

Delta Counties Coalition

Contra Costa County · Sacramento County · San Joaquin County · Solano County · Yolo County

"Working together on water and Delta issues"

December 16, 2022

Department of Water Resources
Attention Delta Conveyance Office
P.O. Box 942836
Sacramento, CA 94236-0001

Via Email: deltaconveyancecomments@water.ca.gov

cc: deltaconveyance@water.ca.gov

Re: Delta Conveyance Project Draft Environmental Impact Report

Dear Department of Water Resources:

This letter provides the Delta Counties Coalition's (DCC) comments on the Delta Conveyance Project Draft Environmental Impact Report (DEIR). The DCC is an alliance consisting of the California Counties of Contra Costa, Sacramento, San Joaquin, Solano, and Yolo. These counties work collaboratively to give one voice on behalf of the Sacramento-San Joaquin River Delta and its four million area-wide residents. The DCC advocates to protect and enhance Delta communities and existing land uses, improve the Delta ecosystem and provide a more reliable water supply for the State.¹

Each of the five Delta counties is also submitting individual comment letters, which include additional concerns that must be addressed by the Department of Water Resources (DWR). To the extent possible, the counties have coordinated to reduce overlap between issues, and the DCC as a group supports the individual submissions of each of the five Delta counties. This letter provides a brief overview of the counties' major concerns with the Delta Tunnel project and the Draft EIR.

Disappointment with State's Policy Direction on Tunnel

The DCC is disappointed that DWR continues to pursue the destructive Tunnel project, which would not create new water for agencies within the State Water

¹ <https://savethedelta.saccounty.gov/pages/default.aspx>

Project's (SWP) service area. DCC has worked for over a decade to help guide the State toward more effective, less impactful means to continue to secure Delta water supplies from the Delta. Upon the announcement that the State would take a new look at Delta conveyance under the leadership of Governor Newsom, the counties and other entities participated in good faith in the Governor's Water Resilience Portfolio process,² as directed under Executive Order N-10-19, which was supposed to be a set of actions to meet California's water needs through the 21st century. Executive Order N-10-19, directed the state to "inventory and assess" . . . "Current planning to modernize conveyance through the Bay Delta with a new single tunnel project." That was never done.

In January 2020, DWR released its Notice of Preparation, which, included a tunnel proposal very similar to the twin tunnel California WaterFix project, with limited exceptions. The DCC commented on the "new" Delta Conveyance Project, requesting that DWR consider feasible alternatives to a tunnel that would meet the identified project objectives, explain that the "truncated and incomplete approach to project alternatives in the prior BDCP and California WaterFix environmental review processes must not be repeated."³ DCC suggested that the Draft EIR, at minimum, analyze and evaluate a through Delta conveyance alternative, alternative intake locations, improving existing facilities with a smaller conveyance system, and an accurate evaluation of the no project alternative. Instead, the current Draft EIR analyzes nine versions of a tunnel (in addition to the no project alternative).

The State has Failed to Meaningfully Engage with Delta Entities

In early 2019, the State indicated that it intended to build on work that has already been done and do additional design and engineering to avoid or minimize the project's local impacts. That process was to include significant engagement with the public, especially Delta communities. As part of that process, the Delta Conveyance Design and Construction Authority created the Stakeholder Engagement Committee (DCA Committee), for instance. The DCC and its counties declined to participate in the DCA's Stakeholder Committee; one of the primary reasons for the DCC's absence, was the limited scope of the Committee, which did not include considerations of *any other alternatives* to address the SWP's water supply needs besides an isolated tunnel project with intakes in two to three already specified locations. These locations, Courtland, Hood and Clarksburg are legacy Delta communities.⁴

² <https://resources.ca.gov/Initiatives/Building-Water-Resilience/portfolio>

³ <https://savethedelta.saccounty.gov/Documents/Letters/2020-04-17%20DCC%20Tunnel%20NOP%20Comments%20to%20DWR.pdf>

⁴ <https://savethedelta.saccounty.gov/Documents/Letters/2019-10-02%20DCA%20Stakeholder%20Engagement%20Committee.pdf>

Again in October of 2020, DCC expressed its concerns to the Resources Agency and DWR that the alternatives being considered were too narrow.⁵ The letter also cited the failure of DWR to “work with Delta communities and other stakeholders to limit local impacts” and to coordinate project planning “with a variety of actions to strengthen existing levee protections, protect Delta water quality, recharge depleted groundwater reserves, and strengthen local water supplies across the state” to “build Water supply resilience.”

While some of the local impacts of the current Tunnel project may be incrementally reduced, relative to prior iterations of the project, the Tunnel and all of the alternatives continue to contain nonstarter components for an acceptable project for the DCC, and none of the Delta Community input on these primary components of the project has been incorporated into project planning. As the area that would be directly burdened in a multitude of ways, the DCC and Delta stakeholders deserve a far greater role in planning any new infrastructure in the Delta.

Another example of subpar community engagement, DWR failed to hold any public meetings in the Delta regarding the DEIR, despite requests from the DCC and the Delta Legislative Caucus. To accommodate the desire of local people to participate in the DEIR process in person, the DCC and the Legislative Caucus hosted a public meeting in Hood on December 6, 2022. With about 110 people in attendance, the meeting demonstrated the high level of interest and concern of Delta and Sacramento area residents about the project.⁶

Specific Comments on the Draft EIR

The Draft EIR Fails to Credibly Describe the Project and its Operations

While the Draft EIR purports to describe the Tunnel at the “project” level under CEQA, the description and the resulting analysis fail to provide enough information that the public can understand the project and its environmental implications of this very massive project. As just one example, the Draft EIR fails to include a meaningful overview map of the massive proposed project in the Executive Summary and Chapter 3. Draft EIR Figures ES-2 and 3-2, for instance, attempt to

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<https://savethedelta.saccounty.gov/Documents/Letters/20.10.27%20DCC%20Ltr%20to%20DWR%20and%20DCA%20re%20Alts%20and%20Scope%20of%20SEC.pdf>

⁶ A video recording of the meeting is here: <https://www.youtube.com/watch?v=JVi6-Q6kfHA>. DCC requests this video be included in the record for this project. Public comments on the DEIR were transcribed by a court reporter and are being submitted to DWR by the Delta Legislative Caucus.

include all three potential alignments on one page, and include no geographical information about the landscapes and communities upon which the intakes, Tunnel and other facilities would be placed. Due to the lack of an understandable map, it was necessary for the public to develop maps based on DWR's GIS data for the project. An example of such a map is attached as Exhibit A.⁷

In addition to the locations of major project features, the proposed operation of the project is also unclear. While "Preliminary Proposed Operations Criteria" are included in Chapter 3 (Draft EIR, pp. 3-149 to 3-156), the Draft EIR also refers to Real-Time Decision-making and Adaptive Management (Draft EIR, pp. 3-156 to 3-161), and the Draft EIR fails to explain what different operations than presented in the Draft EIR may ultimately be undertaken.

According to the Draft EIR, the new north Delta diversions would be rarely utilized and the south Delta diversions would have priority. The Draft EIR states that SWP will first use south Delta facilities, and that "Shifting from south Delta intakes to proposed north Delta intakes has trade-offs and is not expected . . ." (Draft EIR, p. 3-145.) As a result, the water supply modeling in the Draft EIR estimates that only 13% of total Delta exports would be conveyed through the Tunnel, and that the diversions would be unused in the majority of calendar months. (See Draft EIR, Table 6-7.)

It is not credible that the largest and most expensive water supply infrastructure project in California history would sit largely unused after it is built. According to the Delta Independent Science Board's Interim Draft Comments:⁸

The tunnel export capacity utilization rate is small on average, less than 15% for the preferred alternative, as an annual average over the 93-year simulation period for 2020 conditions.

Common sense dictates that if the tunnel was built, it would be operated to divert far more than 13% of the SWP's water supplies in an average year, and that the operations described in the Draft EIR are incomplete and not credible. The unreasonably low utilization described in the Draft EIR skews all of the other impact analyses related to flow in the river, including water quality and fisheries impacts, for instance.

⁷ https://savethedelta.saccounty.gov/Documents/Tunnel_Impacts_Map.pdf

⁸ DISB Comments, Appendix A: Additional Comments on Individual Chapters of the Draft Environmental Impact Report for the Delta Conveyance Project Dec, 1, 2022, pp. 35-36, available at: <https://deltacouncil.ca.gov/delta-isb/meetings> (Dec. 8, 2022 meeting, item 4). The tunnel capacity factor is the ratio of additional annual North Delta diversions to those that would occur with the tunnel operating at 100% of its physical capacity.

At the same time, the operating parameters provided in the Draft EIR are not limited to diversions during high flow conditions, and pumping from the north Diversions could occur year-round, including during late summer and fall months when water supply and quality issues are typically most severe. Given frequently existing degraded water quality and fishery conditions in the Delta, any new diversions considered in the Delta could only operate in high flows to avoid injury to other water users and unreasonable effects on fish and wildlife. Any new diversions would also need to be scaled appropriately and sited on lands already owned by the state or other project proponents. The project described in the Draft EIR does not meet these basic criteria.

The DCC and the public need to know the likely effects of project operations, and the Draft EIR's failure to fully describe the project, along with its apparent underestimation of use of the new proposed diversions, at the same time as allowing potential diversions during low flow conditions, renders the Draft EIR's impact analyses incomplete and not credible.

Draft EIR's Range of Project Alternatives too Narrow

In 2019, after the decertification of the environmental review for the California WaterFix project, the DCC asked the state to truly have a "fresh start" to the conversation around upgrades to the state's water infrastructure to meet water supply needs of the state without causing devastating impacts in the Delta.

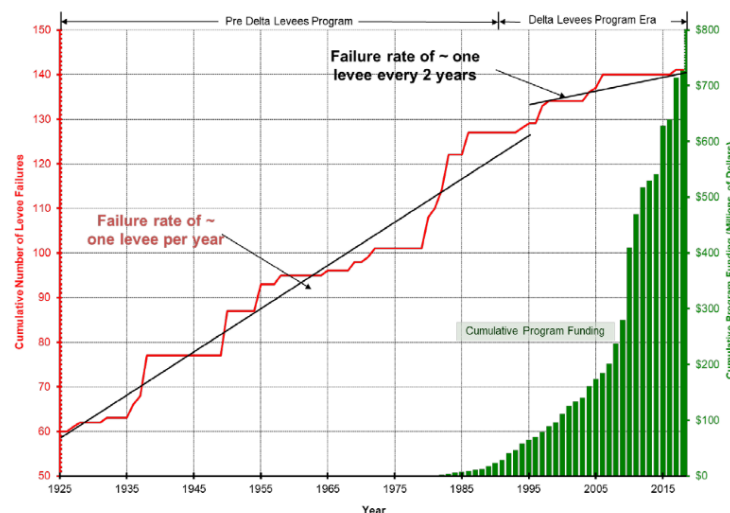
For instance, in its April 17, 2020, comments on the Notice of Preparation, DCC suggested inclusion of a feasible alternative that improves the existing through Delta conveyance system to meet the state's water supply needs. Such an alternative would include levee improvements to ensure protection of the state's water supply infrastructure, along with other local and state infrastructure. Such infrastructure could include preparing the existing South Delta facilities for sea level rise and increased salinity, modifying the Delta Cross Channel gate operations to reduce diversions of protected fish from the Sacramento River, as well as improving fish screening and salvage operations to reduce mortality from entrainment and salvage from existing facilities, installation of fish screens operable at low flows at the existing Clifton Court Forebay facilities is a potential action that could reduce fish salvage and predation losses, leading to reduced mortality of sensitive species and increasing water supply reliability.

Through-Delta conveyance meets the state's co-equal goals mandate of water supply reliability and ecosystem restoration in the Delta, provides critical flow through the Estuary to the Bay, preserves water quality and helps control invasive species while irrigating prime farmland in the Delta. Strengthening Delta levees is vital to protecting over \$60 billion of critical infrastructure, including pipelines, state highways and power and communication lines, along with the state's water supply

delivery system. In addition to statewide benefits, this infrastructure safeguards the lives and livelihoods of four million Delta Counties residents, and protects a vital Delta agricultural industry that contributes more than \$4 billion to the state's economy each year and supports a Northern California mega-region economy with an \$875 billion annual gross regional product.

The state and local partner investment program in Delta levees is incredibly successful. With an average \$22 million per year investment since the 1980's, there has been a 50 percent reduction in levee failures. For about \$1-2 billion (spent over 10-15 years), Delta levees could be improved to the baseline Bulletin 192-82 standard with a 24-foot wide crown and an interior levee bench to further safeguard against potential earthquakes and rising sea levels. Through an adaptive design, the need for incremental levees raises as conditions change can be accommodated.

Figure 1: Cumulative Delta Levee Failures (Source: DWR Delta Levees Program)



Operations and maintenance upgrades to existing conveyance infrastructure in the Delta to maintain flow sand continue providing water to other parts of the state are essential. Upgrades reduce fish entrainment and reduce reverse flows have been considered, but have been delayed while hundreds of millions are spent planning a controversial and damaging Delta tunnel. For example, non-physical fish barriers and/or physical screens should be implemented to safeguard fish along the freshwater pathway to the existing state and federal water project diversions. The use of existing water infrastructure in the Delta, coupled with brackish water treatment, should also be considered.

The early dismissal of these and other alternatives in Draft EIR Appendix 3A is unsupported. Notably, Table 3A-2 Alternatives Eliminated at First Level Screening appears to be based on analyses of the California WaterFix project, and has not been updated. In addition, this analysis fails to account for the feasibility of a

continued through Delta alternative, ignoring the successes of work in recent decades to improve levee resilience to protect against both potential earthquakes and sea level rise. The failure to include levee upgrades is also contrary to the statements in the Draft EIR to the effect that the project would be “dual conveyance”, meaning the SWP would also continue to pump water from the existing south Delta facilities.

In addition, to the extent the Draft EIR considers smaller sized tunnel projects, it should have considered smaller tunnel capacities as well. According to the Interim Draft comments of the DISB, average tunnel utilization is small, relative to its maximum conveyance capacity. Tunnel utilization is below 40% in 50% of years, which raises questions about optimal tunnel sizing⁹ as well as the ability of the SWP to finance construction (addressed in separate expert comments).

The fact that DWR is authorized to develop its own project objectives as a project applicant does not justify the failure to analyze reasonable alternatives to the Delta Tunnel. In addition, as recognized by the DISB, the presentation of alternative performances and tradeoffs in the Draft EIR needs improvement.¹⁰

Project Impacts are not Fully Disclosed or Mitigated to the Extent Feasible

Despite the massive scale of the project, the Draft EIR concludes that many impacts of the project would be less than significant. Many of these conclusions are incomplete and not credible in light of readily available information. The Draft EIR appears to overstate the likely effectiveness of mitigation for many impacts, including impacts on important salmon fisheries that would all need to pass by the experimental fish screens. As noted by other experts, these fish may spend more than an hour and a half attempting to pass the lengthy screens; no other comparable installations have been built and tested to support the Draft EIR’s conclusions regarding effectiveness in preventing fish mortality. In addition, as referenced above, the low tunnel utilization rate suggested in the Draft EIR also skews the significance findings for many impacts.

Long Term Water Quality Impacts

According to the Draft EIR Chapter 9, all water quality impacts except those related to the Effects on Mercury Resulting from Facility Operations and Maintenance (WQ-6) would be less than significant with no mitigation. Other technical comments on

⁹ DISB Comments, Delta Conveyance Project Draft Environmental Impact Report Review, Dec, 1, 2022, p. 10, available at: <https://deltacouncil.ca.gov/delta-isb/meetings> (Dec. 8, 2022 meeting, item 4).

¹⁰ DISB Comments, Delta Conveyance Project Draft Environmental Impact Report Review, Dec, 1, 2022, pp. 21-24, available at: <https://deltacouncil.ca.gov/delta-isb/meetings> (Dec. 8, 2022 meeting, item 4).

the Draft EIR go into more detail, but DCC does not agree that long term water quality impacts would be less than significant. Major concerns include:

- Water quality modeling relies on monthly average outputs, which do not provide the information needed to assess the impacts of the proposed project on water diversion operations, which are conducted on an hourly timeframe. Reliance on monthly averages tends to mask water quality impacts on local water uses.
- The Draft EIR fails to fully assess the project's potential to increase the incidence of Harmful Algal Blooms (HABs), which are becoming increasingly common in the Delta and warmer temperatures, reduced flow, high residence time, and more concentrated nutrients are likely to exacerbate the problem.
- Unlike the 2016 California WaterFix Final EIR (2016), there is no analysis of impacts to the San Francisco Bay. The Sacramento River is the primary source of freshwater for the Delta and the San Francisco Bay. The project would reduce outflow as compared to existing conditions, and the impact on the health of the San Francisco Bay should be considered.

Water Supply Impacts

The DCC's comments on the NOP requested that the Draft EIR analyze the changes in water supplies for all water users, both in and out of the Delta, using a readily understandable analytical approach. While the Draft EIR includes a description of water agencies within the Delta (Draft EIR, pp. 6-31 to 6-33), there is no analysis of the water supply impacts on these water users in the DEIR. Effects on local water supplies should be considered, not just effects on export water supplies. The DCC is disappointed that the Delta's own longstanding beneficial uses of Delta water are overlooked in the Draft EIR.

Agricultural Impacts

Each year California loses an average of 50,000 acres of farmland. The Delta is the largest contiguous area of prime farmland in the state (738,000 acres total, with over 415,000 acres in over 70 types of crops), and gross revenue of farms within the legal Delta totaled \$965 million in 2016.¹¹ Delta farms and related food and beverage manufacturing supported over 23,000 jobs across California and \$4.6 billion in output. While the Draft EIR asserts that farmland in the Delta has been and will continue be subject to conversion pressure, this is incorrect, as state and local laws prevent most farmland conversion in the Primary Zone of the Delta.

The DCP tunnel, not other types of development, is currently the largest threat to Delta farms. The DCP would directly convert 3,787 acres of farmland to

¹¹ Delta Protection Commission, *The State of the Delta Agriculture: Economic Impact, Conservation and Trends* February 3, 2020, can be accessed at <https://delta.ca.gov/wp-content/uploads/2020/07/Ag-ESP-update-agricultural-trends-FINAL-508.pdf>

nonagricultural uses to build the tunnel and associated compensatory mitigation. (Draft EIR, p. 15-3.) The Draft EIR fails to fully address these impacts, as well as to provide adequate farmland mitigation. Among other flaws, Mitigation Measure AG-1 requires 1:1 mitigation for conversion, but mitigation acreage is not targeted to preserve agricultural land in the Delta that is actually under development pressure. Moreover, the “optional approach” authorized by Mitigation Measure AG-1 to fund farm improvements to enhance farmland productivity consistent with “Agricultural Land Stewardship Consideration A2,” as an alternative to agricultural conservation, fails to include any performance criteria that would be necessary to ensure it actually mitigated agricultural impacts identified by the Draft EIR.

Flood Control Impacts

The Draft EIR fails to recognize strides made in recent years to improve flood control resiliency in the Delta. The Metropolitan Water District (MWD), along with state and local partners, has significantly improved the Freshwater Pathway to the state and federal water export pumps. This work has focused on improving levees and emergency preparedness along the corridors that freshwater flows. As a result of these efforts, MWD estimates that the maximum outage for exports of water from the Delta has been reduced to less than six months, which is well within the regional storage capacity of areas served by the State Water Project.



In addition, the Draft EIR does not recognize the potential of the project to reduce funding availability for non-project levees that are currently the responsibility of private landowners and reclamation districts. The conversion of nearly 3,800 acres of farmland would reduce agricultural productivity and the ability of landowners to provide cost sharing for levee maintenance and improvement projects. The indirect

impacts on agricultural operations from worsened water quality under the project would also reduce resources available for flood control investments.

Groundwater Impacts

The Delta counties are within subbasins subject to adopted Groundwater Sustainability Plans under the Sustainable Groundwater Management Act. (Wat. Code, § 10720 et seq.) The Draft EIR, however, fails to analyze the effects of the project during construction and operation on these subbasins' ability to successfully implement their Groundwater Sustainability Plans. During construction, the project would place cutoff walls and implement dewatering in a variety of locations, yet the Draft EIR fails to examine how these physical changes would affect groundwater levels and uses in the vicinity of these activities, which would occur in the South American, Eastern San Joaquin and East Contra Costa Subbasins. In addition, the diversion of up to 1/3 to 1/2 of the flow of the Sacramento River would decrease water recharge from the River to the South American and Eastern San Joaquin Subbasins. The Draft EIR also fails to quantitatively assess these impacts and no mitigation is provided. As the agency that determines whether a Groundwater Sustainability Plan complies with SGMA and is likely to achieve the sustainability goal for the basin, the DCC would expect DWR to provide a more detailed analysis of groundwater impacts of the tunnel project. (See Wat. Code, §§ 10733-10735.)

Recreation and Aesthetic Impacts

Recreation in the Delta is important to Delta residents, visitors and the local economy. The Delta is California's most crucial water and ecological resource, and is the largest freshwater tidal estuary of its kind on the west coast of the Americas. In addition to providing important habitat for birds on the Pacific Flyway and for fish that live in or pass through the Delta, the Delta houses historic towns, scenic roads, farm stands, and ample opportunities for recreation, including boating, birding, biking and fishing. This unique place brings people from all over the state for recreation and tourism. The Delta supports a recreation and tourism industry that provides an estimated \$251 million in direct Delta recreation spending each year.¹²

Additionally, the Delta Protection Commission (DPC) found that "Nature and access to the water are the most appealing aspects of the Delta." (DPC 2021b, p. 41.) Part of the DPC's Sacramento-San Joaquin Delta Economic Sustainability Plan's recreation enhancement goals is to promote recreation destinations as focal points in the Delta and highlight Delta values by highlighting Legacy Communities. (*Id.* at 81.) The Economic Sustainability Plan determined that "The first focal point destination is proposed to include the Legacy Communities of Locke, Walnut Grove,

¹² Delta Protection Commission, Economic Sustainability Plan for the Sacramento-San Joaquin Delta, Recreation and Tourism Chapter 2020 Update [DPC 2021b], p. v.

Ryde, Courtland, and Hood. (*Id.* at 86.) All of these communities would be severely impacted by the tunnel project. As discussed in additional detail below, the construction, muck piles, and permanent infrastructure would decimate the aesthetic value of several areas of the Delta. In doing so, the project would not only create aesthetic and recreational impacts, but also create additional barriers to obtaining the goals of the Economic Sustainability Plan.

In 2019, the Delta was designated as a National Heritage Area, commencing the influx of support for development of the Delta National Heritage Area Management Plan, among other activities. It is expected that the National Heritage Area designation and resulting federal investment will support improvements to recreational and tourist activities in the Delta.

The Delta Counties have been working alongside local, state and federal leaders for decades to improve conditions in the Delta and to maintain and enhance the Delta for local residents as well as visitors from around the world. Many of these opportunities serve low-income residents, including subsistence fishing and other low-cost recreational opportunities. The Tunnel project, with its decade plus construction period, and then the permanent changes to the river and local landscapes, would interfere with realization of these recreational access improvements. In addition, though the Draft EIR recognizes that aesthetic impacts of the project would be significant, it fails to assess how these aesthetic changes would affect recreational opportunities in the Delta near the many areas that the project impacts and changes would occur.

Air Quality, Health and Transportation Impacts

The DCC is also very concerned about the air emissions from up to 13 years or more of construction, much of which would be near existing communities and on roads with little capacity for construction of what is known as a “megaproject”. As explained in separate expert comments, the air emissions analysis underestimates emissions as well as resulting health risks from the project. In addition, the Draft EIR fails to adequately disclose all of the traffic that would result from project construction, including trips that would be through counties outside of the direct footprint. Especially for a project intended entirely to serve other areas of the state, the DCC finds these burdens on its residents and businesses to be unacceptable.

Conclusion

The DCC is disappointed that despite years of effort and attempted engagement, the State is still pursuing what is essentially the same Tunnel project as was set aside in 2019. While the State is moving forward on more resilient, less damaging

and smarter water projects in other areas, the Tunnel would continue to turn the Delta into a sacrifice zone. This is unacceptable.

The DCC continues to be available to work with DWR to advance real improvements to the state's water supply system that also protect the Delta environment and the communities that reside there.

Sincerely,



Don Nottoli
Supervisor, Sacramento County



Mitch Mashburn
Supervisor, Solano County



Karen Mitchoff
Supervisor, Contra Costa
County



Oscar Villegas
Supervisor, Yolo County

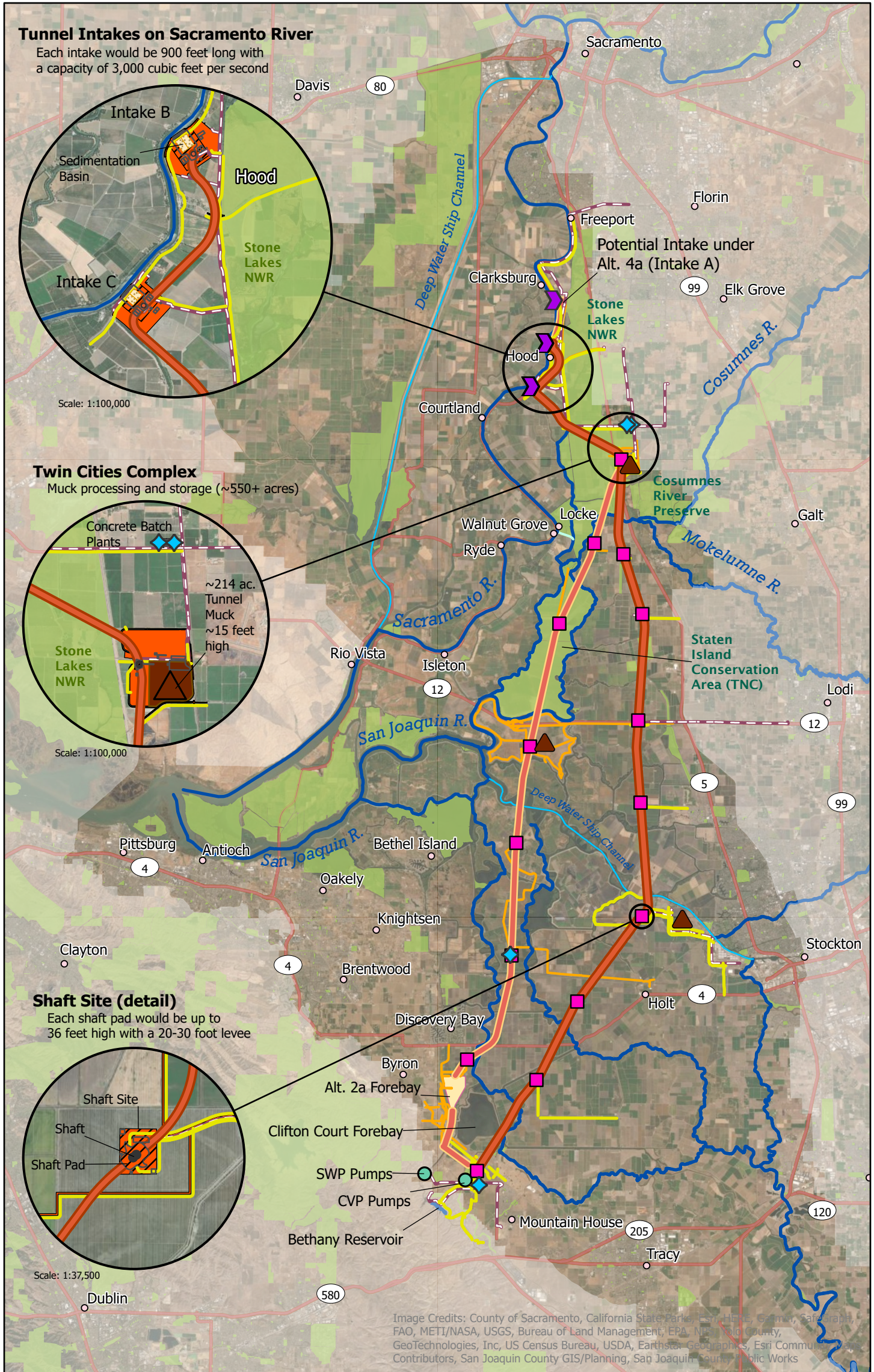


Chuck Winn
Supervisor, San Joaquin
County

cc: Senator Feinstein
Senator Padilla
Congressman DeSaulnier
Congressman Garamendi
Congressman Harder
Congressman Huffman
Congresswoman Matsui
Congresswoman Pelosi
Congressman Thompson
Wade Crowfoot, Secretary, Cal. Natural Resources Agency
Karla Nemeth, Director, Cal. Department of Water Resources
Chuck Bonham, Director, Cal. Department of Fish and Wildlife
Joaquin Esquivel, Chair, Cal. State Water Resources Control Board

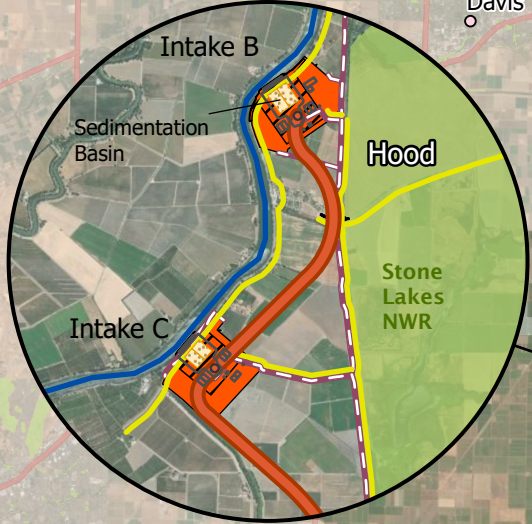
DWR Tunnel Impacts on the California Delta

Proposed (2022)



Tunnel Intakes on Sacramento River

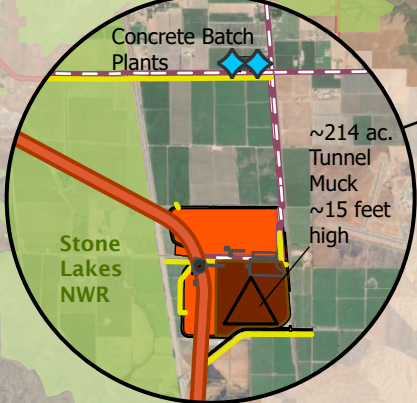
Each intake would be 900 feet long with a capacity of 3,000 cubic feet per second



Scale: 1:100,000

Twin Cities Complex

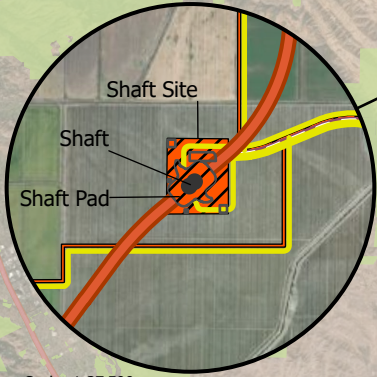
Muck processing and storage (~550+ acres)



Scale: 1:100,000

Shaft Site (detail)

Each shaft pad would be up to 36 feet high with a 20-30 foot levee



Scale: 1:37,500

Image Credits: County of Sacramento, California State Parks, Esri, Hubble, Garmin, Sategraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, Napa County, GeoTechnologies, Inc, US Census Bureau, USDA, Earthstar Geographics, Esri Community Maps Contributors, San Joaquin County GIS/Planning, San Joaquin County Public Works

- | | | | | |
|------------------------|-------------------------|----------------------|--|---|
| Permanent Impact | Major Rivers | Tunnel Muck Site | Alternative 5 / Bethany
(Proposed Project) | Alternative 2a / Central |
| Work Area | Deep Water Ship Channel | Shaft Site | Tunnel (45 mi. long, 39' outer diameter) | Tunnel (42 mil. long, 44' outer diameter) |
| Parks and Public Lands | Delta Cross Channel | Intake Site | Roads and Connections | Roads and Connections |
| | Highways | Concrete Batch Plant | | |
| | New Utilities | Shaft | | |

Scale: 1:350,000
 0 2.5 5 10 Miles
 Projection: State Plane Zone III NAD83 Feet

Prepared Sep 2022 by Valley Spatial Locations Approximate
 Project Components: DWR (2022)
 State Lands: gis.data.ca.gov (2019)