RI001 Alexander

Response to comment RI001-1

The proposed BDCP is a reasonably foreseeable future project that is not part of the Delta Plan. It is being evaluated by the Department of Water Resources as the CEQA lead agency. The cumulative impacts of the proposed Delta Plan, in combination with the impact of the proposed BDCP, are described in EIR Sections 22 and 23. Please refer to Master Response 1.

Response to comment RI001-2

This is a comment on the project, not on the EIR. Delta Plan recommendation WR R15 recommends that DWR and the SWRCB work with stakeholders to identify and recommend measures to reduce procedural and administrative impediments to water transfers and protect water rights and environmental resources (RDEIR, Appendix C, Table C-12, p. C-14; Final Draft Delta Plan, p. 112). Delta Plan Recommendation WR R17 recommends that DWR, in coordination with multiple state agencies and stakeholder, develop a coordinated statewide system for water use reporting that would include data needed to better manage California's water resources (RDEIR, Appendix C, Table C-12, p. C-15; Final Draft Delta Plan, p. 113). As stated in Chapter 3 of the Delta Plan, the rationale for the recommendation is to address the lack of accurate, timely, consistent, and transparent information on the management of California water supplies and beneficial uses, which is a significant impediment to the achievement of the coequal goals.

Response to comment RI001-3

Please see response to I001-1.
Response to comment RI001-4

Please see response to comment I001-1 and Master Response 5. As described on page 2A-39, Lines 38 through 40, of the Draft Program EIR and Master Response 5, it is anticipated that implementation of updated water quality and flow objectives by the State Water Resources Control Board (SWRCB) could increase Delta outflow, reduce current reverse flow conditions in the south Delta, increase flows in restored Delta floodplains, and result in a more “natural flow regime” in the Delta. Neither the Delta Plan nor the SWRCB’s flow objectives will affect water rights. Following the adoption of its flow objectives, the SWRCB will engage in a further public proceeding, including complete environmental review, concerning implementation of the objectives, which may include altering water rights. Please see Master Response 5 for further discussion of the EIR’s analysis of the updated flow objectives and the protections for exiting water uses and users. The hydroelectric power generation at the SWP and CVP reservoirs is primarily used to convey SWP and CVP water. Even if future flow objectives result in changing the timing of reservoir operations, water releases from the SWP and CVP reservoirs would continue to generate electricity, although in a different time of the year, which could be used to meet a portion of California’s energy supply. If less water is conveyed through the Delta by SWP and CVP, there would be less demand for energy for conveyance of this water.

Response to comment RI001-5

Please see response to comment I001-04. The BDCP is separate project, for which the Department of Water Resources is the lead agency. It is not a part of the Delta Plan and was therefore not analyzed in the EIR, as further explained in Master Response 1.
Response to comment RI001-6

Comment noted. Please see response to comment I001-1.
agree to the likely ecological decimation of parts north & upstream of the area in question. Remember Lake Owens!

Thereafter I came upon the BDCP webpage. It was at this point that I hoped to finally get to the proverbial heart of the matter. I was rather disappointed upon the finding of there only being a small percentage of the chapters of the actual BDCP Draft Scoping Plan posted to the website. Most of the rest of what was there consisted largely of what can only, ultimately, be described as so much propaganda. So I examined what I could, to the end that I might have a more accurate picture of the situation. Some of what I found in portions of Ch. 3 of the Draft Scoping Plan certainly gave rise to quite some concern.

For instance, there is that which is identified as the "Major Plan Elements." It calls for, inter alia, "[...] new water diversion facilities[b] to be designed, constructed & operated." Further on therein it’s said, "An isolated canal facility [...] to convey water from the new diversion facilities to the South Delta[.]" At twenty-seven lines of text hence, "Various isolated canal facility routes are under consideration including routes on the east & west sides of the Delta." And at thirty lines thereof, "The isolated canal facility would include above & below ground portions and would connect to the existing South Delta SWP & CVP facilities[.]"

On pg. 3-10, in s 3-15, "Completion of North Delta diversion facilities, the isolated canal facility, and associated project components would mark the beginning of the long-term implementation period of the BDCP." Behold the Peripheral Canal! Yikes! And according to the above citation, without the Peripheral Canal, there is essentially no BDCP. God forbid! Indeed, "is quite telling. Isn’t it? Essentially what is being admitted to is that the BDCP is really nothing more than an elaborate smoke screen designed to obscure the real purpose & intent of the whole bloody enterprise.

And it’s now being done in the name of protecting those species listed as endangered & / or threatened under both the Federal ESA & the California ESA. But is there substance to all the messianic promises being made in this attempt to set parts of Northern California well on their way to each potentially becoming another Lake Owens, for all practical intents & purposes? Well, there are certainly a great deal of promises & propaganda, but that certainly doesn’t prove much. Couple that with the following admission of anticipated efficacy of the proposed Peripheral Canal from pg. 3-8, "[The population level response of covered species to this parameter is uncertain.]" Now, non-flow factors are there cited as reasons, but, be that as it may, it’s apparent that the authors of the Draft Scoping Plan simply can’t bring themselves to admit that the actual purpose of the Peripheral Canal may never be thereby fulfilled. Let’s list a few factors: food limitation, invasive species, discharge of contaminants, temperature trends, etc. Again from pg. 3-8, "Even if construction & operation of North Delta facilities completely eliminates negative effects to covered species [...] other stressors may ultimately result in failure of these species to recover." Even so? What’s this "even if" business? Is it not an admission, at least of sorts, that the Peripheral Canal likely cannot deliver on its promises? Also, from pg. 3-11, "There are also uncertainties related to how covered species will respond to various operational aspects of a North Delta facility[.]"

Going back to pg. 3-8, "Because significant infrastructure would be constructed, this ‘conservation’ measure is not easily reversible. Essentially, any Peripheral Canal that is constructed is permanent (a that by design)."

Now, as to rationale behind the Peripheral Canal, here is something from pg. 2-4, "[Water has been diverted directly from the South Delta through SWP & CVP facilities to meet agricultural & urban water demands south of the Delta.]" What’s this? Drying up Lake Owens & turning it into an alkali salt flat does not suffice for So-Cal? "Rob from Nor-Cal to give to So-Cal" seems to be the order of the day, as
Response to comment RI001-7

Comment noted.

regards

this issue. Indeed, waters conveyed via the Peripheral Canal to parts farther south would certainly reduce demand on Southern California water sources by Southern California end users. And that is the true purpose of the Peripheral Canal. Not any of this other business which is now being cited as reasons & rationale. No. The real reason is that Southern California covets Northern California water: The So-Cal mentality can be best summed up in the words of the late William Mulholland where he said, at a ceremony marking the completion of the L.A. Aqueduct in Nov. 1912 (speaking of Lake Owens water), "There it is! Take it!" And, indeed, that is the purpose of the Peripheral Canal, in re Northern California water.

And from pg. 3-10, "The operation of new facilities may require modifications of the operations of upstream reservoirs. This would require modification of the various agreements & licenses governing the operation of these reservoirs. This may require changes in minimum instream flow requirements, minimum drawdown levels, flood control operations, temperature standards, & riparian & geomorphic flow requirements. Such modifications may require modification of Clean Water Act § 404 permits for these projects, as well. Additionally, hydroelectric facilities may need modification to their FERC licenses." Translation: greater demands will inevitably be imposed on upstream water supplies north of the Delta, thus jeopardizing and ends north of the Delta as well as hydroelectric generation capacities severely, not to mention jeopardizing upstream ecosystems; all in the event the construction & operation of the Peripheral Canal. Thus the purpose & intent of the Peripheral Canal is further revealed.

Now, in the course of this Comment several references have herein been made to Lake Owens and in the following three paragraphs is a brief history of Lake Owens & of Mono Lake, using information taken from http://en.wikipedia.org/wiki/Lake_Owens and from http://en.wikipedia.org/wiki/Mono_Lake. Similar information can be found at many other places & websites, and the following is a partial listing thereof:

http://www.gcpusd.org/owenslake/index.htm
http://www.keeplakekern.org/djst.htm
http://www.desertusa.com/mag8/ispri/owens/owenslake.html
http://www.pbes.org/white/white/peopl/d_histor.htm
http://www.protectlakepeople.org/cls/white.htm, etc.

What was it like before the L.A. Aqueduct dried up Lake Owens (a progress of 11 years from completion of the aqueduct in 1913 until 1924 when the lake had finally dried up)? It was an area supporting numerous & diverse wildlife. According to a 1917 report by Joseph Grinnell of the Museum of Vertebrate Zoology in Berkeley, "Great numbers of birds are in sight along the lake shore – avocets, phalaropes, ducks. Large flocks of shorebirds in flight over the water in the distance, wheezing about shore in mass, now silvery now dark, against the grey-blue of the water. There must be literally thousands of birds within sight of this one spot.” The area was one that included several farms & ranches & even the occasional example of heavy industry. Before that, the Paiute (a tribe of North American indians) inhabited the area, making use of the natural resources, including that done via via their techniques of irrigation. However, by 1901 the irrigation systems then in use were reportedly so poorly designed that several areas of land in the north of Owens Valley became over-saturated to the point of nearly becoming unsuitable for many agricultural purposes. The south of Owens Valley, by contrast, was more arid & less irrigated than the north, a situation that lent itself to the kind of ranching that indeed was characteristic of south valley agriculture, then. The U.S. Bureau of Reclamation reportedly started formulating plans for an irrigation system designed for better water efficiency than the then extant systems. But then came Frederick Eaton of Los Angeles, along with William Mulholland of LADWP. Mr.
Response to comment RI001-8

Please see response to comment I001-01. Compliance with the public trust doctrine is required by the Delta Reform Act, as recognized in Water Code sections 85022(c)(3) and 85032(h). The Final Staff Draft Delta Plan discusses the public trust doctrine throughout, particularly at pages 81 through 83. The EIR analyzes the Delta Plan’s impacts on all relevant public trust resources, including water resources (Section 3), fisheries (Section 4), recreation (Section 18), and navigation (Section 24).
devices, whenever major flows are diverted away from the Delta (thus reducing river levels by the rate of diversion, less any increase in upstream reservoir discharge rates), reservoir levels drop even faster than would otherwise be the case. Thus less water is available for end-users upstream of the diversion points.

Drought or not, the Peripheral Canal is an abominably bad idea. But in the midst of such a drought as we now suffer, the Peripheral Canal is not only an abominably bad idea, it is also categorically insane! And as water is diverted upstream of the North Delta, Delta salinity naturally increases, thus poisoning Delta & Estuary ecosystems at increased risk. To counter this, bypass flows must needs be suffered to increase. And indeed the BDCP calls for exactly that. However, bypass flow rates cannot, ultimately, be made to increase, except that upstream reservoir discharge rates likewise be made to increase. And this is because even if diversion rates are ever reduced below the upper limit of diversion capacity, under no diversion plan now being contemplated will rates ever be brought down to zero.

After all, who builds a canal who does not also intend for it to be used at all?

And the South Delta (along with reservoirs upstream of it) will continue to be exempted from any additional burdens. For this is wholly consistent with the whole idea of a Peripheral Canal. Needless to say, with the construction & operation of the Peripheral Canal, discharge rates for reservoirs upstream of the North Delta will inevitably increase, which during a drought is at the height of folly. And with higher reservoir discharge rates comes reservoir levels lower than otherwise would be the case.

On the heels of that comes reduced hydroelectric generation capacity. It's only natural for that to be.

For the rotational speed of hydroelectric turbines is entirely dependent on the force exerted on each turbine blade by the water. Force, incidentally, is the product of pressure multiplied by volume, and pressure is a function of depth. Where depth is reduced, pressure is reduced. Where pressure is reduced, force (relative to volume) is reduced. Where force is reduced, the rotational speed of each hydroelectric turbine is reduced, and where that is reduced, the electrical output of a given hydroelectric generator is thus reduced. Lo, another facet of the manifest purpose of the Peripheral Canal.

And of all the several means by which electricity is generated for a given population of rate payers, which means are contemplated to be suffered to proliferate, solar, water, and wind result in lower levels of emissions of so-called greenhouse gases (GHGs) than any other such means by which such electricity is to be generated. And of these, water is in the greatest jeopardy. In the event of the construction & operation of the Peripheral Canal, & that by design. Where hydroelectric generation capacity is reduced, an electricity deficit is thus created. That deficit must be made up somehow, or else the risk of area-wide utility service failure, of one form or another, escalates considerably. Additional sources of electricity are time consuming to bring on-line, needless to say. It is so for additional sources of low carbon electricity sources as it is for additional higher carbon electricity sources. When hydroelectric capacity is reduced, the only two ways to make up the resulting deficit, at least in the shorter term, anyhow, are to: (a) allow reservoir levels to sufficiently increase (a thing that will likely never be allowed to happen, in the event of the construction & operation of the Peripheral Canal); (b) generate more electricity from higher carbon sources; and / or (c) institute rolling blackouts. And given the policy goals
of the California Global Warming Solutions Act of 2006 (commonly identified as AB32), the Western Climate Initiative (WCI), etc., and given the emerging such policy goals of Congress & of the White House, the idea of the Peripheral Canal is especially repugnant. The Peripheral Canal is manifestly designed to increase statewide GHG emission rates, and may therefore (at least in theory, anyway) be classifiable as an indirect gross polluter. To paraphrase a popularly known anti-drug slogan "Just say no to the Peripheral Canal!"