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Subject: BDCP Comment Review

Based on the expected volume of the 25,000 or more pages of BDCP documents which are scheduled to be released on December 13 with a 120 day public review period, we believe that review and preparation of formal response comments will be an impossible task. Additionally, 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.”

25,000 plus pages would require more than 200 pages per day to be covered, counting every Saturday and Sunday, and including Christmas, New Years, Presidents’ Day, and Martin Luther King’s Birthday. If the BDCP draft plan and EIS/EIR documents are a similar size, this estimate would double. Moreover, reading the enormous mass of material is just the beginning; the commenter must take notes on what has been read and then relate the portions of the Plan to the portions of the Draft EIR/EIS, and then review requirements applicable to EIRs and EISs. Finally, the commenter must then prepare and revise meaningful comments. It is impossible for organizations interested in thoughtfully responding to these BDCP documents to be staffed for a thorough NEPA/CEQA review.

The EWC and its 33 grassroots members respectfully request that the period be extended beyond the currently planned 120 days of public review, based on the size estimate of the documents you will release in December.

Co-Facilitator