DEPARTMENT OF WATER RESOURCES
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VIA EMAIL

April 28, 2022

Mr. David J. Rehnstrom
Water Distribution Planning
East Bay Municipal Utility District
375 11th Street
Oakland, CA 94607
Mokelumne.Aqueducts.Resiliency@ebmud.com

RE: SCH# 2022030725 Notice of Preparation of an Environmental Impact Report for the Mokelumne Aqueduct Resiliency Project

Dear Mr. Rehnstrom:

The Department of Water Resources (DWR) has received the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Mokelumne Aqueduct Resiliency Project (MARP).

It is DWR's understanding that the MARP is proposed to replace a portion of the existing Mokelumne Aqueducts with a buried Aqueduct Tunnel (Tunnel) of approximately 16.5 miles in length, beginning west of Interstate 5 in the City of Stockton, CA and ending at the EBMUD's Bixler Maintenance Yard in unincorporated Contra Costa County. The purpose of the MARP is to improve the resiliency of the existing Mokelumne Aqueducts against earthquake hazards and levee failures by replacing them in a proposed buried Tunnel within the existing Mokelumne Aqueduct ROW for the 16.5 mile reach where they cross the Delta.

As a water conveyance tunnel project, MARP is similar in many respects to DWR's proposed Delta Conveyance Project (DCP). DWR released an NOP for the DCP in January of 2020, proposing to modernize the aging State Water Project (SWP) in the Delta to restore and protect the reliability of SWP water deliveries in a cost-effective manner, consistent with the State's Water Resilience Portfolio. The DCP EIR is scheduled to be released for public review this summer. Because environmental review for DCP is ahead of MARP and because DWR has invested considerable time and effort in analyzing many of the same potential effects, the DWR would like to provide the following technical considerations EBMUD may want to include for preparation of the EIR for the MARP:

- Tunnelling Spoils: The EIR should consider evaluation of the full effect of treatment and disposal of tunneling spoils. The NOP suggests that material would be trucked or transported by rail from tunnel shafts permanent disposal sites. We recommend that the EIR disclose the environmental impacts of storing, transporting, and disposing of the tunneling material and potential impacts on agricultural land, transportation infrastructure and capacity, air quality, and noise.

- Materials/Worker Transportation: The NOP is unclear on how construction material would be transported to the tunnel launch shafts and other construction sites and how materials (wastewater, existing surface aqueduct features such as pipes and pilings) would be removed. We recommend that the impacts on local and regional roadway capacity be fully addressed in the EIR and mitigation proposed to avoid significant impacts. The NOP also does not indicate if barges would be used to transport materials to or from the construction sites. If barges are used for transporting materials, secondary effects on water quality, aquatic resources, navigation, etc. should be disclosed in the EIR.

- Project Schedule: Providing a construction schedule which outlines major construction phases/steps will be helpful for full disclosure of the duration of each of the construction related impacts unique to each construction activity.

- Terrestrial Biological Resources: The EIR should fully disclose the impacts on biological resources during the construction. We recommend that the EIR include impacts on special status species and habitat types as well as the type and location of mitigation measures to compensate for loses.

- Groundwater/Water Quality Impacts: We recommend that the EIS discuss the impacts on groundwater resources as a result of possible dewatering of construction sites. The impact assessment should also consider disclosing the effects of reuse or disposal of water produced through dewatering operations.

- Cumulative Impacts: MARP is similar in many respects to the DWR's Delta Conveyance Project. The EBMUD cumulative analysis should consider additional effects of DCP especially for traffic, air quality, and noise whether or not the projects are constructed concurrently or consecutively.

DWR looks forward to continued coordination with EBMUD on the DCP and MARP. DWR is committed to collaborating with EBMUD to ensure that these two water resiliency projects are designed to interface in a safe and cost-effective manner.

If you have any questions, please contact me directly at the email address included below.

Sincerely,

Marcus Yee

Marcus L. Yee
Manager, Delta Conveyance Project EIR
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cc: (via email)

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