



April 17, 2020

Renee Rodriguez
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236
Via email: DeltaConveyanceScoping@water.ca.gov

BOARD OF DIRECTORS

Lisa M. Borba, AICP
PRESIDENT

Connstance Holdaway
VICE PRESIDENT

Ernesto A. Avila, P.E.

Bette Boatman

John A. Burgh

GENERAL MANAGER

Stephen J. Welch, P.E., S.E.

Subject: Contra Costa Water District Comments on Delta Conveyance Notice of Preparation

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Delta Conveyance Project. Contra Costa Water District (CCWD) serves water from its intakes in the Sacramento-San Joaquin Delta for residential, commercial, and industrial uses in eastern and central Contra Costa County. CCWD relies on the Delta for 100% of its water supply, including Central Valley Project contract deliveries, diversions under CCWD's own water rights, and diversions under East Contra Costa Irrigation District's pre-1914 water right. As such, CCWD has a vital interest in the environmental effects of the Delta Conveyance Project.

In March 2016, the California Department of Water Resources (DWR) and CCWD reached a mutually beneficial agreement to address impacts of any new Delta conveyance facility on CCWD's facilities, water quality, and water supply. The settlement agreement was made possible by both parties' commitment to focus on solutions within California's divided but interconnected water community.

In recognition that DWR had not decided whether or on what conditions to approve DWR's previously proposed Bay Delta Conservation Plan/California WaterFix Project (BDCP/CWF), the March 2016 settlement agreement contemplated that its provisions would remain in effect for any "amendment, modification, supplement or replacement" of the BDCP/CWF. The agreement identifies the components and parameters of the BDCP/CWF that would constitute a "Conforming Action Alternative," which includes a facility to convey water from one or more new water diversion intakes located along the Sacramento River to the State and/or Federal pumping facilities in the south Delta ("Conveyance Facility"). The facilities proposed in the Delta Conveyance Project are consistent with the Conforming Action Alternative in the settlement agreement.

As illustrated in Figure 1 of the NOP, the Delta Conveyance Project will be constructed in the vicinity of CCWD's Delta water supply intakes and potentially cross under a key CCWD pipeline. The March 2016 settlement agreement will ensure that CCWD's facilities will be protected during construction.

The agreement also provides for mitigation that is responsive to actual Delta Conveyance Project operations, not tied to a specific project capacity. Operation of the Conveyance Project would cause water quality impacts at CCWD's Delta intakes and affect CCWD's ability to fill Los Vaqueros Reservoir. To compensate for these impacts, the agreement requires that a portion of CCWD's water supply will be conveyed to CCWD's system from a higher quality source. The water to be conveyed will be a portion of CCWD's existing water supply; CCWD will not receive any new water. The amount of water to be conveyed to CCWD will be determined by the operation of the Delta Conveyance Project in any given year.

Pursuant to the March 2016 settlement agreement, DWR identified construction and operation of Interconnection Facilities – facilities to convey water from the BDCP/CWF conveyance system to CCWD's water supply system – as mitigation measures in the Final EIR/EIS for the BDCP/CWF and included an evaluation of the environmental effects of such mitigation in the Final EIR/EIS. As the Delta Conveyance Project is the replacement of the BDCP/CWF, CCWD anticipates that DWR again will identify construction and operation of the Interconnection Facilities as mitigation measures in the Delta Conveyance Project Draft EIR and will include an evaluation of the environmental effects of such mitigation in the EIR. CCWD staff are available to assist in this assessment.

CCWD appreciates the State's efforts to mitigate impacts of future construction and operation on our water supply, as well as the State's successful collaboration in developing an appropriate and flexible mitigation plan as described in the March 2016 settlement agreement.

CCWD looks forward to working cooperatively with DWR to include the March 2016 settlement agreement in the Draft EIR. If you have any questions, please do not hesitate to get in touch with me at (925) 688-8079 or dsereno@ccwater.com.

Sincerely,



Deanna Sereno
Senior Policy Advisor

DS:wec