

Chapter 8

Form Letter Comments

Chapter 8

Form Letter Comments

This section contains copies of the form letters received, listed in Table 8-1. A sample of each type of form letter is followed by responses to the comments presented in that letter. A list of the people who signed and submitted each form letter is provided in Appendix A. Where signatories of a form letter changed the content of the form, those altered forms and responses to additional comments are included following the general form letter responses. Responses to comments are numbered individually in sequence, corresponding to the numbering assigned to comments in each comment letter. The responses are prepared in answer to the full text of the original comment.

Table 8-1. Form Letters Received on the Draft EIS/EIR

Form Letter 1
Form Letter 2
Form Letter 3
Form Letter 4
Form Letter 5
Form Letter 6
Form Letter 7
Form Letter 8
Form Letter 9
Form Letter 10
Form Letter 11
Form Letter POST

Form Letter 1

To: 19166535077	From: 2022691060	2-07-06 11:27pm p. 1 of 1
Form 1		
Dear Mr. Marshall,		
I am writing to offer my comments on the draft environmental impact report/statement for the South Delta Improvements Program, particularly regarding the part of the project that would increase the maximum pumping limit for the state water project's Delta pumps to 8,500 cubic feet per second. I strongly believe that this project is unnecessary and could further damage a Bay-Delta ecosystem that has already been harmed by excessive water diversions.	Form 1-1	
I urge you to withdraw the draft environmental impact report and issue a new draft with a preferred alternative that includes a significant reduction in Delta water diversions. The analysis of this alternative should include potential environmental benefits, how water conservation and other proven water management tools can help the state meet its future water needs, and how such a reduction, combined with investments in other water supply sources, could improve the reliability of urban water supplies.	Form 1-2	
I also urge you to include, in the new preferred alternative, at least as much water dedicated to ecosystem restoration and protection as is required by the state's plan to protect and restore the delta -- the CALFED Bay-Delta Plan. The Department of Water Resources should work to restore the delta protections in that plan that have been undermined during the past five years.	Form 1-3	
Finally, I urge you to issue a full draft environmental impact report on the proposal to increase the state water project's maximum pumping limit once improved scientific information is available regarding the causes of the delta's decline and once this decline has been reversed.	Form 1-4	
Sincerely,		

Responses to Comments

Form 1-1, Form 1-2, and Form 1-3

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form 1-4

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form Letter 2

Form 2

Mr. Paul Marshall
California Department of Water Resources
1416 9th Street
Sacramento, CA 95814

Dear Mr. Marshall,

California Trout and our undersigned members are writing to urge you to drop plans for additional pumping from the California Bay-Delta as currently proposed in the South Delta Improvements Program (SDIP), especially while the Delta is experiencing an historic ecosystem collapse.

**Form
2-1**

Most urgently, we request that you withdraw the highly flawed Draft Environmental Impact Report/Statement for SDIP. If the project truly aims to improve water quality and fish survival, you must examine an alternative to the project that accomplishes these goals by significantly reducing Delta pumping from current levels.

**Form
2-2**

We have more reliable, more cost-effective and more environmentally friendly ways to provide abundant water for California's future. These options include water use efficiency and water recycling, outlined in the Department of Water Resources' draft "California Water Plan Update" and Water for California's "Investment Strategy for California Water" (prepared by the Planning and Conservation League).

Together we must make sensible and sustainable water policy decisions that conserve the Delta and our rivers, to keep our state beautiful, vibrant and strong. The survival of the Delta depends upon your agency's actions. Please support the recovery of the Delta and say NO to increased pumping.

Sincerely,

Responses to Comments

Form 2-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 2-2

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form Letter 3

Form 3

Dear Mr. Marshall:

Thank you for soliciting public comments in response to the South Delta Improvement Project (SDIP) DEIR/S.

It makes no sense to move forward with a project that will divert more fresh water from the Delta when Delta fish populations are crashing. Please withdraw the SDIP DEIR/S until the causes of the Delta fish decline are identified and fully resolved. **Form 3-1**

California does not need to increase Delta diversions to meet its current and future water needs. The State's own Water Plan proves that increased investments in urban and agricultural water use efficiency and reclamation can meet our needs well into the future. **Form 3-2**

At the minimum, the SDIP DEIR/S should consider an alternative that significantly reduces Delta pumping from current levels, actually improves Delta water quality and habitat, and protects fish. **Form 3-3**

Please include me on your mailing list to be notified of any decisions or activities concerning this project.

Sincerely,

Responses to Comments

Form 3-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 3-2

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.

Form 3-3

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form Letter 4

Form 4

I am writing to advise you of my serious concern for the welfare of the San Francisco Bay-Delta estuary and the fisheries that depend upon it for survival. As you may know, the productivity of a significant part of the foodweb in the Delta has collapsed according to agency scientists with the Interagency Ecological Program (IEP). Delta populations of important plankton and shrimp that help fuel the foodweb and drive the system's ecology have disappeared, as have many other important species including Delta smelt, longfin smelt, threadfin shad and young-of-the-year striped bass. Recently the Dept. of Fish and Game has sounded the alarm over a dramatic drop in the sturgeon population.

Form
4-1

The estuary that once sustained multiple runs of salmon and abundant runs striped bass, American shad, sturgeon, steelhead and a diverse food web is experiencing such low levels of productivity that an ecosystem crash may be imminent. Should this happen, many fisheries will not find the food necessary to sustain their survival. The prolonged decline of our fisheries now averaging between 80 and 95 percent would continue to the point of suffering what may be irreversible damage.

The estuary may be on the verge of an ecological disaster! The collapse of these natural resources would be tragic as hundreds of millions of dollars of public funding has been spent trying to restore the estuary and its fisheries. The economic consequences to the state's sport and commercial fishing industries and the state's tax base could run into many millions of dollars annually. These are industries that have already suffered dramatic losses due to prolonged declines of the Central Valley's once world class fisheries.

Scientists have long maintained that water export is one of the major impacts to the productivity of the of the Bay-Delta estuary. It has changed the natural flow regime and significantly decreased the amount of water that historically flowed through it into the ocean. Instead of the high spring runoff that flowed through the entire estuary, the water projects have reduced Delta outflow by at least 50%, on average, and dramatically changed the timing and the amount of water available to the estuary. These and other changes in the natural flow regime are currently under study by the IEP scientists. I believe they are at the very heart of the problem. While agencies have reacted with an increased effort to further study the declining productivity, the Department of Water Resources continues to move forward with their "South Delta Improvement Project" (SDIP) that could increase water exports out of the Delta by up to 25%! A decision to move forward with the SDIP in the face of a collapsing ecosystem will further compound the estuary's problems and it could do irreparable harm to the estuary and its fisheries.

While I agree with agency scientists that there are other potential sources of impact, including toxic pesticides and herbicides from agricultural runoff and impacts from exotic species introduced from ballast water discharged by ships, I am strongly opposed to moving forward with the SDIP planning process or discussions on increasing flow rates. Many fishing groups support a moratorium on any additional export of Delta water until the problem with the Delta's food web is fixed and our anadromous fishery resources are maintained at sustainable population levels. These groups take this position after more than twenty years of governmental promises that our Central Valley fisheries and the estuary they depend on would be restored.

Given the obvious concern for our state's natural resources, I am hopeful that you will support the position of stopping the SDIP from moving forward, especially since there is not an immediate need for the State Water Project to build additional export capability at this time.

Form
4-2

One of the greatest estuaries in the world is in real danger. I urge you to help save it!

Responses to Comments

Form 4-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 4-2

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form Letter 5

Form 5

Please stop the plans of the Department of Water Resources to implement the South Delta Improvement Project and the export of any additional water out of Delta until our estuary and its fisheries are restored. There have a decade of broken promises that these public resources would be restored. Given the collapse of the Delta food web, now is the time to restore the estuary and our fisheries before any more water is exported out of the estuary!

**Form
5-1**

The DWR's recently released Bulletin 160 clearly demonstrates that the state's water needs will be met for at least the next decade with the existing water infrastructure. There is no water crisis to justify the destruction of the Delta! The health of our Delta and fisheries is truly at stake!

**Form
5-2**

The Delta's wellbeing is in big trouble. I'm urging you to put a stop to the SDIP before irreversible damage is done.

Responses to Comments

Form 5-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 5-2

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.

Form Letter 6

Form 6

Eighty-five percent of the water pumped from the Delta goes to farming. The Delta ecosystems are crashing and fish are disappearing yet the farmers continue to get water at insanely cheap prices. It's time the farmers start using water saving irrigation methods, pay the going rate or switch to crops that need less water. Something has to give before the Delta ecosystem is destroyed beyond repair. A billion dollar Northern California sportfishing industry is threatened and the local economies are at stake. Kill the fish and we won't need boats, gas, mechanics, marinas, sandwiches, sodas, ice, fishing tackle etc. Pumping the water is not only killing the Delta but hurting small businesses.

Form
6-1

Form
6-2

Responses to Comments

Form 6-1

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form 6-2

The effects of the SDIP on biological resources, including fish, are fully described in the SDIP Draft EIS/EIR in Chapter 6, which includes impact assessment for fish, vegetation and wetlands, and wildlife. Where a significant effect is found to result from implementation of the SDIP, DWR and Reclamation will implement mitigation measure(s) to ensure that the overall impact is less than significant. Additionally, DWR and Reclamation have committed to a Stage 2 evaluation as explained in Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form Letter 7

Form 7

Dear Paul Marshall, California Department of Water Resources,

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Study for the South Delta Improvement Program (SDIP).

I am concerned that at a time when the San Francisco Bay-Delta ecosystem is collapsing and some fish populations are in danger of extinction, a plan is being considered that would significantly increase the amount of fresh water diverted out of the San Francisco Bay-Delta. The exact causes for the fish declines are still being investigated, but Delta pumping is one of the primary culprits. I urge you to withdraw the draft until the causes of the decline are identified and resolved.

Form
7-1

In addition, a revised Environmental Impact Report/Study should be drafted that includes all reasonable alternatives, such as a significant reduction in Delta pumping from current levels. A reduction would allow the Bay-Delta ecosystem to be restored.

Form
7-2

The California State Water Plan has clearly shown that the state can meet current and future water demand without increasing pumping if investments are made in urban and agricultural water conservation and reclamation.

Form
7-3

Thank you.

Responses to Comments

Form 7-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 7-2

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form 7-3

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.

Form Letter 8

Form 8

The Delta food chain is severely broken, and increasing water exports should not occur until the habitat's conditions are better understood, and the fish counts have returned to sufficient levels. Delta populations of important plankton and shrimp that help fuel the food web and drive the system's ecology have disappeared, as have many other important species including Delta smelt, longfin smelt, threadfin shad, and young-of-the-year striped bass. Recently the Dept of Fish and Game has sounded the alarm over a dramatic drop in the sturgeon population. Several factors may possibly be at play here, but everyone agrees and understands that increased water export rates at this time will cause additional and possibly irreversible damage to this great Estuary.

Form
8-1

Responses to Comments

Form 8-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form Letter 9

Form 9

Dear Mr. Marshall,

I am writing to offer my comments on the draft environmental impact report/statement for the South Delta Improvements Program, particularly regarding the part of the project that would increase the maximum pumping limit for the state water project's Delta pumps to 8,500 cubic feet per second. I strongly believe that this project is unnecessary and could further damage a Bay-Delta ecosystem that has already been harmed by excessive water diversions.

Form 9-1

I urge you to withdraw the draft environmental impact report and issue a new draft with a preferred alternative that includes a significant reduction in Delta water diversions. The analysis of this alternative should include potential environmental benefits, how water conservation and other proven water management tools can help the state meet its future water needs, and how such a reduction, combined with investments in other water supply sources, could improve the reliability of urban water supplies.

Form 9-2

It makes no sense to move forward with a project that will divert more fresh water from the Delta when Delta fish populations are crashing. Please withdraw the SDIP DEIR/S until the causes of the Delta fish decline are identified and fully resolved.

Form 9-3

California does not need to increase Delta diversions to meet its current and future water needs. The State's own Water Plan proves that increased investments in urban and agricultural water use efficiency and reclamation can meet our needs well into the future.

Form 9-4

At the minimum, the SDIP DEIR/S should consider an alternative that significantly reduces Delta pumping from current levels, actually improves Delta water quality and habitat, and protects fish. I also urge you to include, in the new preferred alternative, at least as much water dedicated to ecosystem restoration and protection as is required by the state's plan to protect and

Form 9-5

restore the delta -- the CALFED Bay-Delta Plan. The Department of Water Resources should work to restore the delta protections in that plan that have been undermined during the past five years.

F9-5 Cont.

Finally, I urge you to issue a full draft environmental impact report on the proposal to increase the state water project's maximum pumping limit once improved scientific information is available regarding the causes of the delta's decline and once this decline has been reversed.

F9-6

Please include me on your mailing list to be notified of any decisions or activities concerning this project.

Sincerely,

Responses to Comments

Form 9-1, Form 9-2, and Form 9-5

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form 9-3 and Form 9-6

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 9-4

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.

Form Letter 10

Form 10

Please stop the plans of the Department of Water Resources to implement the South Delta Improvement Project and the export of any additional water out of Delta until our estuary and its fisheries are restored. There have a decade of broken promises that these public resources would be restored. Given the collapse of the Delta food web, now is the time to restore the estuary and our fisheries before any more water is exported out of the estuary!

Form
10-1

The DWR's recently released Bulletin 160 clearly demonstrates that the state's water needs will be met for at least the next decade with the existing water infrastructure. There is no water crisis to justify the destruction of the Delta! The health of our Delta and fisheries is truly at stake!

Form
10-2

The Delta's wellbeing is in big trouble. I'm urging you to put a stop to the SDIP before irreversible damage is done.

Eighty-five percent of the water pumped from the Delta goes to farming. The Delta ecosystems are crashing and fish are disappearing yet the farmers continue to get water at insanely cheap prices. It's time the farmers start using water saving irrigation methods, pay the going rate or switch to crops that need less water. Something has to give before the Delta ecosystem is destroyed beyond repair. A billion dollar Northern California sport fishing industry is threatened and the local economies are at stake. Kill the fish and we won't need boats, gas, mechanics, marinas, sandwiches, sodas, ice, fishing tackle etc. Pumping the water is not only killing the Delta but hurting small businesses.

Form
10-3

Too much water is diverted from the Delta! The Delta is dying and allowing more fresh water to flow through to the sea will very likely stem the crashing ecosystems. It's time to make the politically powerful agriculture industry step up. Farmers use most of the water flowing south. They need to start using irrigation methods that conserve water or pay the going rate for water. If major changes aren't in place soon, the Delta and local sport fishing economies will be irreparably damaged

Form
10-4

I am writing to express my complete objection to the DWR's plan to increase water exports from the Delta. The Delta and its habitat are on the brink of total collapse, and now is NOT the time to increase water exports. All fish counts have now been drastically reduced to record all time lows, and increasing water exports at this time will only compound this most recent, drastic decline in fish counts. This great Estuary that once sustained multiple runs of salmon, striped bass, American shad, sturgeon, steelhead and a diverse food web is experiencing such low levels of productivity that an ecosystem crash seems all but inevitable.

Form
10-5

The Delta food chain is severely broken, and increasing water exports should not occur until the habitat's conditions are better understood, and the fish counts have returned to sufficient levels. Delta populations of important plankton and shrimp that help fuel the food web and drive the system's ecology have disappeared, as have many other important species including Delta smelt, longfin smelt, threadfin shad, and young-of-the-year striped bass. Recently the Dept of Fish and Game has sounded the alarm over a dramatic

Form
10-6

drop in the sturgeon population. Several factors may possibly be at play here, but everyone agrees and understands that increased water export rates at this time will cause additional and possibly irreversible damage to this great Estuary.

Even the DWR's own recently released Bulletin 160 clearly demonstrates that the state's water needs will be met for at least the next decade with the existing water infrastructure. There is no water crisis to justify the destruction of the Delta. The health of our Delta and fisheries is truly at stake here, and we should not increase water exports and risk irreversible damage to an already broken habitat.

**Form
10-2**

Responses to Comments

Form 10-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 10-2

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.

Form 10-3

Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*, describes the different alternatives that were evaluated for their ability to meet the project purpose and need. The effects of the SDIP on biological resources, including fish, are fully described in the SDIP Draft EIS/EIR in Chapter 6, which includes impact assessment for fish, vegetation and wetlands, and wildlife. Where a significant effect is found to result from implementation of the SDIP, DWR and Reclamation will implement mitigation measure(s) to ensure that the overall impact is less than significant. Additionally, DWR and Reclamation have committed to a Stage 2 evaluation as explained in Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 10-4

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

Form 10-5

DWR and Reclamation have committed to a Stage 2 evaluation as explained in Master Response K, *Staged Decision Making Process* and Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

Form 10-6

Please see Master Response B, *Relationship between the South Delta
Improvements Program and the Pelagic Organism Decline*.

Responses to Comments

F11-1

The SDIP is composed of two stages. Stage 1 includes constructing and operating the a fish control gate at head of Old River and three flow control gates located on Middle River, Grant Line Canal, and Old River. Stage 2 would increase diversions to CCF up to 8,500 cfs. A description of how the gates would be constructed and operated is provided in Chapter 2, "Project Description," of the SDIP Draft EIS/EIR.

F11-2

Please see Master Response J, *Relationship Between the South Delta Improvements Program and the CALFED Record of Decision and EIS/EIR Programmatic Documents*.

F11-3

Stage 1 of the SDIP would not increase south-of-Delta exports. Stage 2 of the SDIP would increase diversions to CCF up to 8,500 cfs. An evaluation of the amount of additional water that would be exported under Stage 2 is provided in SDIP Draft EIS/EIR Section 5.1, Water Supply. The Draft EIS/EIR evaluated the environmental impacts of increasing exports as described in the water supply chapter. Increasing exports beyond those amounts would require additional analysis.

F11-4

Section 5.3, Water Quality, of the SDIP Draft EIS/EIR describes the expected changes in water quality as a result of operating Stage 1 and Stage 2. Stage 1 does not include increasing exports from the south Delta. As shown in Table 5.3-1, water quality would general remain the same compared to existing conditions or would improve. Table 5.3-3 shows changes in water quality under Stage 2 conditions. Similar to Stage 1, the quality of water in the south Dela would generally remain similar to existing conditions or would improve.

F11-5

Please see response to comment F11-4. SDIP Draft EIS/EIR Section 5.2, Delta Tidal Hydraulics, provides the assessment of changes in south Delta water levels. As summarized in Table 5.2-6, there would be a small change in the tidal levels and flows for each project alternative.

F11-6

Section 6.1, Fish, of the SDIP Draft EIS/EIR includes an assessment of striped bass and black bass.

F11-7

Please see Master Response B, *Relationship Between the South Delta Improvements Program and the Pelagic Organism Decline* and Master Response K, *Staged Decision-Making Process*.

F11-8

Chapter 2, "Project Description," of the SDIP Draft EIS/EIR provides a description of the fish control gate and the flow control gates. The head of Old River, Grant Line Canal, and Old River at DMC gates will all include boat locks. The Middle River gate does not include a boat lock, however, boats would be able to pass over the gate when not in use.

F11-9

Please see Master Response K, *Staged Decision-Making Process*

F11-10

Please see Sections 5.3, Water Quality, 5.2, Delta Tidal Hydraulics, 5.5, Flood Control and Levee Stability, and 6.1, Fish, of the SDIP Draft EIS/EIR regarding water quality, water levels, flood control, and fish, respectively.

Form Letter POST

POST

Dear Mr. Marshall:

POST-1 | I oppose the actions proposed in the draft EIR/EIS for SDIP. SDIP is another
POST-2 | attempt to appropriate additional water from the already-compromised Bay-Delta
POST-3 | Estuary. The dredging, barriers, and eventual increased pumping and water exports
POST-4 | of SDIP will only worsen the Delta Ecosystem Crash (aka Pelagic Organism
POST-5 | Decline). Instead of the measures you propose, measures that will benefit special
POST-6 | interests such as Westlands Water District, I request the following: Withdraw the
EIR/EIS. Reduce pumping rates and water exports to those that existed in the early
2000s when Delta Smelt appeared to be on the road to recovery. Increase ecosystem
restoration measures. Improve water quality. Ensure the ecosystem of the Bay-Delta
Estuary, including its fishery resources, is restored and self-sustaining before you con-
sider appropriating more of its lifeblood (water). As California's Water Plan demon-
strates, our needs will be met for several more decades through conservation, reclama-
tion, efficiency, and conjunctive use.

Signed _____

Printed _____

Address _____

Responses to Comments

POST-1

Please see Master Response B, *Relationship between the South Delta Improvements Program and the Pelagic Organism Decline*.

POST-2

The SDIP is intended to balance the needs of the environment with the needs of the water users south of the Delta. Impacts identified as potentially significant will be mitigated to a less-than-significant level to ensure minimal effects on the environment.

POST-3

Please see Master Response D, *Developing and Screening Alternatives Considered in the Draft EIS/EIR*.

POST-4

The SDIP is the first CALFED conveyance action. Several restoration and water quality projects have already been implemented or are underway. CALFED actions implemented specifically to improve habitats and the environment help to reduce the effects of the overall CALFED Program on these resources. However, CEQA and NEPA require lead agencies to identify and mitigate specifically impacts on environmental resources. Therefore, specific mitigation of each specific impact resulting from the implementation of the SDIP is proposed.

POST-5

Please see Master Response K, *Staged Decision-Making Process*.

POST-6

Please see Master Response L, *Relationship between the South Delta Improvements Program and the California Water Plan Update 2005*.