

**From:** [Troutnk@aol.com](mailto:Troutnk@aol.com) [<mailto:Troutnk@aol.com>]

**Sent:** Monday, April 16, 2012 8:36 AM

**To:** [jerry.meral@resources.ca.gov](mailto:jerry.meral@resources.ca.gov)

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**Subject:** Environmental Water Caucus Concerns About BDCP

**Dr. Meral,**

**Attached is a letter that expresses our concerns about the current state of the Bay Delta Conservation Plan.**

**As you will see, we look forward to your redirecting the project toward a more ecologically sustainable outcome.**

**Nick Di Croce, Co-Facilitator  
Environmental Water Caucus  
805-688-7813**

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ENVIRONMENTAL WATER CAUCUS LETTER  
REGARDING THE BAY DELTA CONSERVATION PLAN  
APRIL 2012





**CA Save Our Streams Council**



Santa Clarita Organization  
of Planning and the  
Environment (SCOPE)



**Tuolumne River Trust**



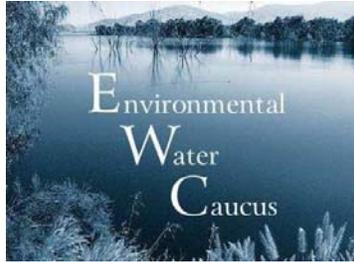
**Institute for  
Fisheries Resources**

*Unite. Protect. Restore.*



**SIERRA NEVADA ALLIANCE**





Dr. Gerald Meral, Deputy Secretary  
California Resources Agency  
1416 Ninth Street, 13th Floor  
Sacramento, CA 95814

April 16, 2012

Via email to: [jerry.meral@resources.ca.gov](mailto:jerry.meral@resources.ca.gov)

Dear Dr. Meral:

A number of our Environmental Water Caucus affiliated organizations have lately been attending meetings on the Bay Delta Conservation Plan and have begun to review the 10,000 page Effects Analysis. As a result, we have developed a number of concerns with the current approach and direction of the project and we would like to share those concerns with you. Briefly stated, they include:

- *A “Preliminary Project” that is evaluated in the Effects Analysis which fails to contribute to the recovery of a number of the endangered species and actually increases the risks of extinction for some of these species. The Effects Analysis indicates that by taking more water from the Delta, BDCP will push species like spring-run Chinook Salmon and longfin smelt, as well as others, toward extinction.*
- *An Effects Analysis whose methodology and resulting science are fundamentally flawed, biased, and selective toward a predetermined solution for increasing water exports. The Technical Appendices severely underestimate the negative impacts of the planned BDCP.*
- *An almost complete disregard of the State Water Board’s determination of the need to increase inflows and outflows to sustain and protect the ecology of the Delta estuary and San Francisco Bay. Instead, the BDCP adheres to exporters’ predetermined outcome of increased water exports that fly in the face of scientific recommendations.*
- *A lack of specific, measurable, and achievable, objectives that define the BDCP contribution to the recovery of covered species and the conservation of natural communities in the Delta. There are currently no goals to recover populations of endangered fish in the Delta, only for avoiding jeopardy. There are also no goals to maintain populations of harvestable species of fish, including fall run Sacramento River Chinook salmon. The draft goals are much weaker than the existing management goals under the current Delta Ecosystem Restoration Program.*

- *Inadequate science review.* Although providing brief reviews by scientists from outside the system, the BDCP should also incorporate more frequent and more intensive reviews by scientists with first-hand knowledge of the system, using the DRERIP process.
- *The implementation of the BDCP is to be overseen by a governing board of water export contractors, similar to the governing board for the Joint Powers Authority that runs the Kern Water Bank.* The fact that the USBR and DWR will be minority members of the Board is not appropriate. Since DWR will own and operate new conveyance and DWR and USBR will be permittees, operations must continue to reside entirely within these agencies; this is a fundamental requirement of the legislation that created the Department of Water Resources.
- *A failure to align with the state's objective in reducing reliance on the Delta.* Adherence to this legislated mandate needs to be described, measured, and reported as a part of the project.
- *The failure to consider strengthening Delta core levees above the PL84-99 standard which would provide protections against earthquake and flood risks and forecasted sea level rise.* The Economic Sustainability Plan estimates that this alternative would cost from \$2 to \$4 Billion (compared with BDCP's \$16 Billion tunnel alternative) and would provide more infrastructure protection for the Delta than any planned BDCP alternative.
- *The absence of a full range of alternatives, including an alternative which would reduce exports from the Delta.* It is understandable that the exporters, who are driving the project, are not interested in this kind of alternative; however, in order to be a truly permitable project, an examination of a full range of alternatives, including ones that would reduce exports, needs to be included and needs to incorporate a public trust balancing of alternatives.

We hope you will consider our expressed concerns and redirect the project so that it will solve the problems of the Bay Delta ecosystems while assuring an equitable and efficient water supply for all Californians. Without a solution to these issues that we have described, as well as other issues, we do not believe that the project can possibly be permitted by the state and federal agencies who must sign off on the adequacy and credibility of the Effects Analysis.



Co-Facilitator  
Environmental Water Caucus



Co-Facilitator  
Environmental Water Caucus

Distribution, by email to the following:

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Senator Diane Feinstein  
Representative George Miller  
Representative Grace Napolitano  
Representative John Garamendi  
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