

From: [David Fries](#)
To: [Delta Engage](#)
Subject: Public Comment for Jan 23, 2025 Meeting
Date: Wednesday, January 22, 2025 11:37:02 AM
Attachments: [Geotechnical Petition to DSC 01-23-25.docx](#)

I will not be able to attend the January 23rd meeting due to previous commitments. Please have the attached comment letter submitted to the Council. Preferably, I would have the comments read into the proceedings.

Thank you for your attention to my request.

David S Fries, Ph. D.
Conservation Chair
San Joaquin Audubon Society

“Birds have wings; they're free; they can fly where they want when they want.

They have the kind of mobility many people envy.” – [Roger Tory Peterson](#)

January 22, 2025

To: Delta Stewardship Council

RE: Comments on Certification of Consistency Number C20242

The San Joaquin Audubon society Chapter opposes granting the Department of Water Resources the authority to begin geotechnical activity in the Delta that is associated with the Delta Conveyance Project. Our opposition is based on the following facts:

1. The geotechnical activities will damage habitat that is essential for the survival and reproduction of avian species.
2. The damage to the habitat is unmitigated.
3. The Delta Plan requires equal benefit to the project and to the Delta. There is obviously great benefit to the Delta Conveyance Project by the geotechnical work and ZERO benefit to the Delta.
4. The geotechnical work, over an unidentified and understated time period (in terms of start and finish dates or seasons of the year), will obstruct our members' birdwatching activities in the Delta and thus violate our public trust rights.
5. A project of this size, separated from the larger Delta Conveyance Project, (which undeniably it is part of), must have its own CQUA and EIR approvals.

The geotechnical activities are stated to drill 261 bore holes along the route of the proposed Delta Conveyance Project. Each drill site is stated to take about 10 hr. on average. That makes a total of around 2,600 hr. of work in the Delta. The claim is that each site will occupy only 0.022 acre of space at so called "discrete locations." There are few discrete locations in the Delta and the sites, where drilling is to occur, must be identified before the project can be considered for approval. In addition to the 0.022 acre (about the space needed to park a drilling apparatus), each drill site is stated to require a "staging area". The size of the staging area, and the habitat that it is in, must be identified and accounted for in terms of potential mitigations required by law. In addition, there will be periods of time necessary for setting up and cleaning up for each drill site. Access to the proposed drill sites by the heavy equipment required for the drilling process is not described and is likely to cause additional damage to avian and mammalian habitat.

The petitioner (DWR) describe no benefit that the geotechnical work will give to the Delta and fail to identify the potential harm it will cause. The number of workdays needed to do the geotechnical work is significantly understated. Therefore, it fails to meet the co-equal goals required by the Delta Plan and must be rejected by the Council.

Respectfully submitted,

David S. Fries, Ph.D.

Conservation Chair

San Joaquine Audubon Society

