[*Date*]

United States Army Corps of Engineers

Sacramento District

1325 J Street, Room 1640

Sacramento, California 95814

DLL-DCP-EIS@usaces.army.mil

**Re: Delta Conveyance Project Draft Environmental Impact Statement**

Dear Army Corps of Engineers:

[*On behalf of Group Name / As a concerned resident of \_\_\_*], I write to submit comments on the draft Environmental Impact Statement (DEIS) for the proposed Delta Conveyance Project (Delta Tunnel). [*Describe your organization if any, and any personal qualifications or associations that may be relevant to your review of the DEIS and/or describe how the project would impact your personal life or resources that are important to you (e.g., water, wildlife, recreation, agriculture, etc.)*.]

The Delta Tunnel is the latest iteration of isolated water conveyance projects that would remove freshwater flows from the Delta for the benefit of other parts of the state. Most of the unacceptable impacts that plagued previous versions of the project (the Bay Delta Conservation Plan and California WaterFix) are still present in the Delta Tunnel. The United States Army Corps of Engineers (Corps) should have conducted an independent review of the Delta Tunnel; instead, the Army Corps has simply reiterated DWR’s deficient Draft Environmental Impact Report (DEIR) in the form of a DEIS.

The DEIS is inadequate and fails to inform the public of the true extent of the environmental impacts as required by the National Environmental Policy Act (NEPA). As a California resident [OR \_\_\_], I/we understand that the state faces a difficult task in combatting the current water crisis. However, the Delta Tunnel would create a sacrifice zone in the Delta region from the social, economic, and environmental impacts of the project. Further, the cost of the Delta Tunnel is alarming and unaffordable.[[1]](#footnote-1)

One of the more glaring deficiencies in the DEIS is the lack of any analysis of the effects of operating the Delta Tunnel. Shockingly, the DEIS only analyzes the construction impacts of the project. Therefore, the wide-ranging operational impacts of operating these massive diversions and associated tunnel are not included in the DEIS. The DEIS entirely fails to analyze water quality, agricultural and other impacts associated with removing up to 6,000 cubic feet per second of water from the Sacramento River, which would be a direct result of the construction of the Delta Tunnel. To be complete, the DEIS must analyze the effects of operating the project that would be permitted by the Corps.

The alternatives analysis in the DEIS is also lacking. It is the lead agency’s responsibility to properly develop appropriate alternatives to projects that would impact public resources. However, the DEIS alternatives are all various versions of the same tunnel project. There are no alternatives that describe other methods to meet the Purpose and Need described in the DEIS. The DEIS ignores other, less environmentally impactful projects that would provide resilient water infrastructure without increasing reliance on Delta exports. There are other alternatives that would meet the need to address sea level rise and climate change. The lack of alternatives is inadequate under NEPA and the Corps must include other types of water projects in its analysis.

Similar to the DEIR, the DEIS’s treatment of many impacts is inadequate and misleading because it minimizes many impacts of the proposed project, precluding good faith review by the interested public. For instance, despite the project’s massive disturbances from constructing a 45-mile long, 39-foot tunnel around the Delta, the DEIS claims that all biological impacts “do not appear to be significant.” This is at best questionable. The impacts from construction would span a decade-plus and span thousands of acres of farmland, grasslands, wetlands and riparian habitat, disturbing and displacing wildlife.

Additionally, the DEIS does not adequately analyze and mitigate the impacts on Delta communities. The Delta Tunnel would create very real impacts to residents during and after construction. The physical impacts caused by the construction of the Delta Tunnel would create negative economic and social impacts throughout the Delta, which were essentially disregarded in the DEIS. This is unacceptable given the extensive and lasting impacts the project would have in the region. For example, criteria and toxic air pollutants, including particulate matter, would increase, and at times double, across the region as a result of project construction, endangering the health of Delta residents.

Overall, this project would create an environmental and socioeconomic disaster. Many of the environmental impacts, as well as the exorbitant cost, could be avoided by pursuing alternative, more sustainable, water projects. [I/we/group name] urge the Corps to withdraw the DEIS and withhold all project approvals for the Delta Tunnel Project until an adequate NEPA review is completed.

Thank you for the opportunity to provide comments on this project and please add [me/us] to the notice list.

Sincerely,

Name

[*Role, Organization/Institution (if any)*]

Email

Mailing address

Phone (optional)

1. The latest cost estimate (not including finance costs) was approximately $16 billion; this estimate is sure to go up. <https://calmatters.org/environment/2022/06/california-water-delta-tunnel/> [↑](#footnote-ref-1)