



April 16, 2020

VIA email to DeltaConveyanceScoping@water.ca.gov

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

RE: Comments on NOP/Scoping for the Environmental Impact Report for the Delta Conveyance Project

Dear Ms. Rodriguez:

The League of Women Voters of California appreciates the opportunity to comment on the most recent plans being undertaken for Delta water conveyance. We would like to associate our comments with those of the April 14, 2020, NOP comment letter submitted by AquAlliance et alia.

The League has long-standing policies supporting nonstructural alternatives for water supply in this state. We have commented in the past on the BDCP and WaterFix plans for moving Sacramento River water under the Sacramento-San Joaquin Delta to the state and federal water project export pumps at Tracy. In the League's October 30, 2015, comment letter on the RDEIR/SDEIS for BDCP/WaterFix (included by reference as if set forth herein), we identified serious policy and legal problems that precluded League support for that project. Despite the substitution of a single tunnel for two tunnels, we still see many problems with the tunnel conveyance project, including, but not limited to, those that follow.

We do not see that realistic limits have been placed on the amount of water to be exported, as the state has approved at least five acre-feet of consumptive water rights claims for every acre-foot of unimpaired flow in the Sacramento and San Joaquin river basins. Under these circumstances, protecting existing supplies consistent with existing water rights is not a sustainable strategy. This is especially true with the recent granting of permanent water rights under the WIIN Act (Water Infrastructure Improvements for the Nation), potentially extending demand claims.

We do not see that strategies such as water conservation and wastewater reclamation have been employed to the fullest extent possible by export users to minimize reliance on the Delta, as required by the Delta Reform Act.

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We do not see that high water quality standards will be protected in the Delta and the estuary, or that strong, binding environmental safeguards will protect all in-stream uses. Of growing concern are the health impacts, especially on low- or fixed-income water users, of Harmful Algal Blooms (HABs) caused by inadequate flows of freshwater through the Delta and the estuary.

We do not see that the full economic, social, and environmental costs and benefits of the project have been fully assessed regarding areas of water origin. It is significant that no public hearings have been scheduled north of the Delta in the Trinity and Klamath watersheds on which the Central Valley Project (CVP), which is identified in the Notice of Preparation (NOP) as a potential beneficiary, relies. For the Sacramento River watershed, a scoping meeting was added in Redding only in response to public pressure. Even in areas where the Stakeholder Engagement Committee is actually being asked to engage, actions like predetermination of Delta tunnel intake locations—and assumption of the inevitability of a tunnel conveyance—inappropriately deprive the committee of meaningful input.

The League of Women Voters of California has not seen any good-faith effort on the part of those promoting Delta Conveyance to consider alternatives to tunnel conveyance for meeting the state's 21st century water challenges. In a world being transformed by climate change, we look forward to the day when California water management planning will reflect a true commitment to sustainable, regional projects that recognize the actual amount and timing of water available for all public uses. We will monitor the scoping process and subsequent documents to verify that California is on that course.

Sincerely,



Carol Moon Goldberg
President