

Buckman, Carolyn

From: Hubbard, Bradley <bhubbard@usbr.gov>
Sent: Friday, November 28, 2014 10:01 AM
To: Frances Mizuno; Buckman, Carolyn; Veronese, Gina
Subject: Fwd: Long-Term Water Transfers

Another comment email...

----- Forwarded message -----

From: Sherri Scott <sherri@grubchico.org>
Date: Fri, Nov 28, 2014 at 9:27 AM
Subject: Long-Term Water Transfers
To: bhubbard@usbr.gov

I would like to share my opposition to the taking or selling (“transfers”) of any water that affects my home and environs, being the North State, not from surface nor from ground sources. They are all intertwined as a whole ecosystem and it all affects me and my health, my livelihood, my thriving agricultural community, and the natural and diverse beauty of nature that brought me to this area. I represent many others who moved to this area for exactly the same reasons and your proposal threatens our way of life!

1

Currently I am witnessing a terrible die off of 50-100 year old trees on the farm. This is at a terrible loss of shade and habitat, but in economic terms that adds costs to summer cooling, high costs of employing tree work to prevent the loss of property as the trees fall or loose limbs, as well as the loss to property if the limbs escape maintenance.

2

Many farmers I know had to dig their well deeper this year and/or lost their pump due to a drop in the water. Our ag well that has gone dry each summer for the last 3 years for August, was dry before the summer even began this year. Fortunately we have been able to use a small domestic well as our back up. Regardless, each year knowing that our water supply could be compromised, we make conscious decisions on how much land we can farm and what types of crops can be managed with what we have. **This is responsible farming.** I refuse to allow folks who view water irresponsibly, relying on water needy crops and industries, to take the water that feeds me, my community, and my ecosystem.

3

I see all around me in neighborhoods and on hikes that plants and trees are dying. I rely on this shade cover to cool me in the summer. The trees rely on the water that its roots worked so hard over a long period of time to reach. The plants around them rely on the shade and water that the

trees provide. The animals, the insects, the birds, the mushrooms, the microorganisms and us humans all rely on this.

3

I hear repeated stories at the farmers market from customers who are witnessing the same things about the effects of drought: dead/dying trees, more insect pressure, more desperate invasions of their fenced off gardens by deer and other animals. They are noticing for the first time or higher occurrences of large predators desperately roaming into human populated areas to find food.

It is unconscionable to even suggest that the water removal in this water proposal will not affect us residents of the North State, us farmers, us nature lovers, us shade lovers! It is unconscionable to even suggest that the money and needs of the Westlands Water District are more important than those that fell in love with this area, moved here, laid their literal and figurative roots down, paid their taxes, and have no real say in actions that SEVERELY affect their way of life and in their livelihoods! It is ridiculous! It is atrocious! It is conniving! IT IS GREEDY!

4

Please stop this water grab!

~Sherri Scott

1525 Dayton Rd.

Chico, CA 95928

530-342-3376

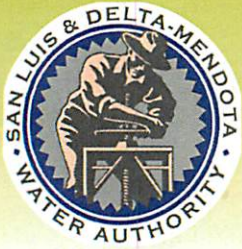
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Thanks,

Brad



LONG-TERM WATER TRANSFERS DRAFT EIS/EIR COMMENT SHEET



There are several options to provide written comments. You can provide your written comments by turning in this form at the public meeting. You may also e-mail your comments directly to bhubbard@usbr.gov with the subject line "Long-Term Water Transfers" or mail this form to the Bureau of Reclamation (mailing address is on the back of this card). Whatever method you choose, please note that all written comments must be received by **5:00 p.m. (Pacific Standard Time) on December 1, 2014.**

PLEASE PRINT CLEARLY. PLEASE NOTE THAT ALL COMMENTS BECOME PART OF THE PUBLIC RECORD.

Name: Amalie Sorensen Amalie Sorensen

Organization (If applicable): _____

Address: 1619 Arcadian Ave Chico CA 95926

Phone: 530-345-0201 Fax: () _____

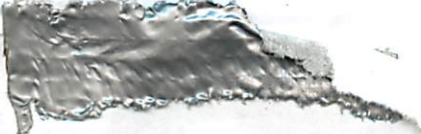
E-mail: AMALIESORENSEN@comcast.net

Date: 10/27/14

Comment: We are farmers (my family) for generations - and generations to come (HOPEFULLY). We farm SUSTAINABLY.

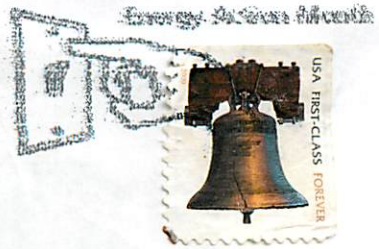
We and outraged others will fight this criminal water-stealing legally. You greedy, Motherfuckin' weirdos can F*ck off and GO TO HELL if you're NOT there already.

Get a life, please! we could be friends in this but NOT by your tactics alone.



CA 957

30 OCT 2014 PM 3 L



Long-Term Water Transfers Draft EIS/EIR
Brad Hubbard
Bureau of Reclamation
2800 Cottage Way, MP-410
Sacramento, CA 95825

00000142005



Please fold, staple, stamp, and mail.



OCT 31 2014



Buckman, Carolyn

Sent:**To:****Subject:****Attachments:**

----- Forwarded message -----

From: **Tony St. Amant** <tsainta@hotmail.com>

Date: Fri, Oct 24, 2014 at 8:00 AM

Subject: Long term water transfers

To: "Brad Hubbard (USBR)" <bhubbard@usbr.gov>Cc: "Gary Bardini (DWR, DD IRWM)" <gary.bardini@water.ca.gov>, "Frances Mizuno (SLDMWA)"<frances.mizuno@sldmwa.org>, "Matt Weiser (Sacto Bee)" <mweiser@sacbee.com>, "Heather Hacking(Chico ER)" <hhacking@chicoer.com>, "Melissa Daugherty (Chico News & Review)"<melissad@newsreview.com>, "Andrew Creasy (Appeal Democrat)" <acreasey@appealdemocrat.com>, "ChipThompson (Red Bluff Daily News)" <editor@redbluffdailynews.com>**For:****Brad Hubbard****Project Manager****Bureau of Reclamation****U.S. Department of Interior**

Dear Mr. Hubbard,

Your agency and the San Luis & Delta-Mendota Water Authority held a hearing in Chico earlier this week on the public draft of the EIS/EIR for long-term water transfers. The EIS/EIR attempts to justify the transfer of between 360,000 and 600,00 acre feet of water per year for ten years from sellers upstream of the Delta to water users south of the Delta and in the San Francisco Bay Area.

1

However, a critical fact came out during the hearing. The data for EIS/EIR's hydrologic analysis is based on the period 1970-2003. None of the climatologic or hydrologic reality the state has experienced since that time is included: none of the increasing evidence that we are actually in a period of climate change and none of the

2

clear, decade-long trends in groundwater declines seen in an increasing number of areas in the Northern Sacramento Valley.

2

The excuse offered by Carrie Buckman of CDM Smith, your consultant, was that the chosen water model is not up to date. The unanswered questions would be, “Why was an out-of-date model chosen?” And, as this analysis has been planned since at least late-2010 and modeling shortcomings have been known for at least those four years, if none is available, “Why hasn’t an up to date model been developed to fulfill this need that has been identified as critical to a large portion of California agriculture?” If the cost of a transfer program includes the need for an up-to-date model, then the proponent should be responsible for developing that model and validating it through a rigorous peer review process. Choosing an out-of-date model should not be an allowable choice.

3

I can see how SLDMWA would be pleased with hydrologic data that ended in 2003, but I don’t understand how your agency could support such an analytic shortcoming. It would seem to me that, as a federal agency, the Bureau would have a balanced responsibility between the welfare of water source areas north of the Sacramento Delta and water consumption areas south of the Delta. Your agency’s support of this terribly flawed analysis results in an inappropriate bias in support of the agencies that wish to import water to compensate for their decades long indifference to sustainable water supplies.

I urge the Bureau to withdraw the EIS/EIR until it is supported by up-to-date hydrologic and climatologic data analyzed through a vigorously peer-reviewed model.

Sincerely,

Tony St. Amant

Chico

--

Thanks,

Brad

Tony St. Amant

tsainta@hotmail.com, telephone (530) 332-9116

Local and Regional Public Policy Experience

Participant in most local and regional water forums from 1999 – present.

Public participant in developing the statewide Strategic Plan for Integrated Regional Water Management.

Public participant in the California Water Plan update 2013.

Public participant at most Northern Sacramento Valley Integrated Water Management Plan Board, Technical Advisory Committee, and public outreach meetings from January 2011 through December 2012.

Public participant in the Butte County general plan update from March 2007 through adoption in October 2010. Successfully advocated for inclusion of a water element.

Member of the initial Integrated Watershed Stakeholders' Group, the public advisory body for development of the Butte County Basin Management Objectives ordinance (Chapter 33A).

Public participant in development of the Butte County Groundwater Conservation ordinance (Chapter 33).

Butte County Deputy Chief Administrative Officer 1991-94, 2000-01

Provided staff support to the Butte County Water Commission, 1991-1994 (prior to establishment of the Water and Resource Conservation Department).

Budget and policy analyst for numerous county departments.

Prior Public Policy Experience

U.S. Air Force, 1957-1987

Retired as Director for Strategic Analysis at the Air Force Center for Studies and Analyses, Washington, D.C.

Education

Master's degree in Political Science, CSU Chico, California, 1991.

Bachelor's degree in Social Science, Troy State University, Alabama, 1973.

November 3, 2014

To: Brad Hubbard (USBR)
Frances Mizuno (SLDMWA)

Subject: Comment 1, Tony St. Amant, Long-Term Water Transfers Environmental Impact Statement/Environmental Impact Report, September 2014

Issue: The San Luis & Delta-Mendota Water Authority is inappropriate as a lead agency for the Long-Term Water Transfers Environmental Impact Statement/Environmental Impact Report, September 2014.

Summary: The San Luis & Delta-Mendota Water Authority (SLDMWA) does not meet California Environmental Quality Act (CEQA) requirements to be the lead agency for this EIR, and there is an unmitigable conflict of interest inherent with SLDMWA as the sole lead agency.

Recommendation:

The EIS/EIR should be withdrawn from public circulation; and

The lead agency should be changed to:

An appropriate state agency with SLDMWA and the counties that overlie the DWR Bulletin 118 groundwater basins and confined (deeper) aquifers from which groundwater substitution transfers may occur designated as responsible agencies; or

A group of agencies, including SLDMWA and the counties that overlie the DWR Bulletin 118 groundwater basins and confined (deeper) aquifers from which groundwater substitution transfers may occur, organized into a cooperative effort by contract, joint exercise of powers, or similar device¹.

1

Discussion:

1. SLDMWA does not meet CEQA requirements to be the lead agency.

SLDMWA is a joint powers public agency that encompasses approximately 2.1 million acres of 29 water service contractors within the western San Joaquin Valley and San Benito and Santa Clara counties. Its boundaries are coextensive with those of its members². All of SLDMWA's purposes and powers are centered on providing benefit to member organizations.³

2

¹ 14 CCR § 15051 (d).

² Amended and Restated Joint Exercise of Powers Agreement (SLDMWA JPA), San Luis & Delta-Mendota Water Authority, January 1, 1992, para. 3, pg. 4.

³ SLDMWA JPA, para. 6, pp. 4-7.

SLDMWA is a narrowly purposed regional organization, yet it is designated as the lead—and therefore, certifying—agency for this EIS/EIR, which has the potential to impact the long-term water supplies and environment of a number of California counties well removed from its geographical boundaries. This relationship does not comply with CEQA or Title 14, California Code of Regulations, nor does it recognize provisions of the Sustainable Groundwater Management Act.

2

CEQA § 21067 defines a lead agency as the public agency that has the principal responsibility for carrying out or approving a project which may have a significant effect on the environment. SLDMWA represents only half of the long-term water transfer process—the potential buyers. The other half—the potential sellers—is comprised of 29 independent agencies⁴, none of which are designated even as responsible agencies in accordance with CEQA § 21069.

14 CCR § 15051 (b)(1) , confirms SLDMWA as an inappropriate organization to be the lead agency: “The Lead Agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose”

Beyond the environmentally-oriented requirements of CEQA and Title 14, the process should integrate the legislative intent of the Sustainable Groundwater Management Act, which among other things is to recognize and preserve the authority of cities and counties to manage groundwater pursuant to their police powers⁵ and that water transfers must respect applicable city and county ordinances⁶. SLDMWA is not the appropriate agency to be certifying findings that may relate to those authorities outside of its own boundaries.

3

With SLDMWA as lead agency and no potential sellers or source counties designated as responsible agencies, the process is unreasonably biased toward the narrow functional interests of SLDMWA and its joint agencies.

Potential sellers and source counties need to be authoritatively involved in any EIS/EIR certification process that holds the potential for long-term effects on their groundwater sustainability, as does this one. The ability to submit comments for *consideration* by SLDMWA and USBR falls far short of a valid, balanced process.

2. There is an inherent and unmitigable conflict of interest with SLDMWA as the lead agency.

Common law doctrine requires a public officer to exercise his or her powers with disinterested skill and primarily for the benefit of the public. Actual injury is not required. A public officer is barred from putting himself in a position in which he may be tempted by his own private interests to disregard his principals and the interests of others.⁷

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⁴ Long-Term Water Transfers Public Draft EIS/EIR, September 2014, Table ES-2.

⁵ Sustainable Groundwater Management Act, Uncodified Findings (b)(5).

⁶ Sustainable Groundwater Management Act, § 10726.4, (a)(3).

⁷ Conflicts of Interest, Office of the Attorney General, 2010, para. B, pg. 102.

The structure of the unmitigable conflict of interest is embodied in three classes of interests which ought to be on equal ground in the water transfer EIS/EIR process but which are not:

Class 1: Willing buyers, represented by the EIS/EIR lead agency SLDMWA

The willing buyers of transferred water, some or all of the 29 members of the SLDMWA joint powers agreement, are at risk of suffering serious financial losses if they are unable to import water from other areas of the state over the next 10 years. Per its joint powers responsibilities, SLDMWA is obligated to act in the interests of, and for the benefit of, member agencies. Consequently it would be a breach of fiduciary responsibility for SLDMWA to act for the benefit of any other organization at the expense of its joint powers partners. SLDMWA is obligated to seek as much water as its member agencies need from source areas without regard for the economic or environmental impact on those areas. Yet the final EIS/EIR will reflect SLDMWA's *independent judgment and analysis*⁸, with no requirement to incorporate any concerns of source area public agencies, groundwater-dependent entities, or groundwater-dependent individuals.

Class 2: Willing sellers, unrepresented in the EIS/EIR process and representing no one in the source areas but their own individual single-purpose organizations

Willing sellers have no standing in the EIS/EIR. While their actions are integral to execution of the proposed water transfers, they were not accorded Responsible Agency status as seems to be indicated by CEQA § 21069. But even if they had been accorded Responsible Agency status, that status would have put their interests in conflict with the third class of interests, groundwater users in the source areas who are not willing sellers. This conflict exists in the northern Sacramento Valley because the willing sellers share water basins with other groundwater users as described below.

The core of this conflict is that willing sellers stand to gain revenue from their sales while those who do not sell—and have no standing in the selling process—stand to incur expenses as water levels decrease from groundwater substitution transfers because of their need to deepen wells and/or drill new wells.

Class 3: Groundwater users in the source areas who are not willing sellers, but who share their groundwater sources (basins) with willing sellers

Groundwater users in the northern Sacramento Valley who are not willing sellers of transfer water are groundwater-dependent cities and towns, groundwater-dependent rural homeowners, and groundwater-dependent agriculturalists. They are a large majority of the population in the northern Sacramento Valley in comparison to the estimated two percent of the population who comprise the potential sellers. This class stands to incur expenses as water levels decrease because of the need to deepen wells and/or drill new wells in response to lowered groundwater levels that will result from groundwater substitution water transfers. Their appropriate representation would be counties, which also hold statutory authority over ground water, but counties have not been accorded agency status in the process.

⁸ 14 CCR 15090 (a)(3)

If SLDMWA is a public agency, conflict of interest constraints must disqualify it from its role as sole lead agency for the long-term water transfer EIR. If SLDMWA is not a public agency, it is not eligible to be the lead agency⁹.

Conflicts of interest abound in the project and in the EIS/EIR, all of which should have been recognized during the scoping process four years ago. The fact they were not could be interpreted as a confirmation of biases that went into developing the project and producing the draft EIS/EIR. The time-frame for moving the water transfer project forward is critical, but SLDMWA's and USBR's failures to properly plan and coordinate this project over the past four-plus years should not be accepted as a valid reason to override the interests of source area organizations and citizens.

SLDMWA's and USBR's failure to integrate agencies into the EIS/EIR effort in a way that balances obvious and well known conflicting interests, whether caused by administrative oversight or bias, cannot be allowed to stand. The stakes for long-term water sustainability in the northern Sacramento Valley are just too high.

4

⁹ CEQA § 21067: "Lead agency' means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment."

Buckman, Carolyn

From: Hubbard, Bradley <bhubbard@usbr.gov>
Sent: Monday, December 01, 2014 4:27 PM
To: Buckman, Carolyn; Veronese, Gina; Frances Mizuno
Subject: Fwd: Long-Term Water Transfers

Comment email.

----- Forwarded message -----

From: karen stinson <jcdlove123@gmail.com>
Date: Mon, Dec 1, 2014 at 4:00 PM
Subject: Long-Term Water Transfers
To: bhubbard@usbr.gov

Dear Mr Hubbard,
I attended the EIS/Eir Public Meeting in Chico on October 15, 2014. I am writing to you today to show my support for my community and for the natural resources we are so blessed with here in Butte County. I am writing to urge you to have more research done on the long term effects of transferring water from the Sacramento River and from the Tuscan Aquifer. In these times of out of control climate change and extreme weather conditions, I urge you to error on the side of caution when it concerns our water.

1

Thank You, and God Bless
Karen Stinson
Chico, CA

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Thanks,

Brad

Buckman, Carolyn

From: HUBBARD, BRADLEY <bhubbard@usbr.gov>
Sent: Thursday, October 23, 2014 4:09 PM
To: Buckman, Carolyn; Veronese, Gina; Frances Mizuno
Subject: Fwd: Long-Term Water Transfers

----- Forwarded message -----

From: Paula Sunn <paulasunn@gmail.com>
Date: Thu, Oct 23, 2014 at 3:52 PM
Subject: Long-Term Water Transfers
To: bhubbard@usbr.gov

Dear Mr. Hubbard,

I live north of the Delta and am very concerned at the water transfers that have been occurring on a temporary basis and even more so about the EIS/EIR that would facilitate longer term water transfers.

Historically, in California, areas with less population, but with adequate water supplies have been exploited in order to keep the dryer, desert areas of the state from having to make the difficult decisions about whether current land use patterns are sustainable, regardless of the environmental and economic degradation that occurs in the areas of origin. The Owens Valley is a good example of this.

1

The EIS/EIR is flawed in not having a way to take into account that the data used to draw conclusions is outdated and that there are already problems occurring in the north state due to the ongoing drought, exacerbated by the transfers that are happening now. In short, there is no evidence that there will be future water supplies that will be sufficient to maintain the current patterns of usage in the areas of origin, much less enough to transfer water south to sustain agriculture in areas that have already overexploited their supplies, especially during the dryer periods that the EIS/EIR is intended to cover.

2

It strikes me that economic interests of those served by the San Luis & Delta-Mendota Water Authority as well as those in the areas of origin who have surface water rights to sell, while replacing this water with further groundwater pumping, ignores the long term ecological degradation that will occur as well as the populations in the north that rely on these supplies. Economic gain for a few is not what should be driving decisions made about resources relied upon by many.

3

I urge you to not only reject this current EIS/EIR, but to do what you can to stop the current temporary water transfers.

Respectfully,

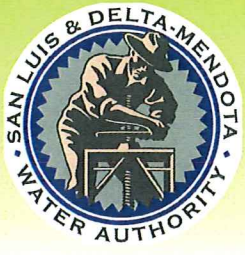
Paula Sunn
5613 Glen Way, Paradise, CA 95969
(530) 514-1584

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Thanks,

Brad



LONG-TERM WATER TRANSFERS DRAFT EIS/EIR COMMENT SHEET



There are several options to provide written comments. You can provide your written comments by turning in this form at the public meeting. You may also e-mail your comments directly to bhubbard@usbr.gov with the subject line "Long-Term Water Transfers" or mail this form to the Bureau of Reclamation (mailing address is on the back of this card). Whatever method you choose, please note that all written comments must be received by **5:00 p.m. (Pacific Standard Time) on December 1, 2014.**

PLEASE PRINT CLEARLY. PLEASE NOTE THAT ALL COMMENTS BECOME PART OF THE PUBLIC RECORD.

Name: Melinda Teves

Organization (If applicable): _____

Address: 1066 E. 8th St., Chico CA 95928

Phone: () _____ Fax: () _____

E-mail: _____

Date: 10/21/14

Comment: _____

- No on groundwater substitution transfers

- No on putting these decisions in the hands of buyers and sellers with self-interest in mind

1

- No on implementing water transfers prior to localities taking over groundwater decisions per recent legislation

- No on formulating plans based on data before 2004.

2

- No on these proposed water transfers

3

Mrs. Sally Wallace
167 Mandalay Court
Chico, CA. 95973

October 24,2014

Long Term Water Transfers
Brad Hubbard
Bureau of Reclamation
2800 Cottage Way MP 410
Sacramento, CA. 95825

Dear Sir”

Everyone I know in Northern California, just about, is violently opposed to this Water Transfer. It is inconceivable that you would not only allow it but instigate it. One bad drought year, and this is the worst we have had in years, is not a good enough reason to send our water to Southern California. You might suggest they start desaliation projects on ocean water, instead.

1

2

Another solution is more careful watering by the farmers... in the central and southern parts of the state..they have been rather profligate with water use over the years.

3

Most of all, we have to leave enough water in streams and rivers and forests for the wildlife... #1 priority, or should be.

4

At the very least, postpone the dams and transfers to the future... it's starting to rain, give nature a chance and don;t make panic decisions.

Respectfully

Mrs Sally Wallace
Mrs. S.M. Wallace

Mrs Sally Wallace
151 Broadway Court
Chico, CA 95923

OCT 27 2014

October 27, 2014

Long Term Water Transfer
Bank Hubbard
Federal of California
151 Broadway Court
Chico, CA 95923

Dear Sir,

I've not known in Northern California just about is violently opposed to this Water Transfer. It is inconceivable that you would not only allow it but instigate it. One had thought years ago this is the way to get a good enough amount of water to Southern California. You might suggest that that destination projects on ocean water instead.

Another solution is more carefully watered by the farmers... in the central and southern parts of the state they have been rather diligent with water use over the years.

...and farmers for the wildlife... will be doing or should be.

At the very least, beyond the dams and transfers to the future... if the timing of the future a chance and don't make good decisions.

Respectfully,
Mrs. S.M. Wallace

Buckman, Carolyn

From: Hubbard, Bradley <bhubbard@usbr.gov>
Sent: Friday, November 28, 2014 9:10 AM
To: Frances Mizuno; Buckman, Carolyn; Veronese, Gina
Subject: Fwd: Long-term water transfers

----- Forwarded message -----

From: **Suzette Welch** <booksontape@rocketmail.com>
Date: Thu, Nov 27, 2014 at 8:20 AM
Subject: Long-term water transfers
To: "bhubbard@usbr.gov" <bhubbard@usbr.gov>

I urge you not to move forward with the proposed water transfers to San Luis and Delta Mendota Water Authority. I am in opposition to the timing of the water transfers “especially in periods of drought” and the size of the proposed water transfers which will allow water to be bought in northern California then sold to a desert area in Central California - the San Luis and Delta Mendota Water Authority.

1

The area to receive transfers of water from Northern California is a desert. They have ruined their aquifer by over pumping and now have subsidence so there is less underground space to store water the groundwater that they do get. What should be done in the South Central Valley is planting of annual crops in years when they have enough water in the area to allow these crops. Instead trees were planted there so that farmers could show that they needed water every year. Now these Southern factory farmers want us to ship water south. We have need of our water in Northern California to support our many family farms. We especially need to keep all the water possible in years like this year where there is not enough water due to a four year drought.

2

3

There is a big fallacy in your report. The hydrologic period analyzed in the EIS/EIR is from 1970-2003, neglecting the last 11 years because the model wasn't up-to-date. Thus the analysis doesn't take into account the current drought.

4

How can you say in your EIR that there will be no environmental impact on the area of origin of the water when there are already wells drying up in this area due to over pumping.

We have wells going dry right now in the foothills and in North and South Chico. People here don't have water to drink and you propose to take more surface water from willing sellers. These sellers are people with water rights and are just out to make money no matter the cost to the land. They sell the surface water and then they pump water out of the aquifer taking needed water from others and making the shallower wells run dry. Pumping the aquifer will drop the depth of water in the water table which will result in loss of our ecosystem. Our beautiful meadows and oak forests will die from lack of water. You will turn another part of California into a desert like the Owens Valley.

5

Suzette Welch
13 Hilda Way
Chico, Ca. 95926

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Thanks,

Brad

Buckman, Carolyn

From: Frances Mizuno <frances.mizuno@sldmwa.org>
Sent: Monday, December 01, 2014 12:33 PM
To: Hubbard, Bradley; Buckman, Carolyn; Veronese, Gina
Subject: Comment Letter

[One more comment letter.](#)

From: Seamus Yeo [mailto:seamus22hk@gmail.com]
Sent: Monday, December 01, 2014 12:11 PM
To: Frances Mizuno
Cc: bwright@friendsoftheriver.org
Subject:

1893 Garden Ave, Apt 7
Eugene, Oregon, 97403
Nov 5th, 2014
Seamus Yeo

Frances Mizuno
San Luis & Delta-Mendota Water Authority
842 6th St, Los Banos CA 93635
Phone: (209) 832-6200
Email: frances.mizuno@sldmwa.org

Dear Mr Mizuno,

I am writing regarding to your recent proposal for the Long Term Water Transfer, that was uploaded to the Environmental Impact Assessment government website on September 2014. I will be doing as part of a course assignment to review the Public Draft of the Environmental Impact Assessment.

The introductions and proposed actions are well informed in terms of history of the area, location and the different lakes that could be involved, service provided and companies that are involved. However, the lack of explanation on what the current infrastructure of CVP and what method would be used to transfer water from the seller to the buyer. The cost of maintenance of the 10 year period would be questioned and should be mentioned.

1

In each of the environmental aspect of this project will be assessed in the following paragraphs respectively; Water, Geology and Soil; Air Quality; Climate Change; Flood Control; Cumulative Effects.

In the assessment of Water, it has been well written for understanding the quality and quantity of supply and the water. Through the use of laws, regulations and information on each lake which water will be extracted, it has given a good over all look. However, the lack of details of each total capacity of water and how much water will be used during the transfer is questionable. The only information given was how much water could be extracted but no relation to the overall total amount of water.

2

In the Geology and soil, they have provided many different topography of maps regarding to the soil that are present around California, along with the different method of translocation of various soils. It would be good if you can provide a 3D infrastructure of the current CVP, and the area that they have been built on.

3

In Air Quality the data provided for different compounds, in direct impact of Carbon dioxide in water is noted and each different method of transferring water is noted. The cumulative effects are also noted well, there is no need for additional information.

4

In Climate Change, it is well written that the most direct issues are affecting the transfer. However, the indirect to animals and soil is a rather difficult to research in. Note that monitoring the possibility of invasive species invading upstream is a plausible situation, which is not noted in Cumulative effects. If there is an Accelerated erosion doing storm water, would it not also accumulate possible sediments that would damage flood control.

5

In the Flood control, the information provided is well responded and the mitigation and the acceptance of some area unable to endure flood possibility should be taken into account. However, the flood control also holds some of the key factors into the methane hold possible harm to the environment especially animals that could not survive in acidic environments.

6

This Draft Environmental Impact Assessment would provide a useful tool as it cover many aspects of environmental concern which will help the community in decision and project managers to decide. However, it could use a little more information about the water supply as ecologist and many other scientist in that field may question how much water is “sustainable”. You have only stated how much water could be taken out, without having mentioning the total amount of water that is current there.

7

Overall, I would like to say that in general that the draft environmental statement is well researched and very informative. I would like that if you can add additional material on a more local levels, as it would affect them the most and their knowledge from experience would affect the overall projects and the cost of maintenance over the 10 years and a timeline. In addition, I would like you to add additional information on monitoring as climate change on the over all levels of water and geology and soil, as those two would inhibit many of the long term water transfer and possible damage in the future.

Yours Faithfully
Seamus Yeo
Student, University of Oregon.

Meeting Notes

11/24/2014

Dear Mr. Brad Hubbard:

I am strongly against the USBR proposal to facilitate the transfer of Sacramento Valley water (mainly by conjunctive use) to south of the Delta and San Francisco Bay water districts.

Several glaring lapses in the proposal stand out. Limiting the baseline years to 1973 to 2003 avoids the last decade of climate change effects and our severe, prolonged current drought.

In recent years the Sacramento Valley general water table has significantly dropped with accompanying ground subsidence.

Residential and agriculture wells have gone dry. And the proposed water transfers will occur during drought and severe drought years - just when the immediate and long term harm to our river, streams and aquifer would be the greatest.

The USBR suggestion that water tables will generally reconstitute in the future is completely unsubstantiated.

No consideration of the accumulative effects on the watershed ecology is included in the USBR analysis.

No significant long term economic analysis is evident comparing the transient benefit to the Westlands Water District versus the destruction of the Northern California Water Shed - the source of 60-70% of California water.

Please put science above political and lobbying pressure to preserve the Sacramento Valley Watershed - Thank you

JULIAN ZENER MD

JULIAN ZENER
1021 N. CHERY ST.
CHICO, CA. 95926

JULIANZENER@COMCAST.NET

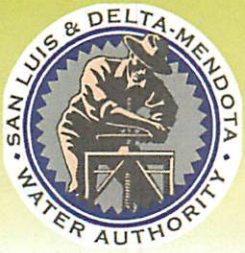
MSCME
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(904) 953-7114
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E-mail: cme-jax@mayo.edu

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LONG-TERM WATER TRANSFERS DRAFT EIS/EIR COMMENT SHEET



There are several options to provide written comments. You can provide your written comments by turning in this form at the public meeting. You may also e-mail your comments directly to bhubbard@usbr.gov with the subject line "Long-Term Water Transfers" or mail this form to the Bureau of Reclamation (mailing address is on the back of this card). Whatever method you choose, please note that all written comments must be received by **5:00 p.m. (Pacific Standard Time) on December 1, 2014.**

PLEASE PRINT CLEARLY. PLEASE NOTE THAT ALL COMMENTS BECOME PART OF THE PUBLIC RECORD.

Name: JOHN SCOTT

Organization (If applicable): BUTTE VALLEY COALITION

Address: 4370 TAO WAY, BUTTE VALLEY, CA 95965-8345

Phone: (530-533-8394) Fax: ()

E-mail: john_lewis_scott@msn.com

Date: November 30, 2014

Comment:

This EIS/R must be withdrawn, because it is totally inadequate as any EIR/EIS could ever be.

1

Follow the comments of the Butte Environmental Council. Your EIS/EIR is so bad that I feel I need to protect and maintain my legal rights in this matter.

2

Very Sincerely,

John Scott - individually and with the Butte Valley Coalition.

Place
First Class
Stamp
Here

Long-Term Water Transfers Draft EIS/EIR
Brad Hubbard
Bureau of Reclamation
2800 Cottage Way, MP-410
Sacramento, CA 95825

Please fold, staple, stamp, and mail.

BUREAU OF RECLAMATION
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2014 DEC -1 PM 4:22

Nov-30, 2014

JOHN SCOTT

BUTTE VALLEY COALITION



Butte Environmental Council

Educating and advocating for the land, air, and water in Northern California since 1975



BUTTE-SUTTER BASIN AREA GROUNDWATER USERS

December 1, 2014

Brad Hubbard (USBR)
Frances Mizuno (SLDMWA)

We support the entire
12 page document submitted
by the Butte Environmental Council.
John Scott
advocate

Subject: Comments, Long-Term Water Transfers (LTWT) Environmental Impact Statement/Environmental Impact Report (EIS/R), September 2014

Butte Environmental Council (BEC) and the undersigned groups and individuals submit the following comments concerning Long-Term Water Transfers. The comments focus on the legal issues surrounding groundwater substitution water transfers and the technical deficiencies of the EIS/R. Concerned citizens of the northern Sacramento Valley recognize that it is long past the time needed to realize the limitations and variability of our natural water supply. We must learn to live within the confines of that system and stop the exploitation of groundwater and strive to improve protections of this critical, fail-safe source of life.

BEC's policy statement regarding water identifies our concerns for Northern Sacramento Valley water resources. Specifically, we believe that citizens should have control over local resources; that Northern California's watersheds must be protected for future generations; and that its ground and surface water must not be exported out of the area to address misuse, waste, and over-allocation. The undersigned groups and individuals submit these comments holding to one conviction:

The EIS/R should be withdrawn from public circulation until the issues listed herein can be adequately addressed.

Page 1 of 12
— pages 2 thru 11 are on file —

e. Water quality

The environmental assessment surrounding the LTWT completely ignores groundwater quality issues. There are numerous plumes throughout the Sacramento Valley for which the Department of Toxic Substance Control has oversight.

Conclusion

The EIS/R should be withdrawn from public circulation; and

The EIS/R should be modified to:

Reflect the elements and requirements of a programmatic EIS/R, strictly adhering to page limitations and tiering of appropriate project level environmental documentation; and

Reflect a legally appropriate lead agency, such as a group of agencies, including SLDMWA and the counties that overlie the DWR Bulletin 118 groundwater basins and confined (deeper) aquifers from which groundwater substitution transfers may occur, organized into a cooperative effort by contract, joint exercise of powers, or similar device.⁶

Sincerely,



Robyn Difalco
Executive Director
Butte Environmental Council



Carol Perkins
Water Policy Advocate
Butte Environmental Council



JOHN SCOTT

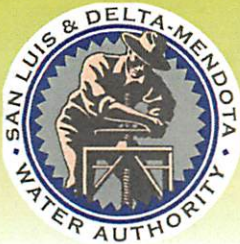
BUTTE VALLEY COALITION

BUTTE COUNTY, CA

⁶ 14 CCR § 15051 (d).



LONG-TERM WATER TRANSFERS DRAFT EIS/EIR COMMENT SHEET



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PLEASE PRINT CLEARLY. PLEASE NOTE THAT ALL COMMENTS BECOME PART OF THE PUBLIC RECORD.

Name: JOHN LEWIS SCOTT

Organization (If applicable): BUTTE VALLEY COALITION

Address: 4370 TAO WAY, BUTTE VALLEY, CA 95965-8345

Phone: (530) 533-8394 Fax: () _____

E-mail: john_lewis_scott@MSA.COM

Date: Nov 30, 2014

Comment: _____

I support THE ENTIRE "12 PAGE COMMENTS"
SUBMITTED BY THE BUTTE ENVIRONMENTAL COUNCIL,
CHICO, CALIFORNIA; DATED DECEMBER 1, 2014.

VERY SINCERELY,

John Scott

JOHN SCOTT

PS: Please keep me current on future aspects of
this and all Long or Short Term Water Transfers
from North of the Sacramento Delta.

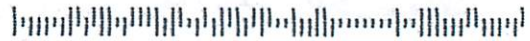
John & Sue Scott
4370 Tao Way
Butte Valley, CA 95965

SACRAMENTO CA 95877
01 DEC 2014 PM 6 L



Long-Term Water Transfers Draft EIS/EIR
Brad Hubbard
Bureau of Reclamation
2800 Cottage Way, MP-410
Sacramento, CA 95825

95825189000



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