



*To advance the economic, social and environmental sustainability of Northern California
by enhancing and preserving the water rights, supplies and water quality.*

April 17, 2020

Via Email (DeltaConveyanceScoping@water.ca.gov)

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

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

Dear Ms. Rodriguez:

The Northern California Water Association (NCWA) provides the following comments on the Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project issued by the Department of Water Resources (DWR). NCWA and its members throughout the Sacramento River Basin work collaboratively to deliver vital water supply and water quality for millions of Sacramento Valley residents, farms and businesses, while at the same time stewarding ecosystems to benefit fish and wildlife.

NCWA recognize the importance to California's future of a healthy Bay-Delta and providing high quality and reliable water supplies for all beneficial uses. NCWA, the North State Water Alliance, and Sacramento Valley Water Users (SVWU) have all been active participants in previous planning and projects regarding conveyance in the Bay-Delta and we look forward to continuing a productive dialogue on DWR's proposal for a new Delta Conveyance Project.

Sacramento River Basin water resources managers encourage the Administration and project proponents to collaborate with them on a solution for modern Delta conveyance that does not redirect impacts (water supply, environmental and financial) to the Sacramento River Basin, thus avoiding impacts to the region's special mosaic of farms, cities and rural communities, fish, birds, and recreation. To achieve these objectives, it will be essential to demonstrate how the Central Valley Project and State Water Project can be operated to support modern Delta conveyance, the co-equal goals, and protecting the Delta as a place--while continuing to serve multiple beneficial uses in the Sacramento River Basin and promote regional water sustainability for all of these beneficial purposes.

As DWR embarks on its environmental review and planning for the Delta Conveyance Project, it should carefully develop criteria for operation of the proposed diversion facility that fully protects water supplies in Northern California, the supporting water rights and contracts, and area of origin protections firmly founded in California law. In addition, the Delta Reform Act of 2009 states that water rights shall not be impaired or diminished as a result of its provisions, including projects such as the Delta Conveyance Project. To adequately inform the public and decision-makers about the environmental impacts of the proposed project, the draft EIR should provide sufficient information about operations to demonstrate that the proposed project will not impact water rights or contracts, and will not reduce available water supplies, both surface and groundwater, for the economy and environment in the Sacramento River Basin. In addition, the draft EIR must demonstrate that the Delta Conveyance Project can avoid significant impacts to salmonids, pelagic fish, and birds in the Sacramento Valley.

NCWA and water resources managers throughout the Sacramento River Basin are prepared to fully engage with DWR and proponents of the Delta Conveyance Project as they develop operational criteria to ensure that operation of the proposed Delta Conveyance Project does not re-direct impacts to this region. We look forward to the opportunity to review the draft EIR and its proposed operations criteria.

NCWA appreciates your attention to these comments as DWR prepares the draft EIR for the proposed project.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "David J. Guy".

David J. Guy
President