

## **Major Problems with California WaterFix Preferred Alternative**

*August 19, 2015*

- Fails to achieve either of the co-equal goals
  - ❖ Will only restore a minimal amount of Delta habitat in an attempt to mitigate the adverse project impacts
  - ❖ Fails to deliver any increase in water supplies
  - ❖ These are state and federal obligations under the 2009 Delta Reform Act and Public Law 112-74, respectively
- DWR and Reclamation have allowed the export water contractors to develop a flawed project design that only benefits the exporters
  - ❖ Agreed to export contractors' offer to pay because of state and federal budget crises
  - ❖ Those who pay the bills run the business
- DWR and Reclamation have failed to consider or analyze a reasonable range of alternatives
  - ❖ No programs for increased regional self-reliance, conservation, desalination, and water use efficiency.
  - ❖ No infrastructure to capture and store “new” water during periods of high Delta flow
  - ❖ No analysis of new intakes in the western Delta instead of the north Delta
  - ❖ The 17 of the 18 BDCP and Cal. WaterFix alternatives are basically the same alternative – north Delta intakes linked to south Delta export pumps by isolated conveyance
- New North Delta intakes will adversely impact key fish species by reducing inflows to the Delta and causing reverse flows – just as bad as the south Delta intakes.
- South Delta intakes will still be used for 51% of the total exports
- Significant adverse water quality impacts in the BDCP Draft EIR/EIS have been assumed away
  - ❖ Assume Emmatton compliance location will not be changed, but still intend to change it in the future (piecemealing under CEQA)
- Cal. WaterFix preferred alternative would increase exports in dry periods when Delta fish are most stressed, and would fail to capture more water when Delta flows are high

- No new detailed modeling has been done for the Draft REIR/SEIS despite significant changes
  - ❖ Greatly reduced ecosystem restoration so major changes in relationship between outflow and salinity
  - ❖ No longer asking for compliance location for Emmaton water quality standard to be changed
  - ❖ Relied instead on Operations and Water Quality modeling for draft BDCP EIR/EIS which contained major errors
  - ❖ Used crude sensitivity analyses based on Late Long Term (2060) studies to estimate Early Long Term (2025) impacts
  - ❖ CEQA requires, and \$15 billion cost demands, detailed modeling of each alternative
- Proposed \$15 billion Cal. WaterFix project likely be rendered obsolete once the State Water Resources Control Board adopts more stringent flow requirements to protect fish and other beneficial uses
  - ❖ Full capacity of tunnels was seldom used under BDCP operational rule assumptions
  - ❖ North Delta intakes would be used even less frequently once flow requirements and export limits are made more stringent
  - ❖ A completely different alternative, as yet ignored by the BDCP proponents, would likely prove more viable

## **Bottom Line**

DWR and Reclamation need to step up and promote alternatives that actually achieve both coequal goals and will benefit all of California rather than merely facilitating a flawed WaterFix project being proposed and paid for by the export contractors.

Adding new storage to capture water in wet periods when it is available, and adding demand reduction and local water supply projects discussed in the California Water Action Plan (January 2014) could result in a project that meets the needs of all of California, not just the export water contractors.

The new alternative requested by the State Water Resources Control Board (RDEIR/SDEIS Appendix C, page C-1) looks like a good starting point for developing a real Delta Fix that restores and sustains the Delta and Bay ecosystem and improves California's water supply reliability.