

**From:** Robin Durston  
**To:** [commentletters](#)  
**Subject:** Comment Letter – 2016 Bay-Delta Plan Amendment & SED  
**Date:** Monday, November 21, 2016 9:47:49 PM

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Dear Sirs:

I am writing to oppose the 2016 Bay-Delta Plan Amendment & SED.  
It is not a good plan.

70 percent of the water used from the Delta goes for large industrial agriculture in the Southwestern San Joaquin Valley that contributes just 0.3% to the state's GDP.

The scientific consensus and state law as outlined in the 2009 Delta Reform Act is that less water must be exported from the Delta. In 2010, the State Water Resources Control Board agreed, finding the Delta can safely share 2.5 to 3.5 million acre feet of water, not 4.9 million acre feet.

Tunnel opponents support conservation, groundwater management, recycling, ecosystem protection projects and don't want \$15+ billion wasted on a Tunnels project that does none of those things. The Delta Tunnels is an expensive boondoggle conceived in the 1960s and rejected by California voters in 1982. It depends on continuing to deliver Sierra snowpack from Northern California to farms in the Southern San Joaquin Valley, even though climate scientists have warned use to expect less snowfall and more rain in the future, just like we have seen over the last decade.

As sea level rises, more, not less water needs to flow through the Delta estuary to prevent saltwater intrusion. The Delta Tunnels will reduce the amount of fresh water needed to protect drinking water for Delta communities and Delta farmers.

Taking more fresh water out of the Northern Delta will only increase salinity, toxics, and algal blooms in the SF Bay-Delta estuary.

Unsustainable amounts of fresh water are already being taken out of the Delta, pushing its fragile and overtaxed ecosystem to the verge of collapse. The Delta Tunnels would continue this practice, not reduce water exports as required by the 2009 Delta Reform Act.

The tunnels would steal massive amounts of more fresh water and send it to southern California cities and Central Valley agriculture, harming protected species in the North Delta including salmon.

Only 30 percent of water exported from the Delta goes to cities in the Bay Area, the South Coast, and Southern California. Big Ag on the west and south side of the San Joaquin Valley will get about 70 percent of Delta water, which often goes to grow water intensive almonds, cotton, and pistachios on unsustainable 'desert' farmland for lucrative overseas exports.

Jobs will not be saved from the Delta tunnels in Southern California and Silicon Valley because these areas will continue to receive water with or without the tunnels.

Temporary jobs will be created during the construction of the tunnels but few long-term jobs in the maintenance of the project. The tunnels are a poor public works project creating just 5

jobs per million spent, whereas water conservation creates 10-20 jobs per million spent.

CA WaterFix never evaluated the economic value of freshwater to the San Francisco Bay, coastal fisheries worth billions, the \$5.2 billion Delta agriculture economy, tourism and the 4 million people who live in the Delta counties.

The Delta Tunnels would take out more fresh water through the tunnels and draw the Bay's saltier water into the northern Delta. With less water flowing through the Delta, the water would also be much warmer which harms protected fish species.

Every attempt to build an environmental impact report proving these claims has failed so far. The planning for the Delta Tunnels to date lacks modeling that proves this claim. 'Maximizing exports' is in direct contradiction to state law which says Delta water exports must be reduced. The Delta is not in an earthquake zone. There are no historic records of massive levee failure due to an earthquake. If an imaginary faultline did rupture beneath the Delta, it would certainly destroy the Delta Tunnels as well.

Building the tunnels and redesigning the pumps at Clifton Forebay will have significant construction impacts for more than a decade.

If climate scientists are correct, the lack of snow expected in the future will mean less fresh water flow to protect water quality in the Delta. To protect water quality, these expensive tunnels will remain empty a majority of the time.

Government officials say the CA WaterFix tunnels will cost \$17 billion for construction, but as with big public infrastructure projects such as the San Francisco-Oakland Bay Bridge and Seattle's Bertha project (the largest tunnel-boring machine); initial cost estimates always rise enormously. CA WaterFix tunnels cost estimates don't include bond interest or cost over-runs. A more realistic estimate is \$60 billion when interest, administration, research, operation, and maintenance fees are taken into account.

Constantly adapting management of the Delta without providing needed fresh water flow has proven ineffective since the 1970s. When maximizing exports is the prime directive, fish suffer. Threatened and endangered fish species have subject to long-term human-induced drought conditions that have reduced fish populations and limited their chances for their recovery.

The tunnels could grab up to 2/3 of the flow of the Sacramento River, which is where the main supply of fresh water in the Delta comes from.

Continuing to maximize exports of fresh water from the Delta will not help restore natural Delta flow patterns. In the original BDCP Tunnels plan, 100,000 acres were to be restored. In the 2015 WaterFix/EcoRestore, only 30,000 acres were to be protected, most of that under previous court order. This new figure of 15,600 is even more disheartening.

Stop this harmful plan that destroys the environment for future generations.

Sincerely,  
Robin Durston

