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**State Water Resources Control Board
1001 I Street
Sacramento, CA. 95814**

Re: Policy Statements against the CA WaterFix and Twin Tunnels

Dear Members of the Water Resources Control Board:

The Bay Delta Conservation Plan (Nov. 2013) (“BDCP”) and the successor plan, CA Water Fix, propose to dramatically alter the way in which the Sacramento River and Sacramento-San Joaquin Delta (“Delta”) waters are allocated and flow through the Clarksburg District.

As the CA Water Fix has been in existence for several months now and has yet to announce any significant plan of its own and done very little to provide information as to their intent going forward we have assumed the many aspects the BDCP may still be relevant.

As the Managing Members of Lake Winchester Vineyard, LLC (“Lake Winchester Vineyard”) in Clarksburg, we are gravely concerned about the potential significant impact of the proposals of the CA Water Fix on local commercial operations, real property usage, environmental and socio-economic impacts. The following comments are submitted for your consideration.

Lake Winchester Vineyard encompasses two parcels in Yolo County, assessor parcels 044-120-008-000 and 044-120-010-000, totaling approximately 342 acres of agricultural land of which approximately half is planted in a permanent crop of wine grapes which are under long-term purchase contracts. All irrigation for vineyard and farming activities at Lake Winchester Vineyard relies on Delta Water source which flow for the Sacramento River into Lake Winchester.

Both parcels of land front Lake Winchester, which receives water from the Sacramento River provided by reclamation district 999 to meet our needs including agricultural irrigation water. The out-take water source for Lake Winchester is just south of Pumphouse Road and South River Road, which is just north of the town of Clarksburg.

The Lake Winchester Vineyard property line begins approximately ½ mile west of the Sacramento River and continues westerly along the lake for approximately 1.5 miles. Portions of the legal acreage of Lake Winchester Vineyard extend into the lake itself.

Two residences front Lake Winchester, as well as agricultural buildings and a business office. In addition to the reclamation and irrigation uses for Lake Winchester, the Sacramento Water Ski club holds a long term lease with property owners to use the lake as a private ski club.

A number of state and federal entities are formulating various services, strategies, policies, habitat conservation plans, reports and other procedures which will have potentially significant impacts. These plans could seriously damage Lake Winchester Vineyard, the lake itself, the neighboring properties and the unique wildlife habitat that rural lands and waterways provide.

Lake Winchester Vineyards is home to many endangered species, including the Swenson Hawk, Elderberry Beetle and Burrowing Owl, among others. All of these are dependent on the waters for survival and would be significantly impacted by water flow disruption.

Additionally, Ducks Unlimited, an international non-profit organization dedicated to the conservation of wetlands and waterfowl, has selected the unique physical environs of this property to create, in partnership with Lake Winchester Vineyards, a five acre natural wildlife fowl habitat. Key to the decision of Ducks Unlimited, a world leader in waterfowl conservation, to create this wildlife habitat at Lake Winchester Vineyard was the availability of water for the marshy wetlands to support the wildlife environs. The impacts to wetlands conservancy and endangered species are not adequately addressed in either the BDCP or the CA Water Fix proposed plans.

Chapter 6 of the BDCP EIR/EIS purports to analyze the significant and serious effects and impacts because of changes in the surface water as a result of the project's alternatives. However, the BDCP Chapter 6 focuses almost exclusively on the changes in the level of surface water in and around both the Delta and the State of California as a result of the project alternatives; it fails to analyze or discuss the quality or quantity of surface water available or use by existing surface water users as either an impact or effect. The CA Water Fix has chosen to avoid any major environmental studies or comply with Federal Standards.

Specifically, the plans fail to analyze significant and substantial impacts of lowered surface water tables both in terms of existing water users and for continuing quality of water for the required uses. The plans have failed to adequately address the potential impacts to the quality of the surface water.

The Clarksburg Agriculture District relies in part on ground water through existing wells located in the District. The proposed plans purport to analyze the significant and serious effects and impacts because of the changes in the groundwater as a result of the project alternatives.

However, proposed plans fail to analyze or discuss the quality or quantity of groundwater available or used by existing Clarksburg ground water users as either impacts or effects as a result of any of the project alternatives.

The proposed plans do not appear to address changes in water quality available for agriculture production activities. The principle crop of the Clarksburg Agricultural District is wine grapes. This is a permanent crop installed at tremendous capital expenditure.

Changes in the quality of the ground water could significantly adversely affect the grape-growing industry in the District and could result in drastic economic and sociological consequences. The proposed plans must fully analyze such significant effects and impacts arising from changes in water quality in the Clarksburg Agricultural District in order to be complete.

The residents and businesses in the Clarksburg Agriculture District rely on a small number of small two lane rural roads for transportation within the Delta and beyond. Large scale construction as planned would result in devastating economic and social impacts to the people and business of the area. No mitigation is offered to offset the traffic and transportation impacts.

Section 14.2.2.3, page 14-20 lines 3 to 21, of the BDCP with reference to the Delta Protection Commission (“DPC”) and its work fails to mention or analyze the DPC’s Economic Sustainably Plan (“ESP”). Cutting across a number of sections written into the Draft EIR/ESP, but with particular focus of Delta agriculture, the Economic Sustainably plan is an important planning and legal document formally adopted by the DPC. Many of the components of the ESP have been incorporated into and made a part of the Delta Plan, formally adopted by the Delta Stewardship Council. The ESP must be considered in any credible plan for the Delta including the CA WaterFix.

Lake Winchester Vineyards requests that the final EIR/EIS clearly identify all places where each and every comment above is addressed.

Respectfully Submitted,

Timothy W. Waits
Member/Manager

Date