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BEFORE THE

CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

HEARING IN THE MATTER OF CALIFORNIA DEPARTMENT OF WATER RESOURCES AND UNITED STATES BUREAU OF RECLAMATION REQUEST FOR A CHANGE IN POINT OF DIVERSION FOR CALIFORNIA WATER FIX	**TESTIMONY OF DAVID ROBINSON** **LOCAL AGENCIES OF THE NORTH DELTA**

I. INTRODUCTION

I am a volunteer firefighter with the city of Walnut Grove, which is a completely volunteer department. I have volunteered with Walnut Grove Fire Department since 1997 and have been the Assistant Chief since 2001. I also spent twenty-three years with the Stockton, California Fire Department. As an emergency responder in the Delta, I am familiar with the particular needs of the region as they relate to emergency services, transportation access, and the community in general. I am a fifth generation Delta resident. My ancestors helped reclaim the land where I currently reside in 1872.

The purpose of this testimony is to provide information on the ways the Delta Tunnels (aka "California WaterFix") would affect Delta communities like Walnut Grove. Specifically, I will discuss how the construction of the project would impede the abilities and responsibilities of emergency responders.

The Delta's intricate geography of levee roads around islands makes the area susceptible to vehicle traffic problems. (See LAND-123 [map indicating road segments of concern].) More importantly, traffic issues compound the severity of emergency situations by lengthening response time for firefighters, Emergency Medical Technicians ("EMT"), and other necessary services. With years of planned construction, years of increased traffic, and years of project related accidents, Delta communities would surely suffer harm. Emergency response times would increase, access to roadside accidents would become more difficult, and emergency responders would be spread thin. Put plainly, the Delta Tunnels are detrimental to the health and safety of Delta communities.

II. THE PETITIONED PROJECT WOULD BE CONTRARY TO THE PUBLIC INTEREST

A. Traffic from the Project Would Interfere with the Provision of Emergency Services

The Walnut Grove Fire Department is an all-volunteer department with about 25 members. We have about 15 members that respond on a regular basis. This response depends on the day of the week and time of day. Frequently, during the workday, because of regular day jobs, we have a very skeleton crew and typically only have a few members

available to respond. Many do not live or work in Walnut Grove, but in the area surrounding the town. When an emergency arises, the volunteers have to put down what they are doing and drive to the station to respond with the appropriate equipment. There are also times on weekends where we have very few people to respond.

When a roadside incident occurs in the Delta, traveling to the location is difficult for emergency responders. Those involved will like be unable to clear the road, given the lack of shoulders on levee roads to pull off on. The vehicles behind the accident would not be able to pull around the incident because of the narrow width of the roads and oncoming traffic. If the incident blocks both lanes, oncoming traffic would be stuck as well. This creates a gridlock scenario with little room and considerable delays for emergency responders.

The more difficult scenario is when one lane is blocked and traffic is going around the incident. When responders arrive, the oncoming traffic has stopped and cannot back up or pull over, blocking our access to the emergency. Then we have to park and walk to the incident. Some emergencies, like extrication, require heavy equipment. In those scenarios, traffic can prevent our access to the accident with the necessary equipment. In the past, we have had to simply wait for sufficient room to open up, a challenging scenario for any emergency responder.

Accidents also affect the surrounding areas more severely in the Delta. With limited routes available to reach any given destination, drivers using navigation technology can only be rerouted along so many other roads. Drivers may be rerouted in a way that further inhibits emergency responders' ability to access the incident. It also can affect a volunteer firefighter's ability to respond to the station to operate the equipment in the first place.

Additionally, the Delta is an agricultural community and has been since its settlement. Farmers have to move equipment from one field to another. This equipment is frequently wide and slow. Combine that with the impatience of your average commuter, a very dangerous scenario arises. This is just another example of how traffic issues particular to the Delta have been overlooked when planning this project.

As a volunteer department, there are only so many fire fighters on staff at a given time. We have other careers, responsibilities, and commitments. At mid-day, there may be only two or three volunteers on duty. If an accident occurs requiring more volunteers to respond, the gridlock can even prevent them from reaching the station, and their equipment, in the first place.

Construction of the Delta Tunnels would only make these issues worse. The proposed project requires considerable truck usage, hauling heavy materials and waste back and forth. According to the FEIR/S, there would be a peak of 2,427 construction workers on the job. (SWRCB, FEIR/S, p.16-277.) With large increases in traffic on the roads in places like Walnut Grove, from both workers and trucks hauling materials, it would be more difficult for the department to access accidents. Along with the increased traffic, the trucks hauling material would make accidents, spills, and other emergencies more likely.

The project would drastically increase daily traffic throughout Delta communities like Walnut Grove. The table below is a representative sample of areas analyzed in the FEIR/S that I am most concerned about.

Road Segments of Particular Concern

Road	ID number	Current Hourly Volume Range	Baseline plus Background Growth plus Project Hourly Volume Range
Paintersville Bridge	CT 28	75 to 150	703 to 786
State Route 160, between Paintersville Bridge and Walnut Grove Bridge	CT 29	78 to 128	720 to 786
State Route 160, between Walnut Grove Bridge and A Street in Isleton	CT 30	173 to 465	793 to 1,085

Road	ID number	Current Hourly Volume Range	Baseline plus Background Growth plus Project Hourly Volume Range
State Route 160, between A Street in Isleton and State Route 12	CT 31	193 to 378	813 to 998
River Road between the Paintersville Bridge and Twin Cities Road	SC 09	85 to 134	132 to 183
River Road between Twin Cities Road and Walnut Grove Bridge	SC 10	223 to 365	642 to 793
River Road between Walnut Grove Bridge and Sacramento County Line	SC 11	175 to 332	418 to 587
Isleton Road	SC 12	61 to 283	106 to 328
Twin Cities Road between River Road and I-5	SC 06	130 to 248	543 to 668

(SWRCB-102, FEIR/S, pp.19-208 to 19-217 [Table 19-25]; see also LAND-123.)

According to the FEIR/S, State Route 160 and River Road through Walnut Grove has a level of service threshold of 1,740 vehicles. (See SWRCB-102, FEIR/S, p. 19-21.) In my experience, this may be possible on straight sections of the road, with no impediments, and all drivers going the exact same speed. With drivers going different speeds, sharp turns, stop signs, farm equipment, driveways, and bridges, 1,740 drivers per hour is unrealistic. With the current traffic volume, it is already dangerous, especially with how impatient many drivers can be.

Currently, when there are problems in other areas, traffic through Walnut Grove increases tremendously. For instance, when there are problems on Highway 12, traffic can be

rerouted through Walnut Grove, to I-5 and back to Highway 12. This is can be a 30-mile detour leading to very impatient drivers. When it happens, Highway 160 would be backed up from Walnut Grove for 2 to 3 miles. Isleton Road then gets backed up and in-town traffic is backed up to the Georgiana Slough Bridge. This already happens with current traffic volumes. When this happens, it is impossible to respond to the station and extremely difficult to even get a fire engine or truck on the levee roads to respond to an incident.

The other sections of road referenced in the table above suffer from the same set of problems. Twin Cities Road, including the bridge over Snodgrass Slough, is incredibly narrow and has areas where visibility becomes an issue. Isleton Road is often very busy, with a lot of curves and intersections that already cause issues for larger vehicles.

These segments of road only highlight some of the worst conditions in the Delta. Because of the increase in traffic, roadside accidents would be more dangerous and difficult to respond to. The roads in Delta communities are narrow, often with only one lane going each direction. (See LAND-190 [photograph of Paintersville Bridge].) Many places do not have adequate shoulders to pull off the road in case of an emergency. (See LAND-190 [photograph of Isleton Road].) Drivers in accidents already lack sufficient space to pull over, leading to traffic back-ups. Often traffic flow in the opposite lane is impacted by an accident because of the space constraints. All of this would result in serious delays in emergency service response times for roadside accidents. People's lives and safety would be impacted in a negative way.

B. Local First Responders Would Not Be Able to Meet the Added Emergency Service Demands of the Project

The project would also thin out already short-handed emergency response resources. As mentioned above, the Walnut Grove Fire Department is an all-volunteer department. Additionally, Clarksburg, Courtland and Isleton all have full volunteer departments, while River Delta and Rio Vista rely heavily on volunteers to supplement a small full-time staff. Each department relies on mutual aid from their neighbors, so service area is not strictly defined by the department map. The Delta Tunnels project would strain these limited emergency resources throughout Delta communities, not just in Walnut Grove.

The project construction would take over 13 years to complete. (LAND-207 [MWD Fact Sheet].) That is years of truck traffic carrying potentially hazardous materials on difficult roads and years of more construction-related accidents. Departments like Walnut Grove would see increases in emergencies requiring a response without an increase in available resources. This would take away from our ability to serve Delta Communities and negatively impact the public.

Unfortunately, the FEIR/S does not include adequate details about how the project would increase the demand on emergency services. (SWRCB-102, FEIR/S, pp. 20-188 to 20-190 [discussion of Impact UT-1, increased demand on emergency responders].) It is not clear to me why this impact is not considered significant, when the strain of resources on Walnut Grove and other Delta towns would put emergency responders in difficult situations. I believe the project's effects on public service demand was underestimated in the FEIR/S and believe that the SWRCB should consider this problem in its permitting decision.

C. Mitigation for Project Is Inadequate to Protect the Public Interest

I am also concerned that the mitigation measures in the FEIR/S are inadequate and lack the necessary specificity. To address the traffic impacts, the project offers mitigation measures intended to limit traffic congestion. The proponents say they want to coordinate with local emergency response agencies to develop Traffic Management Plans ("TMP"). (SWRCB-102, FEIR/S, p. 19-218.) Some of the measures do not effectively address the effects on Delta communities, such as the use of detours and bridges as alternative access routes. (SWRCB-102, FEIR/S, p. 19-219.) The nature of roadways in the Delta limit detour options, and the bridges of the Delta would already be suffering from increased traffic volume. Other measures do not offer enough specificity to indicate their effectiveness, such as the procedures for roadside emergencies. (SWRCB-102, FEIR/S, 19-220 ["Provisions that direct haulers are to pull over in the event of an emergency. If an emergency vehicle is approaching on a narrow two-way roadway, specify measures to ensure that appropriate maneuvers would be conducted by the construction vehicles to allow continual access for the emergency vehicles at the time of an emergency"].)

I am also concerned that the bulk of mitigation resources would go to areas other than communities like Walnut Grove. According to the FEIR/S analysis, Walnut Grove would not be significantly impacted by increased traffic. (SWRCB-102, FEIR/S, pp. 19-210 to 19-215 [Table 19-25 projected traffic volumes of area surrounding Walnut Grove].) Mitigation Agreements with affected agencies would focus on areas significantly impacted according to the FEIR/S impact analysis. (SWRCB-102, FEIR/S, p. 19-221 [discussion of exceeding level of service thresholds].) The only traffic mitigation measures that would be implemented in Walnut Grove is a maximum limit on hourly truck trips. (SWRCB-102, FEIR/S, 19-57 to 19-61 [Table 19-9 mitigation actions by road segment].) The project does not call for a TMP or a Mitigation Agreement for the areas I am concerned about. On the face of the FEIR/S, it looks as if areas that would undoubtedly suffer from traffic related issues would not receive the funding or attention necessary to protect Delta communities. The inclusion of clearer mitigation measures specifically to alleviate traffic in Delta communities would go a long way improving the TMPs and protecting the public interest.

Even where the mitigation measures may help lessen the impacts on Delta communities, a caveat comes attached with them. With respect to all mitigation measures, the FEIR/S states that the proponents “are not solely responsible for the timing, nature, or complete funding of required improvements.” (SWRCB-102, FEIR/S, p. 19-357.) I worry about who will be responsible for taking care of these improvements, if not the project proponents.

I am concerned not only with the traffic but the safety of the workers at the site. I have read the safety precautions that would be taken at the site to minimize dangers and accidents but there is no plan of what to do if there is a hazardous materials-related or industrial accident. I am aware of Courtland Fire Department’s capabilities and ours in Walnut Grove and am concerned for the safety of the workers. You may have two understaffed departments with minimal training responding to a fire station and to the incident. Currently there are no local responders with Hazardous Material, Heavy Rescue, or Confined Space rescue training. Responses wouldn’t be timely, and many times would be with inadequate resources. This would not only be a serious problem for the health and safety of the individuals involved in the

incident but would take the few volunteers available at that time out of town, leaving their respective communities unprotected.

As for the safety issues caused by the project construction, mitigation measures are focused largely on containing onsite hazards. (SWRCB-102, FEIR/S p. 20-120 [discussion of hazardous materials management plans and other preventative measures].) While these measures would be absolutely necessary, I think there are ways for the proponents to more directly assist emergency responders in the Delta. First, the FEIR/S already anticipates providing 24-hour onsite security in construction zones in an effort to alleviate demand on law enforcement. (SWRCB-102, FEIR/S, p. 20-119.) The project should also hire its own emergency responders such as fire fighters and EMT as local agencies won't have the capacity to respond to industrial accidents of the magnitude of a project like this. Requiring the project to provide its own emergency responders would preserve our limited resources for Delta residents.

Second, if the project must rely on local emergency responders, proponents should provide the funding for local emergency responders to expand their capabilities. Walnut Grove currently has good frontline fire apparatus, but if that equipment goes out for mechanical reasons, our capabilities are severely downgraded. Also, the equipment we carry such as turnouts, fire clothing, self-contained breathing apparatuses ("SCBA") and extrication equipment is barely up to standard. This is very expensive equipment and hard for a volunteer department with a budget like ours to replace. If the proponents are expecting agencies like Walnut Grove Fire Department to effectively respond to emergencies, the proponents ought to invest in those agencies. Only with more resources could we be better equipped to deal with the slew of project related issues and better protect public safety.

IV. CONCLUSION

In conclusion, as a resident and volunteer firefighter in the Delta, I do not believe the project would be in the public interest. The human costs that construction would bring are not worth the supposed benefits. There are serious issues of public safety that have not been properly acknowledged. As proposed, the plan does not do enough to alleviate my concerns

that the traffic and construction would strain emergency responders' resources and interfere with our ability to serve the Delta.

Because of all of the complications it would cause, I believe approval of the project by the State Water Board would harm the public interest.

Executed on the 30th day of November, 2017, at Sacramento, California.

David Robinson

REFERENCES

Metropolitan Water District of Southern California Infrastructure Fact Sheet (2017). [LAND-207]

Photographs of Local Roads and Bridges. [LAND-190]

Roadway Segments of Concern (from SWRCB 102, Figure 19-2a). [LAND-123]