWA is currently updating its their existing assessment methodology to be more user-friendly and to provide a better framework for analyzing visual impacts under NEPA. In contrast to the FHWA, the BLM and USFS create existing visual management mapping overlays of the landscape and associated visual management objectives, which can allow a more quantitative analysis. On these federal lands, a pre-project and post-project change can be more quantitatively expressed by evaluating the change in visual quality/scenery management objectives. This approach has its virtues, but it should be noted that Federal mapping may not be representative of site-specific visual conditions because mapping is often prepared at the landscape, not site-specific, level. In the absence of a project falling on Federally managed lands with such mapping, a qualitative visual assessment approach is most often used and is an accepted means of analysis. Given that pre-existing mapping that establishes a visual quality management objective is not available for the study area, the BDCP Lead Agencies used and qualitative analysis combined with a quantitative analysis of the simulations was used for this EIR/EIS. The quantitative evaluation of the simulations uses a modified BLM approach to quantify impacts but whereas the BLM only has 3 ratings (A-C), this analysis establishes 7 ratings (A-G) so that the degree of impact and change is better and more thoroughly expressed. Simulations are representative in that they paint a picture of impacts that not only occur at the simulated locations but elsewhere in the affected study area. Please refer to Final EIS/EIS Chapter 17, Section 17.3.1.2 Preparation of Visual Simulations, and Appendix 17C, which illustrates that a team was used to evaluate the simulations to better account for the range in which different viewers are likely to regard the visual environment. The majority of features that would be constructed by the project have been quantitatively analyzed using the numerical evaluations of the simulations. The remainder has been qualitatively described. The text provides narrative descriptions, beyond negative and adverse, to tell the reader how the visual environment will be altered. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. When required, DWR would provide compensation to property owners for economic losses due to implementation of the proposed project. Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft BDCP Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in the BDCP Appendix 3B, Environmental Commitments, EIR/EIS. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Bay Delta Conservation Plan Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Chapter 16, Socioeconomics, of the Draft EIR/EIS was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Chapter 16, Socioeconomics, Section 16.3.3.9, in Appendix A for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been

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			incorporated into Appendix A.
577	81	Future effects should be considered. Introduction: The constructions of intake, forebays, spoil/borrow areas, reusable tunnel material areas, shift sites, uploading barge facilities, access roads, transmission lines, concrete batch plants/fuel stations, and river operable barrier were detailed explained in the EIR draft (Chapter 16 and Chapter 17). The impact of each construction activities on the visual resources is analyzed, and the impacts on the visual resources could be temporal/permanent, or negative/adverse, according to the Draft. For example, as to the NEPA effects, the primary features that would affect the existing visual quality and character under Alternative 4, once the facility has been constructed, would be Intakes 2, 3, and 5, the intermediate forebay and expanded Clifton Court Forebay, resulting landscape effects left behind from spoil/borrow and reusable tunnel material areas, the operable barrier and transmission lines. The EIS draft states that these changes would be most evident in the northern portion of the study area. The construction would take 9 years, and the intensity of the activities in contrast to the current rural/agricultural nature of the area would be substantial. The mitigation measures AES-1a to AES-1g were proposed to mitigate the effects on the visual resources. Issue Discussion: In the analysis of construction of each facility, the weather, land/road, waterway, vegetation conditions, etc., were assumed to keep the same during the construction years (the overall construction lasts 9 years). However, this assumption is not valid. The draft includes the future effects on the visual and aesthetic changes when analyzing no-action alternative, but doesn't consider the future effects on the current proposed alternative. There is a possibility that the changes of weather conditions during the 9 construction years would occur. For example, the drought and flood might change the vegetation conditions and cause overflow of the waterways, respectively, which would affect the visual resources of the bay delta areas. Thereby, the evaluation results of each construction activity need to be adjusted. Meanwhile, the mitigation measures themselves might cause the degradations of visual quality, and no mitigation measure for these degradations has been proposed. For example, mitigation measures, such as intake dewatering may have some negative effects on the visual views. Specifically, the amount of water needs to be dewatered was not clearly stated in the Draft. The dewatering might change the water flow of the waterways as well as alter the vegetation of the study area. Recommendation: The dynamic assessment of the visual quality across the 9 construction years may be required. Weather changes, vegetation conditions and other dynamic factors during these 9 construction years need to be considered. For example, if flood or drought happens in this construction period, the consequence on the visual resources as well as social economics aspects need to be analyzed and included in the Final EIR/EIS. Moreover, the impacts of the mitigation measures themselves on the visual quality might need to be incorporated and the corresponding mitigation measures need to be provided in the EIR.	Chapter 17 of the 2013 Draft EIR/EIS under Mitigation Measure AES-6c (Implement a Comprehensive Visual Resources Management Plan for the Delta and Study Area) states that the visual resources management plan will recognize and work with the evolving visual landscape as it relates to climate change and sea level rise. It will establish proactive design and management measures that protect the evolving landscape and visual integrity of the study area and will not facilitate reactive design and management measures that could adversely alter the visual landscape of the study area. For more information on Visual Impacts please see Draft EIR/EIS Section 17.3.3 Effects and Mitigation Approaches. Please refer to Final EIR/EIS Chapter 31, Other CEQA/NEPA Required Sections, Sections 31.5.2.12 through 31.5.2.19, which analyzes the potential effects of mitigation measures for aesthetic/visual resources.
577	82	The interaction between BDCP and other projects in cumulative analysis: Introduction: The EIR draft states that the cumulative impact analysis considers projects that could affect the same resources and, where relevant, in the same time frame as the BDCP alternatives, resulting in a cumulative impact. The visual environment is expected to change as a result of past, present, and reasonably foreseeable future projects related to	Since the time of the Draft EIR/EIS notice of preparation (NOP) in 2009, additional projects that could combine with the action alternatives to contribute to cumulative aesthetic and visual resources impacts are known to be reasonably foreseeable or probable. The complete list of cumulative projects is detailed in Appendix 3D, Attachment 3D-A of the Draft EIR/EIS. Table 5.2.2.13-1 of the RDEIR/SDIES includes the additional cumulative projects that would affect aesthetic and visual resources because they would result in visible changes to the landscape, in addition to the list of projects included in Table 17-2 of the Draft EIR/EIS.

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		changes in land use. The change to the existing visual environment will take place, assuming that reasonably foreseeable future projects would include typical design and construction practices to avoid or minimize potential impacts. Issue Discussion: The mutual interaction effect between BDCP and other foreseeable/ongoing projects in the region was not considered. Indeed, the changes that relate to the past, present, and future projects are considered. However, the cumulative analysis did not consider the negative effects of BDCP (caused by their mutual interactions) on the foreseeable/ongoing projects. The negative effects imposed on the foreseeable/ongoing projects might affect the visual quality evolution of BDCP reversely. Recommendation: The analysis model should incorporate the mutual influences of BDCP and other projects, and their impacts on recreation.	These additional cumulative projects are considered in combination with the projects included in Draft EIR/EIS Table 17-2 and the action alternatives to provide a thorough analysis of the potential cumulative impacts on aesthetic and visual resources. Some of the cumulative effects described include localized effects that would occur in direct combination with the action alternative in the vicinity of alternative conveyance facilities and restoration actions. Other cumulative effects described consider more indirect additive effects on aesthetics and visual resources in the region, including outside of the Delta study area. For more information on the cumulative analysis of aesthetics and visual resources please see 5.2.4.12 of Section 5 of the RDIER/SDIES. Please refer to Chapter 4, Section 4.2.5.2, Cumulative Effects Analysis of the Draft EIR/EIS. This describes the process and legal framework for analyzing cumulative impacts under CEQA/NEPA. The cumulative effects analysis for visual resources meets these parameters
577	83	Unconvincing study method for research of recreational activities: Introduction: The Benefit Transfer Method (or Benefit Function Transfer) was used to evaluate impacts on recreational activities in draft EIR/EIS. The essence of Benefit Transfer Method is to transfer available information from studies already completed in another location. Issue Discussion: There are several limitations with the use of the Benefit Transfer Method. The approach may not be scientific because the location of the site, resource, local policies and user specific characteristics could not be similar enough. The Bay Delta bioregion is surrounded by the IT industry of the Silicon Valley and the most famous wine tourism site in the United States, Napa Valley. Expect for the unique economical surroundings, the geological borders of the BDCP are not specific, which made it more difficult to find transferred objects. Plant and animal species inhabiting the Delta are unique as well. However, the BDCP aims to address the areas extending from the Central Valley to the mouth of San Francisco Bay. In addition, studies that would be regarded as transferred ones are not clearly pointed out in the draft. Ecological conservation and environmental protection are not only related to science and technology but also affected by policies and economics. In order to include political factors, the proper transferred location should be identified in the United States. The other two significant river delta areas in the United States are Mississippi River Delta and Colorado River Delta. However, the above two areas are really distinct from the Bay Delta Area in terms of history, culture, economy, geology and so on. Mississippi River Delta supported economy of surroundings by shipping traffic, oil supply and fisheries harvest. Except for land loss, there is the only obvious crisis there. While for Bay Delta area, it does not need to worry about shipping and oil supply problems. Colorado River Delta was established in river flows and ocean tides, forming a dynamic environment. Its current ecological crisis focuses on the loss of wetlands. However, effects resulting from the construction of the dams or waterways there deserving to be considered when we discussed the Delta area. The above analysis indicated that it is not accessible to ascertain a transferred position to study the recreational activities in the Bay Delta area via the Benefit Transfer Method. Recommendation: If BDCP intends to keep the Benefit Transfer Method, more sound evidence should be provided to prove that the selected transferred position is convincing	The recreation impact assessment reported in the CEQA and NEPA documentation for the BDCP and CWF was not based on a "Benefit Transfer Method". The methods applied to the evaluation of impacts on recreation as a result of constructing and operating the preferred alternative (Alternative 4A) and the other alternatives included in the Final EIR/EIS are described in Chapter 15 Recreation Section 15.3.1 Methods for Analysis. The recreation analysis considered the direct impact on recreation facilities and opportunities resulting from construction of the proposed water conveyance facilities, implementation of mitigation measures, and for the BDCP alternatives implementation of Conservation Measures 2 through 22. The recreation impact analysis also considered the impacts on recreation opportunities as a result of changes upstream reservoir end of September storage and changes in river flows. Information from other studies was used to establish baseline conditions and significant impact thresholds. The impact assessment of impacts on upstream reservoirs and rivers was based, in part, on hydrologic modeling conducted for the existing conditions, no project conditions and each action alternative.

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		gradually. Next, individual distinction should be taken into consideration. The way to measure and evaluate experiences of recreational activities could be various. More other study methods may be discovered via a public hearing. References: 1. "Benefit Transfer Method." Benefit Transfer Method. N.p., n.d. Web. 20 Apr. 2014. <http://www.ecosystemvaluation.org/benefit_transfer.htm>. 2. "Bay Delta Bioregion Overview." Bay Delta Bioregion Overview.N.p., n.d. Web. 27 Apr. 2014. <http://ceres.ca.gov/geo_area/bioregions/Bay_Delta/about.html>. 3. Kolb, van Lopik (1958). Geology of the Mississippi River deltaic plain, southeastern Louisiana. Technical Report 3-483. Vicksburg, MS: U.S. Army Corps of Engineers Waterways Experiment Station. 4. Clifford, Frank (September 21, 2007), "A trickle of water might save estuary", Los Angeles Times	
577	84	Overstatement of the recreational visits: Introduction: The draft EIR/EIS states that more visitors are expected to visit the Bay Delta area after the implementation of the construction and conservation activities and regional tourism may be boosted by the introduction of the programs of ecological habitats. Issue discussion: The possibility of attracting more visitors was overstated after the construction of the project. Our arguments are described as follows. San Francisco is one of top ten travel destinations in the United States and ranked as the 4th most popular travel attraction in the 2013 US News Rankings. Yet, how many of the tourists around San Francisco and the Bay area have the travel plan for the Delta area? According to the visit recommendation on the websites TripAdvisor, international tourists usually spend three days in San Francisco and then head to Los Angeles or Las Vegas to continue their California trip or head to the eastern shore. Most locations of interests in San Francisco are concentrated in the downtown area and few of them located in the neighborhoods, such as Tiburon, Sausalito, Napa, Calistoga, Sonoma, Monterey, Carmel and Pebble Beach. The above destinations are all closer to San Francisco compared to the Bay Delta area. Obviously, fewer advantages can allow foreign visitors to make decisions to change their travel plans. Similarly, domestic tourists have fewer possibilities to head toward east because of their intense travel schedule. Even if some tourists plan to travel around the Bay Delta area after the proposed construction, is it convenient for them to arrive there and start their tour? Right now two main transportation methods connecting San Francisco and the Bay Delta area are ferryboats and vehicles through highways. Less noticeable features of the Bay Delta can allow its tourism to be developed further. The project intends to promote the development of its agricultural tourism. However, San Joaquin Valley region, which lies south of the Sacramento-San Joaquin River, gains fewer dollar revenue compared to Napa	The preferred alternative and other alternatives may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Final EIR/EIS Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011 Plan) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove.

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		Valley. The success and distinguished rank of Napa Valley resulted from its long history and premier origins. The Bay Delta area will face intense competition if they plan to take advantage of the tourism. Recommendation: We would recommend the Draft EIR/EIS to provide sufficient data and analysis to support this claim. On the other hand, the following measures could be considered to boost the regional tourism. First, the promoting development of various transportation methods could be implemented to attract more visitors to the Bay Delta. For example, developed biking network was built among San Francisco, San Jose and Palo Alto, which will promote tourism effectively. If the project aims to attract more people from out of the Delta areas, public transportation from the San Francisco to the Bay Delta area should be developed further. Second, a tourism website could be built to introduce the beauty of the Delta area or organize visitors and travel partners. Visitors who have the same travel destinations can be matched together, which not only practices sustainable travel but also add more interests to the whole tour. Further, tourism programs should be enriched in the Bay Delta area. References: 1. "California's Water: Sacramento-San Joaquin River Delta." Association of California Water Agencies |.N.p., n.d. Web. 11 Apr. 2014. <http://www.acwa.com/content/delta/californias-water-sacramento-san-joaquin-river-delta-0>. 2."Bike Share Program Launched In 5 Bay Area Cities - CBS San Francisco."CBS San Francisco.N.p., n.d. Web. 10 Apr. 2014. <http://sanfrancisco.cbslocal.com/2013/08/29/bike-share-bay-area-cities/>. 3. "Mississippi Delta Attractions." Mississippi Riverboat Vacation.N.p., n.d. Web. 9 Apr. 2014. <http://www.visitthedelta.com/attractions/default.aspx>.	
577	85	Underestimate reduced recreational opportunities: Introduction: The draft EIR/EIS claims that noise and visual disturbances happen during construction period only and ignores the long-term impacts on boating and other recreational activities (EIR Ch.15, pg. 141). The recreational visits will increase and recreational chances will be enriched in the Delta by BDCP. Issue Discussion: Water Flow: The construction will result in the reduced water flow in the Sacramento River and the reduced amount will be as much as 20% by 2050. Right now, the current surroundings have adapted to natural periods of low and high flow, which supports a rich diversity of organisms and habitats and ecological functions. The installation and operation of these structures always will shift natural water flow, which have been identified as a key threatening process under the Fisheries Management Act 1994. Native fish species have adapted to the drought and natural change of water conditions and their populations have the capacity to recover. The reduced water flow will disturb this	The existing operation of the SWP and CVP pumps in the south Delta can contribute to reversals in river flows, potentially altering salmon migratory patterns. The new system would reduce the ongoing physical impacts associated with sole reliance on the southern diversion facilities and allow for greater operational flexibility to better protect fish. The proposed intakes would only be permitted to operate with regulatory protections, including river water levels and flow, which would be determined based upon how much water is actually available in the system, the presence of threatened fish species, and water quality standards. Flow criteria will be applied month by month and according to water year type. More information on the ranges of water project diversions, based on water year types and specific flow criteria, can be found in BDCP, Chapter 3, Conservation Strategy. Monitoring for compliance with D-1641 requirements or any future requirements for SWP/CVP water supply operations would be conducted year-round in the future under the proposed project. The potential impact on covered and non-covered sport fish species from construction activities would be considered less than significant because the BDCP would include environmental commitments to prevent

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		ecological balance and there will be little chance for fish species to extend their ability to recovering. Water Level: Reduced water flow will alter water levels as well. The 2003 Union of Concerned Scientists and Ecological Society of America report stated that North America experienced climatic change, which resulted in the change of water levels. Reservoirs will be constructed at popular recreation sites, which must cause effects to recreational activities. Those recreation sites are listed in the EIR(Chapter 15, Page 59), including Folsom Lake, Shasta Lake, Trinity Lake, and Lake Oroville. Under Alternative 9, some boating destinations are completely cut off. Boaters have to lose some recreational opportunities. Fishing lovers also have to face the same disappointing fact that many fishing sites will disappear. It will include the Boathouse Marina at Locke, Walnut Grove public guest dock, and Boon Dox guest dock; temporary impaired access to Cosumnes River Preserve, Landing 63, Deckhead's Marine Supply, Dagmars Landing, Brannan Island State Recreation Area, Bullfrog Landing and Marina, Union Point Bar and Grill, Clifton Court Forebay, and Rivers End Marina and Storage. Additionally, the potential risks of new coming construction are so difficult to tell. For example, the water levels of the Great Lakes reduced owing to the Chicago diversion. The canal was built to flush sewage down the Mississippi from the Chicago River. However, 2.1 billion gallons of drinkable fresh water has to be used to flush sewage down, which was not the original proposed consequence. The process of a decreasing water level will cause effects on bank stability, resulting in slumping, loss of riparian vegetation, erosion and sedimentation. Those impacts on salinity and habitat quality will hurt the regional ecological systems and reduce wildlife species. Wildlife watching and observation are also parts of recreational experiences. Although the movement of sediment and muck can be considered as a method to deal with block problems, the noise and pollutants caused by operation process still should be taken seriously. Water Quality: The exacerbation of water quality resulted from the reduced water flow too. Water quality involves in the chemical, physical and biological characteristics of water and a significant measurement of water conditions. Recreational activities are based on people's feeling and visual experiences. So if the appearance of water environment looks bad or smell worse, people will not have the good mood to go on further exploration of site interests. Commonly, visitors do not grasp considerate professional knowledge about water level and water flow. If they do not pay attention to the water trends in this area, they will not feel the differences and gain negative impressions of this area. However, water clarity is a [visual] factor and it is easy to see by general tourists. In the Bay Delta area, sewage contaminations, illegal dumping and aquatic weeds are all observable factors which should be concerned seriously. A large amount of organisms are included in sewage contaminations like bacteria, viruses and parasites. Sometimes people's exposure to sewage-contaminated recreational water may lead to some diseases, such as gastroenteritis, hepatitis and infected cuts or rashes. Marine animals could transmit those diseases even through contact with sewage-contaminated water. Those sewage contaminations will not only bring a dramatic negative impact on visitors' recreational activities but also be a threat to the health of human beings. Some sewage contaminations may come from the break or leak of large sewage lines.	water quality effects, including environmental training; implementation of stormwater pollution prevention plans, erosion and sediment control plans, hazardous materials management plans, and spill prevention, containment, and countermeasure plans; disposal of spoils, RTM, and dredged material; and a barge operations plan (Appendix 3B, Environmental Commitments). Mitigation Measures AQUA-1a and AQUA-1b would avoid and minimize adverse effects on sport fish populations from impact pile driving. Mitigation Measure REC-2 would ensure continued access for bank fishing at established locations; enhance fishing sites near the proposed water conveyance facilities, including near Clifton Court Forebay; and provide adequate signage directing anglers to the formal sites. The proposed project may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. The overall recreation experience for boaters or fishermen in the vicinity of intake construction areas would be reduced during construction activities because of the elevated noise levels as well as visual setting disruptions. These temporary construction-related effects would last for up to 5 years in the vicinity of intake and barge unloading facilities and could alter fish populations such that recreational fishing opportunities in the study area would be affected. Weekday construction would reduce the amount of fish and other wildlife in recreation areas in the vicinity of the intakes, resulting in decreased recreation opportunities related to wildlife and fish, causing recreationists to experience a changed recreation setting. Chapter 15 describes potential impacts on on-water recreation and fishing. Mitigation Measures would reduce impacts on marine navigation by developing and implementing site-specific construction traffic management plans; installing visual barriers between construction work areas and sensitive receptors; applying aesthetic design treatments to all structures; and employing noise-reducing construction practices. The potential impact on covered and non-covered sport fish species from construction activities would be considered less than significant because the proposed project would include environmental commitments (Appendix 3B). Mitigation Measures would also be available to reduce construction-related underwater noise and pile driving effects, to initiate a complaint/response program, and to provide alternative bank fishing access sites. Please see Chapter 16 Socioeconomics of the Public Draft BDCP for additional information regarding economic impacts to marinas. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011d) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove. Please also refer to Master Response 25 for discussion of upstream reservoir effects. Chapter 8, Water Quality, takes into consideration existing discharges from municipal facilities in its assessment of water quality impacts related to implementation of the proposed project. The water quality analysis presented in the RDIER/RDEIS sections covering the new proposed Alternatives and Appendix A provide a thorough analysis of important water quality constituents of concern at multiple locations throughout the Delta to present the potential water quality effects that could result from implementing the project alternative. In addition, an environmental commitment has been developed that would provide a mechanism for implementing stormwater treatment measures that would result in decreased discharge of

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		Furthermore, it is a little bit disappointing to admit the existing phenomenon of illegal dumping in the Bay Delta area. Illegal dumping is rampant and may allow property value decline. Large items of illegal dumping will block boating lanes, disturb people's healthy and beautiful leisure environment. The future construction sites have the possibility to be an additional source of illegal dumping and bring damage to the regional environment. Lastly, the management and control of aquatic weeds are also very important to keep ecological balance of the Bay Delta area and promote the local development of recreational activities. Healthy aquatic plants are parts of a water body's ecosystem, providing food, habitat and microclimate to local fish and other animals. Sometimes proper aquatic weeds can add interest to recreational uses such as boating, fishing and swimming. Invasive aquatic weeds can degrade water quality, destroy habitat and then reduce recreational opportunities. The aesthetic appeal of water bodies will be damaged by invasive weeds. The balance of the fish population will be disturbed. Fishes are dead due to the removal of too much oxygen from the water. Sometimes, terrible odors and tastes may be caused by invasive weeds. The project should not only concentrate on the proposed solutions to possible invasive aquatic weeds but also solve current aquatic crisis like hyacinth. In previous analysis of this part, many recreational sites like camping areas and marinas do not show in BDCP maps. Maybe the plans or proposed construction of those sites are undecided. Probably BDCP just dismisses them because they have been kept. However, people here care about all sizes of land, as well as their own lands, and they may think those sites which were not referred to would be removed from their hometown areas and their wonderful childhood memories as well. Recommendation: It is not easy to persuade people to change their mind when they have to face the decrease of recreational sites. However, it is not difficult to accept the adjustment of recreational sites for the public. Some sites near or similar to Folsom Lake, Shasta Lake, Trinity Lake, and Lake Oroville should be chosen to replace the above missing positions. So the opportunities of recreational activities will not be reduced, but will be just changed or adjusted. The Bay Delta Conservation Plan should provide solutions to release noise impacts during the construction period as well. Solutions could include the decrease of construction time length and the increase of establishment efficiency. I believe with the increase of people's understanding of the project, more and more people could support the right man-made construction objects. In addition, special rules should be made for the construction period in order to avoid unnecessary threat to the surroundings and people's health, including control of noise level, disposal of construction debris and the related establishment of rules. Effective and influenced education and promotion also should be given attention to. Once the public grasps the basic understanding of threat and crisis; everyone will do their best to join in the conservation plan. References:	contaminants to the Delta, which is intended to reduce the amount of pollution in stormwater runoff entering Delta waterways. Please refer to Appendix 3B, Environmental Commitments, in Appendix A of the RDEIR/SDEIS. Please refer to Master Response 14 for additional discussion of how water quality is addressed in the EIR/EIS. Chapter 23, Noise, of the Final EIR/EIS contains the evaluations of the effects of construction and operation noise resulting from the preferred alternative and other alternatives. Mitigation measures NOI-1a and NOI-1b are available to reduce the effects of noise during construction. DWR and contractors hired to construct any conveyance components of the project will implement a site-specific noise abatement plan to avoid or reduce potential construction-, maintenance-, and operation-related noise impacts. These plans will vary by location.

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		1. "Habitat management." Water flow.N.p., n.d. Web. 7 Apr. 2014. <http://www.dpi.nsw.gov.au/fisheries/habitat/threats/water-flow>. 2. "Habitat management." Instream structures and other mechanisms that alter natural flows.N.p., n.d. Web. 7 Apr. 2014. <http://www.dpi.nsw.gov.au/fisheries/habitat/publications/threats/instream-structures>. 3. Kling, George, and Katharine Hayhoe. "Confronting climate change in the Great Lakes Region." . The Union of Concerned Scientists and the Ecological Society of America, 1 Apr. 2003. Web. 23 Apr. 2014. <http://ucsusa.org/assets/documents/global_warming/greatlakes_final.pdf>. 4. "Water Levels and Flows | Flow For Water." Flow For Water. N.p., n.d. Web. 20 Apr. 2014. <http://flowforwater.org/issues/water-levels-and-flows/>. 5. Diersing, Nancy (2009). "Water Quality: Frequently Asked Questions." Florida Brooks National Marine Sanctuary, Key West, FL. 6. "Ambient: Background." Ambient: Background. N.p., n.d. Web. 15 Apr. 2014. <http://yyy.rsmas.miami.edu/groups/ambient/student/water/SwaterInfo.html>. 7. "Avista - Aquatic Weeds." Avista - Aquatic Weeds.N.p., n.d. Web. 24 Apr. 2014. <https://www.avistautilities.com/environment/spokaneriver/resources/Pages/aquaticweeds.aspx>. 8. "Aquatic Weed Control." Aquatic Weed Control.N.p., n.d. Web. 22 Apr. 2014. <http://www.uky.edu/Ag/PAT/cat5/cat5.htm>.	
577	86	Overstatement of the recreational benefits to local economy Introduction: The draft EIR/EIS claims that the regional economy will be promoted further by the BDCP. The methods which can improve economic conditions include increasing recreational opportunities and creating more employment opportunities via construction projects. The profits of construction can balance the negative effects on the local economy. Issue Discussion: As mentioned in the previous issue, the recreational opportunities will not necessarily increase after the construction. Water conveyance facilities construction brings inferior involvement. Also, land decrease and aesthetics changes probably lead to long lasting creation regression. Recreational activities will develop under a very negative trend. There is no doubt that construction will result in adverse impacts on recreational industries. Recreation and travel provide more than 3,000 employment opportunities, $100 million labor income, and $175 million added value to the local economy. The number of visitors will possibly reduce due to the deterioration of their recreational experiences caused by the construction, which inevitably brings visual, auditory, and air	The EIR/EIS does not claim that the regional economy will be "promoted" by construction and operation of proposed project water conveyance facilities (CM1). Nor does it claim that recreational activities will be improved by construction or operation of proposed project water conveyance facilities. As described in Final EIR/EIS Chapter 16, Socioeconomics, construction of water conveyance facilities under the alternatives would result in several economic effects within the Delta region, some positive and some negative from an economic perspective. For example, construction and operation of the proposed project facilities is expected to increase regional employment opportunities for construction workers and others, while the displacement of farmland is anticipated to reduce employment opportunities in farming sectors of the economy. Regarding recreation and tourism, the important contribution of recreation to the Delta region's economy is acknowledged and described in Final EIR/EIS Chapter 16, Socioeconomics, Section 16.1.1.6, Economic Character of Recreation in the Delta. Additionally, Final EIR/EIS Chapter 15, Recreation, and Chapter 16, Socioeconomics, describe several adverse impacts on recreational resources in the Delta that would result from construction of proposed project water conveyance facilities. (See Impact REC-1 through REC-4 and Impact ECON-5 for each alternative in the EIR/EIS.) For example, as described for Impact ECON-5 for Alternative 4, it is stated that fewer visits to affected recreation sites or areas would lead to less spending, creating an adverse effect. While visitors can adjust their recreational patterns to avoid areas substantially affected by construction activities (by boating or fishing elsewhere in the Delta, for instance), recreation-dependent businesses including marinas and recreational supply retailers may not be able to

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		pollution, etc. The noise, visual pollution, and other problems coming from the water conveyance facilities will negatively affect a variety of creatures in the area. For example, the Sandhill Crane, an indispensable bird in the Delta area, is among the many species that will be directly affected. The benefits of recreational activities after construction have been overemphasized as well. Recreation is a major contributor to the local economy currently. Recreation creates approximately 12 million visitor days of uses per year and brings over ¼ billion dollars expense. People who try to visit the Bay Delta area during the construction period may not visit the place again or may not remember the site passed by or even make a plan for future visit. Recommendation: Effective promotion plays a significant role in the development of regional tourism industries after the construction. Now many residents near the Bay Delta area may still keep the wonderful memories of boating along the Delta on beautiful summer days and enjoying numerous recreational activities. Those recreational activities listed on the Delta official website include house boating, boating, waterskiing, tubing, fishing, relaxing at the beach, birding or simply driving. The amazing 1,000-mile waterways should not only be kept in people's memories completely. However, the topic used to promote the development of local tourism could be waking up old memories and inviting people to visit here again after the achievement of the construction. If there are not enough employment opportunities created to make up the decrease, local and regional government can organize some educational programs to offer additional skills to local farmers or workers in other fields. References: 1. "Economic sustainability plan for the Sacramento-San Joaquin Delta." . N.p., 1 Jan. 2012. Web. 11 Apr. 2014. <http://www.delta.ca.gov/Economic%20Sustainability%20Plan.htm>. 2. "Sacramento-San Joaquin Delta recreation in danger." Sacramento-San Joaquin Delta recreation in danger.N.p., 3. n.d. Web. 30 Apr. 2014. <http://www.rivernewsherald.org/articles2013/deltarecreation_8-21-2013.html>.	economically weather the effects of multiyear construction activities and may be forced to close as a result, even while businesses in areas that become more popular could benefit, as noted in the evaluation of Alternative 4, Impact ECON-5. Effects on Delta recreational resources during the operations and maintenance phase of the proposed project are anticipated to be adverse but relatively minor near proposed project facilities, as described for Impacts REC-5 through REC-8 and Impact ECON-11.
578	1	I am strongly against piping more water to the south. I live in an agricultural area near Winters, CA. I have seen my neighbors need to dig deeper wells to access water this year. I have seen fish have to be trucked from their spawning grounds to the delta. Northern CA should not need to pay for the unsustainable farming practices in the south,	The proposed project aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. For more information regarding funding of the proposed project please see Master Response 5. For more information regarding beneficial use please see Master Response 34.

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		nor should it pay for the unsustainable growth of Southern California. Once the aquifer is gone, it is gone forever.	
579	1	Our organization, Asian Self-Development and Residential Association (APSARA), is writing to you to request information about the Bay Delta Conservation Plan in Cambodian .We have not received any informational materials about the Bay Delta Conservation Plan in Cambodian to educate or to provide to our community in Stockton .This is a concern for us because one of our areas of assistance to our Stockton Cambodian community is health education. Our community members are avid fishers and a majority of our families depend on fish for a huge part of their dietary and nutritional needs. We are aware of the possible negative impacts of the Bay Delta Conservation Plan's twin tunnels, which will affect the health, dietary and recreational lifestyle for many families in the Delta region and we would like to know more details about it. The commentary period for the Bay Delta Conservation Plan will end in June and I do not have access to necessary information to make an informed comment and to share with our Cambodian constituents . Please send our organization informational materials on the Bay Delta Conservation Plan translated in Cambodian.	The Federal Lead Agencies have fully complied with Executive Order 12898. Notably, there is no mandate to "Each Federal agency may, whenever practicable and appropriate, translate crucial public documents, notices, and hearings relating to human health or the environment for limited English speaking populations." Rather, such translation is optional, and subject to the pertinent federal agency's sense of whether translation if "practicable and appropriate." The California Legislature's intention in enacting the Dymally-Alatorre Bilingual Services Act was to assist "persons who live, work and pay taxes" in the State to more easily obtain information about "public services" available to them. (Cal. Gov. Code, § 7291, italics added.) Within the Act, section 9295.2 applies to State agencies. Notably, that statute states that "[t]his section shall not be interpreted to require verbatim translations of any materials provided in English by a state agency." (Italics added.) This qualification is consistent with Article 3, section 6, of the California Constitution, which makes English the official language of the State of California. Thus, the Dymally-Alatorre Bilingual Services Act is not intended to apply to environmental impact reports prepared pursuant to CEQA; and even if it were so intended, the Act would not require verbatim translations of the BDCP and related documents. Here, due to the sheer size of the BDCP and the EIR/EIS for the BDCP, translation of the entirety of these documents was impractical and therefore inappropriate. Even so, BDCP and EIR/EIS Fact Sheets were translated into Spanish, Hmong, Cambodian, Tagalog, Chinese (Mandarin), and Vietnamese. Translated fact sheets were posted to the website and hard copies were provided upon request. Additionally, a multilingual toll-free phone line has been established for questions about the BDCP, which includes information in Spanish, Tagalog, Vietnamese and Chinese (Mandarin) in addition to English (based on Census data) as well as Hmong and Cambodian (based on requests). For more information about the work that has been done to make information available to non-English speaking communities, please see Master Response 27. For more information regarding public outreach efforts please see Master Response 40.
580	1	When I tried to call the BDCP with my concerns, I received a call from Delia Grijalva and then a letter from Allan Davis. I do not feel my concerns were understood. I want to ensure that my comments are a part of the public record. Our property, Clifton Court, L.P. is the private property that lies between the Federal Delta Mendota Canal intake and the State of California Water Facilities on Old River. This property is approximately 600 acres in size. Clifton Court, L.P.is severely negatively impacted by all the water plans and water export operations in the Western Delta. We have owned and operated our property since the early 1960's and have been subject to enormous damage.	The public comment period for the RDEIR/SDEIS began on July 10, 2015 and continues through October 30, 2015. Public comments submitted during the official public comment period and the previous comment period for the 2013 Public Draft will be made available to the public upon the release of the Final EIR/EIS. The Final EIR/EIS will include all comments received during the official comment period and responses to substantive comments. The obligations of California public agencies under Article 1, section 3(b)(1), of the California Constitution and under the Public Records Act, do not include any obligation to post comments on draft environmental documents on agency websites as such comments come in from the public and interested agencies. Rather, those statutes deal with the obligation for public agencies to hold certain kinds of meetings of public bodies and public officials in public, and to make non-privileged documents of various kinds available to members of the public in response to formal requests. To date, neither the California Legislature nor Congress has required Lead Agencies for CEQA and NEPA documents to post comments on draft environmental documents on their websites during the public review periods for those draft documents. This is consistent with the requirements of the California Environmental Quality Act (CEQA Guidelines §15088) and the National Environmental Policy Act (Council on Environmental Quality § 1503.4) and policies held by all Lead Agencies governing the implementation of CEQA and NEPA. Please see Master Responses 40

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			for additional detail on the public outreach that has been done for stakeholders and Master Response 42 regarding treatment of public comments.
580	2	I have never seen an EIR on the 1950's Federal Water Project or the 1960's-70's California Water Project Yet, according to the BDCP Public Draft (4.2.1.2.1), the gates on the Clifton Court Forebay will still be operated with an intake of up to 15,000 cfs. Your EIR is bogus because it does not address the many harms currently caused by diverting water via gravity (up to 15,000 csf) at the adjacent sites on Old River. The current state and federal systems have cost us well over $1,500,000 in damages over the years. In fact, Mr. Davis, in 2012, you told us that we could get our damage expenses for that year reimbursed by the state if we submitted the Government Claims Form that you gave us. When we submitted the form, we were sent to the Victim's Compensation Board. At that hearing, we were told that we would have to sue the state to get compensation for our damages. We are very concerned about our yearly damages from State and Federal pumping continuing under the disguise of the BDCP. We want damages to cease and payment for the ongoing damage.	The project description/covered activities summarized in 4.2.1.2.1 states, "When a large head differential (difference in water surface elevation) exists between the outside and the inside of the gates, theoretical inflow can be as high as 15,000 cfs for a short time, although actual inflow will be constrained on an average basis and in accordance with the conservation strategy." Generally damage claims against the DWR are processed through the Victim's Compensation Board. No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised.
580	3	I asked about water removal from the Sacramento River. I asked how the 9,000 cfs and 15,000 cfs figures were obtained. You have yet to tell me exactly who decided on these amounts of water. Meanwhile we have seen the adverse effect of the water removal. I also asked when water could be taken from the Delta because as of April 25, 2014 the gates to Clifton Court Forebay were still open despite its being a very serious drought year. If the state cannot be trusted to close the gates during a drought, when can the state be trusted?	The maximum diversion capacity of 3,000 cfs at each intake was selected through the BDCP Steering Committee process. This capacity is consistent with the maximum diversion capacity of several other intakes along the Sacramento River that are under operation. The maximum diversion capacity of all intakes was also selected through the BDCP Steering Committee process because the total diverted water volume would need to be pumped by a combination of the SWP Banks and CVP Jones Pumping Plants which have a combined total maximum capacity of 15,000 cfs, as described in Section 3.5.2.1 of Chapter 3, Description of Alternatives, of the Draft EIR/EIS. The export patterns for the action alternatives as compared to the Existing Conditions and the No Action Alternative are presented in Tables C-12-1-1 through C-12-25 in Appendix 5A, Section C, Modeling Results, in the EIR/EIS. Operation of the Clifton Court Forebay gates are governed by SWP operations to meet contractual obligations and related regulatory and permit requirements established by the State Water Resources Control Board, U.S. Army Corps of Engineers, National Marine Fisheries Service, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife.
580	4	I had gravity flow vs. pumping questions. It is clear that Department of Water Resources does not understand the difference between gravity flow and pumping. Before the State and Federal pumping began, we used gravity pumping. Gravity water can be moved through a pipe, syphon or weir. Water flows by gravity. The energy cost is zero. The equipment used in our case was a 30 inch pipe with a cast iron Waterman Gate to control the flow. There was almost no maintenance cost. Once water export began, we were forced to put in pumps. Pumps are expensive and require constant maintenance. The energy to run the pumps has become very expensive, increasing between 25 to 50 times the costs of over 50 years ago. Pump repair costs have also increased at least 10 times. The pumping operation at the state and federal facilities has lowered water levels, increase water velocity and brought silt, dirt, and trash into our pumps which causes rapid wear and destruction. Moreover, our pumps are destroyed when the water level suddenly drops due to trash on the trash racks. Therefore a drop in water level can cause a repair around $25,000 and up to a 3 week delay in irrigation. In short, silt, trash , and dirt brought into the pumping area by the massive water export flows cost us dearly. I request a direct meeting as soon as possible with someone who can address and solve our pumping problems caused by silt, dirt, and trash from the water projects.	Please see Section 3.5.18.1 in the FEIR/EIS for a description of how water would flow by gravity to the south Delta pumping plants under the preferred alternative, 4A. The comment on existing Clifton Court operations does no raise an issue on the adequacy of the EIR/EIS or related documents.

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		Furthermore, we would like compensation for all of the pumping costs that were forced upon us due to the water projects.	
580	5	Then I asked where the state deposited the sediment that it dredged from the Clifton Court Forebay in past years? I asked how much the dredging and barging cost? Clearly you did not hear my question, as you told me Department of Water Resources is exploring various alternatives. I am not talking about the future; I wish to know what past dredging has cost. Again I would like this public information at your earliest convenience.	The issue related to historic operating costs which were paid by the SWP water users does not raise any issues with the environmental analysis provided in the EIR/EIS.
580	6	The state seems to indicate that rip rap applied to levees to prevent erosion is a major ecological disaster. Prior to the exporting of mass amounts of water from the Delta, I maintained our levee banks without rock. These banks have no peat soil. Since the state and federal governments began pumping, I have had to re-rock three times. The last time our levees leaked in the 1990's, I applied rip-rap. Two years later I received an engineering bill from the state for $5,000 for the application of rip-rap. Clearly the government knew the damage the pumping caused our farm yet no one offered to pay for the damages, they simply sent another bill.	The commenter describes his or her experiences maintaining levee banks in the Delta. The comment does not raise any environmental issue related to the EIR/EIS.
580	7	The Federal government rip-rapped their levees after they started pumping large amounts of water. The state built the Clifton Court Forebay using concrete treated base on the inner side of the levee. They have now rocked both inner and outer sides of their levees. Unfortunately, the bottom of the Forebay leaks. The first year the Forebay was filled, I was unable to farm because of the seepage. I was forced to put in an expensive tile drainage system complete with pumps that pump that seepage back into the Forebay. Those drainage tiles are now over 45 years old and need to be replaced. Seepage from the Forebay is another expensive problem that needs to be fixed.	As described in FEIR/EIS, Chapter 3, Section 3.3.1.1, Physical Components, Forebays, the existing Clifton Court Forebay would be modified and new embankments would be constructed around the forebay under Alternative 4A. The new forebay embankments would be designed and constructed to comply with Division of Safety of Dams requirement and have features to minimize seepage flow from the forebay into the surrounding areas. The potential seepage control features may include cutoff walls and toe drains around the embankments to capture seeped water and pump it back into the forebay.
580	8	I wish to get the problems caused by water export fixed and Clifton Court, L.P. compensated for all the adverse complications it has endured over the years. Despite many letters, meetings, (Carl Torgensen , Sue Sims, Chuck Gardner) and assurances, we have never been compensated or had our problems solved. Perhaps the Victims Compensation Board gave the best advice-- sue the state. Is this how the BDCP will work as well? Until the State fixes past problems, I have no faith in the BDCP.	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. Numerous comments were received that focused on various elements of the BDCP. Where the comments focused on elements of the BDCP that overlap with the elements of Alternatives 2D, 4A, or 5A (e.g., CM1 as it comprises of the North Delta Diversions, tunnels, and supporting facilities), specific responses are presented. Where comments raised issues as to whether the BDCP and other HCP/NCCP alternatives in the 2013 Draft EIR/EIS were potentially feasible and could function as an alternative for purposes of meeting CEQA and NEPA's requirements to analyze a reasonable range of alternatives to the proposed project (e.g., issues regarding the BDCP Effects Analysis or financial feasibility), responses are presented generally in Master Response 5. Where comments submitted on the BDCP were focused on elements outside the scope of the environmental analysis or viability of the BDCP and other HCP/NCCP alternatives within the context of CEQA/NEPA (e.g., request of specific revisions to the BDCP related to mapping or references), no specific responses are provided and further consideration will be given to these comments, and any revisions to the Draft BDCP would only be made, if an HCP/NCCP alternative was ultimately approved at the conclusion of the CEQA/NEPA process.
581	1	On behalf of the San Gabriel Valley Economic Partnership, I am writing in support of the Alternative #4 of the Bay Delta Conservation Plan (BDCP) as outlined in the Draft EIR/EIS. The Partnership is a regional business organization committed to enriching the quality of life and improving the economy of the San Gabriel Valley .	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after

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			completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
581	2	Water reliability is a crucial issue for businesses in California which count on a dependable water supply . The Partnership has closely monitored the BDCP approval process and has heard several presentations from water groups outlining the plan and going over the details. We are encouraged by the release of the public draft of the plan and the environmental review documents.	The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the EIR/S.
581	3	We believe that Alternative #4 is the best way to meet California 's co-equal goals of water supply reliability and Delta ecosystem restoration. Alternative #4 reduces the risk to water supplies in the event of an earthquake, improving reliability. Habitat improvements will restore healthy ecosystems for native species. New intakes in the northern Delta reduce conflicts between water delivery systems and migrating fish. It is estimated that 1.1 million Californian jobs in water will be safeguarded with this critical delivery system and that its construction will create more than 177,000 jobs in building projects and environmental restoration.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
581	4	Southern California needs the state to upgrade the State Water Project in order to secure our supply of imported water from the north. We support the BDCP, and specifically Alternative #4, as the best solution to meet California's long-term water reliability goals.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
583	1	The Downtown El Monte Business Association (DEMBA) supports the Bay Delta Conservation Plan (BDCP) and specifically Alternative No.4 as outlined in the Draft EIR/EIS. Following the passage of California's comprehensive water package in 2009, DEMBA has closely watched the BDCP process. We are encouraged by the release of the public draft of the plan and environmental documents. The outcome of this multi-year effort reflects collaboration of public water agencies, state and federal fish and wildlife agencies, business and agricultural stakeholders, local governments and the public.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
583	2	It is our opinion that Alt . No.4, which provides for three northern intakes along the Sacramento River, a 9,000 cfs twin-tunnel system conveying water to the existing aqueduct, coupled with a comprehensive habitat conservation plan, is the best option to meet California's co-equal goals of reliability and ecosystem restoration. This proposed tunnel system will protect public water supplies from seismic risk and subsequent saltwater intrusion from San Francisco Bay. The intakes will reduce conflicts between water systems and migrating fish species. Habitat improvements will provide native species with the healthy ecosystem they need to survive.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.

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583	3	The Downtown El Monte Business Association supports the Bay Delta Conservation Plan and specifically Alternative No. 4, as a workable draft proposal leading to a final successful plan of action offering protection from seismic risk while restoring the Delta's ecosystem .	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
585	1	Olivenhain Municipal Water District is a public agency in Northern San Diego County that provides 80,000 customers with water, wastewater, recycled water, hydroelectric, and recreational services. OMWD currently purchases all of its potable water supply from the San Diego County Water Authority, which in turn is a member agency of Metropolitan Water District of Southern California, a State Water Contractor. We are thankful for the opportunity to comment on the Public Review Draft of the Bay Delta Conservation Plan and the associated Public Review Draft Environmental Impact Report/Environmental Impact Statement. On OMWD's behalf, I am writing to express support for the Bay Delta Conservation Plan, and specifically Alternative 4 as identified in the EIR/EIS. The Sacramento-San Joaquin Bay-Delta represents a critically important portion of water supply for both the State of California and San Diego County. Its future as a source of potable water, however, is far from secure, which is especially troubling given the ongoing severity of California's statewide drought. Significant near-term action is required to achieve the co-equal goals of water reliability and environmental restoration.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
585	2	State and federal officials have positively responded, carrying out a thorough planning process, with a clear vision of the future. OMWD has supported the planning process and applauds the diligent work that has been completed to date that will assist in completing solutions to delta- related challenges. Our review of the draft BDCP and EIR/EIS has confirmed for OMWD that the project's preferred alternative, Alternative 4, represents the framework for a well-founded and viable solution to these challenges. Of course, it remains essential to complete the public review and environmental processes to more accurately define the ultimate project. The culmination of these processes will be achievement of a final EIR/EIS, record of decision, and the division of costs between participants. While we look forward to the issuance of a detailed financing plan for the BDCP, we understand that the documents under review are environmental in nature and do not represent a financing plan; the planning process should thus not be held up until such time as each dollar has been secured.	Alternative 4A, also known as California WaterFix, has been developed in response to public and agency input and is the new CEQA Preferred Alternative. Alternative 4A is also the NEPA Preferred Alternative, a designation that was not attached to any of the alternatives presented in the 2013 Public Draft BDCP Draft EIR/EIS. Alternative 4 (AKA BDCP) remains a potentially viable alternative and is being carried forward in this RDEIR/SDEIS because it represents the original habitat conservation plan/natural community conservation plan (HCP/NCCP) alternative approach, and because it provides an important reference point from which the Alternative 4A, 2D, and 5A descriptions and analyses were developed. If the Lead Agencies ultimately choose the alternative implementation strategy and select an alternative presented in the RDEIR/SDEIS after completing the CEQA and NEPA processes, elements of the conservation plan contained in the alternatives in the 2013 BDCP Draft EIR/EIS may be utilized by other programs for implementation of the long term conservation efforts.
585	3	Olivenhain Metropolitan Water District would like to point out that water users in San Diego County -- one of the state's most populous urban areas -- will be expected to make significant financial contributions to the BDCP. It is our understanding that, though cost allocation discussions are underway with State Water Contractors, the only representation in these discussions for subcontractors like the San Diego County Water Authority are through their respective contractor. This is troublesome in San Diego's case	This comment addresses Alternative 4 (known also as the BDCP) or analysis contained within the draft BDCP Effects Analysis. Alternative 4 remains a viable alternative; however, a modified proposed project (Alternative 4A/California WaterFix) is being considered. For detailed responses on the primary issues being raised with regard to the BDCP or Alternative 4, as well as a discussion of the current status of the draft BDCP Effects Analysis, please see Master Response 5.

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		given that, as you may be aware, SDCWA is currently engaged in litigation with Metropolitan Water District of Southern California over the latter's rate structure. Similarly, there are considerable concerns on the part of SDCWA over how the BDCP's costs will be allocated among Metropolitan's member agencies. Therefore, OMWD strongly suggests that it would be appropriate for SDCWA to be afforded the opportunity to engage state officials on this matter via more direct channels so that its voice can be more effectively represented.	
585	4	We look forward to the completion of the BDCP planning process and, ultimately, its implementation, ensuring greater water supply reliability throughout California for generations to come.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS. Please note that the preferred alternative is now Alternative 4A (i.e., the California WaterFix Project) and no longer includes an HCP.
586	1	No mention of what impacts on the upper Sacramento River would be with the increase of diversion. Although, there should be an increased pressure on the upper Sacramento there is no mention of what I have reviewed about it and how operations of Shasta Dam would change. There are numerous human pressures such as agriculture and population growth. However, there has been no political pressure of thought to re-evaluate the ag industry, CVP policies and water contractors.	Operations of the new conveyance facilities would not result in any major changes above Shasta reservoir (BDCP Ch 5 Effects Analysis). CALSIM modeling predicts that changes in Shasta Reservoir storage capacity due to Alternative 4 scenarios will be minimal (<10%) relative to the NEPA baseline (BDCP EIR/EIS Chapter 6, Surface Water, Alternative 4, Impact SW-1). The State Water Resources Control Board, not DWR, is responsible for decisions relating to water rights. DWR holds water rights approved by the State Water Resources Control Board but does not have the power or authority to issue water rights to others. Additionally, the proposed project does not seek any new water rights nor include any regulatory actions that would affect water rights holders other than DWR, Reclamation, and SWP and CVP contractors. Importantly, all water exported by the SWP and CVP is the subject of the existing water rights of those two agencies. Exports do not come at the expense of other water rights holders. The proposed project and its alternatives analyzed in the EIR/EIS only include the use of water from existing SWP and CVP water rights or voluntary water transfers from other water rights holders. The proposed project and its alternatives do not reduce the protections for other water right holders.
586	2	One of the alternatives that should have been considered is how to achieve results without building the twin tunnels. The is increasing pressure for Californians to allow fracking. I did not see any comments on seismic activity through fracking may impact the project. Additionally how would water quality be impacted if fracking occurs close to the Delta?	Several alternatives were analyzed that would use different means of conveyance, including continued exclusive reliance on Delta channels (the No Action/No Project Alternative and Alternative 9 in the EIR/EIS) and alternatives that would rely primarily on surface canals to provide additional conveyance capacity (Alternatives 1B, 1C, 2B, 2C, 6B, and 6C in the EIR/EIS). Please see Appendix 3A, Identification of Water Conveyance Alternatives, EIR/EIS, and Master Response 4 for further discussion of selection of the alternatives analyzed. Regarding seismic risks to project facilities, DWR will apply relevant codes and standards to design and construction activities, such as the California Building code, USACE's Engineering and Design – Earthquake Design and Evaluation for Civil Works Projects and Division of Safety of Dams Guidelines for use of the Consequence Hazard Matrix and Selection of Ground Motion Parameters. Conformance with these codes and standards is identified as an environmental commitment in Appendix 3B of the EIR/EIS to ensure that seismic risks are minimized as the water conveyance features and overall system are operated. Please see Master Response 16 for more information. Regarding hydraulic fracturing or "fracking," please see Master Response 34. The California Department of Water Resources (DWR) and the US Bureau of Reclamation do not regulate the beneficial uses to which State Water Project or Central Valley Project (CVP) water supplies are put, nor does the BDCP make determinations regarding what constitutes a beneficial use or modify stipulations in water service contracts between the DWR and the SWP contractors, Reclamation and their contractors, or between water transfer sellers and buyers. Beneficial uses are designated by the State Water Resources Control Board. The state Department of Conservation is currently working on regulations relating to well stimulation

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			treatments, including hydraulic fracturing, as required by California Senate Bill 4 from 2013. Through the rule-making process and the scientific reports and EIR required by the legislation, the state will better understand how much water is actually used for fracking in California. Voluntary reporting indicates that the use of water for fracking is minimal compared to the average diversions from the Delta by the state and federal water projects for farms and cities. See also Master Response 34.
588	1	I am against this project, because it is going to affect our economy just because the further away our farmlands are, the cost of essential products are going to go up, and we as the consumers are the ones that are going to suffer the consequences. Please stop this project.	No issues related to the adequacy of the environmental impact analysis in the EIR/S were raised.
589	1	The existing pumps for cement ditches ground up a million fish when started in the spring of 2013. How many each day? Will these new pumps be any better? Do the tunnels sever aquifers? If it takes 10 years to build will you be pumping saltwater brine to you?	Please note the BDCP is no longer the preferred alternative. The preferred alternative is now 2015, RDEIR/SDEIS, Alternative 4A and no longer includes an HCP or Conservation Measures. Alternative 4A has been developed in response to public and agency input. The proposed NDD will include screened diversions, located outside the Delta Smelt main range, and will avoid or minimize effects on migrating fish. The location of the proposed NDD is also in an area that is outside the area of saltwater intrusion into the Delta during most years, and during very dry conditions, the NDD would be used minimally if at all.
590	1	I am worried that in order to push this plan through, negative impacts are not being adequately investigated or presented.	Proposed project impacts are discussed within each Resource Area chapter in the FEIR/EIS.
590	2	Sending more water to farmers will only encourage them to plant more acres. They cannot help themselves. This will create more problems when they demand more waters for new acres.	The BDCP proposes to stabilize water supplies, and exports could only increase under certain circumstances in which ecological goals and objectives are being achieved. It is projected that water deliveries from the federal and state water projects under a fully-implemented BDCP would be about the same as the average annual amount diverted in the last 20 years. The EIR/EIS includes a range of alternatives which could result in changes in south of Delta deliveries. The estimated changes in deliveries for each of the alternatives are provided in Chapter 5, Water Supply, of the EIR/EIS.
590	3	If an area needs to be left out of production for periodic times it is not the end of the world. I do not need or want more almonds. The salmon industry has been devastated by loss of habitat etc. Salmon is a big business also, not just farmers. The money would be better spent elsewhere. This is just another water grab.	Current efforts to protect salmon and delta smelt in the Delta have reduced the volume of water delivered to farms and cities and made those supplies unpredictable. Fallowing orchards is not enough to avert these growing ecosystem concerns. For additional information on the need for the proposed BDCP, Please refer to Master Response 3. An analysis of effects on commercial fisheries was completed as part of the Draft BDCP Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx), which found that the overall impacts of the BDCP on Delta commercial fisheries are expected to be positive to both the population and landings for fishery species. Please refer to Master Response 5 for information on the costs of implementation of the proposed BDCP. It is projected that water deliveries from the federal and state water projects under a fully-implemented BDCP would be about the same as the average annual amount diverted in the last 20 years. State constitutional restrictions require the reasonable and beneficial use of water and state law requires that water supplied from the Delta be put to beneficial uses. The Lead Agencies do not have the authority to designate what water deliveries are used for. Please refer to Master Response 34 regarding the potential uses of water delivered via BDCP proposed conveyance facilities.

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590	4	People in Southern California who make up a large proportion of voters feel they are entitled to ask for as much water as they want. 70% of it is used for outdoor purposes like lawns, washing cars, swimming pools. People in LA and beyond have to alter their monoculture lawns etc. and stop wasting water. Lawns are non-native to California but are pushed by corporations who sell pesticides, herbicides, fertilizer, etc., all harmful to the environment.	The proposed project aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. Please see Master Response 35 regarding water use in Southern California.
590	5	I am very skeptical about how this will truly benefit Bay Delta aquatic life. My background is in aquatic chemistry and biology. I can see safeguards going by the wayside during hard economic times. I have seen too many environmental restorations and remediation abandoned when the money ran out.	The operational criteria and adopted mitigation will be legally binding for project implementation.
590	6	I am not trustful of the slick marketing for this project. Bay Bridge went from initial estimate of 2 billion dollars to 6.5 billion dollars. I see the same thing happening with the tunnels. Safeguards do not always work.	The proposed alternative (referred to in the RDEIR/SDEIS as Alternative 4A) is estimated to cost significantly less relative to the former preferred alternative (Alternative 4 under the BDCP). The difference in cost is largely due to the reduced level of restoration specifically funded by the project, as well as other Conservation Measures that are not included under Alternative 4A. As such, the total estimated cost for Alternative 4A is $14.9 billion in undiscounted 2014 dollars . The estimated cost to implement the former preferred alternative under BDCP is $24.7 billion in undiscounted 2012 dollars. For additional information on the cost of the proposed project, please see Master Response 5.
591	1	Permits need oversight studies: please introduce the process to acquire these permits for program manager and implementation support entity.	If an HCP alternative is chosen by the Fish and Wildlife Agencies a permit oversight is provided by the Permit Oversight Group, among others. Please see Master Response 5 for a discussion of the governance structure proposed in the 2013 public draft BDCP. Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
592	1	Since this project has been in the works for some years (as evinced by detailed maps, environmental studies, etc.), why has Governor Brown's plan never appeared on any ballot to assess voter approval? Tax dollars should be spent if a majority of citizens agree with the Bay Delta "Conservation" Plan!	Prior to construction of the proposed project, the EIR/EIS must be certified and adopted by the implementing agencies, and permits must be obtained. However, a public vote is not required to move forward. California Water Code section 12934, subdivision (d)(3), of the Burns-Porter Act and Water Code section 11260 of the Central Valley Project Act authorize DWR to build water facilities in the Delta, as part of the State Water Project, and give DWR broad discretion as to what those facilities may involve. Thus, DWR has the authority to build the proposed project without a public vote. Even so, the proposed project is the result of more than seven years' collaboration and consultation with numerous stakeholders, agencies, public water agencies and environmental organizations. The organizations that have participated in the Steering Committee, public meetings or written letters to provide input on the Plan include: American Rivers, Bay Institute, Defenders of Wildlife, The Endangered Species Coalition, Environmental Defense Fund, The Golden Gate Salmon Association, National Audubon Society, Natural Resources Defense Council, the Nature Conservancy, and Planning and Conservation League. The feedback was used to guide the development and subsequent revisions of the Proposed Project and its associated EIR/EIS to reflect concerns addressed from the various groups. All of the documents, studies, administrative drafts, and meeting materials have been posted online since 2010 in an unprecedented commitment to provide public access and government transparency. Although the RDEIR/SDEIS, EIR/EIS and much of the proposed project has been drafted by scientists working for a private consulting firm (ICF) working for the Lead Agencies, the Agencies' scientists have been intimately involved, and their judgments are reflected throughout the EIR/EIS and the proposed project itself. The State is most interested in putting forth the best project that meets the goals of ecosystem improvement and water supply reliability. To the degree that the current Plan is endorsed by some

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			environmental organizations serves as confirmation that the proposed plan protects species, habitats and the Delta ecosystem in a way that is compatible with their goals. The website includes correspondence from agencies and NGOs received prior to the start of the formal comment period. Comments received during the comment period are to be included in the Final EIR/EIS. Please see Master Response 40 for additional detail on public outreach efforts that have been made on this project. For information pertaining to funding of the current proposed project, please refer to Master Response 5.
592	2	I learned that there are some benefits to Northern California and Central Valley farmers, but much loss of control to naturalists who appreciate the beauty of the Delta.	Chapter 15 of the Draft EIR/EIS addresses water dependent recreational activities that occur in the Delta, and describes mitigation measures and environmental commitments designed to reduce effects. Chapter 17 addresses aesthetic and visual resources, and mitigation measures and environmental commitments designed to reduce effects.
593	1	I have lived in the Delta region for more than 40 years, and I have benefited from this cultural, historic and agricultural region throughout that time. I am opposed to the twin tunnel system for diverting Delta water to Central and Southern California.	The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years.
593	2	The Delta has been culturally significant in the areas of boating, fishing, waterskiing, wake-boarding and other sporting opportunities. It is a sports tourism mecca with millions of dollars being pumped into several local economies (and by extension the state of California itself through taxation) as people purchase boats, fill their boats, RVs, and personal watercraft with gas, buy groceries and meals in the stores, taverns and restaurants that line its 1,100 miles of shoreline, and stay in the hotels and motels in and around the region. Plus, there is simply a coolness vibe that belongs to the Delta that I have not found elsewhere in the state. It may not be quantifiable, but it is there and it is important. I am afraid much of that will be lost once the water levels drop significantly.	Operations of the conveyance facilities are not expected to result in a substantial decrease or increase in Delta surface water levels. See Appendix 5A, Section C, CALSIM II and DSM2 Modeling Results, EIR/EIS and RDEIR/SDEIS, for more information. Section C reports changes in the monthly averaged daily minimum elevation of the Sacramento River at Freeport (see Section C tables). Results for each alternative are presented by month, probability of exceedance, and by water year type. Results are also presented in comparison to Existing Conditions and the No Action Alternative. The modeling results for the future No Action Alternative indicate that water levels may continue to change as climate change occurs within the Delta. Socioeconomic effects of the various alternatives are described and assessed in Chapter 16, Socioeconomics, of the 2013 Public Draft BDCP EIR/EIS. A Draft BDCP Statewide Economic Impact Report has also been published, which indicates that the BDCP would result in a substantial economic net benefit to the State of California. When required, DWR would provide compensation to property owners for economic losses due to implementation of the proposed project. Construction of water conveyance facilities would be sequenced over approximately 10 years. Construction of individual components (e.g. intakes, tunnels) would range from one to six years. Temporary construction-related impacts include noise, visual, and transportation, among others. The construction-related impacts are disclosed in individual resource area chapters in the Draft BDCP Environmental Impact Report/Environmental Impact Statement (EIR/EIS). All impacts would be minimized and mitigated to the degree feasible and are described under each alternative in the RDEIR/SDEIS individual resource chapters and in the BDCP Appendix 3B, Environmental Commitments, EIR/EIS. An analysis of economic impacts of the proposed project, including impacts related to agriculture, recreation, water rates, and taxes are also evaluated and described in the Bay Delta Conservation Plan Statewide Economic Impact Report (http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/Draft_BDCP_Statewide_Economic_Impact_Report_8-5-13.sflb.ashx). Chapter 16, Socioeconomics, of the Draft EIR/EIS was revised based on the revised construction footprint for proposed water conveyance facilities, along with a refined set of construction cost and schedule assumptions developed for Alternative 4. Refer to Chapter 16, Socioeconomics, Section 16.3.3.9, in Appendix A for the revised analysis of Alternative 4. Additionally, one table from Draft EIR/EIS Appendix 16A has been

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			incorporated into Appendix A. The proposed project may impact recreational opportunities including impacts on hunting, fishing, swimming, and boating. Mitigation is proposed to reduce these impacts; however some impacts may remain significant due to the long-term nature of the temporary construction related impacts. Please see Chapter 15, Recreation, and Section 4.3.11 for more detail on the impacts of the proposed project on recreational opportunities and the proposed mitigation. To compensate for the loss of access as a result of constructing the river intakes, the proponents will work with the California Department of Parks and Recreation to help insure the elements of the proposed project would not conflict with the elements proposed in DPR's Recreation Proposal for the Sacramento-San Joaquin Delta and Suisun Marsh (California Department of Parks and Recreation 2011d) that would enhance bicycle and foot access to the Delta. This would include the helping to fund or construct elements of the American Discovery Trail and the potential conversion of the abandoned Southern Pacific Railroad rail line that formerly connected Sacramento to Walnut Grove.
593	3	The Delta has been historically significant in the development of a way of life for thousands of people over the past 150 or so years- frankly, all the way back to the founding of California itself when paddlewheels stormed in from San Francisco Bay and brought thousands of men and women to the area during the Gold Rush. The Delta waterways are one main reason why Sacramento was chosen as the state's capital so long ago. The people with influence, as well as the gold, were here, and not in San Francisco or Los Angeles, even though they were bigger cities by far. In addition, as an historic geological formation, the Sacramento-San Joaquin Delta is one of the furthest inland deltas in the world- rivaling only the Pearl River Delta in China. Messing with it messes with history and geography.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
593	4	The Delta is and always will be an agriculturally significant region unlike any other throughout the United States and elsewhere. Crops that feed people, millions of people, are grown here. This freshwater soil may be the finest in the world, and the $2 billion in agricultural production per year- in San Joaquin County alone- make the Delta region worth preserving as it is. Numerous crops are grown in this region, and Delta farmers and agribusinesses have helped shape this region for nearly six generations now. In the past two decades, the Delta region has also become a player in the wine industry with agritourism adding significantly to the area's economic success. Again, that also extends back to the state through taxation in various places.	Although both the construction of new physical facilities in the Delta and the restoration of habitat will lead to the conversion of some amounts of agricultural land in the Delta, effects of the BDCP will be subject to aggressive mitigation efforts. Land that is not directly affected by construction or habitat restoration should remain productive. Effects of the BDCP will be subject to aggressive mitigation efforts. Land that is not directly affected by construction or habitat restoration should remain productive. See Master Response 18 for more information regarding agricultural impact mitigation. Please see Chapter 16, Socioeconomics, of the EIR/EIS, for discussion of potential effects on agricultural production and employment in the Delta. More than two-thirds of the residents of the state and more than two million acres of highly productive farm land receive water exported from the Delta watershed. The proposed BDCP aims to provide a more reliable water supply, in a way that is more protective of fish than the current system.
593	5	The Delta already gives enough of its water away. Approximately 70% of its annual freshwater allotment is delivered to the people of Central and Southern California. Less than 1/3 actually stays in the local area. Giving away more water will ultimately give away the most fertile growing region in the country. Salt water from San Francisco Bay will continue to force its way into the Delta estuary, with not enough push back from the Sacramento and San Joaquin rivers to keep the Delta fresh. Soon, more than 800 square miles of the best soil in California will be lost, unable to support the crops people need to survive.	The project water delivery system would be operated in a manner to protect water users and environmental habitat located upstream of and in the Delta in accordance with permits issued by the State Water Resources Control Board, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Department of Fish and Wildlife. The project only would be permitted to operate with regulatory protections, including river water levels and flow, which would be determined based upon how much water is actually available in the system, the presence of threatened fish species, and water quality standards. More information on the ranges of project water diversions, based on water year types and specific flow criteria, can be found in Chapter 3, Section 3.6.4.2, North Delta and South Delta Water Conveyance Operational Criteria, EIR/EIS. Current limitations and operational criteria for existing facilities can be found in DWR's State Water Resources Control Board Permit D1641 (see http://www.swrcb.ca.gov/waterrights/water_issues/programs/bay_delta/decision_1641/index.shtml) and additional limitations described in the Federal Endangered Species Section 7 Biological Opinions and take

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			permits (see http://www.usbr.gov/mp/cvo/ocap_page.html). The EIR/EIS modeling results for the No Action Alternative indicate that, with or without the project, rising sea levels will bring saline tidal water further into the Delta than occurs at present. Adaptive management is part of all alternatives evaluated in the EIR/EIS, as described in Section 3.3.2.2 of Chapter 3, Description of Alternatives. Under adaptive management and monitoring program, monitoring information and research results will be used to assess uncertainties and modify operations to meet the overall project objectives, including water quality objectives.
593	6	Believe me, I understand that Angelinos and other Southern Californians need water; millions of people live there in an arid climate. There are farming concerns throughout California that are hurting for water that we currently have available (this year's drought the exception, not the rule). But for the most part, the farming concerns south of the Delta especially in Kern County - do not feed people. Pistachios and other water-hogging trees are simply not crops that keep people alive (like corn, wheat, sugar beets, alfalfa, tomatoes, asparagus, safflower, potatoes, fruits and other vegetables of the Delta region do); they are simply high-priced extras. Taking away water from crops that sustain people and giving it to those who produce extravagancies such as pistachios does not make economic or moral sense.	State constitutional restrictions require the reasonable and beneficial use of water and state law requires that water supplied from the Delta be put to beneficial uses. The Lead Agencies do not have the authority to designate what water deliveries are used for. Please refer to Master Response 34 regarding the potential uses of water delivered via BDCP proposed conveyance facilities.
593	7	Indeed, not enough of the Bay Delta Conservation Plan has been devoted to any other viable solution to the water woes of Central- and Southern-Californians, such as reclaiming or restoring water throughout those regions. Replenishing the water supplies in huge and available aquifers with treated water for public consumption must be a part of the overall plan before tapping more Delta water. I find your science and your solution to be biased against the Delta and lacking foundation.	Appendix 3A, Identification of Water Conveyance Alternatives, Conservation Measure 1, EIR/EIS, describes the range of conveyance alternatives considered in the development of the EIR/EIS. Appendix 1B, Water Storage, EIR/EIS, describes the potential for additional water storage and Appendix 1C, Demand Management Measures, EIR/EIS, describes conservation, water use efficiency, and other sources of water supply including desalination. While these elements are not proposed as part of the project, the Lead Agencies recognize that they are important tools in managing California's water resources. Please see Master Response 4 regarding the selection of alternatives analyzed and Master Response 7 regarding desalination and Master Response 6 regarding water demand management. Please see Master Response 4 for additional detail on the BDCP and the alternatives involving an HCP component. Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
593	8	I have a personal reason to oppose the twin tunnels. My father, has worked hard all his life to purchase a tract of land on the Delta. His small farm in the town of Hood is located adjacent to the Sacramento River. In fact his property includes a portion of the Sacramento River levee. The maps that we have seen would destroy the town of Hood and my father's property. One map has even showed the entrance of the tunnels to be where his property is located. I understand that the decision to destroy one man's or one family's homestead does not compare to the needs of millions of people, but when it is your homestead it does mean something. Count one more Californian against this expensive, scientifically biased and "rob Peter to pay Paul" solution to the water needs of our state.	Effects on farmland in the Delta, along with associated mitigation measures, are described in Chapter 14, Agricultural Resources, EIR/EIS. Effects on community character are described in Chapter 16, Socioeconomics, EIR/EIS. As described in Chapter 16, where required, DWR would provide compensation to property owners for economic losses associated with implementation of the proposed project.
594	1	I am still reading the Bay Delta Conservation Plan. Most of it is a very thorough analysis of flora and fauna habitats throughout the Delta. The Plan describes how the conservation Measures can effect these habitats and how much permanent loss and fragmentation may be expected. It then sets limits on maximum losses allowable before remedial action must take place. Who gets to say if these are the right limits? Should the voters get to	Environmental protection is both a state and federal issue. The proposed project is designed to restore the Delta ecosystem while enabling more predictable and reliable water supplies to more than 25 million people and 3 million acres of farmland. The Lead Agencies will apply for permits under ESA and CESA to implement the proposed project.

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		choose how much of this environment we will allow to be reduced? Or should we leave it to the experts? If so, what experts? Who has jurisdiction in this area? Is environmental protection a state or federal issue?	The ESA sets forth a separate process for the Lead Agencies to obtain incidental take permits from USFWS and NMFS for activities that may harm threatened or endangered species. The project proponents prepared the BDCP, a separate document from the EIR/EIS, to comply with these permit requirements. The ESA provides for a 30-day public comment period on an application for a Section 10 incidental take permit. For additional information on the process to request take permits and who has jurisdiction over various permitting matters, please see Master Response 45 and Master Response 29. Prior to construction of the proposed project, the EIR/EIS must be certified and adopted by the implementing agencies, and permits must be obtained. However, a public vote is not required to move forward. California Water Code section 12934, subdivision (d)(3), of the Burns-Porter Act and Water Code section 11260 of the Central Valley Project Act authorize DWR to build water facilities in the Delta, as part of the State Water Project, and give DWR broad discretion as to what those facilities may involve. Thus, DWR has the authority to build the proposed project without a public vote. For additional discussion of the various alternatives analyzed and how an alternative may be chosen, please see Master Response 4. Numerous comments were received that focused on various elements of the BDCP. Where the comments focused on elements of the BDCP that overlap with the elements of Alternatives 2D, 4A, or 5A (e.g., CM1 as it comprises of the North Delta Diversions, tunnels, and supporting facilities), specific responses are presented. Where comments raised issues as to whether the BDCP and other HCP/NCCP alternatives in the 2013 Draft EIR/EIS were potentially feasible and could function as an alternative for purposes of meeting CEQA and NEPA's requirements to analyze a reasonable range of alternatives to the proposed project (e.g., issues regarding the BDCP Effects Analysis or financial feasibility), responses are presented generally in Master Response 5. Where comments submitted on the BDCP were focused on elements outside the scope of the environmental analysis or viability of the BDCP and other HCP/NCCP alternatives within the context of CEQA/NEPA (e.g., request of specific revisions to the BDCP related to mapping or references), no specific responses are provided and further consideration will be given to these comments, and any revisions to the Draft BDCP would only be made, if an HCP/NCCP alternative was ultimately approved at the conclusion of the CEQA/NEPA process.The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
594	2	The Bay Delta Conservation Plan talks about budget, but only what it will take to get this project started. It establishes monitoring and sets decision trees to evaluate adverse effects. The Plan also states unresolved contingencies are expected and cannot be estimated at this time. What is not mentioned in the budget is if the maximum habitat losses are exceeded, what the remedial action will be and how much that will cost. Not only will we have to pay to build the project, we also have to pay to monitor this environment, and then pay for any necessary corrective actions. Since any realized damage cannot be known ahead of time, the budget is inherently open ended and can be unpredictable.	The state and federal endangered species permits will set a maximum limit of impacts to all of the covered species. If these maximum limits are exceeded, the permits will have been violated. The monitoring program described in Chapter 3 will ensure that the BDCP complies with the maximum limits established for each of the covered species. Other types of contingencies, called "changed circumstances", are described in Chapter 6 of the 2013 public draft BDCP to account for environmental changes that are foreseeable within the 50-year permit term. The funding strategy includes funding for remedial actions in the event that any of the changed circumstances occur. Please also see Master Response 5 regarding the adequacy of the BDCP funding strategy for the purposes of regulatory approvals from the state and federal wildlife agencies. Please note that the BDCP is no longer the preferred alternative. The preferred alternative is now Alternative 4A and no longer includes an HCP. Alternative 4A has been developed in response to public and agency input. The EIR/EIS analyzes all alternatives, including Alternative 4A.
594	3	With this environmental impact and unlimited budget, it will be tough to get support. To get the public to support and approve budget for this project, I recommend you should promote the significant advantages. For example; the modeled scenarios in the Bay Delta conservation Plan show conservation Measure 1, or the tunnels project, will increase water flows enough to mobilize, or pick up methyl-mercury deposited by sierra mining. So the tunnels will pick up mercury from the Delta sediment and pump it out the aqueduct. I am sure Northern Californian citizens would be in favor of that! You should tell the public	This comment addresses alternatives contained within the 2013 Draft EIR/EIS, including Alternative 4 (BDCP Proposed Project). All of the action alternatives in the 2013 Draft EIR/EIS included large-scale tidal habitat restoration. The large-scale habitat restoration resulted in increased Delta outflow rates in the wet winter months as compared to Existing Conditions and No Action Alternative; and therefore, could increase re-suspension of Delta sediments. Alternative 4 remains a viable alternative; however, a modified Proposed Project (Alternative 4A/California WaterFix) is being considered that does not include an HCP or NCCP component, or large-scale habitat restoration and does not result in changes in Delta outflow rates in the

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		of these significant advantages, so you can get their support for this project!	wet winter months as compared to Existing Conditions and No Action Alternative.
595	1	Please extend the comment period to at least 360 days as 120 days is far too short of time for a document that took over that time to develop.	The public comment period for the 2013 Public Draft BDCP and EIR/EIS was extended to July 29, 2014. Please see Master Response 39 for more information about the public review period.
596	1	Most voters are overwhelmed by the BDCP, including me. We need the equivalent of cliff notes.	For more information regarding the document's length and complexity please see Master Response 38.
596	2	Your website info about these meetings for the BDCP seemed great but was too tiny to be legible. I could not figure out how to zoom in.	The Bay Delta Conservation Plan website, www.BayDeltaConservationPlan.com was designed to ensure that electronic information is accessible to people with disabilities, including those using screen-readers and other software aids, in accordance with federal guidelines. A toll-free hotline number and email address were provided on numerous webpages for those needing assistance in locating the documents or finding information as well. Additionally, public meetings to ask questions of staff and gain assistance in accessing information were noticed in newspapers around the state.
596	3	I doubt that most voters/citizens would read more than a five page summary of the BDCP? Do not roll your eyes. It is true.	In order for the Lead Agencies to effectively communicate with the public, several different types of summary documents and presentations on the BDCP, Draft EIR/EIS, and related documents were made available on the project website. For instance, lay-friendly highlight documents for both the BDCP and the EIR/EIS were published to provide summary information about the documents and to help readers get acquainted with the documents. The BDCP Highlights and the EIR/EIS Highlights were posted online at http://baydeltaconservationplan.com/AboutBDCP/InformationalMaterials.aspx. Short one-page factsheets on the BDCP and EIR/EIS, as well as California WaterFix, were also provided online and by request. In addition, 17 narrated informational webinar episodes were posted to the website for both the BDCP and EIR/EIS. These webinars were developed to provide short, easy to understand summaries of key elements of the BDCP and EIR/EIS. Background documents, additional factsheets, and FAQs continue to be available on-line. For more information, please see Master Response 38 regarding the length and complexity of the documents.
597	1	Extend the comment time to 365 days.	The public comment period for the 2013 Public Draft BDCP and EIR/EIS was extended to July 29, 2014. Please see Master Response 39 for more information about the public review period.
597	2	Allow voters to vote on this project.	Prior to construction of the proposed project, the EIR/EIS must be certified and adopted by the implementing agencies, and permits must be obtained. However, a public vote is not required to move forward. California Water Code section 12934, subdivision (d)(3), of the Burns-Porter Act and Water Code section 11260 of the Central Valley Project Act authorize DWR to build water facilities in the Delta, as part of the State Water Project, and give DWR broad discretion as to what those facilities may involve. Thus, DWR has the authority to build the proposed project without a public vote. Even so, the proposed project is the result of more than seven years' collaboration and consultation with numerous stakeholders, agencies, public water agencies and environmental organizations. The organizations that have participated in the Steering Committee, public meetings or written letters to provide input on the Plan include: American Rivers, Bay Institute, Defenders of Wildlife, The Endangered Species Coalition, Environmental Defense Fund, The Golden Gate Salmon Association, National Audubon Society, Natural Resources Defense Council, the Nature Conservancy, and Planning and Conservation League. The feedback was used to guide the development and subsequent revisions of the Proposed Project and its associated EIR/EIS to reflect concerns addressed from the various groups. All of the documents, studies, administrative drafts, and meeting materials have been posted online since 2010 in an unprecedented commitment to provide public access and government transparency. Although the RDEIR/SDEIS, EIR/EIS and much of the proposed project has been drafted by scientists working for a private consulting firm (ICF) working for the Lead Agencies, the Agencies' scientists have been intimately involved, and their judgments are reflected throughout the EIR/EIS and the proposed project

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			itself. The State is most interested in putting forth the best project that meets the goals of ecosystem improvement and water supply reliability. To the degree that the current Plan is endorsed by some environmental organizations serves as confirmation that the proposed plan protects species, habitats and the Delta ecosystem in a way that is compatible with their goals. The website includes correspondence from agencies and NGOs received prior to the start of the formal comment period. Comments received during the comment period are to be included in the Final EIR/EIS. Please see Master Response 40 for additional detail on public outreach efforts that have been made on this project.
598	1	Congratulations to the entire BDCP team for a superb job on very difficult issues of preserving and restoring an extremely important ecosystem while trying to assure the integrity and reliability of a precious water resource for millions of Californians. The scope, magnitude and complexity of the underlying factors affecting the desired outcome are huge and yet the BDCP plan and draft EIS/EIR appear to be scientifically and socio-culturally sound which will lead to a success. The economics are difficult and remain to be precisely measured but the initial work seems impressive and on track. I have over 40 years' experience as a water resources engineer and environmental scientist that has worked on major water projects all over the world but I have never encompassed or could imagine the scope of this project. I only hope the public can be adequately informed in order to make good decisions on economic and political choices that will lead to a truly successful BDCP with the necessary environmental safeguards and mitigating projects as required. I wish the BDCP project and people the very best.	The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
599	1	We definitely believe something needs to be accomplished in order to meet the ever growing demand for water in California. However, we are completely against the plan to build the two large water tunnels in the Delta. We believe it is an expensive and bad idea. Please consider other plans instead of approving the ill-conceived Delta tunnels.	Please see Master Response 4 regarding development of alternatives for the EIR/EIS, and a description of the process the Lead Agencies followed to develop and screen alternatives. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta.
599	2	We believe the water going to Southern California should be cut in half. The other half of the water should be used for farming in the Central Valley. If the farmers in the valley don't receive enough water, how will they grow the food we eat? For the sake of our health and the economic health of our state, we do not want to eat food which has been shipped from a foreign country. That idea seems ridiculous when we have the capability to grow tasty, safe food right here at home.	The State Water Resources Control Board, not DWR, is responsible for decisions relating to water rights. DWR holds water rights approved by the State Water Resources Control Board but does not have the power or authority to issue water rights to others. Additionally, the proposed project does not seek any new water rights nor include any regulatory actions that would affect water rights holders other than DWR, Reclamation, and SWP and CVP contractors. Importantly, all water exported by the SWP and CVP is the subject of the existing water rights of those two agencies. Exports do not come at the expense of other water rights holders. The proposed project and its alternatives analyzed in the EIR/EIS only include the use of water from existing SWP and CVP water rights or voluntary water transfers from other water rights holders. The proposed project and its alternatives do not reduce the protections for other water right holders.
599	3	All Californians should be restricted on their water use. If it was a state mandate, everyone would be treated equally. We know we wouldn't like giving up our longer showers, but if we know everyone was facing the same restrictions, then it would help ease our sacrifice.	The lead agencies do not have any authority to impose mandatory water rationing on a statewide basis. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including

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			reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta. The comment does not raise any environmental issue related to the 2015 RDEIR/SDEIS or the 2013 DEIR/EIS.
599	4	What will happen if California continues to suffer drought and there is not enough water in Northern California to ship south? All the money spent on the two tunnels would be wasted.	The proposed project aims to allow the federal and state water projects to deliver more reliable water supplies, in a way less harmful to fish. The plan does not increase the amount of water to which DWR holds water rights or for use as allowed under its contracts. It is projected that water deliveries from the federal and state water projects under a fully-implemented project would be about the same as the average annual amount diverted in the last 20 years. The proposed project is just one element of the state's long-range strategy to meet anticipated future water needs of Californians in the face of expanding population and the expected effects of climate change. The proposed project is not a comprehensive, statewide water plan, but is instead aimed at addressing many complex and long-standing issues related to the operations of the SWP and CVP in the Delta, including reliability of exported supplies, and the recovery and conservation of threatened and endangered species that depend on the Delta.
599	5	Instead of spending $25 billion on the two tunnels in the Delta that seem to us to be a poor idea, spend that money on the first of many desalination plants along the coast. We have an unlimited supply of water right off our coast, so why not use it? We believe the best idea would be to have each major coastal city have a desalination plant. The added bonus would be the level of the ocean might drop a tiny bit which would help counter-balance the threat we keep hearing of global warming causing the oceans to rise.	Please see Master Response 4 for discussion of the scope of the proposed project and alternatives (such as desalination and water storage) that were not carried forward for analysis in this document due to the fact that required actions beyond the scope of the proposed project. However, nothing in the proposed project would prevent other entities from pursuing innovative approaches to desalination or other water supply solutions. See Master Response 7 for a more detailed discussion of various desalination projects under consideration and in development at this time. For more information regarding purpose and need please see Master Response 3.