SAN DIEGO™ REGIONAL CHAMBER OF COMMERCE

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June 25, 2014

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

Re: Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for the Bay Delta Conservation Plan

Dear Mr. Wulff:

On behalf of the San Diego Regional Chamber of Commerce (Chamber), I submit this letter in response to your agency's request for comments on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) on the Bay Delta Conservation Plan (BDCP). With more than 3,000 members representing 400,000 employees, the Chamber is the largest nonprofit advocate for regional businesses and is dedicated to growing commerce in the San Diego region. Our members offer the following comments on the EIR/EIS.

We support rehabilitating the Bay Delta and believe any fix must be undertaken with an eye toward what is appropriate for the entire state. But we are concerned with the absence of a final financing plan for the BDCP. Specifically, without a discussion of the financing mechanism and cost allocation for the proposed mitigation measures, it is impossible to determine what, if any, alternative mitigation measures should be considered if financing for the proposed mitigation measures becomes challenging. Less costly mitigation measures that could be equally or more effective should be considered in the event funding sources for the mitigation measure contemplated cannot be secured. We understand Federal and State ESA regulations require funding assurances before permit issuance. An implementation agreement and funding assurances are integral to the permitting process, though neither has been released publicly. Without them, our members are unable to assess the feasibility of the mitigation set forth in the EIR/EIS.

Our members are primarily concerned with how mitigation of the project will be implemented and what, if any, effect the project cost will have on local businesses. Water supply is critical to our region's businesses, as is cost of water supply. The financing plan serves to alert businesses to the cost consequences of the BDCP. Until a final financing plan is provided, we cannot determine how implementation will be funded, nor can we determine whether mitigation can be assured.

It is our understanding that the San Diego County Water Authority submitted a detailed technical analysis of the BDCP EIR/EIS. We share the concerns raised in that letter and look forward to the opportunity to review responses to those questions. We also look forward to a continued dialogue and the opportunity to review additional information as it becomes available. If you have any questions, please do not hesitate to contact Laura Shingles, Policy Analyst, at (619) 544-1378 or lshingles@sdchamber.org.

Sincerely,

Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce