



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



Environmental Council of Sacramento
P.O. Box 1526, Sacramento, California 95812
Phone: 916-444-0022

April 17, 2020

California Department of Water Resources
DeltaConveyanceScoping@water.ca.gov

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

To California Department of Water Resources:

The Environmental Council of Sacramento (ECOS) is a 501(c)(3) nonprofit organization working to achieve regional and community sustainability and a healthy environment for existing and future residents. ECOS member organizations include: 350 Sacramento, Breathe California Sacramento Region, Friends of Stone Lakes National Wildlife Refuge, International Dark-Sky Association, Physicians for Social Responsibility Sacramento Chapter, Sacramento Citizens' Climate Lobby, Sacramento Electric Vehicle Association, Environmental Democrats of Sacramento County, Sacramento Housing Alliance, Sacramento Natural Foods Coop, Sacramento Audubon Society, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Vegetarian Society, Save Our Sandhill Cranes, Save the American River Association, Service Employees International Union (SEIU) Local 1000 and the Sierra Club Sacramento Group.

Members of Habitat 2020, a committee of ECOS, include: Friends of Stone Lakes National Wildlife Refuge, Friends of Swainson's Hawk, International Dark-Sky Association Sacramento Chapter, Sacramento Area Creeks Council, Sacramento Audubon Society, Sacramento Valley Chapter California Native Plant Society, Save Our Sandhill Cranes, Save the American River Association, Sierra Club Sacramento Group and Sacramento Heron and Egret Rescue.

ECOS and Habitat 2020 have extensively reviewed the impacts on terrestrial species associated with each version of the Delta Conveyance, including participation in the terrestrial species stakeholder process for the Bay Delta Conveyance Project (BDCP), comments on the environmental documents, and testimony as a protestant for the CA WaterFix hearings. We have a representative participating on the Stakeholder Engagement Committee (SEC) for the Delta Conveyance Design and Construction Authority (DCA) covering terrestrial species concerns.

Project needs to be defined clearly

A significant concern with recent versions of this project (CA WaterFix, BDCP, etc.) was lack of clarity for what the project is. This culminated in an 11th hour series of such substantial changes that the Phase 2 WaterFix hearing needed to be extended in order to address them. DWR claimed that no additional environmental analysis was needed for these substantial changes because they had already provided such extensive analysis of possible permutations of the project. However, throughout the CA WaterFix and BDCP efforts, the actual project was not defined.



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A complete engineering level design needs to be prepared before any environmental analysis is undertaken. Continuing to design the project during and after environmental review will perpetuate the lack of clarity engendered previously.

Appropriate alternatives must be considered for the project as a whole

The “no project” alternative should not be the only one considered and analyzed. Alternatives are circulating that would either remove the need for the Delta Conveyance or dramatically decrease its impacts. The Sierra Club’s Sensible Water Management Portfolio Smart Tunnel Alternative should be included as an alternative for analysis. This alternative would provide equivalent benefits without the need for expensive new infrastructure and avoid the significant and unavoidable impacts of the tunnel infrastructure.

Other appropriate alternatives to analyze should include: John Garamendi’s “Little Sip, Big Gulp”, Robert Pyke’s Western Delta Intake concept, reverse osmosis of brackish water currently conveyed to Southern California water districts via the California Water Project, and extensive water conservation efforts so that that the tunnel is not needed.

Appropriate Alternatives must be considered for infrastructure components

The extraordinary scale and complexity of this project requires analysis of alternatives to individual components of the planned infrastructure. At a minimum, this includes the intakes, launch shafts, access shafts, and forebays. These alternatives need to include geographic placement, engineering design, and timing of construction. As an example, the three intakes that the SEC was requested to provide feedback on were not balanced with other possible geographic placements or discussions about the tradeoffs involved in selecting those particular placements. Different designs and geographic placements for these intakes could result in greatly reduced impacts and need to be considered.

Similarly, the other infrastructure components also need analyses of alternatives that could avoid and minimize environmental impacts. Engineering and technical concerns have largely driven the geographic placement, design, and construction timing of the infrastructure components. Different geographic placements, designs, and construction timing, that have fewer significant and unavoidable environmental impacts, need to be included in the selection and analysis of alternatives to the specific infrastructure components.

Impact of mechanically assisted flows in the tunnels need to be analyzed

Pressurized pumping of water into and through the Delta Conveyance needs to be analyzed. It cannot be assumed that the Conveyance will continue to utilize gravity flow in perpetuity.



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Analysis needs to assume that all Reusable Tunnel Material (RTM) will need to be disposed, rather than repurposed

The chemical composition of the surfactants used in the tunnel boring process has not been disclosed, and given the proprietary nature of that information, it is reasonably foreseeable that will remain the case. Analysis must be included for the impacts associated with the disposal of all of the RTM – testing the RTM as it comes out will be too late to adjust the environmental analysis if it is determined that the RTM is not usable, even though the analysis assumes that some or all of it could be repurposed.

Accurate transportation impacts must be provided

Prior iterations of the Delta Conveyance utilized a worst-case scenario for traffic impacts. There needs to be a concerted effort to provide the most accurate assessment of traffic flows, which should include the calculations for those flows.

Impacts to Stone Lakes National Wildlife Refuge need to be avoided

Because of the sensitive nature of the Refuge, the project needs to do its utmost to avoid impacts to the refuge. This includes avoiding infrastructure placement in the Refuge as well as roads and transmission lines. The EIR needs to identify how to avoid these impacts in the Refuge.

The full impacts of transmission lines need to be included

The locations of all new transmission lines need to be clearly described and identified as permanent or temporary. A complete analysis of impacts then needs to be provided based on those descriptions and identifications.

Transmission line strikes need to be analyzed for foraging Sandhill Cranes

Prior versions of the Delta Conveyance addressed power line impacts for roosting Sandhill Cranes but did not adequately consider the potential for foraging cranes that are flushed by construction-related activities to also hit transmission lines. Analysis of foraging cranes that are flushed and then flying into transmission lines, both new and old lines, needs to be provided.

Sincerely,

Ralph Propper
President, ECOS

Sean Wirth
Co-Chair, Habitat 2020