

Letter	Comment #	Comment	Relation to Final EIR/EIS
City of Stockton	1	<p>The following comments on the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) for the California WaterFix project (Project) are submitted on behalf of the City of Stockton ("Stockton" or "City"). Due to the highly constrained review period provided for the FEIR/EIS, Stockton's comments focus on the Project's potential to substantially degrade the quality of the City's water supply. In comments on the Draft EIR (DEIR)/EIS and Recirculated Draft EIR (RDEIR)/EIS, Stockton previously identified numerous issues of concern, such as impacts to roadways, that it does not believe have been resolved, and the lack of comment herein on these other issues does not constitute agreement with the FEIR/EIS's treatment of those issues or the adequacy of the responses to the City's comments raising other concerns.</p>	<p>This comment is about water quality, impacts to roadways, project description, and modeling. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
City of Stockton	2	<p>Introduction</p> <p>With a population of approximately 300,000, Stockton is the largest municipality within the Sacramento-San Joaquin River Delta (Delta). The City's primary water supply comes from the San Joaquin River, where the City diverts water for municipal and industrial purposes pursuant to a state-issued water right. The well-being of the City, its residents, and its economy is inextricably linked to the Delta, the quantity and quality of Delta water supplies, and the Delta ecosystem. The Project threatens to degrade the quality and diminish the availability of City's drinking water supply.</p>	<p>This comment is about water quality and water supply. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p> <p>As described in Section 5.2.3.2 of Chapter 5, Water Supply, in the Final EIR/EIS, changes to water supply are not environmental impacts because they would not, by themselves, create a physical change in the environment. Changes to water supply, however, could be considered as part of economic or social changes that may indirectly lead to a physical change in the environment. Therefore, as required under CEQA, any potential physical environmental impacts indirectly caused by changes to water supply are appropriately addressed in the relevant resource chapters in the Final EIR/EIS. The potential impacts related to changes in salinity in the Delta are described in Chapter 8, Water Quality of the Final EIR/EIS. The potential impacts to agricultural and community water supplies are discussed in Chapters 14 and 20 of the Final EIR/EIS. Impact analysis of changes in local water supplies are presented in Chapter 20 (Public Services and Utilities) of the Final EIR/EIS. Changes in socioeconomic and public health are presented in Chapters 16 and Chapter 25, respectively, of the Final EIR/EIS. Potential cumulative impacts are addressed in Chapter 31, Other CEQA/NEPA Required Sections of the Final EIR/EIS.</p>
City of Stockton	3	<p>Stockton first identified this concern over eight (8) years ago, at the start of the Project environmental review process, where it urged that the United States Bureau of Reclamation ("Bureau" or "Reclamation") and the California Department of Water Resources (DWR) (collectively referred to as "Lead Agencies") analyze their Project's impact on the City's Delta water supply, and has repeated these concerns in comments on each version of the EIR/EIS. In addition to these comments, Stockton has provided the Lead Agencies with evidence in the associated Water Fix water rights change petition proceeding that shows the importance of its Delta water source. Stockton has provided evidence of how the development of that supply has helped the overdrafted groundwater basin recovery effort and reduced adverse effects that could occur from the Project to the City's water supply, the groundwater basin, and the City's ability to comply with its wastewater discharge permit. (See Exhibit A, August 30, 2016 Testimony of Robert Granberg, P.E. submitted in the Hearing in the Matter of California Department of Water Resources and United States Bureau of Reclamation's Request for a Change in Point of Diversion for California WaterFix.) Yet no relevant information to resolve the City's concerns was provided in the DEIR/EIS, RDEIR/EIS, or FEIR/EIS. The FEIR/EIS simply repeats the DEIR/EIS and RDEIR/EIS's unsubstantiated assertion that Project-related changes in water quality at Stockton's intake would be minor. In their stubborn refusal to address Stockton's most important concern with the Project, the Lead Agencies have demonstrated an astonishing disregard both for their obligations under the</p>	<p>This comment is about water supply, water quality, and groundwater. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>

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		California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA), and for the City's legitimate interests, including the health and well-being of the residents of Stockton.	
City of Stockton	4	The failure to analyze and disclose water quality impacts at Stockton's intake is all the more troubling given that the Lead Agencies' own experts and EIR/EIS team admitted in August 2016, four (4) months before the FEIR/EIS was released and with fresh reminders that the City did not believe its concerns had been addressed in the DEIR/EIS or RDEIR/EIS, that they had all the data necessary to specifically evaluate Project-related water quality changes at Stockton's intake and that it would take them only 30 minutes to perform that evaluation. (See Exhibit B, California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. I 08-109 (Transcript).) Instead, the Lead Agencies inexplicably decided to "lawyer up" and "circle the wagons," devoting substantial resources to lengthy legal argument in defense of their inadequate EIR instead of providing relevant information and analysis responsive to Stockton's comments and concerns. (See, e.g., FEIR/EIS, Vol. II, Part 1, Master Responses 2, 3, 4, 8, 11, 13, 17, 18, 22, 38.) As a result, Stockton was forced to engage its own consultant to do the Lead Agencies job.	This comment is about water quality and modeling. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	5	As demonstrated in the attached technical report by nationally recognized expert in Delta water quality and hydrodynamic modeling, Dr. Susan Paulsen (see Exhibit C, January 30, 2017 External Memorandum re: Technical Comments on the California WaterFix Project and Associated Final Environmental Impact Report and Environmental Impact Statement (FEIR/EIS), from Susan Paulsen, Ph.D. P.E., to Robert Granberg, et al. (Exponent Report), and discussed in more detail in section III below, the Project would substantially degrade the quality of water at Stockton's intake, resulting in new and substantially more severe impacts to the City's San Joaquin River drinking water supply than disclosed in the FEIR/EIS. The Exponent Report shows that the information that was provided in the FEIR/EIS, and its determination regarding the significance of impacts to the City's water supply, was inadequate because it (1) evaluated Project-related water quality impacts at the wrong location - a location that is not representative of existing conditions at the City's intake or those that would occur as a result of the Project; (2) failed to evaluate the range of impacts that would occur under the Project as it would actually operate, or against the appropriate baseline, thus dramatically understating the frequency and magnitude of significant impacts; and (3) used an inappropriate methodology for calculating and presenting impacts that effectively hid significant day-to-day changes in water quality by burying changes within long-term monthly average data, among other flaws, and (4) does not adequately address potential for increases in microcystis blooms, which are a risk to humans and wildlife. The Exponent Report demonstrates that the Project will substantially degrade the quality of Stockton's water supply, increasing the time that it is unusable by up to 150 percent (150%).	This section is a summary of some of the issues raised in the exponent attachment and does not raise any new environmental issues that weren't addressed in the Final EIR/S.
City of Stockton	6	By substantially degrading Delta water quality and making Stockton's water supply less reliable, the Project is inconsistent with the Legislature's objective in enacting the Delta Reform Act of 2009 "to protect and enhance the quality of water supply from the Delta" (Water Code, § 85001), as well as its goals to: Achieve the two coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. And to: Protect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities. (Water Code, §85054.)	This comment is about water quality, water supply, and the Delta Reform Act. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.

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City of Stockton	7	<p>The Lead Agencies Did Not Provide an Adequate Opportunity for Public Review and Comment on the FEIR/EIS, Which Required Recirculation Due to the Magnitude of the Revisions and New Information It Included</p> <p>Stockton has made its best effort in the limited review time allotted by DWR to review the portions of the FEIR/EIS that are relevant to the City's concerns. Stockton's ability to conduct a thorough review was frustrated by the Lead Agencies' decision to release the FEIR/EIS on the eve of the Christmas holiday, at a time when staff and consultants had planned vacations, and its subsequent attempt, through a statement buried in a December 30, 2016 Federal Register Notice of Availability, to limit the opportunity for public input on the FEIR/EIS to just 30 days. DWR's attempt to limit the full opportunity for public comment is perplexing given that the agency has stated that it does not intend to approve the Project until the completion of the required federal Endangered Species Act consultations, which as of early-December, were predicted to conclude in March or April.</p>	This comment is about the public review period. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. Please see Federal Register Notice Period for the California WaterFix Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) letter regarding requests for extending NEPA review period.
City of Stockton	8	<p>The short review period was especially problematic given the size of the FEIR/EIS, the inclusion of extensive new material and the fact that entire impact sections were rewritten (with no indication of where changes occurred from the DEIR/EIS or RDEIR/EIS), thus requiring the public to re-read the entire impact sections of the document, many of which run into the thousands of pages. For example, the revised water quality impact chapter alone is 1,157 pages long, not including figures, which are located in a separate file. Perhaps most significant of all is the fact that the Project itself has changed with each environmental document that has been released (from Alternative 4 to Alternative 4A with certain operating scenarios, to Alternative 4A H3+ [a new operating scenario] to now operating between Boundaries 1 and 2) and the FEIR/EIS does not explain or analyze impacts of the Project as DWR now states it will operate (i.e., under much wider range of operations than considered in the DEIR/EIS or RDEIR/EIS). As with the DEIR/EIS and RDEIR/EIS, the size, structure, and means of presenting information in the FEIR/EIS inhibited review and informed public participation and the too-short review period denied Stockton and the public a meaningful opportunity to locate, let alone evaluate, the new information contained in the FEIR/EIS and the validity of the conclusions the Lead Agencies have drawn from it. The magnitude of the changes from the RDEIR/EIS necessitated recirculation for an additional appropriate public review. (<i>Spring Valley</i>, 248 Cal.App.4th at p. 109.)</p>	This comment is about the public review period. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. Please see Federal Register Notice Period for the California WaterFix Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) letter regarding requests for extending NEPA review period.
City of Stockton	9	<p>The FEIR/EIS Fails to Address the Potential for Significant Impacts to Stockton's Water Supply</p> <p>The RDEIR/EIS identified a less than significant water quality impact from the effects of Project operations on chloride concentrations. (RDEIR/EIS Executive Summary, p. ES-43, WQ-7.) No evidence or analysis supports this determination as it relates to impacts on Stockton's water supply. In fact, there is ample evidence that the Project will substantially degrade the quality of Stockton's water supply.</p>	This comment is about water supply. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	10	<p>As noted in its comments on the DEIR/EIS and RDEIR/EIS, a key concern of Stockton was the documents reliance on model results from a location known as "Buckley Cove" to evaluate water quality that DWR has asserted is representative of water quality at the City's drinking water intake. The FEIR/EIS continues to present information from Buckley Cove. However, as explained in detail in the Exponent Report, Buckley Cove is over eight (8) miles upstream from Stockton's drinking water intake, and both the composition and quality of water at Buckley Cove differ significantly from the composition and quality of water at the City's intake. For these reasons and concerns, model results from Buckley Cove cannot be used to accurately assess water quality changes at the City's drinking water intake.</p>	The assessment locations in Chapter 8, Water Quality, were chosen such that the modeled water quality changes under the CWF alternatives, relative to baselines, would be representative of water quality changes in the various geographic portions of the Delta as a whole (Chapter 8, Water Quality in Draft EIR/EIS Sections 8.2.2.3 and 8.4.1.3, RDEIR/SDEIS Section 8.3.1.3, and Final EIR/EIS Sections 8.1.2.3 and 8.3.1.3). The assessment was done on a comparative basis (i.e., alternatives as compared to baselines) to understand the relative effect on water quality among the alternatives and geographically across the Delta. This allowed determination of water bodies or reaches of water bodies within the Delta where a given constituent may be most affected by a CWF alternative. Thus, even though water quality in the Delta varies spatially, and locations in the Delta may not have identical water

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			<p>quality to the chosen locations for assessment, given the comparative manner and purposes of the assessment, the effects of the CWF at the locations assessed were considered representative of the effects of the CWF in the various areas of the Delta.</p> <p>The City of Stockton's diversion of water from the Delta is located on the San Joaquin River near Venice Island. The City's WTP intake location is between the Prisoners Point assessment location, which is a Bay-Delta WQCP compliance location assessed for EC, and the San Joaquin River at Buckley Cove assessment location, which was assessed for all other water quality constituents that were quantitatively modeled. These locations are representative for purposes of assessing the effects of the CWF on water quality at the City of Stockton intake even though the specific water quality itself at Prisoners Point and Buckley Cove is not identical to the water quality at the City's intake location (i.e., it varies somewhat across this reach of river). To be clear, the relative effects of the CWF at these locations on the river's designated beneficial uses of water (including the MUN use) are representative of the relative effects of the CWF on the MUN use at the City's WTP intake. In other words, based on findings from all assessment locations in the Delta, the EIR/EIS made impact findings to beneficial uses designated to water bodies and water body segments, not just to the assessment locations themselves, because the beneficial uses (the cornerstone of the State's water quality standards) are designated by water body and water body segment, not by individual locations or diversion locations.</p> <p>The topic of assessment location and effects of the CWF at the City of Stockton's diversion location is further addressed in a report prepared to support testimony in Part 1 of the Petition process: Exhibit DWR-652. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.</p>
City of Stockton	11	<p>Because the FEIR/EIS did not evaluate water quality impacts at the location of the City's drinking water intake, Exponent used DWR's model input files and the DSM2 water quality model to obtain model results to describe water quality impacts at Stockton's drinking water intake location. Exponent's analysis concludes that the Project will result in substantial changes in the source and quality of water present at the City's drinking water intake on the San Joaquin River. (Exponent Report at p. 2.) Water quality changes at the City's drinking water intake will occur as a result of the export from the northern Delta of greater volumes of water, and greater volumes of high-quality Sacramento River water, that will occur under the proposed Project. Under most operational scenarios, a greater fraction of the water at the City's drinking water intake will come from the San Joaquin River rather than the Sacramento River and higher salinity and other water quality changes will occur as a result.</p>	<p>The Exponent assessment of chloride impacts at the City of Stockton's drinking water intake is inconsistent with the methodology used for the EIR/EIS assessment. For one, the Exponent assessment compares conditions under the Proposed Project to conditions under a different baseline EBC2(existing biological conditions 2). In assessing impacts of the Proposed Project isolated from effects of climate change and sea level rise, DWR took into account the No Action Alternative, as discussed in the Final EIR/EIS. This approach, which is permitted under CEQA case law (Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013) 57 Cal.4th 439, 454), allowed DWR to isolate the effects of climate change and sea level rise from the effects of the proposed project and action alternatives themselves. (See Master Response 1, Environmental Baselines.) Further, the Exponent analysis uses a threshold for chloride of 110 mg/L, which is the City's preferred upper limit for chloride; the state's adopted water quality objective for the Delta at the City's intake location for protection of the municipal and domestic supply beneficial use is the state's drinking water maximum contaminant level, which is 250 mg/L recommended, 500 mg/L as an upper level, and 600 mg/L as a short-term level. The 250 mg/L MCL was used, in part, to make determinations regarding chloride impacts in the EIR/EIS, as this is the state's adopted objective as described in 8.1.3.4, Water Quality, of the Final EIR/EIS.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
City of Stockton	12	<p>Exponent's analysis of just one water quality constituent of concern to Stockton - chloride - demonstrates that significant water quality impacts to the City's water supply will result from the implementation of the Project's preferred operational scenario (Alternative 4A) as well as</p>	<p>Please see above.</p> <p>This comment does not raise any substantive new environmental information or analysis that</p>

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City of Stockton	13	<p>The FEIR/EIS fails to disclose the Project's significant impacts to Stockton's drinking water supply for several additional reasons. As detailed in the Exponent Report, the FEIR/EIS uses an inappropriate existing condition baseline to model water quality impacts in the Delta and does not disclose water quality changes modeled by DWR over the full operational range of the Project. Also, it does not adequately address the potential for increases in microcystis blooms, which are a risk to humans and wildlife. Specifically, the FEIR/EIS uses a whole-Delta analysis approach that does not consider area-specific changes as they relate to beneficial use. Changes near drinking water intakes or recreation areas will necessarily result in more substantial adverse impacts due to the increased risk of human exposure, but due to the methodology used in the FEIR/EIS, this important information was not presented, preventing the public from understanding the Project's potential to significantly affect them.</p>	<p>This comment is about water supply, baselines, and water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. Further, the Microcystis impact assessment does, in fact, consider the potential for changes to Microcystis blooms within the different areas of the Delta. The assessment relied, in part, on residence time modeling conducted for 19 sub-regions of the Delta, thus accounting for the changes in flow that would occur due to the CWF throughout the Delta. The topic of Microcystis and effects of the CWF at the City of Stockton's diversion location is further addressed in a report prepared to support testimony in Part 1 of the Petition process: Exhibit DWR-652. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.</p>
City of Stockton	14	<p>As a result of each of these deficiencies, Stockton and the public were deprived of meaningful information about the Project's potentially significant impacts, rendering the FEIR/EIS inadequate under CEQA and NEPA. (CEQA Guidelines, 15003(c); <i>No Oil, Inc. v. City of Los Angeles</i>. 13 Cal.3d 68.) For the same reasons, the FEIR/EIS also fails to meet CEQA's standards for adequacy of an EIR: An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts</p>	<p>This comment is about CEQA/NEPA adequacy. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>

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		does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure. (CEQA Guidelines, § 15151.)	
City of Stockton	15	The FEIR/EIS contained insufficient analysis relevant to Stockton's concerns about impacts to its water supply, and thus the Lead Agencies' decision makers lack sufficient information to enable them to make a decision regarding the Project that intelligently takes account of the environmental consequences to Stockton's water supply. Moreover, the analysis requested by Stockton was clearly "reasonably feasible" as demonstrated by the Exponent Report and the Lead Agencies' own experts' testimony. As such, the FEIR/EIS is clearly inadequate, incomplete, and does not reflect a good faith effort at full disclosure.	This comment is about water supply. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	16	<p>The FEIR/EIS Responses to Comments Do Not Address Stockton's Concerns and Fail to Resolve Substantial Questions About Project Impacts to Stockton's Water Supply and Its Wastewater Treatment Operations</p> <p>CEQA and NEPA require not only effective public notice, but public participation in the evaluation of the environmental consequences of a proposed action. Accordingly, a thoughtful and meaningful response to public comment is an integral part of the EIR and EIS. (40 C.F.R. § 1510(a); <i>State of Cal. v. Block</i> (9th Cir. 1982) 690 F.2d 753, 773; CEQA Guidelines, § 15003(a); <i>Citizens of Goleta Valley v. Board of Supervisors</i> (1990) 52 Cal.3d 553, 564.) An agency's responses to comments must "address in detail ... (the) reasons why specific comments and suggestions were not accepted." (CEQA Guidelines, § 15088(b); see also 40 C.F.R. § 1503.4.) CEQA and NEPA require a lead agency to confront the significant environmental issues raised in comments and does not allow these issues to be "swept under the rug" (See <i>City of Irvine v. County of Orange</i> (2015) 238 Cal.App.4th 526, 553 (<i>Irvine</i>)). When a significant environmental issue is raised in comments that object to the draft EIR's analysis, the response must be detailed and must provide a reasoned, good faith analysis. (CEQA Guidelines, § 15088(c); <i>Friends of the Eel River v. Sonoma County Water Agency</i> (2003) 108 Cal.App.4th 859, 878.) Cursory responses are not sufficient: the agency must "make available to the public high quality information, including accurate scientific analysis, expert agency comments and public scrutiny, before decisions are made and actions are taken." (<i>Center for Biological Diversity v. U.S. Forest Service</i> (9th Cir. 2003) 349 F.3d 1157, 1167; see 40 C.F.R. § 1500.1 (b); CEQA Guidelines, § 15132(d); see also <i>People v. County of Kern</i> (1974) 39 Cal.App.3d 830, 841-842.)</p>	This comment is about previous responses to comments. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	17	Stockton has raised concerns about the effect of Project-related water quality changes on its San Joaquin River drinking water supply, as well as the City's ability to comply with its wastewater discharge requirements from the beginning of the NEPA and CEQA process. However, the responses to its comments do not resolve these concerns.	This comment is about water quality and wastewater discharge. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	18	<p>A. Comments Regarding Impacts to Stockton's Water Supply</p> <p>The FEIR/EIS provided only generic, conclusory, and redundant responses to Stockton's comments about impacts to the quality of its water supply that asserted, with no supporting evidence or explanation, that information relating to Stockton's water supply was included in the FEIR/EIS analysis, citing Appendix 5A and Chapter 8. (See FEIR/EIS, Vol. II, Part 2-1, Letter 1655, Comment 2, p. 120.) For example, the response to Stockton's comment that water quality at Buckley Cove was not representative of the conditions at the City's drinking water intake, and thus could not be used to properly assess impacts to the City's water supply,</p>	This comment is about previous responses to comments regarding water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.

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City of Stockton	19	<p>The Lead Agencies’ failure to address the most significant environmental issue raised by the largest city within the Delta is even more inadequate when viewed in the light of the testimony given by DWR and the Bureau’s own modeling panel who completed the water quality modeling for the FEIR/EIS. When asked how long it would take for a person who is familiar with the model to use the model to do a comparison of water quality for two different locations, a member of the Lead Agencies’ modeling and environmental review team, Jamie Anderson, stated that it would take only “a half an hour” to complete this analysis. (Transcript, <i>supra</i>, at pp.108-109.) The fact that the Lead Agencies possessed the data, expertise, and resources to conduct the necessary analysis at Stockton’s drinking water intake, and it would have only taken a half-hour to conduct that analysis, and that those acknowledgements were made four (4) months prior to the release of the FEIR/EIS and years after Stockton had first put the agencies on notice of its specific concerns, is strong evidence that the response was not made in good faith.</p>	<p>While time was not the deciding factor in the original selection of Delta assessment locations, it should be noted that preparation of the water quality modeling tables and assessment required many hours for each alternative (as opposed to the half hour estimate cited in this comment). As explained above in comment 10, The assessment locations in Chapter 8, Water Quality, were chosen such that the modeled water quality changes under the CWF alternatives, relative to baselines, would be representative of water quality changes in the various geographic portions of the Delta as a whole (Chapter 8, Water Quality in Draft EIR/EIS Sections 8.2.2.3 and 8.4.1.3, RDEIR/SDEIS Section 8.3.1.3, and Final EIR/EIS Sections 8.1.2.3 and 8.3.1.3). That response also explains why DWR and Reclamation believe impacts at Stockton’s drinking water intake to be fully captured by the assessment that has been done in the Final EIR/EIS.</p>
City of Stockton	20	<p>Finally, Stockton’s comments regarding water quality at its drinking water intake were designed to draw DWR and the Bureau’s attention to a significant environmental issue that the EIR had not addressed, i.e., whether the project would detrimentally effect Stockton’s drinking water source. A key purpose of the comment process is to bring deficiencies in the draft EIR to the attention of decision-makers. (CEQA Guidelines. §§ 15200, 15204.) Furthermore, the comment and response process “produces a <i>better EIR</i>, by bringing attention of the public and decision-makers significant environmental points that might [otherwise] have been overlooked.” (<i>Irvine, supra</i>, 238 Cal.App.4th at p. 557.) If the Lead Agencies had addressed water quality at Stockton’s drinking water intake it would have made for a better EIR. It would have made an EIR that addressed the effects to drinking water for a city of 300,000 people. Instead, these comments were not addressed in any meaningful way, and Stockton’s concerns are being “swept under the rug.” (See <i>Irvine</i> at p. 553.) The responses to Stockton’s comments regarding water quality effects to its drinking water intake are inadequate because they are not detailed, reasoned, or provided in good faith, resulting in an inadequate EIR/EIS.</p>	<p>This comment is about water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>

Letter	Comment #	Comment	Relation to Final EIR/EIS
City of Stockton	21	<p>Comments Regarding Impacts to Stockton's Wastewater Discharge</p> <p>The FEIR/EIS's response to Stockton's comments expressing concern about impacts to its wastewater discharge are similarly inadequate. For example, although Stockton's comment 8 in Letter 1655 mentioned flow reductions, the essence of the City's concern as expressed in the comment was the potential for Project operations to result in increased concentrations of water quality constituents that would adversely affect Stockton's ability to comply with its National Pollutant Discharge Elimination System (NPDES) permit discharge requirements. (FEIR/EIS, Vol. 11, Part 2-1, Letter 1655, Comment 2, p. 122.) The response cites irrelevant and nonspecific evidence that long-term average flows at Vernalis would be "similar" as the basis for its determination that the Project would not have significant impacts on water quality concentrations at the location of the City's discharge. However, the City's wastewater discharge location is approximately 30 miles downstream of Vernalis. Flows in the San Joaquin River at Vernalis are affected by the operation of upstream facilities on the San Joaquin, Merced, Tuolumne, and Stanislaus Rivers, as well as by deliveries to the Mendota Pool from the Delta-Mendota Canal and overflows from the Kings River in the Tulare Lake Region. As a result, it is not surprising that the Project's diversions on the Sacramento River near Sacramento might have minimal impact on those flows, or resulting water quality at that location, especially when considered only in terms of long-term average changes.</p>	<p>Generally, changes in receiving water conditions could affect an NPDES discharger if that discharger's permit has effluent limitations that incorporate dilution credit and a mixing zone that allows for achieving water quality criteria. The effect would be on the effluent limitation value and would depend on the specific constituents for which the discharger has dilution credit. The extent of effect on a discharger would depend on the amount of dilution credit available versus what is needed by that discharger to sufficiently dilute the discharge to meet water quality at the edge of the mixing zone. The two factors that affect dilution credit are ambient dilution flows and ambient constituent concentrations for which the dilution credit has been granted (i.e., assimilative capacity). Regarding flow, Appendix 5A, Section C of the Final EIR/EIS presents modeling results for flow at Vernalis (section C.62, beginning at page 5A-C1836). Table C-62-6 in Appendix 5A, Section C shows that there would be very little to no change in San Joaquin River flow at Vernalis relative to the No Action Alternative. Additionally, as stated in Chapter 6, Surface Water, the average of highest flows simulated (flows with probability of exceedance of 10% or less) under Alternative 4A would remain similar (or show less than 1% change with respect to the channel capacity: 52,000 cfs) as compared to the flows under Existing Conditions. Hence, the basis for the statement that flows at Vernalis would be similar. Regarding water quality, the Final EIR/EIS concluded that the CWF would have a less than significant impact to water quality in the region of the Delta where the City's wastewater discharge is located, including the San Joaquin River upstream of the Delta, which is the basis for determining available assimilative capacity for dilution credit. Also see Master Response 14, in Volume 2, Final EIR/EIS, regarding water quality impacts.</p>
City of Stockton	22	<p>By contrast, the Exponent Report shows the likelihood that Project-related water quality effects will be increasingly more substantial as the San Joaquin River flows north towards its confluence with the Mokulumne and Sacramento Rivers, which contribute freshening flows that contribute to higher water quality in the San Joaquin River, because the Project will significantly reduce the fraction of cleaner water from those other sources, resulting in higher concentrations of chloride in the San Joaquin River. Moreover, the fact that long-term average data shows generally that flows will be "similar" compared to existing conditions does not address whether more substantial changes will occur on a shorter term basis, such as days or weeks, which is the relevant timeframe for wastewater discharge compliance, or by how much. It is reasonable to assume, based on the evidence in the Exponent Report, that the Project could cause substantial short-term increases in salinity (electrical conductivity (EC)) and other constituents, such as bromide, that will compromise Stockton's ability to comply with its NPDES permit.</p>	<p>This comment is about water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
City of Stockton	23	<p>Master Response 15, Effects on National Pollutant Discharge Elimination System Dischargers, cited in the response to these comments, also does not adequately address the City's concerns. That response indicates that the FEIR/EIS identified significant impacts to certain unspecified municipal water suppliers and NPDES dischargers as a result of higher levels of salinity related parameters, and states that the Lead Agencies "will implement mitigation measures to address the higher levels of salinity-related parameters that are of concern, as to minimize the impacts on Delta municipal water suppliers, and thus municipal wastewater dischargers." (FEIR/EIS, Vol. II, Part 1, Master Response 15, p. 1-138). The response also explains that DWR and Reclamation will adjust operations in "real time" to achieve compliance with EC and chloride objectives. This response is neither relevant to Stockton's concerns, nor assures the City that its water supply will be protected, because the City's drinking water intake is on the San Joaquin River, and there are no established water quality objective compliance points for chloride on the San Joaquin River. Moreover, a project can comply with a water quality objective and still result in substantial degradation of water quality compared to existing conditions.</p>	<p>This comment is about water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>

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City of Stockton	24	Further, the mitigation measures noted in the response are not identified) making it difficult to determine what the response was referring to. Mitigation Measure WQ-7, which calls for the Lead Agencies to "[c]onduct additional evaluation and modeling of increased chloride levels and develop and implement phased mitigation actions" and related sub-mitigation measures WQ-7a-7d do not apply to the preferred Alternative 4A, as the FEIR did not identify a significant impact to chloride for Alternative 4A. (FEIR/EIS, Vol. I, Executive Summary, p. ES-61.)	This comment is about modeling, mitigation, and water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	25	In an appendix to the FEIR/EIS, the FEIR/EIS proposes a new environmental commitment, 3B.3.1, Assist Water Purveyors in Developing Methods to Reduce Potential Water Quality Effects. (FEIR/EIS, Vol. I. Appendix 3B p. 3B-76 <i>et seq.</i>) Notably, this environmental commitment is limited to in-Delta water purveyors "that will be subject to significant unavoidable water quality effects from operation of the water conveyance facilities and effects on dissolved oxygen (DOC) due to habitat restoration activities." (<i>Id.</i> at pp. 38-76-77.)	This comment is about water quality and Environmental Commitments. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. Potential effects related to restoration actions under Alternative 4A, would be much less than indicted for Alternative 4 in the Draft EIR/EIS because of the reduced amount of habitat restoration required for Alternative 4A. Please refer to Final Chapter 3, Description of Alternatives.
City of Stockton	26	However, as noted, the FEIR/EIS did not identify a significant unavoidable impact from the preferred Alternative 4A, and discusses impacts from Alternative 4A only in terms of water quality objective exceedance and substantial degradation in the Western Delta (FETR/EIS, Vol. II, Part 1, Master Response 14, p. 1-125), which does not include Stockton. Also, given that the FEIR/EIS claims that impacts to chloride for Alternative 4A would be less than significant, this mitigation would not even apply to the Project the proponents propose to approve. If it does apply, and impacts are considered to be significant and unavoidable, then the RDEIR/EIS should have been recirculated. (CEQA Guidelines, § 15088.5(a) [recirculation required when new significant impact identified].)	This comment is about water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	27	Environmental Commitment 3B.3.1 Is Insufficient to Address Potential Impacts to Stockton's Water Supply and Wastewater Operations and Does Not Excuse the Lead Agencies from the Requirement that the EIR/EIS Actually Evaluate Project Impacts Even assuming it would apply to Stockton, Environmental Commitment 3B.3.1 raises more questions about the Project proponents' commitment to mitigate significant impacts than it answers, and does not satisfy CEQA's standards for mitigation. If its purpose is to mitigate the Project's significant unavoidable water quality effects, why are these effects not identified in the FEIR/EIS? The FEIR/EIS does not identify significant impacts from the preferred Alternative 4A. Given that it does not identify which municipal water purveyors could be subject to significant unavoidable effects, when and how will this assessment be made, and by whom?	This comment is about Environmental Commitments, mitigation adequacy, and water quality. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	28	The commitment indicates that the Project proponents would provide financial assistance to "fully offset any increased treatment or delivery costs" in order to supply water of acceptable quality. (FEIR/EIS, Vol. I, Appendix 3B, p. 3B-77.) It further states that "it is anticipated that any solutions would be devised by the affected purveyors in consultation with project proponents after thorough investigation and completion of environmental review." (<i>Id.</i>) This measure thus appears to shift the burden of identifying Project-related impacts to the affected purveyors, like Stockton, and further qualifies the mitigation commitment by requiring Project proponent concurrence that a significant unavoidable impact has occurred, thus giving the Project proponents an effective "veto" over any mitigation identified as necessary by affected parties (i.e., "Assistance for construction and/or operation of facilities or the procurement of replacement sources shall be limited to reasonable, cost-effective solutions developed with input from the project proponents."). (<i>Id.</i>) Given the Lead Agencies' refusal to analyze or acknowledge potential impacts to Stockton, and the opposition from	This comment is about Environmental Commitments and mitigation. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.

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		<p>other Project proponents, to Stockton's legitimate concerns expressed in the associated water rights change proceedings, Stockton currently has zero confidence that any Project proponent would be willing to acknowledge that significant impacts to Stockton will occur, or agree to fund the necessary solutions. In any event, CEQA requires that a lead agency make a firm commitment to avoid or mitigate the impacts of its projects. Shifting the burden for analysis of those impacts to the affected parties while retaining veto power over the appropriate means of mitigating identified impacts, as the Lead Agencies have done here, violates CEQA.</p>	
City of Stockton	29	<p>Finally, even if the Project proponents were willing to engage in good faith analysis and negotiation with Stockton on these issues, the options identified for mitigating impacts to municipal suppliers from increased chloride and bromide are all likely infeasible as regards to Stockton. <i>(Id.)</i> The mitigation identified includes providing funding to acquire alternative in-basin water supplies but suggests that measure is limited to effects to Los Vaqueros Reservoir. Plus, the lack of other in-basin water supplies was a key factor in the City's decision to obtain its own surface water right to divert from the San Joaquin River and construct its Drinking Water Supply and Treatment Plant facilities, which required an investment of over \$223 million dollars. There is no evidence that other options identified for municipal uses (develop water supply connections to SWP facilities or BDCP interties or develop demand management/or conservation recycling projects to extend available water supplies) would be feasible on the scale needed to replace Stockton's surface water supply, in light of Exponent's findings regarding the substantial increase in number of days the Project would render its source water unusable. Average maximum daily demand within Stockton's municipal service area is approximately 42 million gallons per day. There is no evidence to suggest alternative supplies in this amount could be available to Stockton, or that they could be developed and implemented in a cost effective manner. Even if alternative supplies were somehow made available, the variable nature of the impact to Stockton's water supply would make the coordination and delivery of such supplies highly problematic. Thus Environmental Commitment 3B.3.1, like Mitigation Measure WQ-7, provides no assurance that the Project's significant impacts to Stockton's water supply or wastewater discharge will or could be mitigated.</p>	<p>This comment is about mitigation, water supply, and wastewater discharge. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
City of Stockton	30	<p>Environmental Commitment 3B.3.1 does not satisfy CEQA's standards for mitigation because it lacks information that would demonstrate its feasibility. Moreover, simply including this mitigation in the FEIR/EIS does not excuse the Lead Agencies from their obligation to actually evaluate the nature and extent of potential impacts to Stockton's operations. Knowing the extent of potential impacts under the potential operating scenarios, including Boundary 1 and Boundary 2, is essential to understanding the nature and severity of any associated environmental impacts that could result if Stockton were unable to divert water for municipal use or discharge wastewater to the San Joaquin River, including if it were required to construct and operate additional treatment facilities. Given the clear potential for significant impacts acknowledged in Environmental Commitment 3B.3 .1, the FEIR/EIS must be revised to evaluate, disclose, and fully mitigate the full range of impacts resulting from Project-related changes to Stockton's water supply and wastewater discharge.</p>	<p>This comment is about Environmental Commitments, mitigation, water supply, and wastewater discharge. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
City of Stockton	31	<p>Conclusion</p> <p>Despite Stockton's good faith participation in the multiple rounds of environmental review for the Project, the Lead Agencies have continued to ignore Stockton's concerns. The FEIR/EIS's many inadequacies deprived Stockton and its 300,000 residents of meaningful information about the Project's significant impacts to its water supply and mitigation for those impacts. Therefore, the document fails to "protect the environment and demonstrate</p>	<p>This comment is about CEQA adequacy. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>

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		to an apprehensive public that the agency has, in fact analyzed and considered the ecological implications of its action [in approving the Project]." (CEQA Guidelines, § 15003(b); <i>No Oil Inc. v. City of Los Angeles</i> (1974) 13 Cal.3d 68, 86.) When considered in light of the extensive unidentified revisions and additions to the FEIR/EIS and the substantial evidence that the Project will result in significant impacts to Stockton's water supply that were not evaluated, disclosed, or mitigated in the FEIR/EIS, the inadequacies are sufficiently substantial that the document must be revised and a new Draft EIR/EIS circulated to the public for review.	
City of Stockton	ATT 1	Exhibit A: August 30, 2016 Testimony of Robert Granberg, P.E., submitted in the Hearing in the Matter of California Department of Water Resources and United States Bureau of Reclamation's Request for a Change in Point of Diversion for California WaterFix	This attachment is Exhibit STKN-010 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 2	Exhibit A: August 30, 2016 Testimony of Robert Granberg, P.E., submitted in the Hearing in the Matter of California Department of Water Resources and United States Bureau of Reclamation's Request for a Change in Point of Diversion for California WaterFix	This attachment is Exhibit STKN-011 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 3	Exhibit A: August 30, 2016 Testimony of Robert Granberg, P.E., submitted in the Hearing in the Matter of California Department of Water Resources and United States Bureau o Reclamation's Request for a Change in Point of Diversion for California WaterFix	This attachment is Exhibit STKN-023 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 4	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Water Board Hearing Transcript (August 25, 2016) presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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City of Stockton	ATT 5	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Exhibit STKN-01 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 6	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Exhibit STKN-05 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 7	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Exhibit STKN-07 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 8	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Exhibit STKN-06 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 9	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment is Exhibits STKN-08 and STKN-09 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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City of Stockton	ATT 10	Exhibit B: California WaterFix Water Right Change Petition Hearing Transcript, Aug. 25, 2016, Vol. 15, pp. 108-109, and associated Exhibits	This attachment was received during a previous comment period does not raise any substantive new environmental issues that were not previously addressed in Volume 2, response to comment letter 1655 and comment letter 2496 of the Final EIR/S.
City of Stockton	ATT 11	Exhibit C. January 30. 2017 Exponent External Memorandum re: Technical Comments on California WaterFix and Associated final Environmental Impact Report and Environmental Impact Statement(FEIR/EIS)	As responded to in the body of the letter, the Exponent assessment of chloride impacts at the City of Stockton's drinking water intake is inconsistent with the methodology used for the EIR/EIS assessment. For one, the Exponent assessment compares conditions under the Proposed Project to conditions under a different baseline EBC2. The proper baseline for assessing impacts of the Proposed Project isolated from effects of climate change and sea level rise is the No Action Alternative, which has been discussed in the Final EIR/EIS. Further, the Exponent analysis uses a threshold for chloride of 110 mg/L, which is the City's preferred upper limit for chloride; the state's adopted water quality objective for the Delta at the City's intake location for protection of the municipal and domestic supply beneficial use is the state's drinking water maximum contaminant level, which is 250 mg/L recommended, 500 mg/L as an upper level, and 600 mg/L as a short-term level. The 250 mg/L MCL was used, in part, to make determinations regarding chloride impacts in the EIR/EIS, as this is the state's adopted objective.
City of Stockton	ATT 12	Attachment 1: Curriculum vitae of Susan C. Paulsen, Ph.D., P.E.	This attachment is Exhibit Brentwood-102 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.

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City of Stockton	ATT 13	Attachment 2: Exponent (2016). Report on the Effects of the Proposed California WaterFix Project on Water Quality at the City of Brentwood. Exhibit Brentwood-102 of the WaterFix Change Petition Proceedings. August 30, 2016	This attachment is Exhibit Brentwood-102 presented for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials.
City of Stockton	ATT 14	Attachment 3: Source water fingerprinting at the City's intake and Buckley Cove for NAA and EBC2 scenarios during critical, dry, normal, and wet water year types	The attachment is water source modeling. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.
City of Stockton	ATT 15	Attachment 4: Chloride concentrations at the City's intake and Buckley Cove for NAA and EBC2 scenarios during critical, dry, normal, and wet water year types	This attachment presents modeling results for chloride in a manner inconsistent with the modeling and assessment methods in Chapter 8 and supporting appendices. The approach and rationale for the chloride assessment periods has been addressed in the Final EIR/EIS in both Chapter 8 and in responses to comments, Volume 2, on the Draft EIR/EIS and RDEIR/SDEIS. Further, EBC2 is not the appropriate existing conditions modeling run, which also has been addressed in the Final EIR/EIS in responses to comments.
City of Stockton	ATT 16	Attachment 5: Source water fingerprinting at the City's intake and Buckley Cove for Boundary 1, Boundary 2, Alternative 4A, and EBC2 scenarios during critical, dry, normal, and wet water year types	These graphs are used to illustrate that the source water fractions at these locations would change under the different scenarios. The mass-balance constituent modeling for the Chapter 8 assessment is based on the modeled source water fractions for each scenario, thus, captures changes under the scenarios. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.
City of Stockton	ATT 17	Attachment 6: Chloride concentrations at the City's intake and Buckley Cove for Boundary 1, Boundary 2, Alternative 4A, NAA, and EBC2 scenarios during critical, dry, normal, and wet water year types	These graphs are used to illustrate that the source water fractions at these locations would change under the different scenarios. The mass-balance constituent modeling for the Chapter 8 assessment is based on the modeled source water fractions for each scenario, thus, captures changes under the scenarios. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.