May 22, 2014

BDPC Comments
Ryan Wulff, National Marine Fisheries Service
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

SUBJECT: Support BDCP EIR/EIS Alternative #4
Email: BDCP.comments@noaa.gov

Dear Mr. Wulff,

As the General Manager of Burbank Water and Power (BWP), I am writing to express support for the Bay Delta Conservation Plan (BDCP) and specifically Alternative #4 as outlined in the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

Following the passage of California’s comprehensive water package in 2009, BWP has closely monitored the BDCP process as the Burbank community depends on the health of the Delta for the 103,000 residents. I am encouraged by the release of the public draft of the plan and environmental documents. The outcome of this multi-year effort reflects unprecedented collaboration of public water agencies, state and federal fish and wildlife agencies, business and agricultural stakeholders, local governments and the public.

The draft plan and accompanying environmental documents identify several options for addressing the current challenges with California’s water supply delivery system and the Delta ecosystem. BWP supports Alternative #4 as the best alternative to meet the state’s equal goals of water supply reliability and Delta ecosystem restoration. Alternative #4 provides for three new intakes on the Sacramento River in the northern Delta and a 9,000 cubic feet per second tunnel system to convey that water to the existing aqueduct system, coupled with a comprehensive habitat conservation plan for the Delta.

**Water Supply Reliability**

In BWP’s view, the construction of new water intakes and related underground conveyance is an essential element of the BDCP. The proposed twin tunnel system will protect public water supplies if a seismic event were to trigger levee breaks and cause saltwater to intrude from San Francisco Bay. The new intakes in the northern Delta will reduce conflicts between water systems and migrating fish species such as salmon and provide for much needed operational flexibility. Habitat improvements will also provide native species with the healthy ecosystems they need to survive.

**Ecosystem Restoration**

BWP also supports Alternative #4 to help restore fish and wildlife species in the Delta and minimize impacts on Delta communities and farms. Alternative #4 strikes the best balance between the multiple competing uses (e.g., agricultural, recreation, Delta communities, and water supply) and environmental pressures (e.g., subsidence, seismic risk, climate change, and ecological collapse). BWP also endorses
the proposed changes to shrink the intermediate forebay surface area from 750 acres to 40 acres, and realign a segment of the proposed tunnels to the east to utilize more public lands and avoid Delta communities. These changes will reduce the BDCP impacts to landowners and Delta residents.

**Economic Considerations and Stability**
A study released through the public process indicates that the BDCP would result in a significant net economic benefit to the State of California, including a net improvement in the economic welfare of California residents of $4.8 billion to $5.4 billion. The results of the statewide economic impact study analyzed the project as an investment for the state as a whole and concluded that there is a positive economic benefit. Alternative #4 also provides for 50 years of regulatory stability which will help to protect an estimated 1.1 million jobs throughout the state and create more than 177,000 jobs from construction projects and environmental restoration.

The City of Burbank has been working diligently on becoming more sustainable. Burbank was the first city in the nation to voluntarily adopt a 33% renewable portfolio standard and is currently serving 25% of its power from renewable resources. At the end of 2014, BWP will have completed a four-year build out of recycled water that will serve 13 percent of Burbank’s annual water use with recycled water. BWP also has a goal to conserve 500 acre feet of water annually through consumer incentives and with the assistance of grant funding to support increased water supply reliability, reduce impacts on imported water supplies and surface water ecosystems, and reduce the impact of drought conditions. Burbank also won the coveted 2014 Green California Leadership Award for the BWP EcoCampus. Burbank has the most LEED Platinum Buildings in the state.

BWP supports the BDCP, and specifically endorses Alternative #4, as adopted in the City’s 2014 Legislative Platform. Alternative #4 is the best workable draft proposal that can lead to a final successful plan of action because it offers the greatest solution to minimize seismic risk to our state’s water supply infrastructure while restoring the Delta’s ecosystem. The present version of Alternative 4 represents substantial refinements and additional scientific work and analysis to identify a form of the proposed BDCP that is grounded in solid science and reaches what even the Department of Water Resources, the project proponent and lead agency for CEQA, considers the optimal balance between ecological and water supply objectives.

Sincerely,

Ron Davis  
General Manager, BWP

c: Senator Diane Feinstein  
Congressman Adam Schiff  
Congressman Brad Sherman  
State Senator Carol Liu  
Assembly Member Mike Gatto  
Burbank City Council  
Burbank Water and Power Board