

Water Transfers

1. Local Agencies of the North Delta (LAND)

2015 comments on the BDCP/WaterFix

Complete document here:

<http://restorethedelta.org/wp-content/uploads/2015/11/LAND-WaterFix-Alt.-4A-Cmnt-Ltr-10.30.15.pdf>

pp 6-7

Continued Reliance on Undisclosed Water Transfers to Operate the North Delta Diversions

LAND previously commented on the omission of disclosure and analysis regarding the BDCP's plan to rely on water transfers to meet flow and water quality requirements necessary to operate the project. Those concerns remain. The RDEIR/S fails to disclose what transfers are necessary for the project and the amount of increased transfers that would occur as a result of the Tunnels. Without providing any details, the Alt. 4A operations description states that spring outflow for Longfin Smelt would be provided by water purchases for willing sellers. (RDEIR/S, p. 4.1-6.) The Alt. 4 BDCP analysis describes ultimately ramping up to 1.3 million acre feet of water transfers (RDEIR/S, App. D, pp. D.3.83 to 85.); it is unclear to what extent these water transfers are contemplated under Alt. 4A. Tunnels proponent Kern County Water Agency has indicated its plans to meet spring outflow requirements with Proposition 1 funded water purchases. (KCWA RDEIR/SDEIS draft Comment Letter, October 30, 2015, p. 3.) Use of these funds to meet regulatory requirements is specifically prohibited. (Wat. Code, §§ 79709(c), 79710(a), 79753(b).) The Tunnels proponents cannot plan on securing freshwater flows to meet any of the existing compliance obligations of the state and federal water projects (SWP/CVP.)

Water transfers result in myriad environmental impacts, including groundwater depletion, loss of agricultural crops, reduction in wildlife habitat and other impacts. Moreover, the state's water accounting system does not monitor critical streamflow data that would be necessary to perform accurate accounting of water transfers, making "gaming the system" a real risk. The location of new, northern SWP/CVP diversions will by definition increase water transfers from north to south bypassing the Delta. There will be tremendous demand to attempt to use the Tunnels for more transfers, and there will be pushback against letting flows bypass the new diversions. As these impacts will occur as a result of the project, they must be analyzed in the RDEIR/S. If the project relies on transfers or will facilitate additional transfers, those facts must be disclosed and analyzed; the RDEIR/S fails to do so.