

The Delta Tunnels in the Context of Sacramento Regional Conservation

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Testimony



40 Years Work to Conserve Sacramento Habitat

- 1973-4 Cosumnes River Basin Resource Study
- Managed vernal pool resource studies
- Evaluated constraints to Sacramento County growth
- Developed 1993 Sacramento County General Plan Conservation/Open Space Policies
- 10 years as Conservation Chair, Friends of Stone Lakes NWR
- Co-Chair Habitat 2020

Scope of Presentation

- Importance of Habitat Lands in South Sacramento County
- Concerns with Delta Tunnels Project
 - Groundwater Impacts
 - Truck Traffic
 - Environmental Commitments

Importance of Habitat Lands in South Sacramento County

- Increasingly recognized over last 30 years
- Permanent and seasonal wetlands
- Valley Grassland mixed with vernal pools
- Mixed riparian woodland
- Agricultural Cropland

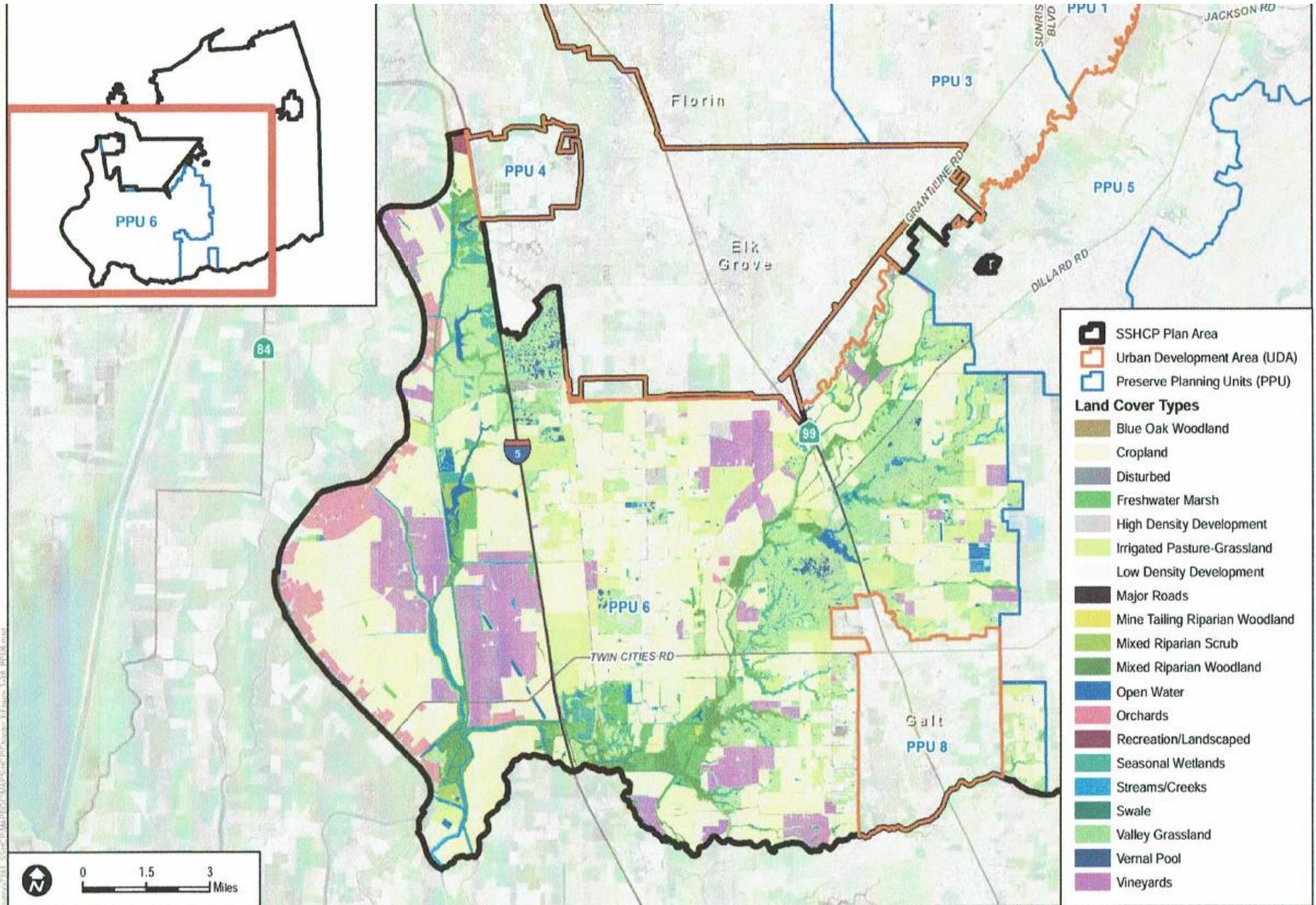


FIGURE 3-38
Preserve Planning Unit 6

Stone Lakes and Cosumnes: Important Wildlife Corridors

- DFW has initiated California Essential Habitat Connectivity Project to identify essential habitat in state
- Goal to identify large intact habitat/natural landscape blocks and their essential links
- Prepared statewide Corridor Map

Initiatives to Protect & Enhance South Sacramento Habitat

- Cosumnes Preserve, 50,000 acres in all
- Stone Lakes NWR
- South Sacramento Habitat Conservation Plan

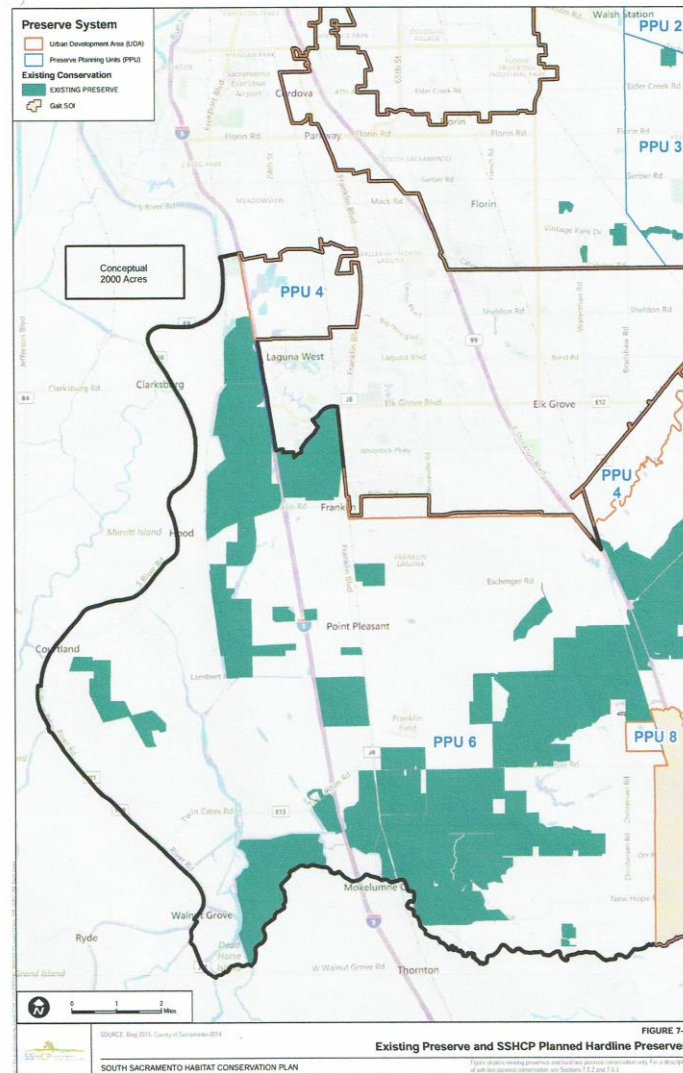
Cosumnes Preserve

- Began w/ purchase of 1500 acres in 1987, the “Tall Forest” by Nature Conservancy
- Additional Partners w/ purchases:
 - Ducks Unlimited
 - US BLM
 - State DFW
 - State DWR
 - Sac County Parks

Stone Lakes NWR

- Established in 1994 as 505th NWR
- Manages 6500 acres within a Refuge Boundary of about 18,000 acres
- Provides roosting habitat for migratory waterfowl, including sandhill crane

FIGURE 3

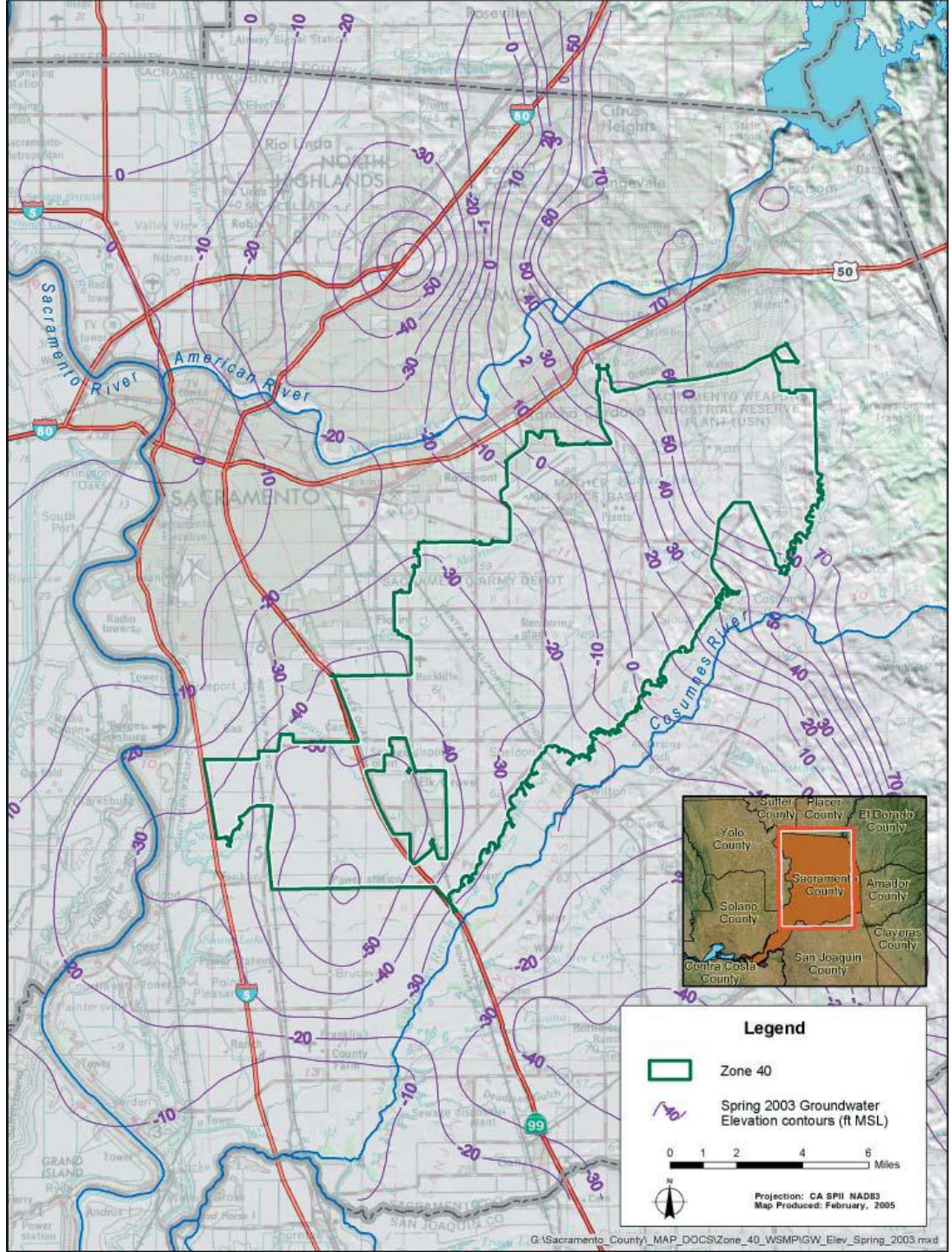


South Sacramento Habitat Conservation Plan

- The third leg of habitat protection triad
- Would protect substantial land outside the Sacramento County Urban Service Boundary
- Establishes 8 Preserve Planning Units
- PPU 6 is most proximate to Delta Tunnels
- Greater sandhill crane and Swainson's hawk are major focus
- Plan calls for 9750 acres to be preserved

The Challenge of Groundwater Overdraft

- Years of urban and agricultural groundwater pumping have drawn down the aquifer north of the river
- The Cosumnes River has become separated from its aquifer
- Cosumnes Coalition and others are working to augment recharge, return base flows to the river & restore salmon spawning



Delta Tunnels Impact on Aquifers

- The FEIR/S asserts that groundwater levels will drop no more than five feet due to lower flows in the Sacramento River caused by tunnel intakes

Delta Tunnels Impact on Aquifers

- But Dr Stephen Mehl has testified that DWR's groundwater model was inadequate
- His qualitative analysis of stream loss effects demonstrated a potential adverse effect on stream loss in the South American Subbasin
- His analysis indicates that maximum differences in the river's hydraulic head could be up to 40 feet.

Delta Tunnels Impact on Aquifers

- Our concern is that reduced groundwater recharge from the Sacramento River could
 - Over time substantively alter the contours of the Elk Grove Cone of Depression
 - Undercut efforts to recharge the groundwater basin and restore riparian habitat in the lower Cosumnes river

Delta Tunnels Impact on Aquifers

- If this occurs, it would be an additional unreasonable impact and contrary to public interest
- The State Board should require additional analysis to fully understand the effects of the new diversions on reduced groundwater recharge from the river before approving any of the requested permit modifications

Truck Traffic

- The construction of the intakes, forebay and tunnels will take over 12 years
- The hourly trip volumes for Delta road segments during peak construction periods are included in the FEIR/S
- Project related traffic increases are constant throughout a 6 a.m. to 7 p.m. day
- Conclusion: Vehicular traffic will be trucks, most likely 4-6 axle trucks hauling material

FIGURE 4

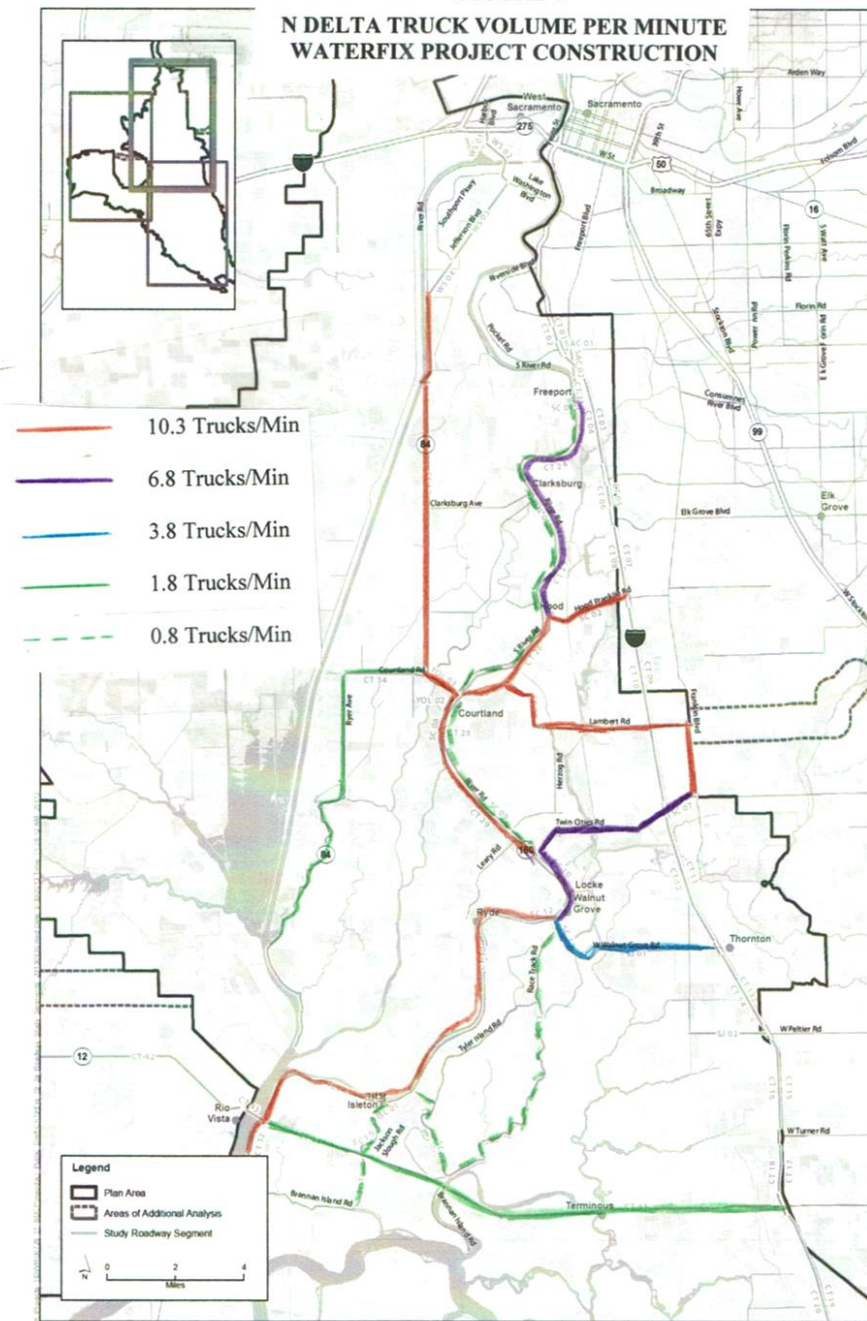


Figure 19-2a
Roadway Segments

Truck Traffic

Projected Traffic Is at 5 Levels

- 620 trucks/hr 10.3 trucks/min 1 truck/ 5 sec
- 405-10 trucks/hr 6.8 trucks/min 1 truck/ 9 sec
- 230 trucks/hr 3.8 trucks/min 1 truck/ 16 sec
- 110-20 trucks/hr 1.8 trucks/min 1 truck/ 30 sec
- 45 trucks/hr 0.8 trucks/min 1 truck/ 80 sec

Truck Traffic Impacts On Hood Franklin Road

- Without Project:
 - 2014 annual average daily traffic was 2137 vehicles
 - 27 were 4-5+ axle trucks: 1.3% of total
- With Project:
 - If assume 80% of trucks are 4-5+ axle , daily traffic is 6448 trucks/day
 - Percentage of big rig traffic rises to 63.5%

Truck Traffic Impacts on Wildlife

Roads and Traffic:

- Limit regular movement of animals to different habitats
- Affect use of habitats adjacent to roadways
- Limit ability for areas to be re-colonized & young to find & establish new territories
- Increase wildlife mortality due to collisions & lower reproductive success

Truck Traffic Impacts Visitor Experience

- Stone Lakes NWR Visitor Station is adjacent to Hood Franklin Road
- Receives 30,000 visitors annually
- Over 2000 of them children in environmental education programs

Truck Traffic Impacts Mitigation is Limited

- Focus on mitigation is on congested traffic segments, not heavy truck use of rural roads
- Transportation Mit Measure 1A requires traffic management plans to be developed
- Requires some specific measures to address Stone Lakes NWR
- But...

Truck Traffic Impacts

Conclusion

- Whatever mitigation does emerge, even if fully enforced, will not significantly mitigate the impact of up to 10 big rigs every minute travelling down the rural roads of the North Delta and Sacramento and adjacent counties—all day, day in and day out, for many, many months on end.
- The magnitude of heavy duty truck traffic is an additional consideration among the many unreasonable impacts of the Delta Tunnels project on wildlife.

Ensuring Implementation of Environmental Commitments

- Altogether, the Environmental Commitments represent a significant effort to protect 13,340 acres and restore 2,396 acres of habitat
- There are no mitigation measures for the loss of listed species habitat in the FEIR/S
- So, these commitments substitute for specific mitigation requirements that would otherwise be applicable in their absence
- They are THE mitigation for project related habitat loss

Problems with the Environmental Commitments

- DWR has provided no information as to HOW and WHEN the habitat mitigation requirements will be met
- The MMRP provides only that DWR will prepare a management plan for each listed species habitat restoration & protection site
It wouldn't be triggered until sites had been secured for restoration

Problems with the Environmental Commitments

- There is only an upper and NO LOWER commitment for restoration acreage
- The project encompasses the entire Delta, yet primary habitat impacts are mostly in North Delta and Franks Tract
- There are no assurances that mitigation will occur where the impact is greatest
- With no BDCP, there is no requirement that mitigation occur in the project area

Problems with the Environmental Commitments

- These problems are of particular concern to those of us who have worked hard to protect Sacramento Region habitat
- We seek assurances that environmental commitments will be met close to areas with habitat loss & without the arbitrary constraint of a Delta boundary

Problems with the Environmental Commitments

- There will be substantial resistance to fulfilling these habitat acquisition and restoration commitments
 - There is resistance to paying for the tunnels themselves
 - DWR is looking for ways to scale back the project

Environmental Commitments

Recommended Condition

- If State Water Board approves, the Petitioners' request it do so with conditions that obligate petitioners to:
 - Mitigate to the full extent the acreage commitments in Tables 5-1 and 5-2 of the MMRP (SWRCB-111);
 - Develop within 18 months, in consultation with state, federal and other wildlife management entities, an implementation plan that identifies priority areas and timelines for acquiring fee title/easements and for restoration;
 - Provide habitat protection and restoration in proximity to the location of the impact;
 - Complete acquisition no later than 10 years and restoration projects no later than 20 years from the date of Board approval; and
 - Establish and meet interim progress benchmarks.