

ENVIRONMENTAL WATER CAUCUS REQUESTS 60-DAY EXTENSION OF COMMENT PERIOD ON TUNNELS PROJECT ENVIRONMENTAL DOCUMENTS



CA Save Our Streams Council



September 18, 2015

Via Email and U.S. Mail

The Honorable Sally Jewell
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240
exsec@ios.doi.gov

David Murillo, Regional Director
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825
dmurillo@usbr.gov

John Laird, Secretary
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Kinberly.goncalves@resources.ca.gov

Mark W. Cowin, Director,
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001
Mark.cowin@water.ca.gov

BDCPComments@icfi.com

**Re: Request for 60-day Extension of Comment Deadline for Delta Water Tunnels
Diversion--BDCP/California Water Fix RDEIR/SDEIS Comments**

Dear Secretary Jewell, Regional Director Murillo, Secretary Laird, Director Cowin and Federal and California Agencies, Officers, and Staff Members Carrying out the BDCP/DHCCP/Delta Water Tunnels Diversion:

The Environmental Water Caucus (EWC) (a coalition of over 30 nonprofit environmental and community organizations and California Indian Tribes) request an extension of 60 days for submitting public comments on the more than 48,000 pages, constituting the Bay Delta Conservation Plan (BDCP)/California Water Fix Partially Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) for the BDCP Draft EIR/EIS.¹

This Request is for an extension of time to comment on the subject documents. This Request is necessary because of the extraordinary volume of the technical and scientific material to be read, understood, researched, and then commented upon.

Further, this request is made to provide the lead agencies time to remedy fundamental flaws identified by the State of California Delta Independent Science Board on September 14, 2016, wherein they found the existing documents, that unless fixed, preclude meaningful comment and analysis. We submit for consideration a summary of their conclusions outlining serious flaws in the environmental analysis that preclude meaningful review or decisions based on these flawed documents:

"The Current Draft falls short, however, as a basis for weighty decisions about natural resources. It leaves environmental impacts and underlying science unclear by deferring content to the Final EIR/EIS ("the Final Report") and by neglecting a number of problems inherited from the Previous Draft. The gaps include:

- 1. Details on the adaptive management process, collaborative science, monitoring, and the resources that these efforts will require;*
- 2. Due regard for landscape-scale restoration, restoration timing and funding, and the strategy of avoiding damage to existing wetlands;*

¹ <http://baydeltaconservationplan.com/Home.aspx>

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3. *Analysis of how levee failures would affect water operations, and how the implemented project would affect the economics of levee maintenance;*
4. *Deficiencies concerning: uncertainties and their consequences; linkages among species, landscapes, and management actions; effects of climate change on the proposed project; and effects of changed water availability on agricultural practices in the San Joaquin Valley.*
5. *Concise and clear summaries—crisp yet analytical, and integrated with graphics—particularly comparing the alternatives in their expected major impacts.*

*Environmental impacts of California WaterFix need to be assessed more completely and clearly."*²

We would add to the list the failure of the documents to include the biological assessments or endangered species consultations for fish, wildlife and aquatic and plant species that are facing extinction or threatened with extinction. Lacking these critical documents the public and decision makers are precluded from accurately assessing and understanding how these species will be further harmed by dredging, blasting, road construction, power lines, barge traffic, noise, and diversion of water supplies essential to habitat and aquatic food sources..

Thank you for your consideration of this request.

Sincerely,

*Conner Everts
Facilitator
Environmental Water Caucus
Executive Director
Southern California Watershed Alliance*

*Jeff Miller
Conservation Advocate
Center for Biological Diversity*

*Tim Sloane
President
Pacific Coast Federation of Fisherman's
Associations*

*Eric Wesselman
Executive Director
Friends of the River*

*Bill Jennings
Executive Director
California Sportfishing Protection Alliance*

*Carolee Krieger
Executive Director
California Water Impact Network*

*Jonas Minton
Senior Water Policy Advisor
Planning and Conservation League*

*Colin Bailey
Executive Director
Environmental Justice Coalition for Water*

² <http://deltacouncil.ca.gov/docs/delta-isb-s-review-rdeirsdeis-bdcpcalifornia-waterfix>

Larry Collins
President
S.F. Crab Boat Owners Association

Lloyd Carter
President
California Save Our Streams Council

Kathryn Phillips
Director
Sierra Club California

Adam Scow
California Campaign Director
Food and Water Watch

Barbara Barrigan-Parrilla
Executive Director
Restore the Delta

Pietro Parravano
President
Institute for Fisheries Resources

Chief Caleen Sisk
Spiritual Leader
Winnemen Wintu Tribe

Stephen Green
President
Save the American River Association

Barbara Vlamis
Executive Director
AquAlliance

Huey D. Johnson
Founder and President
Resource Renewal Institute

Additional Addressees, all via email:

Maria Rea, Assistant Regional Administrator
National Marine Fisheries Service

Michael Tucker, Fishery Biologist
National Marine Fisheries Service

Larry Rabin, Acting, Field Supervisor, S.F. Bay-Delta
U.S. Fish and Wildlife Service

Lori Rinek
U.S. Fish and Wildlife Service

Mary Lee Knecht, Program Manager
U.S. Bureau of Reclamation

Patty Idloff
U.S. Bureau of Reclamation

Deanna Harwood
NOAA Office of General Counsel

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Kaylee Allen
Department of Interior Solicitor's Office

Jared Blumenfeld, Regional Administrator (regular mail)
U.S. EPA, Region IX

Tom Hagler
U.S. EPA General Counsel Office

Tim Vendlinski, Bay Delta Program Manager, Water Division
U.S. EPA, Region IX

Stephanie Skophammer, Program Manager
U.S. EPA, Region IX

Erin Foresman, Bay Delta Coordinator
U.S. EPA
Sacramento, CA

Lisa Clay, Assistant District Counsel
U.S. Army Corps of Engineers

Michael Nepstad
U.S. Army Corps of Engineers

Diane Riddle, Environmental Program Manager
State Water Resources Control Board