

From: Nancy Arbuckle
To: info@planbayarea.org
Subject: Comments on DEIR for Plan Bay Area 2040
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Thank you for the opportunity to provide comments the DEIR for Plan Bay Area 2040. My comments follow:

Failure to adequately address impacts on rivers and Delta

I believe the DEIR for Plan Bay Area 2040 fails to adequately address potential significant negative environmental impacts on the Tuolumne and other rivers as well as the Sacramento-San Joaquin Bay-Delta. I am concerned that the impacts of population and job growth projections included in Plan Bay Area have not been adequately studied.

The Plan forecasts that the SFPUC's customer base will increase by 28%, from 2.6 million to 3.3 million people by 2040. Population in the Santa Clara Valley Water District service area is projected to increase by 26%, and population in the East Bay Municipal Utilities District by 25%. This level of growth is simply not sustainable.

Failure to give equal weight to ecosystem restoration

The Delta Reform Act of 2009 established as state policy that achieving water supply reliability and restoring the Delta's ecosystem must be given equal consideration. The Plan Bay Area Draft EIR offers no real analysis of potential impacts on our waterways and the Bay-Delta, and fails to give equal weight to ecosystem restoration.

A 2010 flow criteria report by the State Water Resources Control Board determined that 60% of the San Joaquin River's unimpaired flow would be necessary to fully protect fish, yet currently only about a third of the River's natural flow reaches the Delta on average. The Tuolumne is the largest tributary to the San Joaquin, and on average only 20% of its unimpaired flow reaches the San Joaquin. The precipitous decline of Central Valley salmon, steelhead and other aquatic species over the past few decades suggests that humans are already diverting too much water from our rivers and the Delta.

The EIR must evaluate how the increase in water demand might impact our river and Delta ecosystems, especially potential impacts to fish and wildlife, water quality and recreation.

Failure to address extended drought conditions

The EIR is inadequate in that it appears to focus on water supply impacts from a single dry year versus a multiple-year drought. Most water agencies have adopted drought plans aimed at managing three-to-five-year droughts; the SFPUC's drought plan addresses an eight-and-a-half-year drought. While extended droughts create challenges for water agencies, they have a much more serious impact on fish and wildlife, including species protected by the Endangered Species Act. Water quality, protected by the Clean Water Act, also is heavily impacted by droughts.

Inadequate mitigation

The primary mitigation measure included in the EIR suggests that water agencies and municipalities must conserve more water and/or identify new sources of water, such as reclaimed water and desalination. This is not an adequate mitigation. The EIR must address potential environmental impacts that might occur if conservation and alternative water supplies are unable to keep pace with demand, and identify mitigation measures to address these potential impacts.

Jobs/housing imbalance will continue regardless

While a case could be made for adding new housing stock to the Bay Area to enable people to live closer to their jobs and/or public transportation in order to reduce greenhouse gas emissions from automobiles, the projected growth in employment will likely offset any gains at addressing the jobs/housing imbalance. The Plan forecasts a 31% increase in households, and a 37% increase in jobs. If these projections are accurate, the region will continue to face a severe housing shortage, while adding a lot more stress on our aquatic ecosystems. The final EIR must include an alternative that dramatically reduces the amount of projected jobs growth.

I appreciate the opportunity to be heard.

Nancy Arbuckle