



1 I, Ivan Senock, do hereby declare as follows:

2 1. The facts set forth in this declaration are based upon my personal knowledge, and if  
3 called as a witness in these proceedings, I could and would testify competently thereto under oath.  
4 As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment  
5 upon the matter.

6 2. I am the Deputy Director at Restore the Delta.

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8 3. Restore the Delta is a grassroots campaign of residents and organizations committed  
9 to restoring the Sacramento-San Joaquin Delta so that fisheries, communities, and family farming  
10 can thrive there together again; so that water quality is protected for all communities, particularly  
11 environmental justice communities; and so that Delta communities are protected from flood and  
12 drought impacts resulting from climate change while gaining improved public access to clean  
13 waterways. Restore the Delta's goal is to connect communities to regional rivers and to empower  
14 local communities to become the guardians of the estuary through participation in government  
15 planning and waterway monitoring. Restore the Delta advocates for local Delta stakeholders to  
16 ensure that they have a direct impact on water management decisions affecting the well-being of  
17 their communities, and water sustainability policies for all Californians.

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19 4. I reside in Sacramento, California, and work in Stockton, California, where Restore  
20 the Delta's office is located.

21 5. In addition, the majority of Restore the Delta's staff live and work in Stockton,  
22 California, and have strong family ties throughout the Delta.

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24 6. I am aware of the Delta Conveyance Project and the California Department of Water  
25 Resources' current plan to begin geotechnical investigations throughout the Sacramento-San  
26 Joaquin Delta to begin implementation of that project.

1           7.       I am further aware that such investigations will entail the boring of many boreholes,  
2 some of which will be over hundreds of feet deep, the dredging of several massive trenches, and  
3 multiple vibration tests.

4           8.       I am concerned that the geotechnical investigations the California Department of  
5 Water Resources plans to undertake beginning in May 2024 will have significant and potentially  
6 irreversible impacts on the Delta and the species and communities that rely on it.

7           9.       For example, I am concerned that the geotechnical investigations at issue will stir up  
8 the sediment at the bottom of the Delta and thereby expose fish and other species to pollutants that  
9 have settled on the Delta floor.

10          10.       Many people throughout the Delta rely on subsistence fishing to help feed  
11 themselves and their families, so any risks to fish species in the Delta will have impacts on Delta  
12 residents, particularly low-income Delta residents, as pollutants move up the food chain and into the  
13 fish species folks catch and eat.

14          11.       Restore the Delta as an organization advocates for such people and communities and  
15 some of these people and communities are represented as members of the organization.

16          12.       Moreover, I am also concerned that the geotechnical investigations the California  
17 Department of Water Resources plans to undertake beginning in May 2024 will impair important  
18 cultural resources and potentially damage buried Tribal sites, relics, artifacts, and remains.

19          13.       The Delta is a shared cultural landscape that is an important spiritual and cultural  
20 resource for local Tribes and other communities, including dozens of communities of color, that live  
21 in and near the Delta. Many Restore the Delta members hold deep attachments for the Delta itself as  
22 a cultural resource and cultural landscape, and many Restore the Delta members also deeply value  
23 Delta species, including fish and plants, as important cultural (and Tribal) resources.

24          14.       The drilling, boring, and dredging activities planned have the potential to impair and  
25 even destroy Tribal and other cultural resources.  
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1           15.     I have a Masters in Cultural Anthropology from California State University at  
2 Sacramento and used to work as a Tribal Historic Preservation Officer with the Buena Vista  
3 Rancheria of Me-Wuk Indians. As a result, I am painfully aware that there have been no  
4 comprehensive studies to pinpoint cultural, historic, or Tribal sites and resources within the Delta.  
5 Consequently, I am also aware that the geotechnical investigations the California Department of  
6 Water Resources plans to undertake may inadvertently discover and thereby damage or destroy  
7 invaluable cultural and Tribal resources buried in the sediment.

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9           16.     Furthermore, and similarly, I am also aware, from this previous work and from my  
10 current work with Restore the Delta, that Tribal consultation with the California Department of  
11 Water Resources has been an often difficult and painful process for Tribal monitors. Even when  
12 Tribal monitors are invited and allowed onsite (which is not always), Tribal monitors are often  
13 brought in with little time to evaluate sites for potential resources. As a result, I am concerned that  
14 the geotechnical studies will be implemented without sufficient Tribal monitoring to ensure that  
15 cultural resources are identified and protected.

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17           17.     I am also concerned that the implementation of the geotechnical studies will  
18 negatively impact communities' ability to recreate in and enjoy the Delta. These projects are large  
19 and loud, and may discourage recreation, fishing, and cultural activities like gathering plants.

20           18.     Finally, I am aware that the California Department of Water Resources has not  
21 submitted a written statement to the Delta Stewardship Council certifying that the Delta  
22 Conveyance Project is consistent with the Delta Reform Act of 2009 and the 2013 Delta Plan issued  
23 by the Delta Stewardship Council, as required by that Act.

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25           19.     Restore the Delta regularly works with the Delta Stewardship Council.


26           20.     Given the impacts the Delta Conveyance Project is likely to have on water quality in  
27 the Delta and on Chinook salmon and other fish in the Delta, I have doubts that the California  
28 Department of Water Resources can adequately justify how the Delta Conveyance Project is

1 consistent with the Delta Reform Act's stated goal to protect, restore, and enhance the Delta  
2 ecosystem and the fish, wildlife, and recreation it supports.

3 21. If and when the California Department of Water Resources gets around to drafting  
4 and submitting a written statement certifying that the Delta Conveyance Project is consistent with  
5 the Delta Reform Act of 2009 and the 2013 Delta Plan, Restore the Delta intends to participate in  
6 subsequent proceedings potentially challenging that certification as inconsistent with the Delta  
7 Reform Act and 2013 Delta Plan.

8 22. And Restore the Delta also intends to notify other communities and community  
9 groups throughout the Delta about any subsequent Delta Reform Act related proceedings, and to  
10 offer to help those communities and community groups engage in such proceedings.  
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12 Executed this Second day of May 2024 in Stockton, California.

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15 Ivan Senock