

Delta Conveyance Project

Scoping Comment Card



DCS201

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

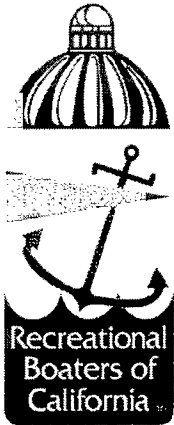
Name Kristen Oliner Date 2/19/20
Organization Restore the Delta Email Kristenoliner@gmail.com
Address 1255 Oro Valley Cir
City Walnut Creek State CA Zip 94596

I spoke tonight (Brentwood) regarding my concern that even a "single tunnel" option is NOT an acceptable alternative. The effect of Climate Change requires an updated and monitored assessment of conditions in the Delta now and frequently in the months and years ahead. The Harmful Algal Blooms are showing indications of air borne toxins which are impacted Environmental Justice communities.

The federal approval for increased pumping of water in and enroute to the Delta will compound harm from this single tunnel project. The "Science" being used to justify the federal withdrawals is being questioned by large numbers of scientists.

Email comments to DeltaConveyanceScoping@water.ca.gov.

Therefore: Assumptions based on this science cannot be trusted.



RBOC
Protecting your boating interests.™

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Sacramento CA 95814
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DCS202

RBOC Opposing Re-started Delta Conveyance Project January 23, 2020

RBOC is continuing its opposition to the controversial proposal to construct a tunnel through the Sacramento – San Joaquin Delta as Governor Newsom's Department of Water Resources "restarted" the Delta single tunnel Delta Conveyance Project last week with a Notice of Preparation [NOP] that initiates the Environmental Impact Review [EIR].

RBOC urges boaters to submit their concerns by the March 20 deadline, and to attend and speak at one of the seven public scoping meetings to be held on February 3, 5, 10, 12, 13, 19 and 20 throughout the state.

The Delta Conveyance Project, even as a single-tunnel version of the previous WaterFix project, would be a massive construction project that could seriously impact boaters' access to the Delta for years to come.

Stated RBOC President Daniel J. Hodge: "RBOC and the boating community must continue to speak strongly during this new phase. Even as reconfigured, the single tunnel would significantly impair the ability of boaters to access to the 1,000 miles of waterways in the Delta – especially during the 13 or more years of construction."

The proposed Delta Conveyance Project is the latest threat to boating in the Delta. The project is described in the NOP is a single underground tunnel with two intakes that together have a total diversion capacity of 6,000 cubic feet-per-second (cfs). The NOP notes that there will likely be alternatives identified that evaluate a range of capacities from 3,000 cfs to 7,500 cfs.

Construction and commissioning of the overall conveyance project is projected to take approximately 13 years. During construction, major waterways and tributaries could be closed to recreational boaters. The project announcement notes that probable effects may include the displacement and reduction of recreation sites as well as effects on marine traffic.

RBOC concerns include:

- The significant, negative impact that will occur with the closure of waterways to navigation during the lengthy construction period.
- The absence of a plan to ensure that the Delta infrastructure will not only be preserved, but improved.
- The lack of surety that the plan will address the threat that climate change and increased water transfer pose to the amount and quality of water in the Delta.

RBOC urges boaters to take action by submitting comments and attending one of the seven public scoping meetings.

Public comments on the NOP are due on March 20, 2020 by 5 p.m. and may be submitted via email at DeltaConveyanceScoping@water.ca.gov or mail at Delta Conveyance Scoping Comments, Attn: Renee Rodriguez, Department of Water Resources, P.O. Box 942836, Sacramento, CA 94236.

- continued

Daniel J. Hodge
President

Winston Bumpus
Vice President – North

Todd Leutheuser
Vice President – South

Otis Brock
Secretary – Treasurer

Ray Durazo
Past President

Legislative Advocate
Jerry Desmond
Director of
Government Relations

Mail donation checks to
RBOC

c/o Otis Brock
1253 Yuba Avenue
San Pablo, CA 94806

Donations to RBOC are
not tax deductible due
to our extensive lobbying
activities

Shasta Dam Raise Project
c/o: Stantec
3301 C Street, Suite 1900
Sacramento, CA 95816

Patricia Osborn
1130 Upland Road
Mount Shasta, CA
96067

DCS203
California Department
Water Resources

Delta Conveyances
Environmental Review
March 2020

To Whom It May Concern,

I am writing to submit my public comment during the scoping period in regards to the proposed rise of Shasta Dam, I have many concerns that I feel warrants additional consideration and through investigation in regards to the impact this proposed project will have upon the environment, cultural sites and the surrounding communities.

I grew up in Shasta Lake City, formally known as Central Valley. Our family has resided in this small community for four generations. I have spent the majority of my life in and around the Shasta Lake area and have considerable knowledge of the waterways, lake shore and culturally sensitive areas.

Workforce and Housing:

This proposed project will require a massive work force, for all aspect of the construction. There is not enough workforces in the greater Redding area, therefore to obtain adequate and sustained amount of employees, this will require people to migrate into the communities surrounding Redding in Northern California. There is a major housing shortage in the Redding area due to the recent Carr fire that destroyed 1000 homes in 2018; this has left available rental units, and RV space at an all-time low. Likewise the real estate market in Northern California has become in short supply, as the recent loss of over 11,000 homes from the Camp fire is resulting in Paradise residents fanning out in nearby townships in search of permanent housing, including the Redding area.

When Shasta Dam was originally constructed, there were numerous new residential communities in the surrounding area to support the influx of workers in need of housing. These areas included, Keswick, Summit city and Project city, and commonly referred to as Dam housing, which were constructed with sub-standard materials and in close proximity of each other. I bring this to your attention related to the scooping comments because as a result of this proposed large scale project, directly result in a major increase in demand for new construction, a housing boom. This housing boom will have a direct impact on the surrounding environment that must be included in the scoop of the EIR. Many aspects of developing new construction have negative effects on the environment, such as clearing land of trees, paving and concrete decreasing surface water absorption, increase waste material to landfills, and air pollution such as dust and emissions from construction vehicles. Furthermore, as developers utilize land needed to build new homes this will inevitable increase the interface that housing population has into the forestlands. This increased interface with forestlands will result in the heightened fire risk that has plagued the rural northern Californian communities. Additionally, as owners of a cabinet woodshop, we have already experienced an overwhelming demand for new construction work, due to the rebuilding of residence lost from recent fires, so my question to consider is; "where is the workforce for the housing construction going to come from when all available contractors are already maxed out, many for several years?" As I have clearly demonstrated with the original construction of Shasta Dam there was a well-documented housing boom necessary to support the influx of the workforce. It is the duty of the EIR to fully evaluate all aspect (traffic, air-quality, noise pollution, etc.) that the proposed raise of Shasta Dam project will directly impact, such as the effects on the environment of a major housing boom, and additional influx of workforce required to supply the construction companies.

Air Quality:

I have been on the Siskiyou County Air Quality Pollution Control Board, as a Community Advisor Board Member for two terms. I have several points I would expect the EIR to fully evaluate. There is natural topography of the area of the proposed project that needs to be considered, in regards to air quality. California has a natural large central valley that comes to a point in the foothills in the area of Shasta Dam. This topography acts like a block of sorts trapping air and heat leading to air stagnation. There are numerous existing points of major air pollution contributories, including but not limited to

- Knauf Insulation Factory, located at 3100 Ashby Rd., Redding
- Lehigh Cement, located 15390 Wonderland Blvd., Redding
- Mountain Gate Quarry, located at 20285 Radcliff Rd., Redding
- Sierra Pacific Industries, located at 3735 El Cajon Ave, Shasta Lk

The above mentioned are within 20 mile radius of the proposed project site.

Additionally, Interstate 5, Highway 299, 273, and 44 of which attribute to diesel PM 2.5 toxic pollutants are within close proximity to the proposed project site. The EIR for the proposed raise of Shasta Dam must consider its fleet mix in its entirety, not to exclude employee, vendors, material suppliers, on/off site heavy equipment, contracted transportation and housing construction. A full evaluation with the inclusion of the pre-existing contributories and the projected emissions resulting from this proposed project must be fully evaluated to determine if a toxic hot zone will result from this proposed Project.

Traffic:

There are only main two roads that lead to Shasta Dam. Lake Boulevard and Shasta Dam Boulevard both become single lane narrow roads that intersect each other. These two roads are in residential areas and do not have proper sidewalks nor adequate street lights. As a child growing up off Lake Boulevard in the area of Williamson Road I can attest to how dangerous this section of roadways was and still presently. Traffic tends to speed the road is windy and had limited sight lines due to trees. There is a small shoulder along the roads that is gravel and difficult to ride a bike on for children. The street lights along these roads are few a far between in this rural area that make it nearly impossible for a pedestrian to navigate safely in the evening hours. There are two school located directly off these roads which include, Buckeye Elementary and Mountain Lakes High School. There are parks located directly off Shasta Dam Boulevard that include Boomtown BMX track and Margaret Pelf Park. I am concerned

about the marked increase in traffic fleet mix that will result as a direct effect of the proposed Shasta Dam Project on these remote, rural, narrow roads for the general safety and well-being of the communities population.

Water Quality:

- Recreational use of Shasta Lake from motorized boating has resulted in measurable amount of engine oil, exhaust, and other toxic contaminants deposited directly into the water supply. Unlike automobiles that require routine SMOG, and oil leaks are visible on the surface, boat are often mass polluters of the water in which they are utilized. I routinely see noticeable oil slick in the water near all boat ramps and marinas. Shasta Lake has a large year round high volume boat usage. The proposed raise Shasta Dam project stated that one of its main objective is restore fish populations and the inclusion of the effects from boat usage must be fully consider in the EIR evaluation.
- Human waste in and around Shasta Lake from free range camping is deplorable. There are only two floating public bathrooms available on the vast space of Shasta Lake. I have free range camped in numerous locations and located mounds upon mounds of human feces. This is common place at sites such as Ski Island, Jones Valley on the rocky point local call Crystal point, and Beehive in Lakehead, only noted a few of these sites. Removing old vault bathrooms from campsites will undoubtable uncover leaking human waste into the soil. Houseboats do drop there holding tanks into the lake, although illegal it is very difficult to catch them in the process due to the vast space of Shasta Lake. I did not go to this lake for serval years after one occasion on the Pit arm of the lake when dove in from my boat only to surface in very close proximity to a floating large formed stool. I am concerned that raising Shasta Lake will result in a pike in this affluent intake into the water supply.
- Unregulated fire pits and trash located on the shores of Shasta Lake. Lake Tahoe has a motto of "Keep it Blue" then Shasta Lake motto must be "Trash Shasta Lake". I have witnessed heartbreaking amount of trash at Jones Valley to the point they call it Pollution Point. Ignorant

youth commonly burn discarded wood pallet in bonfire style parties and I carry a magnet in my boat, in an attempt to remove the nails. I have witnessed people bringing household trash to the shore of the lake to burn it, including toxic chemical, such as paint, and tires. I have spent entire days filling large ice chests with broken glass. College students annually come and have trashed campsites to the point of making the local news. All these conditions result in unsafe, unhealthy conditions at the shoreline of Shasta Lake, which directly affect the water conditions and fish populations within the lake.

- To fully evaluate the current water conditions there must include a walking tour of every boat harbor on Shasta Lake. There are hundreds of old unused stored personal boats and houseboats that are docked, that the current conditions that I have witnessed are that they are visible dilapidated, decomposing, and abandoned from remote owners. I expect that they are leaking contaminants into the water.
- Additionally Shasta Lake is a reservoir that was filled on known abandoned mine sites that have resulted in toxic levels of Mercury that has tainted the fish populations. This fact is well documented and has never been mitigated.

My question for the EIR to consider in their evaluation of feasibility is the fact that there are two functioning large scale water bottling factories, with three more proposed just upstream in the northern towns of Mount Shasta, Weed, Dunsmuir, and McCloud. These water extracting factories remove large amounts of water from the ecosystem and result in a net loss of water flowing into Shasta Lake, these companies include

- Crystal Geyser Roxane, located at 1440 Mary's drive, Weed CA
- Mount Shasta Spring Water, office 1878 Twin View Blvd. Redding

Proposed water extraction / bottling factories in a current planning Phase include

- Crystal Geyser, located at 210 Ski Village Dr, Mount Shasta CA

- McCloud Artesian Spring Water Company. EIR underway
- Castle Rock Water Company, located at 4121 Dunsmuir Ave, in which the city of Dunsmuir has recently opened applications for this site.

In addition evaluate the water extraction source and usage from the, Snow Mountain Spring Water Distributor located 3625 Old 44 Drive, Redding CA.

It is deemed pertinent that the EIR to the Shasta Dam Project thoroughly evaluate and conclude a rational answer to the following question.

“How can California claim to need to build 18 feet higher on Shasta Dam for the purpose to increase water storage, when upstream they are permitting several private companies, with more slated to open, to extract massive amount of pure clean water annually which in turn is exported out of California to international areas?”

Emergency Action Plan.

There is an estimated population in 2018 of Redding 91,794, Anderson 9,932, Cottonwood 3,316, Red Bluff 14,287 for a total of 119,329 estimated population at extreme risk zone in the event of a Shasta Dam failure. There is currently no advanced warning system in place such as a tsunami warning alarm. Why? I insist that as an aspect of the proposed Shasta Dam project include mitigated safety measure that will require the instillation of a Tsunami type advanced warning system and full evacuation plan in place. If any construction were to occur upon the 74 year old Shasta Dam it could and would increase the risk for catastrophic failure. It is a duty of this proposed Project EIR to protect the surrounding communities and citizens from direct harm.

On September 20th, 2017 there was a mere 3.8 magnitude earth quake struck 16.7 miles west of Burney, there is video documentation from the Winnemen Wintu tribe of the effects on the surface water in Shasta Lake. The Tribe was on their annual Run4Salmon journey paddle portion across Shasta Lake, when the water suddenly became over taken by waves that capsized their boats. They did not know there was a nearby earthquake that same time frame. It is well documented the effects of reservoirs with the prolonged weight of water storage upon fault lines. Increasing the storage capacity of Shasta Lake will further the high risk associated with earthquakes in this region of California.

I presently live in the city of Mount Shasta; the volcano that I have personally witnessed is continuously venting from its summit, and has been deemed "Very High Threat" from the U.S. Geological Survey in 2018. This volcano is presently having its ice cold water extracted from it even in historically drought years. These present circumstances is increase the risk of volcanic activity in this region, the indigenous Winnemen Wintu have spoken of grave danger associated with this volcano losing it cooling measures through reckless water extraction. So for a safety question to consider is: when (not if) there is another volcanic eruption from Mount Shasta that sends a cascade of water and debris into the rivers that contribute to Shasta Lake. Will the dam be strong enough to hold a tsunami of debris?

It is a duty of this proposed Project EIR to protect the surrounding communities and citizens from direct harm.

Cultural Impact.

The Winnemen Wintu tribal people are historically well documented; it is a proven fact that the land upon which Shasta Dam was built and latter filled was the majority of land within their territory. I have been in strong and direct support of the Winnemen Wintu tribe for the last 4 years, as I have participated in the Run4Salmon prayer journey that happened annually in September since 2016. I have traveled through sensitive scared sites on this journey, laid down prayers at the sacred fire at the McCloud Bridge Campground, which was once the homestead of their family members. AB52 cultural considerations must be of utmost importance to the EIR of the proposed Shasta Dam Project. The full evaluation of cultural sensitive sites that will be directly affected should be supportive of the conclusion that NO

dam raise is acceptable. The cultural desiccation these indigenous first nation people have endured is a crime against humanity and must not be continuously disregarded. It is expected that the EIR process will take the information provided by the Winnemen Wintu of high value with regards to the salmon restoration upon which they have been actively seeking a viable solution. I will omit detailed information in my comment as I am very well sure this topic will be addressed by numerous experts and natural conversationalist alike.

In closing I have one additional question I would like on the record.

Do the southern Californian counties and cities, and/or water districts that have invested millions into the Shasta Dam Project, do they in turn have increase water usage rights to the water stored in Shasta Lake? Is that regardless of the current lake levels and drought conditions? I will expect a clear answer to this simple question with legal documentation to support your response.

Thank you for your time and thorough and extensive elevation of all comment submitted in regards to the proposed Shasta Dam project, as we the citizen will be looking forward to reading every line in the Draft EIR.

EO!

Patricia Osborn, RN

Public Health nurse

Home Health Nurse, supervisor

Current seated Grand Jury Member of 2019

Air Quality Pollution Control Board on Advisory Committee as Community Member

Supporter of Winnemen Wintu cultural rights and restorative salmon efforts

3/2/20 Delta Tunnel Conveyance Project Scoping Comments

I want to honor the traditional lands of the Winnemem Wintu Tribe, where we currently stand.

My name is Raven Stevens. I live on the west side of Bulium Puuyuuk, Mt. Shasta, which is a major source area of California's water.

I am also on the Board of W.A.T.E.R., or We Advocate Thorough Environmental Review, located in Mt. Shasta.

Thank you for bringing a meeting up north. You must continue to hold meetings up here so the public can participate.

The definition of insanity is doing the same thing and expecting different results. Therefore, this project must take into consideration how PAST POLICIES have failed Tribes, the environment, fish and people, all who need water to survive.

Have we learned nothing from history? We have seen

- 1) the destruction of Tribes by genocidal policies,
- 2) the changing of policy for corporate interests (which you call family farms...)
- 3) the severe decline of winter and spring run Chinook Salmon, Steelhead, Delta Smelt and Green Sturgeon

The water that flows from source areas is considered a Public Trust. This means that this water must **MUST NEVER** be allowed to be sold for a profit. How will the EIR deal with “for profit” companies, like Westland’s Water District, who will make decisions that only benefit their “for-profit” schemes?

Westland’s Water District provides water for corporate farms. These corporations farm on arid and now polluted lands which should be pushed into retirement from agricultural production.

The EIR must analyze:

- 1) How District 1 benefits by the shipping of water out of our area to the South.
 - a. What are the real time mitigations in place to support the Water Recharge Areas, where the water is sourced?
- 2) How will the Salmon survive this Administrations new Biological Opinion? There needs to be a swim-way put in place around the Shasta Dam
- 3) How will redirecting the fresh water flow, into the proposed Tunnel effect the water quality in the Delta and surrounding areas? The EIR must analyze the impacts to salinity, pesticide levels, toxic hot spots, mercury and ability of all wildlife to survive more changes.

Lastly, how does climate change play into this project? Overall, scientists agree that there will be less snow pack and therefore less fresh water flowing into our creeks, streams and rivers.

In the EIR you must include how this project works **WHEN** there is less recharge water flowing into these river systems. If the Delta Tunnel goes online, it must “take less” water according to the amount flowing in, just like other users must “take less.”

Having this hearing today is not about your Agency just "CHECKING THE BOX" as if you are now "done." We cannot continue with the short-sightedness that has gotten us into this mess.

In order to make real change, your agency must always consult with, learn from and follow Indigenous leadership.

Thank you.

Operations of the new Delta Conveyance Project would increase the Department of Water Resource's ability to capture water during high flow events, the same as with the proposed Sites Reservoir project. Along with increased impoundment behind a raised Shasta Dam, these diversions would result in a great decrease in water quality, resulting in increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won't be cleaned out due to a lack of seasonal high freshwater flows in the Delta; with resulting detrimental impacts on the aquatic life in the San Francisco Bay and Delta. Already there's a severe drop in the numbers of returning Sacramento River Chinook salmon.

Scientists agree that allowing more, not less, water to flow through the Delta and west toward San Francisco Bay is essential for protecting fish life and providing a clean supply of drinking water for current and future generations. That means restricting pumping of water out the south end of the Delta into Central Valley farmland. The National Oceanic and Atmospheric Administration has reported over 80% of collected fish exhibited spinal deformities due to selenium. Yet the Central Valley Regional Water Board has issued a 25-year permit for toxic discharges of agricultural wastewater coming from the Westlands Water District into the San Joaquin River and the Delta and Bay. This discharge is high in selenium, mercury, nitrates, pesticides and other toxins, and is being discharged into the San Joaquin River, and thus into the drinking water supply of Bay Area residents and millions of Californians.

The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets that the tunnel project proposes. This might best be accomplished by stopping water deliveries to the Westlands Water District where ever more thirsty crops such as almonds are being planted, mostly for export.

A Westlands farmer has reported the district plans to convert most of their farmland into "solar farms" anyway. So this is about the water rights and enriching corporate interests, not about "feeding America".

This is not a complicated topic - this scheme is a scam to privilege the 350 entities in the Westlands Water District with more water rights at the expense of the health and wealth of the citizens of California.

Frank Toriello

President of We Advocate Thorough Environmental Review (W.A.T.E.R.)

Delta Conveyance Project

Scoping Comment Card



DCS206

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Steve Gordon Date 3-2-20
Organization Citizen Email sagordon@gmail.com
Address 15916 Oregon Rd
City Hornbrook State CA Zip 96044

Since fish are a big issue - has the protection of game fish predators been addressed & how? From my time in the Bay, delta, rivers and lakes, I observe countless Cormorants, otter, numerous species of merganser & other fish ducks, the non native striped bass, and seals all looking for dinner. For Instance, here in Redding, the fish ducks above the ACFD diversion cruise downstream and fly up to repeat eating the smolt & fry that we are committed to protect. Takes a lot of little fish to feed a hungry bird!

Delta Conveyance Project

Scoping Comment Card



DCS207

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name A. Elaine Kite Date _____
Organization Bear Creek Watershed Group Email avechaos88@gmail.com
Address 27108 Dersch Rd
City Shingletown State CA Zip 96089

Why is it called the Delta Conveyance Project when
the water actually ends up in southern Calif
and the central valley desert?

Delta Conveyance Project

Scoping Comment Card



The public scoping period is January 15, 2020 through March 20, 2020

DCS208

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Morgan Lindsay Date 3/2/20

Organization _____ Email morganclindsay@gmail.com

Address PO Box 764

City Ashland State OR Zip 97520

Dear Gov Newsome and State of California,

I urge you to fully study all the effects of this project including negative effects to the rivers, salmon, and natural ecosystems of all upstream river

basins. I especially urge you to respect the

full sovereignty of all Tribal Nations of the

total Sacramento River watershed. You must

consult with all federally recognized and

unrecognized tribal governments and elders and

youth. Native voices must be heard and

considered in this process. I also urge you

to consider alternatives to the challenges posed by rising sea levels due to climate change.

We must divert less water, we need to

keep the water in the river. Thank you,

Morgan Lindsay



The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Kylee Sorrelle

Date 3-2-2020

Organization HUTS Water Protectors Club Email KyleeSorrell@gmail.com

City WYU State CA Zip 95546

You must understand, what you are doing is wrong.
This project is wrong. Stop hurting Native people for
profit. Innocent (However you spell it lol). My people, the
Hupa, live and survive off of the river. It's sickening
to think a filthy corp like yourselves would do
such a thing. You completely disgust me. To think
water is just an object you can sell and profit off
of is so fucking stupid. People such as yourselves are
the reason climate change is real. We barely have
water left and we can't give any more to corps.
As long as I'm standing your project will not
go through. I am a water protector for as
long as I live :) Have a horrible day.

Delta Conveyance Project

Scoping Comment Card



DCS210

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Anna Powell Date 3/5/20

Organization Hupa Valley Tribe Email anna.rose.2122@gmail.com

Address 591 Millcreek Rd

City Hoopla State CA Zip 95546

This plan fails to acknowledge the fiduciary responsibility to protect Tribal Water Rights, as well as Tribal Cultural Resources such as Salmon, basketry materials and the tribal fishery. The effects on the Trinity River is seen as an in-direct effect when Trinity River water will be pumped through these tunnels, via Sacramento River; Therefore this project has a Direct Effect on the Trinity River! It has a direct effect on the Tribes who rely on the Trinity, as well as the Klamath River. It needs to be treated in that manner! This project will adversely affect the fishery of the Klamath and Trinity Rivers which will be a form of cultural genocide for the Hupa, Kurok and Karuk tribes ^{within} ~~along~~ the river basin. These issues need to be taken into consideration,

Delta Conveyance Project

Scoping Comment Card



DCS211

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Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Lindsay Wood Date 3/2/2020

Organization _____ Email waterformwildlifeca@gmail.com

Address 1739 Old big creek road

City Meadow Valley State CA Zip 95956

In 1982, California Voters struck down the Peripheral Canal project (Prop 9) with ~~a~~ 63% of voters against the project. It is inappropriate that the ^{legislature} governor in 2012 reauthorized SB 200, creating funding to begin implementation and planning of this Project. This project will have environmental impacts in the delta, while continued exports desiccate the Sacramento River watershed upstream.

What more evidence does the administration need that the Sacramento River hydrologic system is out of balance? In one year the Carr, Camp, and Mendocino complex fires collectively scorched 708,213 acres. The four runs of Chinook Salmon are crashing. ~~the~~ Oh a good day, the Sacramento River runs an average of 3500 cfs. Why does the tunnel carry so much water? This project has the capacity to divert the entire flow of the Sacramento River.

Email comments to DeltaConveyanceScoping@water.ca.gov.

Delta Conveyance Project

Scoping Comment Card



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DCS212

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Pat Lind Date 3/2/2020

Organization _____ Email _____

Address 4215 Fort Pick St

City Shasta Lake City State CA Zip 96019

There needs to be a no tunnel alternative! The largest estuary in our country, the Delta, needs the fresh water from the Sacramento River. We need to reduce water use by stopping unsustainable farming in the desert, swimming pools & water waste in private & corporate settings. Change in landscape of residences to use native plants, fines for water waste. Recycle & reduce water waste.

Alternatives are desalination plants, gray water systems and recycling.

Fish, aquatic life & riparian systems deserve health since their health is our health.

This 1 tunnel takes almost as much water as 2 tunnels (6000-9000 ft³)
The project is going against all of nature and indigenous rights.
Stop the tunnel respect the tribes!

Delta Conveyance Project

Scoping Comment Card



DCS213

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Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name DANIA ROSE Colegrove Date _____

Organization Hoopz Tribal Member Email gotwater21RLM@gmail.com

Address PBX 531

City Hoopz State CA Zip 95546

I oppose THIS WATER THEFT! I oppose THE Delta
Tunnel plan! I DO LIKE THE O WATER TUNNEL
NO TWIN tunnel NO SINGLE tunnel - NO MORE DIVERSIONS!

THE WATER IS LIFE NOT ONLY FOR HUMANS BUT FOR ALL.

KEEP THE RIVERS, Healthy! Healthy River = Healthy
Life. Don't Kill THE SALMON -

Delta Conveyance Project

Scoping Comment Card



DCS214

The public scoping period is January 15, 2020 through March 20, 2020

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Will Harling Date 3/2/2020
Organization Mid Klamath Watershed Council Email will@mkwc.org
Address Box 409
City Orleans State CA Zip 95556

* Fully analyze the impacts of further water diversions on salmon dependent people & ecosystems.

* Fully analyze the cumulative impacts of the Delta Tunnels, including ^{impacts from} Shasta Dam Raise, the proposed Sites Reservoir, Trump Water Plan contracts, and the State Water Project.

Our salmon are going extinct. The wealth of our land flows south with our water. Gov. Newsom, stand on the right side of history, stand with the Tribes of California who are protecting our children's futures and their cultures. Our waters are not wasted to the sea. Stand with us against the Trump Water Plan and honor tribal treaty obligations.

Delta Conveyance Project

Scoping Comment Card



DCS215

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Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Nicholas Wilde Date 3-2-20
Organization Dream Quest Email wildenick@yahoo.com
Address 550 Salyer Loop Rd.
City Salyer State CA Zip 95563

Sustainability is a necessary component of resiliency. Conservation of water and rationing need to be considered. Rainwater Collection and storage need to be utilized in order to decentralize a basic human need. A massive infrastructure project in a seismic zone does not give confidence that sustainability and resiliency are foremost in the goals of the project. Greywater regulations should be examined. Life style changes that would negate the need to transfer water across the entirety of the state, should be incentivized and mandatory. No Rivers or species of animals should be compromised to allow profits to be made by anybody. Public Resources and basic human rights cannot be given to corporations.

Delta Conveyance Project

Scoping Comment Card



The public scoping period is January 15, 2020 through March 20, 2020 DCS216

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Jenny Staats Date 3/2/20
Organization _____ Email mediastorm2010@gmail.com
Address HC 11 Box 789
City Somes Bar State CA Zip 95568

The EIR for this project needs to analyze impacts to California's salmon people - this means all the communities that are salmon dependent including Tribes and coastal fishing communities. The EIR also needs to analyze the impacts to source waters and their reservoir storage including the Trinity and ^{Klamath} ~~Klamath~~ Rivers, Sacramento, Feather and Yuba and San Joaquin Rivers.

- The EIR should also analyze the costs and benefits of a NO TUNNEL alternative and investments in water conservation.

I live on the Klamath River and I know that the effects of the water project would further affect endangered species on the river that are already dangerously imperiled.

Delta Conveyance Project

Scoping Comment Card



The public scoping period is January 15, 2020 through March 20, 2020 DCS217

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Alessandra De La Torre Date 03/02/2020

Organization _____ Email alessandra@rogueclimate.org

Address _____

City Ashland State OR Zip 97520

Tribal involvement, specifically the Yurok, Hoopa Valley, and Karuk, is imperative to ensure long-term water preservation, ~~and~~ cultural resiliency, and salmon health. Fishing communities are dependent on these very ecosystems the Delta Conveyance Project would impact and if they are recommending "no tunnel" alternatives, please listen. They know best. They have already felt the negative impacts of a capitalistic system that does not include community members in its decision-making process. Listen to the young people standing up for the rivers and salmon. The issue is listening to large ag and major corporations. The consideration I give is to LISTEN and make space for communities that are most affected by this project. Thank you.

Email comments to DeltaConveyanceScoping@water.ca.gov.

Delta Conveyance Project

Scoping Comment Card



The public scoping period is January 15, 2020 through March 20, 2020

DCS218

Please provide comments on the scope of issues to be considered in the Delta Conveyance Project environmental analysis. Please print.

Name Gino O'Rourke Date 3/2/20
Organization Yurok Tribe Email eorourke@yuroktribe.nsn.us
Address P.O. Box HC 64 Site 3 box 9
City Weitchpec State CA Zip 95546

Too much water has already been taking from the Klamath River and its tributaries. Low flows are already destroying the salmon populations, and causing health advisories to not go near the water. The indigenous peoples to the land, have rights to the water, and they have never been compensated for all of water that has been taken from them. They depend on the fish, not only for subsistence but also culturally and spiritually as well. It connects us to the land, and to a time before Western Influences wreaked havoc on the lands and the peoples.

From: [Anne Hoagland](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: FW: Onebox Voicemail (Callback: 530-628-4505)
Date: Tuesday, March 10, 2020 2:56:31 PM
Attachments: [53896164.wav](#)

Forwarding per Stacy Sebring's request.

From: 530-628-4505 <ext.124@onebox.com>
Date: Monday, March 9, 2020 at 12:32 PM
To: "shay.humphrey@icfi.com" <shay.humphrey@icfi.com>, "tiffany.mendoza@icfi.com" <tiffany.mendoza@icfi.com>, "heather@jb-comm.com" <heather@jb-comm.com>, "anne@jb-comm.com" <anne@jb-comm.com>
Subject: Onebox Voicemail (Callback: 530-628-4505)



You Received a New Voicemail

Your voicemail is attached. Here is a transcription of the message content:

"Hello my name is Stacy Sebring. My number is 530-628-4505. I live in High Palm California in Trinity County on the South Fork of the Trinity River and I'm just calling to tell you I'm absolutely 100% against the Delta Vance project which stands to drain our rivers even more than they are. We are going into a drought contrary to what Trump says and the latest report on the salmon is grim the salmon run plunge again in 2019 and I am really upset that more meetings have not been up North to talk to people up here where the source of the water is and I want to ask the Department of Water resources to extend the scoping period be on March 20 to allow people up here to get a grasp on what you people are trying to pull and I'd also like to ask you to please have more meetings up here besides just one in Reading which only happened because the water protectors came down to talk to you in Sacramento the fact that you only we're going to have the father's North meeting in reading(?) in Sacramento. Says a lot you need to have more in Reading Y Rica. Your Rica Willow Creek Weaver Ville. There should be more meetings North where people where the source of the water are can come down and talk and give their input and extend the scoping period beyond March 20. Thank you very much."

[Click To Return Call](#)

This voicemail was transcribed with the Voicemail to Text feature.

If you haven't already done so, access your account to get unlimited transcriptions or to add this feature for other users. Simply [log in](#) and click "Add Features."

Message Details

DIALED	866-924-9955
RECEIVED	Mon, Mar 9 2020 12:31 PM
FROM	530-628-4505
LENGTH	2 minutes and 11 seconds



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6922 Hollywood Blvd., Los Angeles, CA 90028
MID9077

|

From: [john armstrong](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: A big picture comment
Date: Wednesday, March 18, 2020 9:28:25 AM

I'm opposed to the single tunnel because most of the water will go to Central Valley domestic & foreign agribiz, and I'm saying that's bad because:

- 80% of the almond industry is exported and 60% of Central Valley and Imperial Valley ag output is exported. And I'm saying that's bad for 2 reasons:
 - a. Water and ag barons and their public sector enablers (senators, reps, lobbyists) get the profits, not CA citizens.
 - b. That much export is a permanent loss of CA mineral soil and water resource, embedded and production associated.
- Via the conduit of purchasable CA legislators like feinstein, mccarthy, nunes, mcclintock and water barons like lynda and stewart resnick, world and CA agribiz constantly trashes out the missions of CalEPA's Dept of Pesticide Registration and Dept of Toxic Substances Control, for 2. I know firsthand in detail how that works, I worked at these 2 departments for a total of 6 years as a software developer and database manager.

After 20 years of Internet, it's pretty easy to follow the money and criminal actions of purchasable legislators. The public's getting pretty tired of it again.

John Armstrong – ret'd USFS – Among many other things, 9 years forest genetics software development in FS research stations – CA, ID, CO. Exp: I worked on every phase of the white pine blister rust / CA sugar pine project in the late 80s early 90s at Intermountain Station – Idaho and the Placerville Nursery Electrophoresis Lab. Our work created the stat in the current CA-ForestCarbonPlanFinalDraft, **“one large, old sugar pine tree, approximately 300 years old, stores as much carbon as 175 younger, 30-year-old white firs”**. 12 years software development and database management in 6 CA state depts.

From: [Clara Karger](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Marie Rumsey](#); [Tina Oh](#); [Lily Rosenberg](#)
Subject: CCA Comments on Delta Conveyance Scoping
Date: Tuesday, March 17, 2020 11:03:46 AM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[2020 03 16 NOP Delta Conveyance.pdf](#)

Hello,

Please see attached comment letter for Delta conveyance scoping.

Best,

Clara



Clara Karger

Policy Associate

213.418.1672 | ckarger@ccala.org | ccala.org

626 Wilshire Blvd., Suite 850, Los Angeles, CA 90017



[Visit our data portal](#) **DTLA Insights**



March 16, 2020

California Department of Water Resources
Attn: Renee Rodriguez
P.O. Box 942836
Sacramento, CA 94236

Re: Delta Conveyance Scoping Comments

Central City Association (CCA) is pleased to provide input on the scoping process of the single tunnel Delta conveyance project as water reliability and quality are critical to the wellbeing of the Los Angeles region.

Founded in 1924, CCA represents more than 400 businesses, non-profits and trade associations with a shared commitment of increasing the vibrancy of Downtown Los Angeles, and the region more broadly. Our membership depends on water sourced from the Sacramento Delta. Moving forward with the Delta conveyance project is a key step to ensuring our region's water supply is protected for generations to come.

We believe that the single tunnel with conveyance capacity of 6,000 cubic-feet-per-second of water is the appropriate alternative to meet California's climate resiliency, reliability and security objectives. We request that the project move forward with intentionality and certainty.

Moving forward with the appropriate alternative described above will have lasting economic impact on the region by ensuring that millions of Southern California residents, business owners and visitors can reliably access safe and clean water and avoid a preventable water shortage.

We thank Governor Newsom and the Department of Water Resources for initiating the next step in the process to upgrade and safeguard California's water infrastructure.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Lall", is positioned above the printed name and title.

Jessica Lall
President & CEO
Central City Association of Los Angeles

From: [Kendal Asuncion](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Comment Letter - Los Angeles Area Chamber of Commerce
Date: Wednesday, March 18, 2020 7:19:55 AM
Attachments: [03162020_DWR-NOPDeltaConveyance.pdf](#)

Good morning –

Hope among the unprecedented time we're in that this email finds you as well as can be. The Los Angeles Area Chamber of Commerce has prepared written comments regarding the Delta Conveyance Project, you will find them attached. Please do not hesitate to reach out if there are any questions.

Best,
Kendal

Kendal K. Asuncion | Public Policy Manager
LOS ANGELES AREA CHAMBER OF COMMERCE
350 S. Bixel St. | Los Angeles, CA 90017
Ph: [213.580.7518](tel:213.580.7518) | Fax: [213.580.7511](tel:213.580.7511)
kasuncion@lachamber.com | www.lachamber.com



March 18, 2020

Department of Water Resources
Attn: Renee Rodriguez
P.O. Box 942836
Sacramento, CA 94236

RE: Delta Conveyance Project Notice of Preparation

Dear Department of Water Resources:

On behalf of the Los Angeles Area Chamber of Commerce (Chamber), I am writing to provide our support for a Delta Conveyance Project. We applaud Governor Newsom's leadership to modernize the State Water Project, beginning with the environmental review process and Notice of Preparation a Delta Conveyance Project.

As the Department of Water Resources knows, water is integral to all Californians, and it is key to Southern California's \$3 billion economy. The State Water Projects is indispensable to that economy. It reliably and affordably delivers water to businesses and residents in our region. A water shortage caused by disruptions in water delivers would have severe economic repercussions in Los Angeles and the southern California region that would ripple throughout the state. A Delta Conveyance Project with sufficient carrying capacity is an insurance policy to protect our economy, and nearly a million jobs statewide.

The Chamber has long supported water projects that ensure water reliability and leverage past investments in water infrastructure. Many of our regional efforts to develop and improve local water supply, like wastewater recycling, groundwater banking, and desalination rely on imported water. Projects like these are part of the larger Draft Water Resilience Portfolio and the Delta Conveyance Project underpins them all. A solution with sufficient carrying capacity, that improves water security, protects against natural disasters, and keeps water affordable for residents and businesses

For these reasons, the Los Angeles Area Chamber of Commerce supports a Delta Water Conveyance Project with sufficient capacity that addresses these concerns. If you have questions please contact Kendal Asuncion, Manager of Public Policy, at (213) 580-7518 or kasuncion@lachamber.com. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Maria Salinas".

Maria Salinas
President & CEO

From: [Patricia Overall](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Delta Conveyance Environmental Review
Date: Tuesday, March 17, 2020 4:14:06 PM

Public Scopers:

NO, NO, NO to any "conveyances" that would drain more water from the Delta, sending it South or otherwise. PROTECTING THE ENVIRONMENT OF THE DELTA MUST TAKE PRECEDENCE OVER WATER GRABS. We do not have another chance to save salmon, smelt and critically challenged wildlife of the area; the crisis exists **NOW**.

Patricia Overall, veteran of the 1982 Peripheral Canal War
San Francisco

From: [Drake Hebert](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Robert E. Doyle](#); [Kristina Kelchner](#); [Brian Holt](#)
Subject: Delta Conveyance NOP Comment Letter
Date: Tuesday, March 17, 2020 4:15:27 PM
Attachments: [image001.png](#)
[Delta Conveyance NOP Comment Letter.pdf](#)

Dear Ms. Renee Rodriguez,

Find attached the East Bay Regional Park District's comment letter on the Delta Conveyance NOP. We look forward to hearing more about the project in the coming months.

Thank you,
Drake Hebert



Drake Hebert
Acting Planner | Planning/GIS
East Bay Regional Park District
2950 Peralta Oaks Court, Oakland, CA 94605
T: 510-544-2334
DHebert@ebparks.org | www.ebparks.org

STATEMENT OF CONFIDENTIALITY | This electronic message and any files or attachments transmitted with it may be confidential, privileged, or proprietary information of the East Bay Regional Park District. The information is solely for the use of the individual or entity to which it was intended to be addressed. If the reader of this message is not the intended recipient, you are hereby notified that use, distribution, or copying of this e-mail is strictly prohibited. If you received this e-mail in error, please notify the sender immediately, destroy any copies, and delete it from your system.

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March 17, 2020

Renee Rodriguez
Delta Conveyance Scoping Comments
Department of Water Resources
P.O Box 942836
Sacramento, CA 94236

Sent via email: DeltaConveyanceScoping@water.ca.gov

RE: Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project

Dear Ms. Rodriguez,

The East Bay Regional Park District (EBRPD; Park District) appreciates the opportunity to provide comments on the Notice of Preparation for the Draft Environmental Impact Report (EIR) for the Delta Conveyance Project.

The Park District owns and manages multiple parks, trails, and facilities located on the Delta and near the existing Banks and Jones Pumping Plants, the proposed Southern Forebay, and the South Delta Conveyance Facilities. These include shoreline parks (Big Break Regional Shoreline, Antioch-Oakley Regional Shoreline, Browns Island Regional Preserve, Bay Point Regional Shoreline, Martinez Regional Shoreline, and Carquinez Straight Regional Shoreline), inland parks (Delta Access Regional Recreation Area, Byron Vernal Pools Regional Preserve, Vasco Hills Regional Preserve, and Vasco Caves Regional Preserve), regional trails (Delta de Anza Regional Trail, Big Break Regional Trail, and the Marsh Creek Regional Trail), and the San Francisco Bay Area Water Trail (a network of small boat launches that encourages and protects the public's ability to explore the Bay and Delta via small watercraft). Additionally, the 2013 EBRPD Master Plan identifies up to eight potential future regional trails in the project area. These include the Mokelumne Coast to Crest Trail, the Marsh Creek Trail to Rock Slough extension of the Delta de Anza Trail, and the Great Delta Trail extension.

The parklands on the Delta allow the public to have outdoor experiences on or near the water. Activities include fishing, hiking, dog walking, picnicking, boating, and bird watching. Furthermore, the public can learn about both the natural and cultural heritage of the Delta from interpretive wayside panels, naturalist programs, visitor centers, and rangers on patrol. The protected lands also support special status wildlife species and migratory and local bird populations. The inland parklands likewise provide habitat for special status species, preserve and protect Native American archaeological sites, and allow recreational opportunities for the public. Regional trails give walkers, runners, bikers, commuters, and school children of all abilities a fun, healthy, and safe vehicle-free opportunity to enjoy the outdoors and get to school and work.

Board of Directors

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The EIR for the Delta Conveyance project will need to consider the project's impacts to existing and planned EBRPD park and trail facilities.

Thank you for your review and consideration of our comments. Please send the Park District notices on any future actions regarding this plan. If you have any questions or concerns, please contact me at (510) 544-2320, or by email at kthai@ebparks.org.

Respectfully,



Kim Thai
Senior Planner

From: gzdasiuk@gmail.com
To: [DWR Delta Conveyance Scoping](#)
Cc: ["Paul Anderson"](#)
Subject: Delta Single Tunnel Project
Date: Tuesday, March 17, 2020 9:58:20 PM

Dear Ms. Rodriguez,

As a California boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.

There must be a plan to ensure that the Delta infrastructure will not only be preserved but improved.

The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta.

Thank you for the opportunity to offer my comments.

Sincerely yours,

George Zdasiuk
48 Hillbrook Drive
Portola Valley, CA 94028

From: [franz](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Delta tunnel
Date: Wednesday, March 18, 2020 12:47:26 PM

I ask that this message be incorporated into the official comments as I was not able to attend the meetings last month.

The Tunnel reduces the net water outflows to the lower delta and the bay area. The loss of fish and wildlife, the incomes from commercial fishermen and potentially the farmers presently taking water as allowed under the present reclamation districts bylaws, are being ignored. In fact, the tunnel is looking like a net loss of income for northern California while increasing the fertility of the Westlands and making money for their farmers.

And for what, I ask? The water that is to be taken from the Sacramento/San Joaquin rivers is going to the Westlands which was desert when it was bought up at low costs many decades ago. Those property owners bought desert knowing that water was either non existent or difficult to find. Now they see a chance to add value to their land by growing more almonds and fruit which are very high users of water. This sounds like special interests are demanding more water than the they had any right to expect.

Several years ago Kesterson lake was poisoned by runoff from the Westlands and thousands of wildfowl were killed. Unfortunately, the runoff from Kesterson will increase if they obtain more northern CA water and the poisoned water runoff that is already dumped into the San Joaquin River, will increase. This then feeds the many downstream irrigation and municipal water districts with poisoned water. Thus several million people will be poisoned and the costs to purify their water will increase. Are you asking the innocents to pay the bill while Westlands prospers? How can State ever support such a corrupt plan?

So I ask you to end the flawed plan to supply more water to the south and to develop other ways to solve their problem. The LA basin is a huge part of this issue and at their present rate of growth, they will be need all the remaining water in the Delta within decades. They should be solving their problem now. Its time they realize they must give up all their swimming pools, baths and drinking water unless they start to plan their future. (such as photo voltaic farms to power the conversion of seawater to drinking water).

And finally, the state of California needs to be planning for the rise in sea levels which will increase the penetration of salt water past the city of Antioch and require the raising many of our levees. So here we are, discussing the Westlands when Armageddon is just around the corner. What's wrong here??? Lets concentrate on the serous problems that affect millions of people instead of giving water to a small number of Westlands farmers.

If this tunnel goes ahead, I will be on the fore front of civil disobedience in every way I can.

Franz Steiner, Architect

211 Willamette ave, Kensington CA 94708
510 914 1289

From: [Allan Chan](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Delta tunnel project
Date: Wednesday, March 18, 2020 8:21:50 AM

To who it may concern

I moved to Oakley from the Bay Area many years ago for more affordable housing and because I love the Delta. Our natural resources that the Delta provides is one of the reasons I stay. I love to hunt and fish here and I am good at it. My two sons have grown up here and also share my passion for the Delta. Over the last years I've seen the decline of multiple species and I understand that this is due to many contributing factors. We can only control a few of these factors like water quality and water flow. What concerns me is if we send more water south the salinity line changes. The tunnels kill many fish, have we considered a multiple tier dam near the tunnel or a better screening system. Change is not always a good thing.

I want my kids children to enjoy the Delta but it seems to me like we are killing it. I belong to CSBA and my circle of friends all hunt and fish and enjoy the delta experience. Some things that alarm me are water weeds, the decline of delta smelt, the decline of striped bass, salmon and steelhead and even crappie and bluegill. What can I do to help?

Thank you Allan Chan

Sent from my iPad

From: [Tom Williams](#)
To: [Rodriguez, Renee@DWR](#); [Yee, Marcus@DWR](#); [DWR Delta Conveyance Scoping](#)
Subject: Extension of Comment Period - COVID 19 Isolations
Date: Tuesday, March 17, 2020 11:45:19 AM

DATE: March 17, 2020

TO: Department of Water Resources
DeltaConveyanceScoping@water.ca.gov

Attn.: Renee Rodriguez, Dept. of Water Res., P.O. Box 942836,
Sacramento, CA 94236

CC: Marcus Yee, 916-651-6736.

FROM: Dr. Tom Williams, Snr. Techn. Adviser, Citizens Coalition for Safe
Community
323-528-9682

SUBJECT: Delta Conveyance DEIR/DEIS NOP/Scoping

RE: Request for Extension of Public Scoping Comments

Please provide a two-week+ extension for the Public Commenting Period for the Delta Conveyance Project DEIR/DEIS from March 20, 2020 to April 06, 2020, 5pm due to the disruption and isolation created by the Governor's requests, urgings, and orders.

Thank You for your considerations.

Dr. Tom Williams

The primary purpose of the scoping process is to identify important issues raised by the public and responsible and trustee public agencies related to the issuance of regulatory permits and authorizations and natural environment and resources protection. Public scoping comments are focused on:

Public accessible and understanding,

Significant Environmental Impacts,
Mitigation/Compensation of SEI, and
Alternatives

From: [Michael A. Brodsky](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Nemeth, Karla@DWR](#); [Crowfoot, Wade@CNRA](#)
Subject: Extension of deadline for scoping comments Delta Conveyance NOP
Date: Tuesday, March 17, 2020 3:44:11 PM

I am writing to request on behalf of Save the California Delta Alliance an extension of the deadline for submitting comments on the NOP for the Delta Conveyance Project, which was March 20, 2020.

My office is located in Santa Cruz County, which has been put on lockdown in an effort to control the spread of the Corona Virus. My staff is not allowed to come to work, and I am not allowed to go to my office. I cannot access many files that are in hard copy and it is difficult to coordinate the work of staff.

The Santa Cruz County shelter in place order is in effect through April 7. I request an extension of the comment deadline until at least April 15.

I am aware that other parties who would like to submit comments on the NOP are in similar situations. Other parties may have different lockdown schedules and may need a longer extension.

Thank you for considering this request as we all work together to prevent the spread of this virus.

Michael Brodsky

From: [Osha Meserve](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: FW: Request for Extension of NOP Comment Period on Delta Conveyance Project
Date: Monday, March 16, 2020 4:59:10 PM

Please consider the request below. Thanks!

Osha R. Meserve
(916) 455-7300

From: Osha Meserve
Sent: Monday, March 16, 2020 3:34 PM
To: marcus.yee@water.ca.gov
Cc: cindy.messer@water.ca.gov
Subject: Request for Extension of NOP Comment Period on Delta Conveyance Project

Hi Marcus,

I would like to request that DWR extend the NOP comment period on the Delta Conveyance Project NOP for at least 30 days. With many government offices and businesses shut down upon order of the Governor and/or local governments, the public's ability to provide comments to DWR will be hindered by the coronavirus pandemic. Extending these types of comment periods now will help ensure compliance with the safety measures needed to help slow the spread of the virus in California.

Thanks and please feel free to contact me to discuss this as needed.

Best regards,

Osha

Osha R. Meserve
Soluri Meserve
510 8th Street
Sacramento, CA 95814

 tel: 916.455.7300 ■  fax: 916.244.7300 ■  mobile: 916.425.9914 ■  email: osha@semlawyers.com

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient.

From: [Dee Dee Saavedra](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: No to Trumps Water Plan
Date: Tuesday, March 17, 2020 9:15:13 PM

To whom it may concern,

California's salmon rivers are at a crisis point. A recent report stated over 45% of California's fisheries are facing extinction within 50 years. The Klamath River spring chinook and coho salmon are currently facing extinction, and the Sacramento River/ Bay Delta winter run salmon, Spring Salmon, delta smelt, and green sturgeon are all imperiled. Loss of habitat, low river flows and poor water quality are the main issues impacting the fish in both watersheds. The Trinity River, the Klamath's largest tributary, has been dammed and diverted to the Sacramento River, and is delivered to Central Valley Project contractors such as the Westlands Water District. The Bay Delta, Sacramento River and Klamath-Trinity River salmon declines are connected to overallocation of water to the Central Valley Project and State Water Project.

This situation has been made much worse by bad water management during recent droughts and ocean impacts from climate change. Even fish that are not endangered such as the Klamath and Trinity River fall run Chinook are facing rapidly dwindling numbers, which means that members of California's three largest Tribes, the Yurok, Hoopa Valley, and Karuk Tribes do not have access to an essential food source. Most Delta and Sacramento River Tribes have not had access to salmon for many decades.

Commercial fishing and coastal communities are also suffering from the economic impacts from loss of salmon. This year only 47,261 salmon returned to the Klamath and Trinity Rivers out of the 97,912 that were predicted. This severely impacted people in Northern California and Southern Oregon. All available science points to the fact that floodplain and estuary restoration, access to cold water habitat and improved flows will be essential if salmon are to survive climate change in California.

Now the state of California is taking public comments on the plan to build a new 7000 cfs diversions that would be feed by California's most important salmon River. At public hearings on the Delta tunnel proposal hundred of people from at least eight Tribes, four fishing organizations and many social justice and environmental groups testified against this proposal. Concerns came from all over the state and ranged from concerns about increased water bills from L.A. to concerns about possible fish kills from diversions and lack of salmon fishing seasons in Del Norte County. Delta Tribes also expressed opposition due to the desecration of cultural sites from the construction of the tunnels and residents of Stockton, California said they will have to deal with the health impacts from tunnel construction and diminished water quality.

Luckily the people of California do not need this tunnel. Californians are saving water and support conservation to save the environment. Unfortunately, large water brokers and corporate agriculture interests, such as the Westlands Water District, know there is money to be made from water. In 2017 Donald Trump appointed a Westlands Water District

lobbyist, David Bernhardt to head the Department of Interior, and he has created several new plans and rules that would harm California's salmon. California's Governor, Gavin Newsom has also prioritized water deliveries over the environment thus far, but did recently challenge one of these plans in court.

Currently proposed state and federal processes threaten California's rivers include;

- * The Trump Water Plan for Long Term Operations of the Central Valley Project,
- * Shasta Dam Enlargement,
- * The Long Term Operations of the State Water Project,
- * The Proposed Sites Reservoir,
- * The Twin Tunnels proposal, which is now the One Tunnel,
- * The Westlands Water District and other CVP water district permanent water contracts,
- * The Governor's Water Resilience Portfolio. This document lays out the Governor's water priorities and the one tunnel proposal and Sites Reservoir are top priorities in the document.

These projects are all connected as the Sites Reservoir project and its new diversions, the Trump water plan, and the Long Term Operations of the State Water Project would allow more water to be diverted and stored from the Trinity and Sacramento River systems and Bay Delta, and the tunnel would allow this water to be moved south. The Governor's water portfolio and Trump actions make sure all of these new reservoirs and diversions are prioritized on the state and federal level above salmon and communities.

Thank you for your time

-DeeDee Saavedra, a tax paying California resident that considers nature and life.

From: [Michael Hazelton](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Opposing the Delta Conveyance Project
Date: Tuesday, March 17, 2020 3:31:39 PM

Hello,

I am writing in opposition to modifying the conveyance infrastructure in the Sacramento-San Joaquin Delta as pulling more water from these river systems will seriously damage the natural ecosystem that exists here. Instead, we should focus on using less water, recycling more water, and finding alternative sources (i.e. desalinate). We don't need to destroy the environment to serve water to all Californians. Please do the right thing and preserve as much natural habitat as possible using less invasive methods.

Best,
Michael Hazelton

From: [Terra Land Group](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Public Comment Letter #2 Re: Recent Scoping Sessions for EIR
Date: Monday, March 16, 2020 12:07:39 PM
Attachments: [2020-03-16_LTR2_DWR_DCS.pdf](#)

Good Afternoon,

Attached please find a letter dated January 14, 2019 from Terra Land Group, LLC to the California Department of Water Resources Re: Public Comments in Response to Recent Scoping Sessions Regarding the Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project, January 2020: LETTER #2.

Thank you,

Martin Harris
Terra Land Group
MH/cm

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TERRA LAND GROUP, LLC

March 16, 2020

VIA EMAIL

Delta Conveyance Scoping Comments
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236
(DeltaConveyanceScoping@water.ca.gov)

**Re: Public Comments in Response to Recent Scoping Sessions Regarding the Notice of
Preparation of Environmental Impact Report for the Delta Conveyance Project, January 2020:
LETTER #2.**

Dear Project Team Members,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). On March 11, 2020, TLG wrote a public comment letter in response to recent scoping sessions regarding the Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project, January 2020. In addition (and due to the potential impacts that may be involved), TLG presents this second letter to the Delta Conveyance Project team members board for additional consideration. **(See Enclosures 1-3)**

Thank you for your attention to this very important matter.

Respectfully,



Martin Harris
for Terra Land Group, LLC.

MH/cm

Enclosures:

These Enclosures can be downloaded as needed via Dropbox through the provided hyperlinks.

1. 2020-03-16 letter from TLG to the Tri-Dam Project
(<https://www.dropbox.com/s/54ewjmvxbkx63w/2020-03-16 LTR TriDam Aglt4.pdf?dl=0>)
2. 2020-03-16 letter from TLG to the Manteca City Council
(<https://www.dropbox.com/s/lewvcvj2hn0hqwy/2020-03-16 LTR MCC AgltsC1.pdf?dl=0>)
3. 2020-03-16 letter from TLG to the San Joaquin Area Flood Control Agency
(<https://www.dropbox.com/s/fgguy7qqxyfdup3/2020-03-16 LTR SJAFCA Aglts3.3.pdf?dl=0>)

From: [Tim Stroshane](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Barbara Barrigan-Parrilla](#); [Michael Tubbs](#); [Kathy Miller](#); [Vink, Erik@DPC](#); [Kelley Taber](#); [Dean Ruiz, Esq.](#); [John Herrick Esq.](#); [Dante J. Nomellini Esq.](#); [Osha Meserve](#); [Roger Moore](#); [Jonas Minton](#); [Bill Jennings](#); [Chris Shutes](#); [Carolee Krieger](#); [Michael Jackson Esq.](#); [Barbara Vlamis](#); [Regina Chichizola](#); [Tom Stokely](#); [Patricia Schifferle](#); [Kathryn Phillips](#); [Brandon Dawson](#); [Molly Culton](#); [Bob Wright](#); [Elaine Barut](#); [Irene Calimlim](#); [Adam Keats](#); [Doug Obegi](#); [Kate Poole](#); [Jon Rosenfield](#); [Gary Bobker](#); [John McManus](#); [Michelle Ghafar](#); [Nina Robertson](#)
Subject: Restore the Delta's Delta Conveyance Project NOP Comments
Date: Wednesday, March 18, 2020 11:09:27 AM
Attachments: [20200320 RTD comments DCP Scoping.pdf](#)

Dear Ms. Rodriguez:

On behalf of eight Stockton-based environmental justice community organizations, attached please find our comments on the proposed Delta Conveyance Project (DCP). Our coalition is very concerned about this project from statewide and local standpoints.

We would appreciate the favor of a reply indicating that DWR has received our attached letter. We also wish to express our appreciation to DWR for extending the deadline for these comments on the DCP NOP to Friday, April 17 at 5:00 PM.

Truly,

Tim Stroshane
Policy Analyst
Restore the Delta



LG
BT+ Social Justice Initiative



Via email: DeltaConveyanceScoping@water.ca.gov

March 20, 2020

Delta Conveyance Scoping Comments
Attn: Renee Rodriguez
California Department of WaterResources
P.O. Box 942836
Sacramento CA 94236

Subject: Delta Conveyance Scoping Comments

Dear Ms. Rodriguez:

Restore the Delta (RTD) advocates for local Delta stakeholders to ensure that they have a direct impact on water management decisions affecting the water quality and well-being of their communities, and water sustainability policies for all Californians. We work through public education and outreach so that all Californians recognize the Sacramento-San Joaquin Bay Delta as part of California's natural heritage, deserving of restoration. We fight for a Delta whose waters are fishable, swimmable, drinkable, and farmable, supporting the health of the San Francisco Bay-Delta Estuary, and the ocean

Delta Conveyance Project Notice of Preparation Comments from Restore the Delta
March 20, 2020
Page 2 of 15

beyond. Our coalition envisions the Sacramento-San Joaquin Delta as a place where a vibrant local economy, tourism, recreation, farming, wildlife, and fisheries thrive as a result of resident efforts to protect our waterway commons.

This letter conveys our comments on the Notice of Preparation (NOP) for the Delta Conveyance Project (DCP) issued January 15, 2020, by the California Department of Water Resources (DWR). This letter also seeks to put before you a few key questions and our discussion of them:

- With what water will future Delta tunnel and dams and reservoirs be able to operate?
- Will California's key water agencies, yours among them, conduct thorough, factual, and honest outreach to all communities, especially environmental justice and disadvantaged communities in their service areas regarding the costs of proposed projects and water outcomes?
- With lengthy and costly construction logistics, have California's key water agencies, yours among them, done the necessary "due diligence" studies to make fully informed decisions about a future Delta tunnel, dams, and reservoirs?
- Have these decisions been balanced with considerations for maintaining, retrofitting, repairing, and preserving existing water agencies' infrastructure, especially any future repairs and changes needed at Oroville Dam?

Thank you for considering our comments on the new DCP's NOP. Email addresses for Barbara Barrigan-Parrilla and Tim Stroshane are included If you wish to reach out to us.

Sincerely,

\Signed via email

Dillon Delvo
Executive Director,
Little Manila Rising



Nathan Werth
Executive Director
Substratum Systems

\Signed via email

Sammy Nunez
Executive Director
Fathers & Families of San Joaquin



Nicholas Hatten
Executive Director
LGBT+Social Justice Initiative

Delta Conveyance Project Notice of Preparation Comments from Restore the Delta
 March 20, 2020
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\Signed via email

Jasmine Leek
 Founder and Managing Director
 Third City Coalition

\Signed via email

Tama Brisbane
 Executive Director
 With Our Words, Inc.



Barbara Barrigan-Parrilla
 Executive Director
barbara@restorethedelta.org



Tim Stroshane
 Policy Analyst
tim@restorethedelta.org

Attachments:

1. Specific Delta Conveyance Project NOP Comments

cc: Mayor Michael Tubbs, City of Stockton
 Kathy Miller, San Joaquin County Supervisor
 Erik Vink, Delta Protection Commission
 Kelley Taber, Somach & Simmons
 S. Dean Ruiz, South Delta Water Agency
 John Herrick, South Delta Water Agency
 Dante Nomellini, Central Delta Water Agency
 Osha Meserve, Soluri Meserve LLC
 Roger Moore, Law Office of Roger B. Moore
 Jonas Minton, Planning & Conservation League
 Bill Jennings, California Sportfishing Protection Alliance
 Chris Shutes, California Sportfishing Protection Alliance
 Carolee Krieger, California Water Impact Network
 Michael B. Jackson, California Water Impact Network
 Barbara Vlamis, AquAlliance
 Regina Chichizola, Save California Salmon
 Tom Stokely, Save California Salmon
 Patricia Schifferle, Pacific Advocates
 Kathryn Phillips, Sierra Club California
 Brandon Dawson, Sierra Club California
 Molly Culton, Sierra Club California
 Bob Wright, Sierra Club California
 Elaine Barut, Little Manila Rising
 Irene Calimlim, Fathers and Families San Joaquin
 Adam Keats
 Doug Obegi, Natural Resources Defense Council

Delta Conveyance Project Notice of Preparation Comments from Restore the Delta

March 20, 2020

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Kate Poole, Natural Resources Defense Council

Jon Rosenfield, San Francisco Baykeeper

Gary Bobker, The Bay Institute

John McManus, Golden State Salmon

Michelle Ghafar, Earthjustice

Nina Robertson, Earthjustice

Attachment 1

Restore the Delta's Specific Delta Conveyance Project NOP Comments

Purpose and Project Objectives

The express purpose of the new DCP is “to develop new diversion and conveyance facilities in the Delta necessary to restore and protect the reliability of State Water Project (SWP) deliveries and, potentially, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State’s Water Resilience Portfolio [WRP].” Related objectives include responding to anticipated sea level rise and other foreseeable climate change and extreme weather events; minimizing potential public health and safety impacts of reduced SWP water deliveries south of the Delta due to Delta levee failure from earthquakes; protecting SWP, and potentially CVP, ability to deliver water when sufficiently available under biological opinions, Delta Reform Act, and contract terms “and other existing applicable agreements”—the latter of which we take to mean potential execution of voluntary agreements in lieu of adoption and implementation of full Bay-Delta Plan flow objectives by the State Water Resources Control Board; and providing “operational flexibility to improve aquatic conditions in the Delta and better manage risks of further regulatory constraints on project operations.”

DWR continues to avoid in this NOP situating its new DCP (previously its California WaterFix) objectives and purpose in the overall framework of state water and civil rights policies. Questions that need answers include:

- How does this project claim to further the state constitutional requirement that all water use as well as methods of diversion are to be reasonable and beneficial?
- How does it claim to further the statewide mandate from state case law that reasonable and beneficial use of water must protect the public trust resources of the state, which include fish, water itself, and recreational beneficial uses, among others?
- In 2009, the Legislature declared that it is the policy of the state to reduce reliance on the Delta for California’s future water needs. How does the new DCP address this mandate to reduce reliance on the Delta for importation of water?
- How might the new DCP claim to promote environmental justice for Delta communities when it clearly proposes to remove water from the Delta and degrade water quality here in the midst of one of California’s most economically distressed communities in the City of Stockton?

RTD insists that the Draft EIR incorporate answers to these specific questions about purpose and need.

We further urge that the Draft EIR fully evaluate the claim in the objectives of the NOP that the new DCP will actually solve problems raised by both climate and seismic risks.

Though seismic risk to Delta levees may be conceptually reduced relative to what was thought a decade ago when California WaterFix and the Bay Delta Conservation Plan were in early planning stages, this does not mean there is no risk. The reduction in risk, however, merits “attenuation” in the state’s rhetoric about seismic risk to Delta levees, and in the rhetoric of the state’s allies concerning some new type of Delta conveyance.

Delta levees are still needed. Each iteration of California WaterFix’s operations since 2012 relied for some portion of the year on conveyance of state and federal stored water in and through Delta channels to reach the state’s Banks Pumping Plant near Byron and the federal Jones Pumping Plant near Tracy. Through-Delta conveyance means passage of water intended for export between Delta levees for the entire distance. Environmental reviews of the tunnels project revealed that about half the time (48 percent) on average the south Delta pumps would continue to be the point from which state and federal exports would originate. DWR and the Bureau sought to modify their water rights permits from the State Water Resources Control Board between 2015 and 2019 to **add** points of diversion in the north to augment their south Delta pumping plants—**not to replace** the south Delta diversions with the north. There would be times when listed fish species would be present or fresh water flows entering the north Delta would be too low (seasonally or from drought) to permit such diversions through the tunnels. ***Sending water through leveed Delta channels is still vital to the State Water Project and the Central Valley Project in addition to the health of the Delta itself.***

Over the last decade of water debates we at Restore the Delta have continually found it irresponsible of tunnels advocates to push for tunnels as some sort of seismic insurance policy while excluding Delta levees from that same treatment. ***We have no reason to believe at this time that a new DCP would have less need for Delta levee stability in the face of any level of seismic risk than did California WaterFix.*** Delta levee stability investment is an essential component of any investment in long-term conveyance for the Delta—with or without a single-tunnel concept—whether the levee failure hazard results from earthquakes or sea level rise due to climate change.

If DWR and the Bureau, and their urban and agricultural customers, are to continue exporting water from the Delta for the long haul, they must recognize that Delta levees are essential to their future as well as to the Delta’s—and help persuade the public to support Delta levee investments, and soon. And this is true regardless of whether concerns for Delta levee stability are seismic or climate-based in origin. Delta levees need to be addressed in either case. Why doesn’t the NOP recognize this reality? Does it mean that DWR is an earthquake and climate denier, even as it stresses need for the new DCP as a seismic and sea level rise protection measure? Please consider our report, *Climate Equity and Seismic Resilience for the San Francisco Bay-Delta Estuary*, where we address both climate and seismic risks to the Delta.¹

¹ Accessible at <https://www.restorethedelta.org/climate-equity-and-seismic-resilience-for-the%E2%80%A8san-francisco-bay-delta-estuary/>.

With What Water?

The Fourth California Climate Assessment (4CA) was largely ignored by the Draft WRP. This leaves us with the disturbing impression, which we conveyed to the state in our February comments on the Draft WRP, that **DWR regards the 4CA with contempt and ignores water-related findings from its supporting studies provided by some of its own scientists and modelers when it comes to formulating future water strategies for our state.** One study supporting the 4CA estimates water supply probabilities for the California State Water Project (SWP) and the federal Central Valley Project (CVP):

- There is a probability of 59 to 65 percent that north-of-Delta (NOD) April storage—at the start of the traditional irrigation season—“will be inferior to current performance.”
- There is a 95 percent probability—a virtual certainty—that NOD carryover storage (on September 30) will be worse than current performance, which was also found for Shasta, Oroville, Folsom, and Trinity lakes’ carryover storage.
- There is between an 89 and 93 percent probability that annual Delta exports will be reduced.²
- By visually interpreting probability distribution surfaces produced to support the 4CA, we estimate that if temperatures rise 2°C by 2050 and precipitation falls about 10 percent, NOD April storage would likely decrease about 10 to 15 percent. But if precipitation decreases 20 percent at that level of warming, NOD end of April storage will decrease 25 to 30 percent.³
- The same study estimates (again using probability distribution surfaces) that with 2°C warming by 2050 and precipitation falling about 10 percent, NOD carryover storage (on September 30) would decrease 30 to 35 percent. But if precipitation

² Schwarz, A., et al. 2018. *Climate Change Risk Faced by the California Central Valley Water Resource System*. California’s Fourth Climate Change Assessment, Table 4, pp. 17-18. Accessible at http://climateassessment.ca.gov/techreports/docs/20180827-Water_CCCA4-EXT-2018-001.pdf.

³ *Ibid.*, Figure 6, p. 19. Schwarz et al note that “End of April storage is less sensitive to temperature increases than carryover storage because end of April storage measures accumulated runoff into NOD reservoirs during the winter rainy season. Higher temperatures are likely to generate less snow and accelerated melting rates, with the result that a higher proportion of the winter precipitation would flow immediately to the reservoirs, and less would remain high in the watershed as snow storage.”

decreased by 20 percent at this level of warming, NOD carryover storage would decrease by 40 to 50 percent.⁴

- At 2°C warming by 2050 and a 10 percent decrease in precipitation, average annual Delta exports are estimated to decrease by about 30 percent; at a 20 percent decrease in precipitation, Delta exports may decrease between 40 and 50 percent from historic levels.⁵
- Another 4CA supporting study of average and extreme climate effects on the State Water Project found that “the flow seasonal pattern shift in rim [that is upstream reservoir] inflows from the Sierra Nevada and sea level rise in the San Francisco bay together would...[lead] to a half million-acre feet export reduction in the middle of this century [2050].”⁶
- With more progress on greenhouse gas reduction, Delta export reductions could be cut in half and lessen carryover storage reductions.⁷
- “During drought episodes in the middle of this century, climate change impacts on the SWP and CVP operations are much worse in the driest climate model projection scenario. Delta exports would reduce to half of that in historical droughts. Carryover storage would decrease to one-fifth of that in historical droughts.”⁸
- Another 4CA study supporting analysis of water impacts states: “Mean annual precipitation is projected to increase modestly in the northern part of the state, but year-to-year variability is also projected to increase, leading to a greater incidence of dry years in future decades, which may affect hydropower generation.”⁹

⁴ *Ibid.* Schwarz et al note “Carryover storage, on the other hand, is affected by the diminished snow reserves associated with higher temperatures, with smaller late-spring/early-summer snow-fed flows culminating in much lower storage levels at the end of the summer. Carryover storage response is also related to the higher sea levels assumed at higher temperature values...requiring more water to be released from storage (especially during the summer months) to repel sea water intrusion, and meet Delta outflow and salinity requirements.”

⁵ *Ibid.*, Figure 11, p. 25.

⁶ Wang, J., et al. 2018. *Mean and Extreme Climate Change Impacts on the State Water Project*. California’s Fourth Climate Change Assessment, p. 41. Accessible at http://climateassessment.ca.gov/techreports/docs/20180827-Water_CCCA4-EXT-2018-004.pdf.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ Pierce, D.W., et al. 2018. *Climate, Drought, and Sea Level Rise Scenarios for California’s Fourth Climate Change Assessment*. California’s Fourth Climate Change Assessment, p. iv. Accessible at http://climateassessment.ca.gov/techreports/docs/20180827-Projections_CCCA4-CEC-2018-006.pdf.

- “By the end of the century under the RCP 8.5 [business-as-usual] scenario, winter precipitation is projected to increase by up to 20%, but decrease in spring and autumn by up to 20%. These changes will present a challenge to the operation of existing water storage infrastructure including reservoirs and associated hydroelectric plants, which are an important source of California’s electricity.”¹⁰
- “Daily extreme precipitation values are projected to increase 5-15% (RCP 4.5 [moderate GHG reduction scenario]) to 15-20% (RCP 8.5), presenting challenges for storm drainage and flood control.”¹¹
- “Basins that are currently snow dominated show a shift to earlier flow as more winter precipitation falls as rain instead of snow and what snow there is melts earlier. These shifts will have further implications for the operation of reservoirs and hydroelectric energy generation in addition to those effects noted above.”¹²
- “Moisture deficit is projected to increase over much of the state, but with only small changes in the Central Valley. Top level soil moisture is projected to decrease, especially in the southern half of the state.”¹³

California’s 4CA studies help us prepare for the dramatic conditions that await us: sea level rise, extreme heat, drought, flooding, and water quality degradation—with or without a tunnel—in the Delta and elsewhere. The 4CA also finds reduced upstream reservoir storage at the beginning and at the end of the spring and summer irrigation season, and that Delta exports will likely decrease substantially as a result. The question for water contractors like yours is whether it will make sense to invest in systems that tap the Central Valley as compared with repairing, retrofitting, and maintaining facilities and systems that are closer to home? Will there be enough water to justify bonded debt incurred with construction of a tunnel?

The latest State Water Project Delivery Capability Report for 2019 echoes some of these 4CA findings. The long-term average deliveries from the State Water Project (SWP) decreased from 62 percent of Table A water to 59 percent of total Table A amounts, about a five percent decrease. The average delivery amount also decreased from 2,571 thousand acre-feet (TAF) to 2,453 TAF, also about a five percent decrease and a reduction of about 118 TAF looking forward. Dry period averages decrease significantly. Article 21 surplus supplies remain nearly the same as in prior delivery

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² *Ibid.*

¹³ *Ibid.*

capability reports, but dry year surplus deliveries are about one-tenth to one-eighth of wet year surplus deliveries, according to the 2019 report.¹⁴

Outreach to Environmental Justice Communities

Environmental justice communities have endured burdens and impacts of environmental harms and where economic and personal effects they impose are disproportionately borne. There are environmental justice communities throughout California. Many are located in the vicinities of local, state, and federal water project facilities, and many more are located within or beyond the service areas of local water agencies. Many lack access to affordable, clean drinking water.

In 2016, Restore the Delta documented environmental justice communities throughout the Delta and has continued advocating that the future of Delta environmental justice communities is profoundly vulnerable to drinking water, recreational, and economic impacts of more water exports, including the problem of spreading harmful algal blooms during spring and summer. We partnered with the Winnemem Wintu people of northern California to build an environmental justice case concerning the last Delta conveyance project, California WaterFix. RTD also trained and worked with local environmental justice organizations in southern California about California WaterFix. In addition to our efforts, the Community Water Center in Visalia has long advocated for the rights of rural and small communities for affordable, clean, and safe drinking water, and in February 2020 celebrated passage of SB 971 to strengthen drought water planning in these types of communities.¹⁵

The proposed Delta Conveyance Project (DCP) planning process remains behind on doing meaningful outreach to environmental justice communities from the Oregon border to San Diego. The Notice of Preparation for the new DCP proposes the Department of Water Resources' suggested scope of issues to be covered in the upcoming draft environmental impact report. It failed to include environmental justice and public health concerns as issues to be covered. We are aware that California Department of Water Resources consultants for the new DCP are gearing up to do more outreach on these and other topics. We are happy to see forward movement on environmental justice issues by DWR. But it is deeply frustrating to us that even after environmental justice issues were relevant to the demise of California WaterFix, that the State Water Contractors (including Metropolitan Water District) once again fail to prioritize the redressing of environmental justice grievances and issues.

Affordability of a new DCP for ratepayers in environmental justice communities in the service area of all state water contractors, including Metropolitan's, must be addressed.

¹⁴ California Department of Water Resources. 2019. Draft State Water Project Delivery Capability Report 2019. December. See Tables 5-4, 5-5, 5-6, and 5-7. Accessible at http://ccwa.com/docs/2019_DWR_Draft_State_Water_Project_Delivery_Capability_Report.pdf

¹⁵ Community Water Center blog: <https://www.communitywatercenter.org/droughtplanning>

In addition, removal of more fresh water from the Delta leads to salt water intrusion which will further spread harmful algal blooms (HABs) in Delta channels. Their growth will increase water treatment costs for the cities of Antioch, Pittsburg, Fairfield, Stockton, and West Sacramento, and our urban water agencies like Contra Costa Water District and Solano County Water Agency.

HABs in Delta river channels and in reservoirs and lakes statewide is a growing concern as our climate warms. Their spread will reduce the public's enjoyment—including enjoyment by members of environmental justice communities—of public trust water bodies throughout the state. Potentially more HABs will make subsistence fishing more difficult and hazardous for those communities reliant on fish for an affordable and healthy component of their diets. HABs can threaten local drinking water supplies and increase costs for drinking water treatment for all water users, yet will impact environmental justice communities the hardest. In addition, the cyanobacteria from HABs can become airborne and exacerbate air pollution. Many neighborhoods surrounded by HABs in Stockton have been designated AB617 areas due to high rates of air pollution, and the fourth highest rate of asthma in the United States. These areas cannot sustain increases in HABs from reduced flows from climate change, let alone the operation of a Delta tunnel.

Operationally, the new DCP will depend for water on increased storage at Shasta Lake, the new Sites Reservoir, and elsewhere. It will also depend on increased imports from the Trinity River. Water from these sources will come from regions where Indigenous peoples reside and who themselves depend upon good quality water and sufficient fresh water flows for the health of Chinook salmon runs. These salmon runs are miraculous for the epic character of the ir life histories. They depend on healthy water ways from the Delta north to the Sacramento River, and from the Pacific Ocean to the Trinity and Klamath Rivers to complete them. Religions and spiritual lives of the region's Indigenous peoples are bound up with the survival and flourishing of salmon. Their environmental justice fight is for survival of their cultures and their communities. Salmon are at the center of their world and lives. If all Californians—including their powerful water agencies—valued the miracles that salmon perform year-in and year-out, we all (Indigenous and immigrant Californians alike) could enjoy this healthy food source. But they are devalued in favor of supplying water mainly benefiting farm export crops in the current warming climate.

Again, DWR had to play catch-up during the DCP Notice of Preparation process. Tribal cultural resources were included in the NOP as an issue area for the draft EIR to address, but DWR failed to schedule a public meeting about scoping issues in northern California where affected Indigenous tribes reside. After fourteen years of planning some kind of new Delta conveyance facility (twenty-five when one includes the CalFED process), it was beyond belief and unconscionable to Indigenous peoples of northern California and to us that all seven planned meetings announced in the NOP were to be held in Sacramento and points south. After realizing this error, DWR scheduled a new scoping meeting in Redding (*El Pom*) March 2nd. Over 200 people from seven tribes

attended to oppose the new DCP and ask why Trinity River had been omitted from the NOP's map and from proposed project flows.¹⁶ No other meaningful references to northern California Indigenous tribes appeared in the NOP, even though they will be directly and indirectly affected by new DCP construction and operation.

No New Facilities for At Least a Generation

Large and complex new water facilities like dams, reservoirs, and water tunnels require long lead times and complicated schedules. Recently the Delta Conveyance Design and Construction Authority was informed that a new tunnel has currently a proposed completion date of 2035.

It may seem smart and overdue that California needs to build new infrastructure projects like a Delta tunnel and new reservoir storage will all due haste. It's just that California has entered a new reality where droughts are expected to be hotter and last longer, and atmospheric river storms are likely to cause more flooding and greater risks to our state.

What are the best uses of Californians' time, good will, public commitment to efficient use of water, and money?

DCP cost was estimated in 2018 at about \$11 billion. An inflation rate of 5 percent per year was factored into that budget. We have learned that construction costs have accelerated since 2018. Moreover, a new "unknown" that will have some effect on project planning, design, and construction is COVID-19 pandemic. What effect will the pandemic have on supply chains for such projects as DCP? The world economy is slowing dramatically due to the pandemic, so the U.S. and California governments have yet to enact at this writing some type of fiscal stimulus or response. No one knows how long the pandemic will remain dangerous to human societies, or whether such a large project as DCP will remain feasible and possible for public agencies once it passes.

As the new DCP is still under design, costs for the project—including true mitigation costs—are not fixed. A recent technical report prepared for the Delta Conveyance Design Construction Authority (DCDCA) by construction engineers suggests that the tunnel should move further east as a means to reduce construction costs, rather than construct it under islands purchased by Metropolitan Water District (which are less accessible to highways, rail lines, and Port of Stockton facilities). Plus, a great deal of new infrastructure, such as new roads and rail spurs to supply tunnel construction, will have to be designed, permitted and built before tunnel work may begin, adding years to the project. The DCDCA believes that with permitting and supportive infrastructure creation—including roads, train depots, and barge landings—the project will take at least 23 years to complete.

¹⁶ "Trinity System" is included in Figure 2 of the NOP, but omits the Trinity River, from which the Trinity System exports water, and which affects Trinity County residents and California Indigenous tribes in the region.

The report also asserts that tunnel planners should not count on reusing Delta soils that will be removed during construction for shoring up levees or the new forebay to be constructed around the existing pumps. (It is estimated that the DCP's volume of excavated soil materials will be 40 percent of the volume expected for California WaterFix.)¹⁷ Deep Delta soils contain legacy mercury, arsenic, and chromium-6 and are not considered safe for use near drinking water supplies. It will be costly to remove, safely transport, and store such soils without dirt becoming airborne or leaking into drinking water sources. Safe disposal of tunnel-excavated soils will also be a costly enterprise if not handled correctly because they risk devastating environmental health outcomes.

Old Binaries, New Realities

Water officials regularly bemoan the lack of trust that characterizes so much of California water policy and politics. Governor Newsom in 2019 urged Californians to get past “the old binaries.” This is all very well and good. But getting past the old binaries means that water agencies must treat all Californians like their local and regional water concerns matter—including those environmental justice communities who have historically shouldered disproportionate burdens of degraded river and drinking water quality, declining fish populations and contamination, and rising water bills beyond what their incomes can support.

The governor's Draft WRP continues to emphasize old binaries in which water importers in the San Joaquin Valley and southern California should have assured and expanded supplies in a desiccating future—coming at the expense of the Delta and northern California environmental justice and Indigenous tribal communities. Examples of this continuing “old binary” are the raising of Shasta Dam and expansion of its lake, construction of Sites Reservoir, and planning and construction of the DCP. In the name of breaking old binaries, Governor Newsom supports projects that instead reinforce the old binaries, with support of water agencies like Metropolitan.

The new reality of climate change means that California water agencies need to ensure that their local and regional systems are well-maintained and in good working order for the long-term. The Federal Energy Regulatory Commission (FERC) recently ordered the Santa Clara Valley Water District to drain Leroy Anderson Reservoir due to strong seismic concerns. Key facilities all along the State Water Project are near (such as San Luis Reservoir) or actually traverse major earthquake faults (like the California Aqueduct). Unfortunately, public safety awareness of the sheer number of dams in highly urbanized regions like southern California is lacking. Hundreds of dams ring southern California cities and communities, only a fraction of which have prepared inundation map, according to the state Division of Safety of Dams (DSOD). This lack of awareness is compounded by an absence of flood inundation maps, as shown in

¹⁷ Kathryn Mallon of DCDCA email to Barbara Barrigan-Parrilla, 13 March 2020.

Attachment 2 to this letter, indicated by circled location points (square location points denote dams with inundation maps).¹⁸

Lake Oroville and Oroville Dam, the capstone reservoir of the SWP, continues to be under engineering and public safety scrutiny in the wake of its spillway failure in February 2017. While the Federal Emergency Management Agency (FEMA) agreed on February 21, 2020, to pay \$113 million that had originally been denied for spillway repairs, it was continuing to withhold about \$193 million the state wanted for repairing the adjacent emergency spillway. The *Sacramento Bee* reported that “all costs not covered by FEMA would be borne by member agencies of the State Water Project, Oroville Dam’s operator.” As you all know, Metropolitan is a member agency of the State Water Project. Metropolitan will need to ensure it budgets adequately to pay its fair share of Oroville Dam repair costs, and for maintenance of its many other dams and facilities—all of which in the south coastal region are exposed to the seismic risks of the San Andreas and many other adjacent fault zones in the region.

Alternatives

Typically, DWR drafts its Delta conveyance EIRs so that alternatives are considered to be simple variations on a theme—if a tunnel is wanted, then different flow capacities and different diversion points are considered as alternatives. But the realities that are dimly recognized within the project’s purpose and objectives (discussed above) include seismic and climate risks. These are significant risks. So it is entirely reasonable that non-tunnel and non-diversion alternatives come under consideration in this Draft EIR. We urge DWR to devise an investment program that continues through-Delta conveyance, subject to the rules of water quality plans and biological opinions, but which seeks to boost local and regional self-sufficiency as an alternative that seeks to address seismic and climate risks for SWP customer service areas. How does such an alternative perform compared with the reliability of supplies garnered by a DCP and other tunnel-based conveyance alternatives? The Draft WRP was short on specifics when it came to a true assessment of California’s future water needs, unfortunately, and missed an opportunity to conduct a meaningful needs assessment along the lines we describe in our report, *Climate Equity and Seismic Resilience for the San Francisco Bay-Delta Estuary* (see Appendix B).

Potential Environmental Effects

The list of potential effects in the NOP are inadequate. Environmental justice effects are omitted, when even the California WaterFix and BDCP environmental documents contained analyses of these effects. Public health effects are confined to risk of mosquito-borne diseases, which are routinely controlled by mosquito abatement districts. Harmful algal blooms (HABs) are not mentioned but need to be. Disturbance of channel sediments that may contain mercury and selenium must be addressed for their

¹⁸ California Department of Water Resources, Division of Safety of Dams. 2020. *California Dam Breach Inundation Maps*. GIS tool accessible at <https://fmds.water.ca.gov/maps/damim/>.

water quality, public health, and environmental justice effects. Transportation, noise, and air quality effects must also address not just construction effects but operational effects. By what pathways will continued operation of tunnels generate impacts on surrounding communities and businesses (including farms) from tunnel operations?

From: [Kathleen Stein](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Water
Date: Monday, March 16, 2020 12:20:22 PM

To whom it may concern,

Please respond to the following.

1. If runoff is to be collected and stored from rain in So. Cal isn't it prudent to see this implemented prior to approving any other method?
2. PG&E has an over abundance of power due to renewable energy sources and desalination plants need this to operate, shouldn't these be built in order to avoid the damage to the estuary by the fresh water not flowing through it. Shouldn't this be accomplished prior to deciding to build a tunnel?
3. A tunnel may be best but to replace the current conveyance aqueduct, not to draw water from a new spot. This would reduce evaporation. Therefore it would save water and wouldn't this be better than decimating the Delta further?
4. If all the above methods were used then there should be enough water for everyone Right?
5. Furthermore I believe the current system for ownership and conveyance of water would be better for all people if there was a federal system for transporting water from the areas with an over abundance to the areas with a shortage. Much like the railway system. No one person should own the water it should be treated like the air and the sun!

I look forward to you response.

KATHLEEN STEIN

From: [Jacklyn Shaw](#)
 To: [DWR Delta Conveyance Scoping](#)
 Cc: [Cathy Kaehler Lodi, LUA?](#); [Robin Marchi](#)
 Subject: "Science Charade" (A. Rydel, 1977; W. Wagner, 1995)
 Date: Wednesday, March 18, 2020 6:03:28 PM
 Attachments: [New science or just spin science charade in the Delta California WaterBlog.pdf](#)

on 3.18.2020 from jjjjshaw@verizon.net (@dynamiQs.biz)

Dear Concerned Neighbors, Friends, elected and appointed officials and investigative reporters:

Attn: ReneeR, Chuck W., Bob E., Andy C., BruceB, and others (to enlarge font size?)

RE: YES! Delta already has water loss... Fwd: [Post: New science or just spin: "SCIENCE CHARADE" (JH Adler, 2017; W. Wagner, 1995) IN THE DELTA (by A. Rypel, 3.15.2020, CaliforniaWaterBlog)

Whereas I'd had a constricted page to [ContactTheWhiteHouse.gov](#) — you'd be pleased to read the seven pages to print out, save and quote ... by Rypel, 3.15.2020, CaliforniaWaterBlog...WordPress... (For due credits and more, please sign on or join <https://californiawaterblog.com/>) He refers to Jon. H. Adler, *The Science Charade in Species Conservation*, 24 Sup. Ct. Econ. Rev. 109, 116 (2017). Scientists state that the Delta Plan is "NOT PRACTICAL". Also, Rypel suggests that **managing the flow is questionable, not proven**. The "Science Charade" is a classic line since W. Wagner, 1995.... Politicians think and say they are following science. Then when it ends up in courts, liberal or not, Lo and behold, all is fine and dandy and handily matches the political policies(patriotic goal or sometimes greed). That is if not care for stewards of the Delta fertile soil for food crops. Thanks for the timely article from the scientists, californiawaterblog.com Word Press, etc. It is such a heartfelt relief for scientists to clearly explain all the details we have observed, which I attempted to detail in descriptive terms. It really is common sense with scientific data. And the bureaucratic, alphabet soup of terms is spelled out...

HIGHLIGHTS FOLLOW:

— *Central Valley Project (CVP) and State Water Project (SWP) have claimed that these efforts are based on new science. **Yet unpacking those claims requires some legal analysis, a basic understanding of science, and more than a little nuanced reading.***

— *California [Governor] **has elected to sue** the federal government over the recent BiOps . . .*

Key points:

— *(1) the 2010 report "Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem" found that flow standards aimed solely at protecting fish populations in the Delta would require **75% of the unimpaired flow in the Sacramento and San Joaquin watersheds.***

— *(2) existing new science indicates that restoration of the Delta will require more water to be left in the Delta, not less. The 2017 Scientific Basis Report for the SWRCB Bay Delta Plan effort*

— *(3) Using this approach without showing that it works — places all risk of failure ...*

DISCUSSION:

— ***But most improvements mandated in the last round of BiOps are merely proposed, not complete, and most ongoing improvement projects remain unfinished and untested...*** In the near term, California agencies may soon face this challenge head on... ***[And Delta locals are paying taxes for these agencies to reduce our water, when not also into more drought or eventual dust bowl?]***

— *The benefits of successful voluntary agreements are tantalizing:*

— *and the agreements would lock in the water withdrawals before regulators know if the habitat improvements actually work. A safer approach would be to improve the habitat, and then conduct scientific studies to see if listed species actually benefit — before withdrawing additional water.*

— ***It requires contingency plans. But most improvements mandated in the last round of BiOps are merely proposed, not complete, and most ongoing improvement projects remain unfinished and untested...***

— *If the Administration succeeds in developing a set of voluntary agreements, and as DWR concludes its environmental analysis, look for the media blitz ... It will fall to the state regulatory agencies to determine whether they are truly supported by science, or merely by a science charade [???*

Sincerely,

Prof. Jacklyn Shaw, Grower

Lodi, CA 95242

jacklyn.el.shaw@icloud.com

facebook.com/CaliforniaWaterSolutions (log)

cell (562) 233.7300

NOTES by article excerpts in italics plus bold emphasis (and without the photos):

From: [Christine Bos](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Jeremy Harris](#)
Subject: Comment on Delta Conveyance Project
Date: Wednesday, March 18, 2020 4:00:51 PM
Attachments: [Delta Conveyance Scoping Comments LBACC.pdf](#)

Dear Ms. Rodriguez,

On behalf of the Long Beach Area Chamber of Commerce please see attached our comment letter in regards to the Governor's newly proposed Delta Conveyance Project.

Kind Regards,

--

Christine M. Bos
Government Affairs Manager
Long Beach Area Chamber of Commerce
1 World Trade Center, Suite 1650
Long Beach, CA 90831-1650
D: (562) 435-9594



March 18, 2020

Ms. Renee Rodriguez
California Department of Water Resources
Post Office Box 942836
Sacramento, California 94236
Sent Via Email: DeltaConveyanceScoping@water.ca.gov

Subject: Delta Conveyance Scoping Comments

Dear Ms. Rodriguez:

On behalf of the Long Beach Area Chamber of Commerce, our 800 members, representatives, and community stakeholders please accept this correspondence and enter into the record our input for the scoping process of the single-tunnel Delta conveyance project being advanced by the California Department of Water Resources. We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies for much of California.

We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits, and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now.

This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.

We support Governor Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.

Sincerely,

A handwritten signature in black ink that reads "Randy Gordon". The signature is fluid and cursive, with the first name "Randy" and last name "Gordon" clearly distinguishable.

Randy Gordon
President/CEO
Long Beach Area Chamber of Commerce

From: [Allison Boucher](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Comments
Date: Wednesday, March 18, 2020 9:40:11 PM

We believe no tunnel is needed. Water should not be conveyed to the unsustainable agriculture. The water currently spent on this unsustainable agriculture should be reduced, not increased. We need to fallow lots and lots of acreage.

Allison Boucher



Allison & Dave Boucher
Tuolumne River Conservancy, Inc.

T: 209.471.0476

W: tuolumneriverconservancy.org

A: [1163 East March Lane, Ste. D-708 Stockton, CA 95210](#)

From: [Timothy Ellenberger](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Paul Anderson](#); [Becky Worledge](#)
Subject: Comments On Proposed Delta Tunnel Project
Date: Thursday, March 19, 2020 9:53:56 AM
Attachments: [SJSC Delta Tunnel Letter 3-20.doc](#)

Dear Ms. Rodriguez....attached are my comments on the proposed Delta Tunnel Project.

March 18, 2020

Delta Conveyance Scoping
Comments
Atten: Renee Rodriguez
Department of Water Resources
PO Box 942836
Sacramento, CA 94236

Dear Ms. Rodriguez:

I am a California boater and I am very concerned about the significant negative impact of the proposed Delta Tunnel Project. The anticipated closure of navigable waterways and tributaries will have a devastating effect on recreational boating and the commercial infrastructure that supports it, for more than a dozen years.

If the project is to move forward, which I am not in support of, there must be a plan to ensure that the Delta, its ecology and its business enterprises be not only be supported and preserved but improved. In my view and the view of many others, the plan must address the threat that climate change and increased water transfer pose to the Delta. Such considerations are vital for this state and its citizens.

Thank you for the opportunity to offer my comments.

Sincerely,

Tim Ellenberger
Past Commodore, San Jose Sailing Club
1074 Carolyn Avenue
San Jose, CA 95125

From: [Ann Dorsey](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Comments Regarding the proposed Delta Conveyance Project
Date: Wednesday, March 18, 2020 9:17:12 PM

To Whom It May Concern:

I am writing to express my concerns about the proposed Delta Conveyance Project and urge you to reject it for the following reasons:

Deltas, estuaries and wetlands act as natural buffers against sea level rise and tidal surges. The state should be actively expanding and restoring these areas not reducing and degrading them.

Increasing the amount of water diverted from the Sacramento River which feeds into the Delta will have devastating effects on the species that live in and around it. The more water diverted the less water left to pass through the Delta. Lower water levels result in warmer water. Warmer water harms some of the creatures living in it as well as promotes harmful algal blooms. Some algae produce harmful toxins that are detrimental to fish, wildlife and humans and can make the water unsuitable for irrigation, and if not treated properly, non-potable. Low water levels also result in higher concentrations of pollutants which are injurious to fish, wildlife and humans and increases salt water incursion from the Bay which contaminates water making it no longer potable.

There are better ways to secure our water. Actions can be taken to optimize the amount and way we use water by: installing meters wherever water is not currently being metered, only providing subsidies or reduced rates to family farms or small businesses that can prove they are in need, making it illegal for businesses that receive subsidized and / or reduced rate water to sell it to others, increasing water use efficiency especially for agricultural and other major water users, doing more to conserve water, educating everyone about what they can do to keep our water clean (e.g. fertilizers, pollutants, trash and vegetation out of sewer drains), strengthening enforcement of water pollution laws for business, and taking actions to maximize the use of water where it is such as improving water capture and storage capabilities which will both provide water when it is needed and raise ground water levels, and cleaning contaminated groundwater so it can be used, thereby minimizing the need for moving water across the state.

Furthermore, in addition to the stated potential environmental effects, the tunnel environmental impact report (EIR) should consider the following:

- The EIR should analyze alternatives that would increase Delta outflow and reduce exports as compared to current conditions in the Delta. Specifically, the EIR should examine a “no tunnel” alternative.
- The EIR should analyze water conservation, efficiency, and additional demand reduction measures that would be less environmentally harmful than the tunnel and achieve the same water supply reliability goals and targets.
- The EIR must analyze the tunnel’s consistency with the Delta Reform Act’s policy of reduced reliance on the Delta.
- The EIR must analyze the tunnel’s cumulative impacts, with particular focus on:
 - global climate change impacts;
 - water quality, including effects of increases in salinity, toxic hot spots, pesticides, mercury, and other pollutant discharge that won’t be cleaned out due to lack of freshwater in the Delta;
 - biological resources, including all species that may be impacted by the SWP, as well as upland habitats that may be affected;
 - impacts on tunnel alignment, since the proposed eastern alignment has potential for significant urban impacts for Delta residents; and

o Impacts incurred during construction of the tunnel and the reservoirs required for water storage.

- The EIR must adequately analyze the effectiveness of proposed mitigation and conservation measures over the term tunnel project.
- The EIR should analyze the economic costs and benefits of the single tunnel project, as well as those of a “no tunnel” alternative and investment in water conservation and efficiency improvements to meet water supply needs.

o For ratepayers in Southern California, it is important that you have comparisons to a no-tunnel option in terms of financing.

While I agree it is important to make our water supply more secure, the proposed Delta Conveyance project is not the answer. Please oppose this project.

Thank you,

Ann Dorsey

Northridge, CA 91325

From: jolcalif@comcast.net
To: [DWR Delta Conveyance Scoping](#)
Cc: [Paul Anderson](#)
Subject: Delta Conveyance Comments
Date: Wednesday, March 18, 2020 7:23:14 PM

Delta Conveyance Scoping Comments

Attn Renee Rodriguez

Department of Water Resources

PO Box 942836

Sacramento, CA 94236

Dear Ms. Rodriguez,

As a longtime California resident and boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.

There must be a plan to ensure that the Delta infrastructure will not only be preserved but improved.

The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta and in San Francisco Bay.

Also, a comprehensive look at the usage of water across the state in terms of equitable treatment of farmers, particularly smaller farms owned by the resident farmer, urban and suburban areas, parks, etc.

Thank you for your consideration of these concerns.

Sincerely yours,

Jack O'Loughlin

1519 Ben Roe Drive
Los Altos, CA 94024

jolcalif@comcast.net

From: [Judee Kendall](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Frey, Christine \(CFrey@mwdh2o.com\)](#); [Greg Tan \(gtan.cmgt@gmail.com\)](#); [Alex Bruno \(alex@brunogroupinc.com\)](#)
Subject: Delta Conveyance Scoping Comments
Date: Thursday, March 19, 2020 4:06:03 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[doc01411720200319155810.pdf](#)

Good afternoon,

Please direct the attached letter to Renee Rodriquez.

Best regards,

JUDEE KENDALL | PRESIDENT-CEO



P. 818-240-7870 F. 818-240-2872

jkendall@glendalechamber.com

[CLICK HERE](#) To become a **member of the Glendale Chamber of Commerce**



March 19, 2020

Delta Conveyance Scoping Comments
Attn: Renee Rodriguez
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

On behalf of the Board of Directors of the Glendale Chamber of Commerce, I am pleased to provide input for the scoping process of the single-tunnel Delta conveyance project being advanced by the Department of Water Resources. We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California.

More than 30 percent of Southern California's water supply comes from the Sierra Nevada and it provides the backbone water supply for millions of people, our \$1.6 trillion economy, farms and our environment. Modernizing and upgrading our state's aging infrastructure with a single tunnel properly sized to convey 6,000 cubic-feet-per-second of water supply for the State Water Project will allow us to more efficiently move water, restore the Delta ecosystem and manage our water supply through climate extremes.

We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost and the time to move forward is now.

This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.

We support the Newsom administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.

Respectfully,



Judee Kendall
President-CEO

JK/gw

Cc: Christine Frey
Gregg Tan

From: [Nussbaum, Nicole \(CONTR\)](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Prowatzke, Michael](#); [Robbins, Gerald](#)
Subject: [EXTERNAL] Delta Conveyance Project - comments
Date: Friday, March 20, 2020 1:16:52 PM
Attachments: [image001.png](#)
[Delta Conveyance Scoping.pdf](#)

Good afternoon,

Please see attached for the comments from Western Area Power Administration on the Delta Conveyance Project.

Thank you, and have a good afternoon.

Nicole Nussbaum | Safety & Environmental Administrative Assistant

DMS on contract to U.S. Department of Energy
Western Area Power Administration | Sierra Nevada Region
114 Parkshore Drive, Folsom CA 95630
O (916) 353-4675 | nussbaum@wapa.gov



Note: I am not a government employee and have no legal authority to obligate any federal, state or local government to perform any action or payment.



Department of Energy
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, CA 95630-4710

Delta Conveyance Scoping Comments

Attn: Renee Rodriguez
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

To Whom It May Concern:

The Western Area Power Administration (WAPA) submits the following comments for the environmental impact report scoping process for the Delta Conveyance Project (DCP).

Many of WAPA's October 30, 2015, comments related to the Bay Delta Conservation Plan Water Fix (Water Fix) Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) are relevant to this project. Comments at that time resulted in refinements to the project that eliminated the need to relocate 230-kilovolt (kV) and 500-kV transmission lines from the Tracy substation, and these modifications appeared in the 2018 Supplemental Environmental Impact Report for Water Fix. However, WAPA notes that the project area for DCP once again includes the problematic area from the 2015 version of the Water Fix proposal.

1. In the description of proposed project facilities, a "Southern Forebay would be located near the existing Clifton Court Forebay" and would also include a pumping plant and conveyance facilities. Although the precise location of these facilities are not clear at this time, an expansion of the Clifton Court Forebay to the south (which appears to be within the proposed project facility corridor options) will directly impact WAPA's existing Hurley-Tracy No. 1 and 2 double circuit 230-kV transmission line (HUR-TRY 1&2), Tracy-Contra Costa/Tracy-Los Vaqueros 69-kV transmission lines (TRY-CC/LV Lines) and the Transmission Agency of Northern California's (TANC) Olinda-Tracy 500-kV transmission line (TANC Line) as part of the California-Oregon Transmission Project. WAPA operates, maintains, and holds the land easement rights for this potentially impacted segment of the TANC Line. When developing new transmission corridors, WAPA selects alignments that avoid crossing over or through open bodies of water unless required in order to span over rivers and/or canals. Reasonable access to maintain these transmission lines is critical to the operational reliability of WAPA's electric network and the TANC Line. An alignment of a WAPA transmission line over or through an expansion to Clifton Court Forebay causes significant concerns for WAPA.

If a southern expansion of the Clifton Court Forebay is necessary as part of the DCP, then the HUR-TRY 1 & 2, TRY-CC/LV Lines, and TANC Line will need to be relocated/rerouted as required by WAPA and TANC. These lines are part of the bulk electric system and critical to the reliability of the network, therefore acquiring the necessary outages to relocate these lines may be limited or restricted under certain system operating conditions. Due to the close proximity of these lines and the critical role they serve in the reliability of the northern California bulk electric system, the planning associated with the relocation, design configuration, construction, and outage scheduling for these lines must be closely coordinated between WAPA and TANC. It is WAPA's preference to work directly with TANC to acquire the resources and perform these evaluations.

2. If there are spoils from the project, these may not impinge upon WAPA's right-of-way easements or obstruct access to towers. Typically, the WAPA easement agreement restricts the landowner from piling or placing materials within the easement area. This restriction is needed to ensure ground to conductor clearance of not less than 35 feet for 69-kV circuits. In addition, 30 feet of unobstructed maintenance access is required around towers.
3. In general, plans for all tunnel crossings, spoil areas, and any other use of WAPA's rights-of-way or easements shall be reviewed and approved by WAPA during the design phase and prior to construction.
4. WAPA requires an entity working in or around WAPA electrical power lines to abide and comply with the National Electric Safety Code and Occupational Safety and Health Administration (OSHA) standards. Equipment within a WAPA easement area shall not exceed fourteen (14) feet in height when the transmission line is energized.
5. During construction activities, DCP must prevent or minimize the proliferation of dust from contaminating and building up on insulators of nearby WAPA transmission lines.
6. In areas where the DCP enters WAPA rights-of-way, all DCP efforts must abide by WAPA's General Guidelines for the Use of Electric Transmission Line Rights-of-Way that can be found on our website at:
<https://www.wapa.gov/regions/SN/Operations/Pages/right-of-way.aspx>
7. WAPA requests active and regular communication throughout the process, particularly if a facet of the project will require a decision or action on WAPA's part. Coordination with WAPA throughout the environmental process is appropriate and necessary to ensure that any action taken by WAPA to construct, remove, replace, install, acquire land, acquire easements, perform environmental reviews, etc. associated with the WAPA transmission system in support of the DCP project is covered under the DCP environmental documents and project description (including required mitigation).

Please add the following emails to all mailing lists for the DCP: jamiller@wapa.gov, prowatzke@wapa.gov, and grobbins@wapa.gov.

If you have any questions regarding these comments, please contact Gerald Robbins at 916-353-4032, or via email at grobbins@wapa.gov.

Sincerely,

Gerald Robbins
Environmental Manager

From: [Brenes, Liz](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Flores, Vivian](#); [Rodriguez, Arlene](#); [SUTLEY, NANCY H](#); [Crosson, Liz](#); [Romero, Barbara](#)
Subject: 3-19-20 - Letter - Delta Conveyance Project Notice of Preparation - Final.pdf
Date: Thursday, March 19, 2020 5:38:16 PM
Attachments: [3-19-20 - Letter - Delta Conveyance Project Notice of Preparation - Final.pdf](#)

Attached is a letter from Richard Harasick, Senior Assistant General Manager – Water System to Renee Rodriguez at Department of Water Resources regarding:
Delta Conveyance Project Notice of Preparation.

Original sent via U.S. mail.

Thank you,

Liz Brenes

Water Resources Division

111 N. Hope Street, Room 314

Los Angeles, CA 90012

T. (213) 367-4050

Martha.brenes@ladwp.com



CUSTOMERS FIRST

Eric Garcetti, Mayor

Board of Commissioners

Mel Levine, President

Cynthia McClain-Hill, Vice President

Jill Banks Barad

Nicole Neeman Brady

Susana Reyes

Susan A. Rodriguez, Secretary

Martin L. Adams, General Manager and Chief Engineer

March 19, 2020

Department of Water Resources
P.O. Box 942836
Sacramento, California 94236

Dear Ms. Renee Rodriguez:

Subject: Delta Conveyance Project Notice of Preparation

Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the Delta Conveyance Project (Project) Notice of Preparation (NOP) prepared by the Department of Water Resources (DWR). The fundamental purpose of the proposed Project according to the NOP is to develop new facilities in the Delta necessary to restore and protect the reliability of the State Water Project (SWP) water deliveries. While supplies from the Delta continue to face many challenges, including potential disruption from sea level rise and catastrophic earthquakes, the NOP also identifies the need for additional operational flexibility from the Project to better manage risks from further regulatory constraints. LADWP supports a fix in the Delta that aligns with the State's Water Resilience Portfolio to establish a climate resilient water portfolio, reduce reliance on the Delta, and support local supply diversification. At the same time, LADWP continues to be concerned about the ecological health of the Delta and the need to balance water supply with ecosystem restoration, while meeting State of California (State) and Federal regulatory requirements, and remaining consistent with existing water delivery contracts.

While the City of Los Angeles (City) is reducing its reliance on purchased imported supplies from the Delta, the reliability of the SWP system will continue to be an important part of the supply reliability for the City's 4 million population, and the region's supplies in future dry years. The City also believes that a diverse portfolio of local supplies continues to be the cornerstone for a sustainable future. Additionally, the City is already making investments to triple the total amount of local supply production through improved water use efficiency and conservation, increased recycled water use, enhanced storm water capture to help recharge aquifers, and clean-up of contamination in the San Fernando groundwater basin. Water resilience for the City is achieved in the

Ms. Renee Rodriguez
March 19, 2020
Page 2

Los Angeles's Green New Deal 2019 Sustainability pLAn which sets the following targets for local supply development and water use efficiency:

- Increase stormwater capture capacity to 150,000 acre feet per year by 2035.
- Recycle 100 percent of wastewater for beneficial reuse by 2035.
- Reduce potable water use per capita by 22.5 percent by 2025 and 25 percent by 2035.
- Reduce purchase of imported water by 50 percent by 2025.
- Source 70 percent of Los Angeles's water locally by 2035.

Over the next 20 years, the region's imported supplies from the Delta and Colorado River are likely to face many significant risks and challenges. It will be up to local agencies to do their part to help mitigate those risks by maximizing their development of sustainable local supplies in order to ensure the region's future reliability.

LADWP looks forward to a proposed project by DWR that clearly describes the impacts and benefits to participants and non-participants, clarity on the regulatory permitting outcome on operations, clarity on the risks and benefits to the Cal Eco-Restore program, environmental and climate change impacts, and disclosure of financial and rate impact risks to beneficiaries. LADWP supports and encourages the State to implement a "beneficiary-pays" funding principle for this project.

The regulatory allocation of State and Federal water supplies for all project options need to be clarified for project participants and non-participants. It must be clearly understood how governance of future project operations will be impacted by the conflict of competing interests resulting from multiple points of diversion, which will be regulated under a different set of rules at the new north intakes versus the existing south Delta points of diversion. In addition, clarity is needed on the State Water Resources Development System water supply contracts as it is modified to incorporate the Project and may impact funding obligations between several of the large State water contractors.

LADWP appreciates the work and dedication that DWR staff has provided throughout the process in response to changed project conditions. LADWP wishes to reaffirm the support of the Project that balances water supplies with restoring ecosystem health in the Delta.

Ms. Renee Rodriguez
March 19, 2020
Page 3

If you have any questions, or require additional information, please contact,
David R. Pettijohn, Director of Water Resources at (213) 367-0899.

Sincerely,



Richard F. Harasick
Senior Assistant General Manager – Water System

ST:lb/cyr

c: John W. Murray, Jr., Los Angeles-Metropolitan Water District Director
Tracy Quinn, Los Angeles-Metropolitan Water District Director
Jesús E. Quiñonez, Los Angeles-Metropolitan Water District Director
Heather Repenning, Los Angeles-Metropolitan Water District Director
Barbara Romero, Office of the Mayor of the City of Los Angeles
Elizabeth Crosson, Office of the Mayor of the City of Los Angeles
Martin L. Adams, Los Angeles Department of Water & Power
Nancy Sutley, Los Angeles Department of Water & Power

From: [Jim Sadler](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Attn: Renee Rodriguez
Date: Friday, March 20, 2020 12:31:29 PM

Dear Ms Rodriguez,

As a California boater, I am very concerned about the significant negative impact that the closure of navigable waterways and tributaries will have on recreational boating for more than a dozen years.

There must be a plan to ensure that the Delta infrastructure will not only be preserved but improved.

The plan must address the threat that climate change and increased water transfer pose to the amount and quality of the water in the Delta.

Thank you for the opportunity to offer my comments.

Sincerely yours,

James R Sadler

3418 Timberlake Ave

San Jose, CA. 95148

From: [Winn,Rochelle R](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Arakawa,Stephen N](#); [Horton,Robert C](#)
Subject: Comments on Delta Conveyance Notice of Preparation/Scoping
Date: Thursday, March 19, 2020 2:51:05 PM
Attachments: [image002.jpg](#)
[SNA Met Delta Conveyance Scoping Comment Let sign03162020.pdf](#)

Good Afternoon Ms. Rodriguez,

Attached is a PDF copy of Delta Conveyance Scoping Comments from The Metropolitan Water District of Southern California. Thank you so much for your consideration.

If you have questions, please feel free to contact Steve Arakawa at 213-217-6052 or at sarakawa@mwdh2o.com.

Regards,

Rochelle R. Winn

Bay-Delta Initiatives

Colorado River Resources

The Metropolitan Water District of Southern California

700 North Alameda Street, Los Angeles, CA 90012

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mwdh2o.com



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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

March 16, 2020

Delta Conveyance Scoping Comments

Attn: Renee Rodriguez, California Department of Water Resources

P.O. Box 942836

Sacramento, CA 94236

Dear Ms. Rodriguez:

Comments on Delta Conveyance Notice of Preparation/Scoping

The Metropolitan Water District of Southern California (Metropolitan) is pleased to provide input to the California Environmental Quality Act (CEQA) scoping process for the single-tunnel Delta Conveyance Project now being advanced by the California Department of Water Resources (Department) under the direction of Governor Gavin Newsom.

We agree with the project purpose and project objectives as stated in the Department's Notice of Preparation. The need for this project is greater than ever. Even as Southern California continues to diversify its overall water portfolio by developing local supplies and lowering demand, high-quality supplies from Northern California will remain a vital foundation of our water management strategy. This supply enables viable new local supply projects such as recycling, groundwater recharge, and groundwater conjunctive use. Imported supplies contribute to vital reserves in storage, necessary to withstand dry cycles, which are likely to become longer and more severe than recent history.

While we agree with the project purpose and objectives, the purpose and objectives should expressly and explicitly state that the project must be "cost effective," meaning that the project must make economic sense for the Public Water Agencies (PWA), like Metropolitan, which will fund all of the costs. Under CEQA, a project and its alternatives must be feasible to implement, and feasibility includes "economic viability." (14 Cal. Code of Regs. [CEQA "Guidelines"], § 15126.6(f)(1).) We recommend adding to the end of the project purpose statement the statement that development of new Delta conveyance facilities must be "in a cost-effective manner."

Overall, Metropolitan supports the proposed project for Delta conveyance: one tunnel, sized to convey 6,000 cubic-feet-per-second (cfs) of water supply for agencies like Metropolitan that contract for participation in the State Water Project (SWP). While it is appropriate for the environmental process to examine a range of sizes, previous analyses have shown that smaller facilities do not proportionately reduce costs, as opportunities to sufficiently capture high stormwater flows are lost. And, as noted above, the project and its alternatives must be cost

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effective. We believe a 6,000 cfs facility has the greatest possibility of fulfilling this need. We understand that the costs as compared to benefits goes up sharply as the capacity is reduced below 6000 cfs. Therefore, the Environmental Impact Report (EIR) should not evaluate alternative capacities that the PWA investors would have no interest in funding because the economic benefits and cost effectiveness would not exist.

In addition, the prior analyses of the California WaterFix Project demonstrated that at the conveyance capacities evaluated in that EIR, the ability to correct adverse reverse flow patterns that affect sensitive fish species increase with increased capacity. For this reason, we agree with the NOP that an alternative with a capacity of up to 7,500 cfs should be evaluated in the EIR. A 7,500 cfs facility could also help accommodate Central Valley Project (CVP) use, if CVP contractors and the Bureau of Reclamation ultimately decide to participate in the Delta Conveyance Project.

The proposed 6,000 cfs tunnel facility would require two intakes in the northern Delta. We support examining the three possible intake locations that had been fully vetted during the previous California WaterFix planning process. These locations were carefully identified to minimize impacts to migrating fisheries and nearby Delta communities while taking into account potential sea level rise.

We also support the two corridors to be examined for the tunnel facility, a “central” route similar to that of California WaterFix and an “eastern” route closer to Interstate 5. Fully examining these two corridors shows great promise in identifying an ultimate route that minimizes potentially significant impacts to the Delta region.

During the BDCP/California WaterFix scoping process, the Department received requests to study alternatives that emphasized local water supply development. Then and now, under CEQA, alternatives to the project that are evaluated in detail in the EIR must meet the project objectives. Projects that improve local water supply reliability, for example, while essential to California’s overall water reliability picture, are not alternatives to the proposed Delta Conveyance Project under CEQA because they do not meet the project objectives; objectives which we support.

Finally, Metropolitan is a potential Responsible Agency under CEQA for this project and the Department and the EIR should acknowledge this status. CEQA defines a Responsible Agency as one, other than the lead agency, “which has responsibility for carrying out or approving a project.” (Pub. Resources Code, § 21069.) The CEQA Guidelines expand that definition: “the term ‘responsible agency’ includes all public agencies other than the lead agency which have discretionary approval power over the project.” (CEQA Guidelines, § 15381.) The State Water Contractors and the Department are currently exploring potential amendments to the State Water Project contracts to allocate the costs and benefits of a Delta conveyance facility. The potential discretionary decision to approve new contracts or provide funding for a Delta conveyance project qualifies the SWP contractors such as Metropolitan as potential Responsible Agencies. As a potential Responsible Agency under CEQA, Metropolitan should have an enhanced role in

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consulting with the Department on the scope and the contents of the Draft EIR. (CEQA Guidelines, §§ 15082(c), 15086.)

We look forward to consulting with the Department in the development of the EIR for this important project.

Thank you for considering these comments.

Sincerely,



Jeffrey Kightlinger
General Manager

SNA:rrw

cc: Ms. Jennifer Pierre
General Manager
State Water Contractors
1121 L Street, Suite 1050
Sacramento, CA 95814-3944

From: [Tom Williams](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: renee.rodrique@water.ca.gov; Yee.Marcus@DWR; Buckman.Carolyn@DWR
Subject: Public Scoping Comments for Delta Conveyance DEIR with attachment
Date: Friday, March 20, 2020 1:18:44 PM
Attachments: [0320Delta conveyance Scoping Comments.docx](#)

DATE: March 20, 2020

TO: Department of Water Resources

DeltaConveyanceScoping@water.ca.gov

Attn.: Renee Rodriguez, Dept. of Water Res., P.O. Box 942836,
Sacramento, CA 94236

renee.rodrique@water.ca.gov

CC: Marcus Yee, 916-651-6736 marcus.yee@water.ca.gov

Carolyn Buckman, DWR Env.Mngr. 03/19/20 Item No. 10c
Env.Mgr.Rept.

carolyn.buckman@water.ca.gov

Others

FROM: Dr. Tom Williams, Snr.Techn.Adviser, ctwilliams2012@yahoo.com,
323-528-9682

SUBJECT: Delta Conveyance DEIR/DEIS NOP/Scoping

RE: Public Comments for Scoping

The primary purpose of the scoping process is to identify important issues raised by the public and responsible and trustee public agencies related to the issuance of regulatory permits and authorizations and natural environment and resources protection. Public scoping comments are focused on:

Public accessible and understanding,

Significant Environmental Impacts,

Mitigation/Compensation of SEI, and

Alternatives

Comments:

Requested extension of the 032020 deadline which was not responded to or given.

See attached for other comments.

DATE: March 20, 2020

TO: Department of Water Resources
DeltaConveyanceScoping@water.ca.gov

Attn.: Renee Rodriguez, Dept. of Water Res., P.O. Box 942836, Sacramento, CA 94236
Renee.rodrique@water.ca.gov

CC: Marcus Yee, 916-651-6736 marcus.yee@water.ca.gov
Carolyn Buckman, DWR Env.Mngr. 03/19/20 Item No. 10c Env.Mgr.Rept.
carolyn.buckman@water.ca.gov

FROM: Dr. Tom Williams, Snr.Techn.Adviser, ctwilliams2012@yahoo.com, 323-528-9682

SUBJECT: Delta Conveyance DEIR/DEIS NOP/Scoping

RE: Public Comments for Scoping

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- Public accessible and understanding,
- Significant Environmental Impacts,
- Mitigation/Compensation of SEI, and
- Alternatives

Comments:

Requested extension of the 032020 deadline which was not responded to or given.

Provide Scoping Summary Report within 60 days of closing Scoping period and provide monthly online updating of the draft SSR.

Environmental Manager's Report Contact: Carolyn Buckman, DWR Environmental Manager

Date: March 19, 2020 Item No. 10c Subject: Environmental Manager's Report

Summary: The Department of Water Resources (DWR) is conducting scoping to begin the California Environmental Quality Act (CEQA) process to analyze a single-tunnel solution to modernizing and rehabilitating the water distribution system in the Delta.

*Detailed Report:....After the comment period closes, DWR will compile comments into a **Scoping Summary Report** and use information received to formulate alternatives to the proposed project....*

Provide Public with a standard Definitions/Glossary of terms used and their numerical use.

Provide definitions and quantification of specific terms: practical, feasible, reasonable, and adequate.

Provide Publicly Accessible information through direct WWW-links, appendices, and responses to Scoping comments.

Provide dictation in an appendix or direct link via DWR webpages involving any "personal communications" references.

Provide all footnotes to be included in a bibliography or list of references, with appropriate linkages for direct Public access.

Provide Qualifications of all "Preparers" and their corporate affiliations for 2010-2021.

Provide quantitative and explicit current Project Goals/Objectives/Policies and Purposes/Needs for Public proposing of mitigative/compensatory alternatives.

Provide direct numerical relations for current proposed Project, any current alternatives, and current GOP/PNs.

Provide numerical/quantified definitions of "reliability" and for "potentially" for this review and previously for water resources reviews by DWR during 2015-2021.

NOP 1 / 4 "...develop new diversion and conveyance facilities in the Delta necessary to restore and protect the **reliability** of State Water Project...water deliveries and, **potentially**, Central Valley Project (CVP) water deliveries south of the Delta, consistent with the State's Water Resilience Portfolio.

Provide objectives for DC and for WaterFix and clearly identify those that differ between the two projects.

DWR Q&A 2/1 5. How does this...differ from the previous California WaterFix project? The objective of the proposed project **is...largely the same as WaterFix: to restore and protect the reliability** of water supplies that move through the Delta by adding flexibility with a new point of diversion and new infrastructure.

Provide clarification regarding the Scoping for this Project (DC) and an unexpanded Scoping for other projects.

The Scoping process is expanded beyond the simple NOP via related links/documents, including https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Delta-Conveyance/DC_NOP_QA_Final.pdf?la=en&hash=3967A433CAD79D37B91E0EDB6EB3BFC30F5FAA43.

Provide definitions and clarification for use of vague terms used throughout the NOP, such as: will also involve, likely requiring, may include, anticipated...NEPA compliance, relevant NEPA information, once established, federal lead agency vs Lead Agency, and if appropriate.

NOP/Q&A 3/1 10. Will the federal government have a role in this process? In the NOP, DWR states that the Delta Conveyance Project **will also involve federal agencies** that must comply with the National Environmental Policy Act (NEPA), **likely requiring the preparation of an Environmental Impact Statement (EIS)**. Federal Agencies with roles in the **project may include approvals or permits** issued by the United States Bureau of Reclamation (Reclamation) and United States Army Corps of Engineers. To assist in the **anticipated federal agencies' NEPA compliance**, DWR will prepare an EIR that includes **relevant NEPA information** where appropriate. **Once established**, the **federal lead agency** will publish a Notice of Intent to formally initiate the NEPA process. DWR **will coordinate** with the federal Lead Agency for NEPA compliance and, **if appropriate**, will prepare a joint EIR/EIS with the federal Lead Agency.

Provide clear and thorough definitions, numerical ranges, and specific quantified terms for:

More reliably capture, Water during and after storm events, Protect existing supplies, Threats, Climate change, Sea level rise (averaged, HHT and LLT), Earthquakes (RM -1 – 7, 0.1 – 0.5 G), Pursuing, and Local supply resiliency projects

NOP/Q&A 3/3 12. Are water agencies looking for more water? The implementation of the proposed Delta Conveyance Project will not involve any new water rights.

The goal of modernizing Delta conveyance is to **more reliably capture water during and after storm events**, and to **protect existing supplies from the threats posed by climate change, sea level rise and earthquakes**....agencies throughout California **are pursuing local supply resiliency projects**...recycling, groundwater recharge, storage and conservation to reduce reliance on the Delta....

Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for: "Background information", DW Roundtable, Conveyance, "Major issues facing the Delta", Levees, Flood protection, Water quality, Farmland preservation, and Invasive species.

NOP/Q&A 3/4 13. Is the state committed...will be hosting a number of public engagement venues to gain the input of the public on issues related to the Delta Conveyance Project....DWR will also provide **background information** on its website and is available to brief groups locally and statewide about the proposed project....planning a series of technical workshops during development of the EIR and public meetings...California Natural Resources Agency, has formed the Secretary's **Delta Water Roundtable** to provide a forum for...**conveyance as well as major issues facing the Delta** including but not limited to **levees, flood protection, water quality, farmland preservation and aquatic invasive species**.

Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for: Opportunities and "Other permits and environment review processes".

NOP/Q&A 3/4 For the Delta Conveyance Project..., there **will be opportunities** for public input for **other permits or environmental review** 4/1 **processes**, including those with the State Water Resources Control Board and the Delta Stewardship Council

Provide clear and thorough clarified glossary, listings, and definitions, background document links, numerical ranges, and specific quantified terms for:

List of all SWP contractors, current allocation and future allocation with 7500cfs, Cost Allocation Methodology, Assess, potential, associated, Reasonably foreseeable potential, Contract modifications, and Preliminary contract negotiations.

NOP/Q&A 3/2 11. Which public water agencies are participating in the Delta Conveyance Project? DWR is conducting preliminary contract negotiations with State Water Project contractors to determine a **methodology for cost allocation**.... The Delta Conveyance Project EIR **will assess**..., **potential**

environmental impacts associated with **reasonably foreseeable potential contract modifications** that were **discussed during the preliminary contract negotiations**.

Provide clear and thorough clarified glossary and definitions, numerical ranges, and specific quantified terms for:

Cost estimates, B/C Analysis, Financial Analysis, and Operations.

NOP/Q&A 4/6 18. What will the project cost be? There will be a **cost estimate**, as well as both a **Benefit-Cost Analysis** and a **Financial Analysis**, developed during the planning process. At this point, the NOP is a start of the environmental review,...**economic issues**. Cost analyses will come later in the process, **after a preferred alternative** has been selected....

Provide an updated draft of the Costs, Benefits, Cost Analysis, and Financial Analysis commensurate with the staged assessment and mitigation for the proposed Project.:

Provide an updated draft of the MMRP with the staged assessment and mitigation for the proposed Project.:
NOP/Q&A 5/2 20. How can the public get engaged in Delta flow and water quality impacts? When will there be an operations plan made available?

The State Water Resources Control Board is currently working on updating Water Quality Control Plan standards....**Final operational plans** specifically for the proposed Delta Conveyance Project will not be determined until after the other permitting processes are complete (including CEQA, **CESA**, and the Change in Point of Diversion before the State Board). However, **preliminary operational assumptions** will be...in the EIR to assist in the assessment of water quality, aquatic resources, hydrodynamic effects on **non-project water users, etc.**

Provide quantitative, numerical, and explicit definitions and comparisons of for those areas with and those areas without SWP/CVP pumping stations within the Project region by northern, central, and southern sectors of the Delta regarding to a) the risks and the damages excepted by earthquakes and b) by inundation of brackish and freshwaters.

NOP 1/5 • To minimize the potential for public health and safety impacts...**resulting from a major earthquake that causes breaching of Delta levees and the inundation of brackish water** into the areas in which the existing SWP and CVP pumping plants operate in the southern Delta.

Provide definitions and quantification of “seismic event(s)” along with distances, depths, periods, intensities, and surface responses and probable damages to levees and other infrastructure facilities.

Provide definitions and quantification of current levees stability responses to a “design seismic event”.

Provide definitions and quantification of lowest intensity likely (1/500) to produce a breaching of a levee under “normal” flows and in the event of “Plus 5-foot flows” (flood or sea rise).

Provide in the DEIR/DEIS a draft of the Project’s Mitigation, Monitoring, and Reporting Plan.

NOP 10/2 Where the potential to cause significant environmental impacts are identified, the EIR will identify avoidance, minimization, or mitigation measures that avoid or substantially lessen those impacts.

Provide definitions and quantification of seismicity and risks for the Forebay, named water conveyance facilities, and pump stations.

Provide clear definitions and procedural estimations for “risks”, “threats”, “likely”, “could’s, would’s and should’s”, and “can’s, will’s, shall’s, and must’s”

Provide quantitative estimates of “Climate Changes” for the life-of-project (e.g., 50 years) and increased variability (Coefficients of variation, standard deviations/errors for norms, +/- 4-5-6thSD for Higher-Storm/Lower-Drought flows.

Provide definitions and quantifications for “reliability”, “reliably”, “flexible”, and “flexibility”.

Provide review of all eligible/suitable areas of Groundwater Resources for recharge and production using “Delta-Conveyance waters” – Sources and Destinations.

Provide quantitative records (maximum, flows, duration, elevations, etc.) for 2010-date bypassing all “Flood Flows”.

Provide and quantify the most probable recipient of averaged, base, and one-month periodic flows and whether for direct use or indirect reuse after underground or surface storage.

Provide maps of all measurable, recordable seismic events 0 - +7 RM within 50 miles of any proposed tunnel alignments and within 100 miles of any Project shaft. Provide map with correlations of events with most probable fault plane (including surface traces and subsurface projections).

Provide map of any known or suspected "blind fault plane" within 25 miles of any alignment.

Provide a map of all known breaches of levees within the Project region and 50 miles above and below planned physical facilities and a map of known areas of inundation.

Provide a map and description of all levee reinforcements conducted and placed within the Project region from 1930-Present. Distinguish between earthen works and others (e.g., slurry/grout walls and treatments, cutoff walls, crown barriers, etc.).

Provide technical, numeric, and quantitative reviews and analyses of structural behaviors and movements of:

- fixed air-filled vertical shafts without any tunnels,
- single empty/air-filled tunnels within 300ft of the shafts,
- twin empty/air-filled tunnels within 300ft of starter shafts,
- single/twin empty/air-filled within 300ft of receiver shafts,
- fixed air-filled vertical shafts with air-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations;
- fixed partially water-filled vertical shafts with water-filled tunnels with 0.0, 0.5, 0.7, and 1.0 G accelerations;

Provide numeric, quantitative assessment/definitions for any use of cost-effective, efficient, economic, financial, or other non-physical descriptor.

Withdraw and revise current CEQA documents (NOP, IS, and Assessment of Significance) and recirculate as combined EIR/EIS with appropriate state and federal documents. As indicated below, provide the inclusive document for Public Scoping Review and Scoping.

*NOP 1/2 The Delta Conveyance Project **will also involve** federal agencies that **must comply** with the National Environmental Policy Act (NEPA), **likely requiring** the preparation of an environmental impact statement (EIS). ... To assist in the anticipated federal agencies' NEPA compliance, **DWR will prepare an EIR that includes relevant NEPA information where appropriate**. Once the role of the federal lead agency is established, that federal lead agency **will** publish a Notice of Intent to formally initiate the NEPA process.*

Provide a Draft Mitigation, Monitoring, and Reporting Plan (Program) as part of the DEIR/DEIS, including all related/tiered reporting for the Public and specifically all Public commenters for scoping and DEIR/DEIS review.

*NOP 12/3 As required by the CEQA Guidelines, within 30 days after receiving the Notice of Preparation, each responsible and trustee agency is required to provide the lead agency with specific detail about the scope, significant environmental issues, reasonable alternatives, and **mitigation measures** related to the responsible or trustee agency's area of statutory responsibility that will need to be explored in the EIR. In the response, responsible and trustee agencies should indicate their respective level of responsibility for the project.*

Provide review and facility and operational requirements for Peak/Off-Peak flow diversions from Delta, and through all related facilities, provide locations and facilities required to access diverted flows and those which maybe be required to receive, hold, and recharge underground storage capacities.

Provide review and assessment of secondary, growth induced impacts with expansion/changes of annual and perennial land uses, both agricultural and structured.

Provide list of specific quantified conditions for the EIR and for the EIS Project conditions and operations and require Amended DEIR/DEIS recirculation and review/comment with any physical or operation (flows) involvement of the federal CVP or other such projects.

*NOP 3 / 4 Reclamation is considering the potential option to involve the **CVP** in the Delta Conveyance Project. ... the connection to the existing **Jones Pumping Plant** in the south Delta is included in the proposed facility descriptions below. ... may include a portion of the overall capacity dedicated for CVP use, or it may*

accommodate **CVP use of available capacity (when not used by SWP participants)**. If Reclamation determines that there could be a role for the CVP in the Delta Conveyance Project, this role would be identified in a separate NEPA Notice of Intent issued by Reclamation.

Provide detailed descriptions, PFDs/P&IDs, and links to equipment suppliers and certification authorities for fish screens and sources for designation of “state of the art” fish screens.

Provide definitions for state-of-the-art and practical/reasonable/effective fish screens.

Provide alternative descriptions and assessments for single, highest intake for 6000 and for 7500cfs flows.

Provide definition of “ancillary facilities”, e.g., chemical additives and mixing.

Provide definition and description of “tunnel shaft” and its relationship to the intake (northern) forebay and alternatives for cut-&-cover, shallow, and deep intake tunnels.

*NOP 5/1 The proposed project would include two intakes with a maximum diversion capacity of **about 3,000 cfs each**. The size of each intake location could range from 75 to 150 acres, depending upon **fish screen selection**, along the Sacramento River and include a **state-of-the-art fish screen**, sedimentation basins, **tunnel shaft**, and **ancillary facilities**.*

Provide list of “reasonably foreseeable potential contract modifications”, e.g., increased diameter, multiple diversions(intakes), additional TBM Shafts, etc., and additional assessment, mitigation, and monitoring, and reporting plans, including recirculation of Amended DEIR/DEIS) for any “Contract Amendment (Project Description, changes).

*NOP 6/4 Contract Amendment for Delta Conveyance ...may involve modifications to one or more of ... SWP...water supply contracts to incorporate the Delta Conveyance Project. Therefore, if modifications move forward, the Delta Conveyance Project EIR will assess, as part of the proposed project, potential environmental impacts associated with **reasonably foreseeable potential contract modifications**.*

Provide definitions, tabular, and graphical/numeric delineations for “Project Area”, “Study Areas”, “Regions”, “Service Areas”, “Resource Areas”, all water recipients and contractors for local distributions, and.

*6/5 PROJECT AREA The proposed EIR project area for evaluation of impacts consists of the following three geographic regions, as shown in Figure 2, below. • Upstream of the Delta region • Statutory Delta (California Water Code Section 12220) • South-of-Delta SWP Service Areas and, **potentially, South-of-Delta CVP Service Areas**.*

*6/6 The **study areas** will be specifically defined **for each resource area** evaluated in the EIR.*

*Figure 3 shows the SWP South-of-Delta **water contractors**.*

Provide diversion (0.0-mile, 10-mile, and 20-mile downstream points from Forebay) hydrographs of flows (velocities, volumes, elevations, etc.), temperatures (at -10% and -90% depths), and TDS (at -10 and -90% depths).

Provide channel hydrographs at 0.1-, 10-, 20-, 50-, and 100-mile downstream of Forebay discharge point(s) (velocities, volumes, elevations, etc.), temperatures (at -10% and -90% depths), and TDS (at -10 and -90% depths) prior to discharge for local uses along the Valley Conveyance.

Provide simplest physical alternative for the Project alignment, dead-straight path from uppermost diversion on Sacramento River to the Intake facility for the Clinton Forebay with at least one shaft (mid point) and not more than four equally space shafts for tunnel-boring-machine drives/starters and reception/receivers, excluding any shafts at start and finish.

Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions including connections to all districts and end-users of water through the tunnel(s) and Delta Fore Bay.

Provide text, graphical, numeric and Process Flow Diagrams (PFD/P&ID) descriptions for identified components (e.g., inlets, inlet-forebay tunnels and shafts, shafts for both forebays,

Define, delineate, and describe specifically “connecting tunnel reaches.

Provide definitions, delineation, and description specifically for “launch” compared to “retrieval” shafts and alternatives of double launch, of double retrieval shafts, and of combined retrieval/launch shafts.

Provide description of Site recovery including demolition/removal of 45ft high concrete shaft freeboard and earthen reuse.

*NOP 5/2 Tunnel and Tunnel Shafts The proposed project would construct up to two north connecting **tunnel reaches** to connect the intakes to an Intermediate Forebay..., a single main tunnel from the Intermediate Forebay to a new Southern Forebay, and two connecting south tunnel reaches as part of the proposed project’s South Delta Conveyance Facilities...to connect to the existing SWP and, **potentially***

CVP,....The proposed **single main tunnel** and **connecting tunnel reaches** would be constructed underground with the bottom of the tunnel at approximately 190 feet below the ground surface. Construction for the tunnel would require a **series of launch shafts and retrieval shafts**. Each launch and retrieval shaft site would require a permanent area of about four acres. Launch sites would involve temporary use of up to about 400 acres for construction staging and material storage. Depending on the location, the shafts may also require flood protection facilities to extend up to about 45 feet above the existing ground surface to avoid water from entering the tunnel from the ground surface if the area was flooded.

Provide technical, quantitative and numerical description of source materials, boring related changes, and discharge conditions, and probable treatments and conditions of the RTM ("reusable tunnel material") within 1, 10, and 30 days from discharge beyond the shaft.

Provide technical, quantitative and numerical description of potential reuses for embankments

Provide technical, quantitative and numerical description of other purposes.

Provide technical, quantitative and numerical description of "stored purposes", especially including water contents and strengths.

*NOP 5/2 Earthen material would be removed from below the ground surface as tunnel construction progresses; this **reusable tunnel material** could be **reused** for embankments or **other purposes** in the Delta or **stored** near the launch shaft locations.*

Provide impact assessment and mitigation for "Geology and Seismicity: changes in risk of settlement during Life of Project, during construction and operations".

*NOP 9/3 • Geology and Seismicity: changes in risk of settlement during **construction**.*

Provide thorough, quantitative, and mapped production for temporary storage, treatment, and ultimate "re-use" or "disposal" of tunnel muck debris (>30% fluids) and its impacts and mitigation/monitoring on impact sectors below, through 0-10 years.

NOP 9/3 • Soils: changes in topsoil associated with construction of the water conveyance facilities.

• *Terrestrial Biological Resources: effects to terrestrial species due to construction of the water conveyance facilities.*

• *Land Use: incompatibilities with land use designations.*

• *Agricultural and Forestry Resources: preservation or conversion of farmland.*

• *Recreation: displacement and reduction of recreation sites.*

• *Aesthetics and Visual Resources: effects to scenic views because of water conveyance facilities.*

• *Cultural/Tribal Cultural Resources: effects to archeological and historical sites and tribal cultural resources.*

Provide thorough, complete, and quantitative impact assessment and mitigation for areas receiving any significant derived project waters (e.g., >10 acre-feet/year) and incorporate California Dept. Finance projections with and without such project waters to 2045 (using 2020 census).

NOP 10/1 Public Services and Utilities: effects to regional or local utilities.

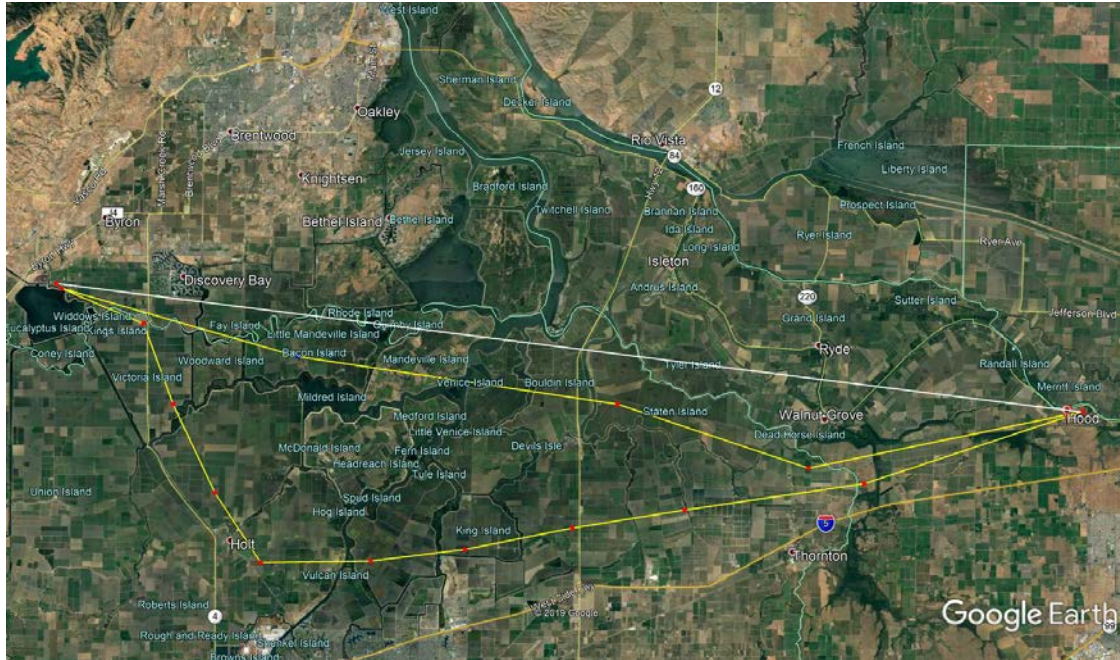
• *Growth Inducement and Other Indirect Effects: changes to land uses as a result of changes in water availability resulting from changes in water supply deliveries*

Provide a separate summary with web-links to sources for all specific details provided by agencies within 60 days of closure of Scoping, including scopes, significant issues and impacts, reasonable and unreasonable alternatives, and all mitigations, monitoring, reporting recommendations, and responsibilities.

*NOP 12/3 As required by the CEQA Guidelines,...each responsible and trustee agency is required to provide the lead agency with specific detail about the **scope, significant environmental issues, reasonable alternatives, and mitigation measures**...should indicate their respective **level of responsibility** for the project.*

Provide alternative description and assessment for the shortest practical tunnel route as shown below (dead-straight route) without turns/curves in the tunnel portion and two shafts (two starter/launch shafts with double TBM meeting within the "middle" of the tunnel line).

A: 37 miles/white line Courtland-Hood-Clarksburg miles C: 42 east/bottom B: 39 middle



Provide Non-Tunnel Alternative for improved reliability of Delta flows, Improved Levee Alternative, including slurry/grouted cut-off walls within levees and at least 50% of levee height beneath the levee (e.g., 50ft levee height with 75ft deep/height cut-off walls).

Provide in the Improved Levee Alternative additional provision of "High K-Rail" for raising top of levee by 3-5ft on temporary and then permanent basis.

From: [Don Wagenet](#)
To: [DWR Delta Conveyance Scoping](#)
Cc: [Amy Cuellar](#); [General Manager](#)
Subject: Transmission Agency of Northern California Scoping Comments
Date: Friday, March 20, 2020 1:12:32 PM
Attachments: [final signed TANC Comments-DCP_3_2020.pdf](#)

Delta Conveyance Project Scoping:

Please accept the attached Scoping Comments from the Transmission Agency of Northern California (TANC).

Please reply to confirm receipt of this message and the attached comments.

Thank You
Don Wagenet
TANC



Transmission Agency of Northern California
P.O. Box 15129 Sacramento, CA 95851-0129 (916) 852-1673

Date: March 19, 2020

Delta Conveyance Scoping Comments

Attn: Renee Rodriguez

Department of Water Resources

P.O. Box 942836

Sacramento, CA 94236

Subject: Comments to the Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project; January 15, 2020 (NOP)

Dear Ms. Rodriguez:

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide these comments in response to the subject NOP. These comments are informed by the information provided in the NOP, publicly available information provided by the Delta Conveyance Design and Construction Authority, and by past efforts taken within the Delta and the watersheds of the Sacramento and San Joaquin Rivers, including those undertaken through the Bay Delta Conservation Plan (BDCP) and California WaterFix projects.

We have included eight comments to assist The Department of Water Resources (DWR) in developing a reasonable range of alternatives for evaluation in the Environmental Impact Report (EIR) for the Delta Conveyance Project (DCP). Our comments include information regarding potential environmental impacts and mitigation measures associated with each of them.

Please add the following email addresses to all mailing lists for this project: dwagenet@tanc.us, acuellar@tanc.us, and bgriess@tanc.us. If you have any questions regarding these comments, please call Don Wagenet at (916.852.1673).

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryan Griess", is written over the typed name and title.

Bryan Griess
General Manager

A Public Entity whose Members include:

Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Modesto Irrigation District,
Palo Alto, Plumas-Sierra Rural Electric Cooperative, Redding, Roseville,
Sacramento Municipal Utility District, Santa Clara, Turlock Irrigation District, Ukiah

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Comment 1 – Background Information and Context of TANC’s Comments

TANC is a joint exercise of powers agency organized under Chapter 5, Division 7, Title 1 of the California Government Code, and a Joint Powers Agreement, dated as of December 10, 1984, among the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara and Ukiah, the Modesto Irrigation District (MID), the Sacramento Municipal Utility District (SMUD), and the Turlock Irrigation District (TID), as members, and Plumas-Sierra Rural Electric Cooperative, as an associate member.

TANC is the Project Manager of the California-Oregon Transmission Project (COTP), which is an existing 339-mile long, 1,600-megawatt, 500 kilovolt (kV) transmission project between the California-Oregon border and Tracy, California. The COTP is critical to the delivery of electricity to California. The Western Area Power Administration (WAPA) has minority ownership interest in the COTP, transmission entitlement rights, certain lands rights, and provides operations and maintenance (O&M) services to TANC for the COTP.

TANC is concerned that certain construction, operation, and maintenance activities associated with the DCP could result in significant impacts to public services and utilities, public health and safety, and soils and drainage near the COTP.

Comment 2 – No Authorization or Acquiescence

TANC’s comments herein are not intended, and shall not be construed, as authorization of, or acquiescence in, any particular uses of the COTP right of way (ROW) for the purposes of implementing the DCP.

Comment 3 – Alternatives - Southern Forebay Located Northwest of Clifton Court Forebay

If additional surface water storage as a Southern Forebay is needed near Clifton Court Forebay for DCP operational purposes, TANC supports alternatives that locate the Southern Forebay northwest of Clifton Court Forebay as envisioned in the Proposed California Water Fix Project of July 2018 (Figure 1).

Comment 4 – Alternatives - Southern Forebay Located South of Clifton Court Forebay and Unacceptable COTP Transmission Tower Relocations

If additional surface water storage as a Southern Forebay is needed near Clifton Court Forebay for DCP operational purposes, TANC will find unacceptable any alternative that locate the Southern Forebay south of Clifton Court Forebay as envisioned in the Approved California Water Fix Project of 2017.

The COTP ROW and transmission towers run in close proximity to the southern extent of the existing Clifton Court Forebay. If such alternatives are considered in the DCP EIR, the following significant impacts to Public Services and Utilities would need to be considered:

Forebay expansion across the COTP ROW(s) would significantly and adversely affect those facilities and ROWs. Tower footings were not designed to withstand constant flooding and the reductions in stability that would result from permanent inundation. Specifically, the following

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adverse significant physical impacts would likely occur as a result of ROW excavation and flooding:

- Excavation within 100 feet of transmission tower footings during construction would threaten the integrity of tower footings and risk the collapse of the towers.
- Forebay flooding would severely reduce the integrity of the transmission tower footings, and likely result in tower failure.
- The structural stability of five or possibly more 500-kV COTP transmission towers would be threatened by excavation and subsequent flooding of the Southern Forebay.
- The cumulative impacts of excavation and flooding would almost certainly result in one or more transmission tower failures over time.

Proposed southward expansions of Clifton Court Forebay, or the construction of a new Southern Forebay in any location would require the relocation of several COTP transmission towers as proposed in the Bay-Delta Conservation Plan and California WaterFix through 2017.

If any transmission tower relocations are proposed in any location or as part of any alternative, the following environmental and economic considerations are relevant to the development of such alternatives. The Department of Water Resources and the Delta Conveyance Design and Construction Authority would be responsible for the following:

- A. Full funding of all environmental studies, permit applications, and all other regulatory compliance requirements and consultations needed for relocating the COTP ROW within or outside of the existing DCP study area;
- B. All new, additional and/or replacement right of way lands that may need to be acquired for relocation of the existing transmission towers. Acquisition of the new ROWs must include rights fully equivalent in all respects to the current rights. Full ownership and transmission entitlements associated with those rights will need to be vested completely to TANC and the COTP participants.
- C. All costs for the design and construction of any temporary transmission towers that will be needed to maintain COTP service levels as the COTP is relocated to new ROW; and
- D. All costs for the design, construction and commissioning of the permanent replacement 500-kV line of equal or greater capacity;
- E. Payment of all lost revenues resulting from outages needed for relocation, replacement interconnection, and
- F. All associated litigation costs.

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Comment 5 – Public Health and Safety Impacts Associated with Permanent and Temporary Transmission Line Crossings of the COTP ROW

The DCP is likely to propose the construction, operation, and maintenance of temporary and permanent transmission lines needed for DCP power that could cross the COTP ROW at several locations. Accidental or inadvertent contact with energized 500 kV transmission lines and towers could result in significant public health and safety impacts including serious injury, electrocution, and in some instances, fatalities.

Comment 6 – Proposed Mitigation Measures for Public Health and Safety Impacts Associated with Permanent and Temporary Transmission Line Crossings of the COTP ROW

The following public health and safety mitigation measures will need to be implemented in association with any and all permanent and temporary transmission and distribution line crossings of the COTP ROW proposed as part of the DCP.

- A. No transmission line crossings of the COTP ROW will be authorized to be sited in a manner that would place new transmission towers within the COTP ROW.
- B. At all locations where proposed transmission or distribution lines to deliver power to the DCP cross the COTP ROW, they shall cross under the COTP conductors. Further, these crossings shall satisfy National Electricity Safety Code and/or California General Order 95 requirements (whichever is more restrictive) for the COTP line under its maximum sag conditions.
- C. Access to the COTP facilities for inspection and maintenance, including access for heavy equipment, shall be available at all times during DCP transmission facilities planning, construction and operation.
- D. All COTP ROW access roads shall be available at all times for emergency and routine O&M activities.
- E. Permanent markers indicating the proximity of energized high-voltage power line conductors shall be required to be furnished and installed on DCP electric transmission facilities before the completion of construction according to standard industry practices for such marker installations.

Comment 7 – Potentially Significant Soils, Drainage, and Public Services and Utilities Impacts Associated with Permanent Water Conveyance Facility Crossings of the COTP ROW and Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW

DCP design and construction activities potentially affecting soil engineering properties, drainage, and surface and subsurface hydrology and integrity could have the potential to significantly increase soil liquefaction, alter localized soil-water hydrologic conditions that reduce soil stability and consequently the integrity of transmission tower footings.

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Comment 8 – Proposed Mitigation Measures for Potentially Significant Soils, Drainage, and Public Services and Utilities Impacts Associated with Permanent Water Conveyance Facility Crossings of the COTP ROW and Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW

Should water facility crossings of the COTP ROW be needed, TANC recommends the following mitigation measures for potentially significant soils, drainage, and public services and utilities impacts:

- All temporary earthwork within or adjacent to the COTP ROW shall be designed and implemented in a manner that results in drainage away from COTP transmission tower footings.
- No cut or fill or cofferdam construction and/or dewatering activities will be authorized that could affect the stability of the COTP transmission tower footings consistent with all applicable government codes. Excavations will not be authorized within 100 feet of COTP transmission tower footings.
- Residual Tunnel Material and any and all other excavated soil, spoils, or other materials will not be allowed to be placed within the COTP ROW.

TANC appreciates the opportunity to comment on the Draft DCP EIR. We look forward to coordinating with the DWR and other DCP proponent agencies regarding these comments and the importance of maintaining the safety, reliability, and integrity of the COTP throughout DCP planning, design, construction, operation, and maintenance.



DESIGN REFINEMENTS PROPOSED

To Minimize Impacts, Improve Performance and Reduce Costs

Design improvements are being proposed to minimize impacts of the WaterFix project on local communities and the environment. The proposed changes build on past modifications that significantly reduced the project's footprint and costs. The new optimizations also seek to minimize impacts on environmental resources in the Delta, including wetlands and other water resources.

The proposed optimizations will be subject to environmental review as a part of the forthcoming Supplemental Environmental Impact Report expected in Summer 2018.

KEY BENEFITS OF THE NEWLY PROPOSED OPTIMIZATIONS



Significantly reduces wetland impacts



Reduces impacts to salmon and smelt at the Clifton Court Forebay



Reduces the number of power poles and lines required which improves aesthetics, reduces impacts to birds, and minimizes the need for power facilities near the town of Courtland, while also eliminating the need to relocate large 230 kV and 500 kV transmission lines

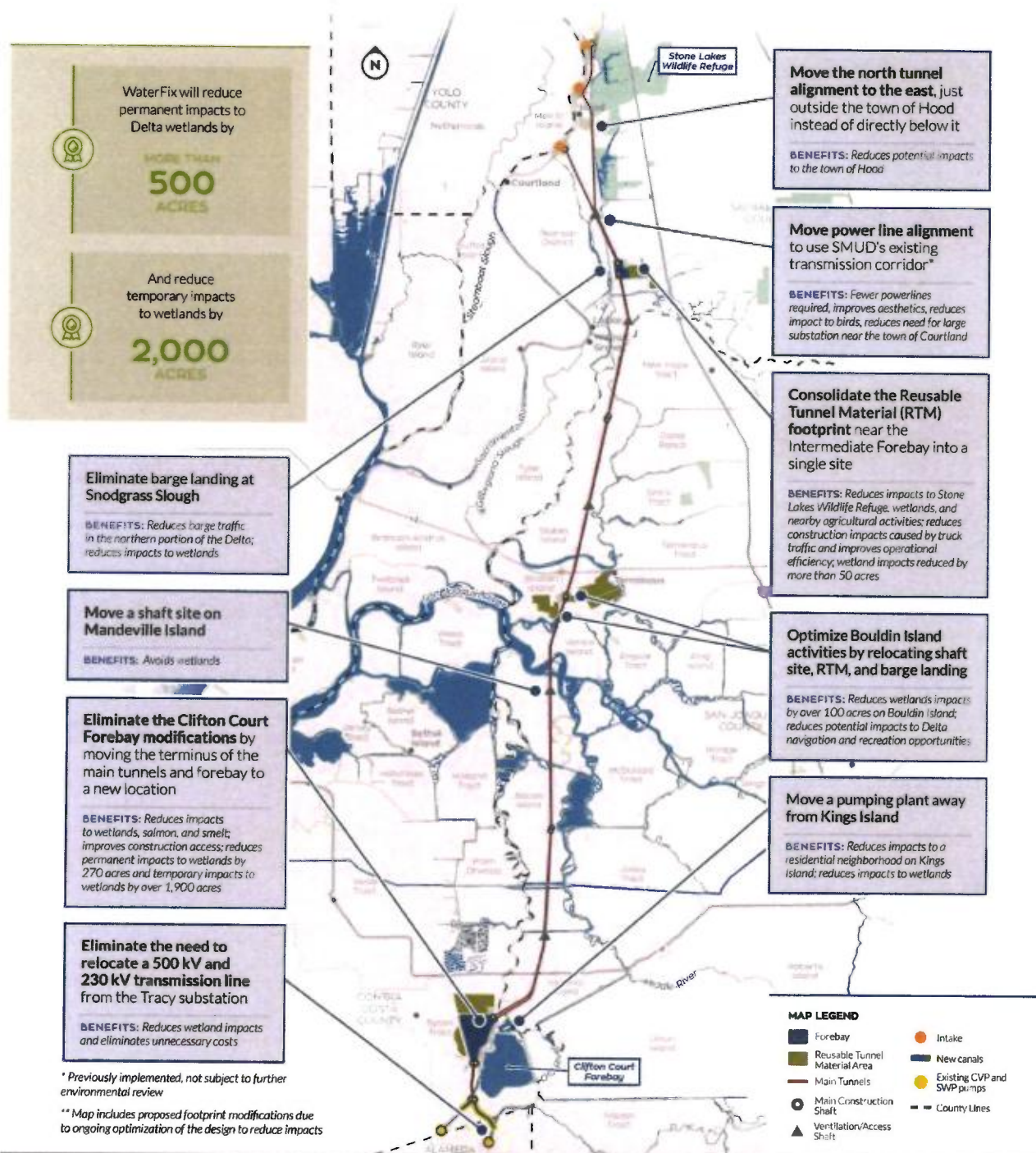


Consolidates the reusable tunnel material (RTM) footprint to minimize impacts to Stone Lakes Wildlife Refuge and nearby agricultural lands



Reduces potential impacts to the town of Hood and a residential neighborhood on Kings Island

DESIGN REFINEMENTS & PROPOSED MODIFICATIONS



From: [Eileen Hupp](#)
To: [DWR Delta Conveyance Scoping](#)
Subject: Delta Conveyance Scoping Comments
Date: Friday, March 20, 2020 12:49:42 PM
Attachments: [image001.jpg](#)
[palos verdes peninsula chamber letter.pdf](#)

Dear Ms. Rodriguez,

Attached please find a letter regarding the Delta Conveyance Project.

Thank you.

Sincerely yours,

Eileen Hupp

Eileen Hupp
President & CEO
Palos Verdes Peninsula Chamber of Commerce
4040 Palos Verdes Drive North, Suite 205
Rolling Hills Estates, CA 90274
eileen@palosverdeschamber.com
310-377-8111





Sent Via Email: DeltaConveyanceScoping@water.ca.gov

March 20, 2020

Ms. Renee Rodriguez
California Department of Water Resources
Post Office Box 942836
Sacramento, California 94236

RE: Delta Conveyance Scoping Comments

Dear Ms. Rodriguez:

On behalf of the Palos Verdes Peninsula Chamber of Commerce, I would like to provide input for the scoping process of the single-tunnel Delta conveyance project being advanced by the California Department of Water Resources. We appreciate Governor Newsom's leadership to help ensure, safe, affordable and reliable water supplies to much of California.

We are not alone in our support. There is widespread backing for the project in Southern California and throughout the state from diverse and prominent interests, ranging from labor and business to public agencies, nonprofits and agriculture. We all recognize that a severe water shortage would come with an enormous economic cost. The time to move forward is now.

This project is not the only step we must take to ensure water resiliency. Ensuring Southern California has a reliable water supply in the future requires a diverse portfolio of both imported and local supplies and conservation. Much progress and significant investments are being made on a wide range of local projects and water efficiency, but the Delta conveyance project remains vitally important.

We support the Newsom Administration's work to move forward in the planning process in a manner that achieves the goals of water supply reliability and ecosystem restoration. With our largest and most affordable supply at risk, we need the reliability the proposed Delta conveyance project will provide.

Sincerely yours,

Eileen Hupp
President & CEO

Palos Verdes Peninsula Chamber of Commerce
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