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Re: BDCP Public Comment Review Time Extension Request

Dear Responsible Officials:

I am writing on behalf of the Environmental Protection Information Center ("EPIC"), a nonprofit organization that works to protect human and natural communities in Northwest California. Consistent with this mission, and in representation of the staff, board of directors, and the 2000 individuals that make up the membership of EPIC, our organization submits the following comments in regards our request of an extension in the public comment review time currently provided for submitting informed comments on the Bay Delta Conservation Plan Draft EIR/EIS.

In a letter from November 21, 2013 (prior to the December 13, 2013, release of the BDCP Draft Plan and EIR/EIS), the Environmental Water Caucus, of which EPIC is an active participating member, requested that the public review and comment period be extended beyond the planned 120 days, based on the anticipated 25,000 page estimated volume of the BDCP documents. Staff at our organization has now begun review of the 40,214 actual pages of the released documents, and we reiterate the request that you extend the review and comment period for at least 120 additional days, due to the extraordinary size of the documents to be reviewed.
Based on the dictated 120 day review time period, the public is being asked to review 473 pages per day during the 85 working days that are available during the comment period. Though our cursory review of the documentation has already revealed glaring omissions, such as the lack of analysis of impacts of the proposed water conveyance structures of the BDCP on Coho Salmon in the Trinity River, our organization finds in-depth review of the BDCP Draft EIR/EIS to be nearly impossible in the short time frame defined within the current public comment period. As was pointed out in the previous request, NEPA regulation 40 CFR 1502.7 declares that the text of an EIS for “proposals of unusual scope or complexity shall normally be less than 300 pages.” As was also stated in that previous letter, it is impossible for organizations interested in thoughtfully responding to these BDCP documents to be staffed for a thorough NEPA/CEQA review based on the outlandish size and complexity of the documents to be reviewed. Our public interest conservation organization is community supported and grassroots scale; it is imperative that the public be granted an appropriate opportunity to understand, assess, and provide comment on a proposed project that would transform the nature of water management in our state for generations to come, with potentially very harmful outcomes for natural and human communities in the Northwest corner of the state.

In conclusion, our organization respectfully requests that the public review period be extended for an additional 120 days, until August 15, 2014, based on the size of the actual documents you released on December 13, 2013.

Respectfully,

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