



2179 Holly Lane
Solvang, CA 93463
www.EWCCalifornia.org

December 19, 2013 (via email)

Samuel D. Rauch
Administrator for Fisheries
NOAA Fisheries Service

Michael L. Connor
Deputy Secretary
U.S. Bureau of Reclamation

Gary Frazer
Assistant Director-Endangered Species
U.S. Fish and Wildlife Service

Gina McCarthy
Administrator
U.S. Environmental Protection Agency

William W. Stelle, Jr.
Acting Regional Administrator
NOAA Fisheries Service

Jerry Meral
Deputy Secretary
California Resources Agency

BDCP.comments@noaa.gov

Subject: BDCP Public Review and Comment Period Time Extension Request

You may recall that in a November 21 letter to you, prior to the December 13 release of the BDCP Draft Plan and EIR/EIS, we requested that the public review and comment period be extended beyond the planned 120 days, based on the anticipated 25,000 page estimate of the BDCP documents. We have now determined that there are 40,214 actual pages of the released documents and we request that you extend the public review and comment period for at least 120 additional days, due to the extraordinary size of the documents to be reviewed.

Based on the dictated 120 day review time period, the public is being asked to review 473 pages of technical and scientific material per day during the 85 working days that are available during the public review and comment period. Additional time would be required to understand, research, and prepare comments on the voluminous documents. The BDCP web site provides instructions that: "Comments should identify the specific part of the document at issue and should include supporting evidence and facts."

As we pointed out in our previous request, NEPA regulation 40 CFR 1502.7 declares that the text of an EIS for "proposals of unusual scope or complexity shall normally be less than 300 pages." As we also stated in that previous letter, it is impossible for organizations interested in thoughtfully responding to these BDCP documents to be staffed for a thorough NEPA/CEQA

review based on the outlandish size of the documents to be reviewed. Moreover, individual members of the public attempting to comprehend and comment on the BDCP documents would be overwhelmed. It is worthwhile noting that these documents represent 20% more pages than the 32 volumes of the last printed edition of the Encyclopedia Britannica.

Therefore, the EWC and its 33 grassroots members respectfully request that the public review and comment period be extended for an additional 120 days, until August 15, 2014, based on the size of the actual documents you released on December 13. Without such additional time, the public's essential role in the NEPA process of commenting on the agencies' findings contained in the BDCP's environmental review documents will be severely constrained.

A handwritten signature in black ink, reading "Nick DiCroce". The signature is written in a cursive style with a prominent initial "N".

Co-Facilitator