



Delta Independent Science Board

980 NINTH STREET, SUITE 1500
SACRAMENTO, CALIFORNIA 95814
[HTTPS://DELTACOUNCIL.CA.GOV](https://deltacouncil.ca.gov)
(916) 445-5511

April 17, 2020

Delta Conveyance Scoping Comments
Attention: Karla Nemeth, Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Sent via e-mail to DeltaConveyanceScoping@water.ca.gov
Karla.Nemeth@water.ca.gov

Subject: Notice of Preparation for the Delta Conveyance Project

Dear Director Nemeth,

The California Department of Water Resources (DWR) will soon initiate preparation of an Environmental Impact Report (EIR) for the Delta Conveyance Project in the Sacramento-San Joaquin Delta, California. In accordance with our responsibilities to provide scientific oversight of programs that support adaptive management, as specified in the Delta Reform Act of 2009, the Delta Independent Science Board (Delta ISB) plans to review the EIR documents for the Delta Conveyance Project, as we did with previous Delta conveyance EIRs, and looks forward to discussing the process and expected timeline with DWR.

On behalf of the Delta ISB, we write with two goals: (1) to invite a DWR representative to attend a future meeting of the Delta ISB to discuss the process and timeline for our review of the EIR documents for the Delta Conveyance Project and (2) to share some insights and expectations based on our previous review of EIR documents for the Bay Delta Conservation Plan (BDGP) and California WaterFix projects.

The Delta ISB leadership sees tremendous opportunity in having the Delta Conveyance Project leadership attend one of our meetings early in the development of the EIR documents, so we can discuss the best approaches for providing scientific review of the EIR documents for the Delta Conveyance Project, as required by the 2009 Delta legislation. Because several members of the Delta ISB will be rotating off the Delta ISB at the end of August 2020, it would be advantageous for representatives from DWR to attend a Delta ISB meeting either in August when both existing and new members of the Delta ISB will be meeting or during fall 2020 after new Delta ISB members have begun their terms.

Although we recognize that the Delta Conveyance Project is a new project that will use new processes and involve a new team, we see an opportunity to learn from previous processes so that this effort can advance in a way that will lend itself to the best scientific review and public and regulatory evaluation. Practices that lend themselves to the best scientific review will also support effective and transparent communication of this information to the public and decision makers. For this reason, we recommend that Delta Conveyance Project managers

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review the comments we provided in our June 16, 2017, memo, "Delta ISB's Final EIR/EIS Review for California WaterFix." This memo is provided as an attachment to this letter for your consideration, and an accessible version of the memo can be found at <https://deltacouncil.ca.gov/pdf/isb/products/2017-06-16-isb-waterfix-review.pdf>.

We highlight a few areas noted in our June 2017 comments that are pertinent to the upcoming EIR process for the Delta Conveyance Project:

- **Adaptive management** – The Delta ISB recommends that adaptive management be considered in all phases of the Delta Conveyance Project, including early phases of project planning. We would be happy to discuss some approaches for doing this.
- **Scientific information** – We recommend that EIR documents incorporate new findings from recent scientific work throughout the process. Findings from climate-change science, for example, will be evolving throughout the Delta Conveyance Project and it will be critical to stay abreast of new research findings and incorporate these findings as they develop.
- **Communication** – We recommend clear communication of the principal findings, alternatives, and uncertainties throughout the EIR documents. The Delta ISB recommends use of graphics and informative summaries to ensure that information is understandable to decision-makers and the public. These approaches will increase the readability and credibility of the EIR documents and increase transparency.
- **Long-term effects** – The EIR documents should consider future uncertainties such as the degree and timing of sea level rise and other aspects of climate change in the analysis of the long-term performance of alternatives. Long-term interactions of California's groundwater and Delta problems also seem important. Because the Delta is a complex and dynamic system, the EIR documents should discuss contingencies when possible. Risk analysis should be included in the process.
- **Summary of project impacts on Delta residents and visitors** – The impacts of project construction on Delta residents and visitors should be summarized and presented in a coherent and understandable way. This information will be informative to the agencies involved and will facilitate public engagement and scientific advancement.

In summary, the Delta ISB is committed to providing a rigorous scientific review of the EIR documents for the Delta Conveyance Project and looks forward to working with DWR throughout this process. We hope that DWR representatives will attend a future meeting of the Delta ISB in the late summer/fall, so that we have an opportunity to discuss the review process and timeline in more detail. If representatives would like to attend a future meeting or discuss comments in this letter, please e-mail us at disb@deltacouncil.ca.gov.

Sincerely,


Elizabeth A. Canuel
Delta ISB Chair


Jay R. Lund
Delta ISB Chair Elect


Stephen Brandt
Delta ISB Past Chair

Attachment: Delta ISB's Final EIR/EIS Review for California WaterFix (2017)