



February 8, 2023

Mr. Zachary Simmons
Project Manager
U.S. Army Corps of Engineers
DLL-DCP-EIS@usace.army.mil

SUBJECT: Comments on the Delta Conveyance Project Draft Environmental Impacts Statement

Dear Mr. Simmons:

The undersigned coalition of interests supports the proposed Delta Conveyance Project identified in the Draft Environmental Impacts Statement (the Bethany Reservoir Alignment, Alternative 5 – as identified in the Department of Water Resources’ Draft Environmental Impact Report), which is vital and essential to completing the voter-approved State Water project and modernizing California’s water transport infrastructure. The State Water Project and the water that flows through its vast network of infrastructure is the backbone of the state’s invaluable water supply for 27 million Californians. The Delta Conveyance Project is a landmark investment in the state’s incomplete and aging water infrastructure and a vital project for California’s future. The state-of-the-art water conveyance solution described as the Bethany Reservoir Alignment in the Department of Water Resources’ Draft EIR (hereinafter referred to as the Proposed Project or Proposed Alternative) will ensure that tens of millions of Californians will have clean, reliable, and affordable water for generations to come.

The local infrastructure that the State Water Project is reliant upon to protect, collect, and move water through the Delta to California homes, farms, and businesses was constructed more than 50 years ago, and as a result of many factors, is at ever-increasing risk of failure from climate change, sea level rise, and seismic conditions. The Delta Conveyance Project proposed alternative is the right project at the right time to help ensure the State Water Project can continue to meet California’s water needs into the future. The proposed alternative evaluated in the Draft EIS has been refined and structured in a manner that avoids and mitigates local environmental and community impacts within the Delta, and provides important assurances that the communities most affected by construction of the project are provided the means and resources to achieve local benefits. These important values are balanced with the urgent need to modernize the State Water Project’s Delta infrastructure to avoid a catastrophic disruption of our state’s primary water supply.

Collectively, our comments below on the Draft EIS focus on three primary themes that are important in the ongoing dialogue and consideration relating to adoption of a Record of Decision on the Final EIS and advancement of the project:

- **Critical need for new Delta Conveyance as a climate adaptation strategy**
- **Importance of new Delta Conveyance in embracing the commitment to protection and advancement of the Human Right to Water**
- **Value of Delta Conveyance to the Southern California and statewide economies**

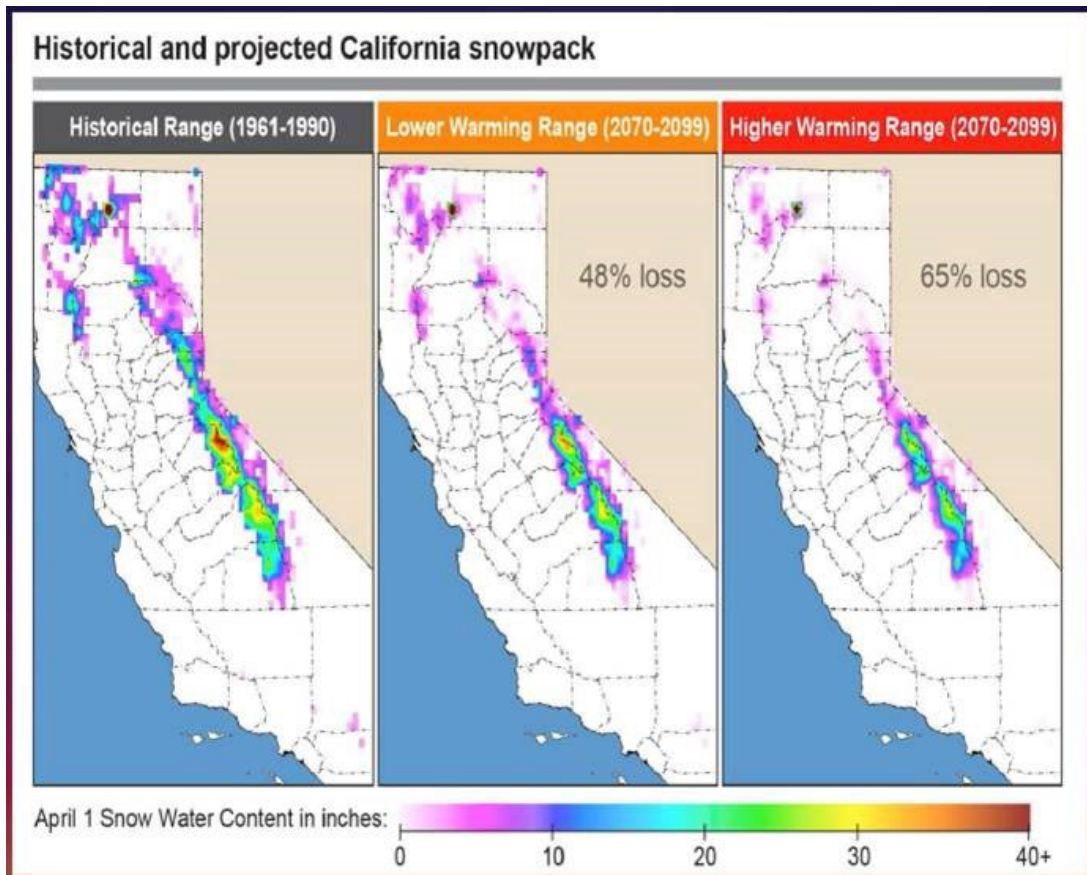
Delta Conveyance is an Active Climate Adaptation Strategy

Climate change is a real and present threat to California’s water reliability. Rising temperatures, decreasing snowpack, recurring and prolonged droughts, and heavy precipitation events are threatening our primary water delivery system, clearly demonstrating the need for a proactive solution that protects water supplies for generations to come. The evidence of climate change impact is squarely in front of us today and is exemplified in a review of trends and indices that demonstrate the need for climate adaptation and water use efficiency strategies – like the Delta Conveyance Project – to be undertaken immediately.

- **Shifting Hydrology:** Experts project a reduction in average California peak snowpack water volume over the next 60-80 years of 79 percent, and the peak timing – which has historically been around April 1 of each year – could move up by as much as four weeks, meaning that snow melt will occur earlier in the season, exacerbating the challenges for water managers to ensure that water supplies are available when in most demand.¹ In addition, in a recent study by the Lawrence Berkeley National Laboratory, it

¹ Lawrence Berkeley National Laboratory Report – December 11, 2018

was found that snowpacks – specifically in the western United States – will drastically decline or become non-existent by the end of the next century. The study predicts that the Sierra Nevada snowpack could decrease approximately 45 percent by 2050.² This presents a threat to endangered and threatened fish species as well that can be best protected and managed by the construction and operation of the proposed Project.



- **Warming Temperatures:** Evaluation undertaken pursuant to California’s Fourth Climate Change Assessment concludes that mid-century impacts of warmer temperatures (including a +2.5F degree projected increase in California’s average annual temperature by 2069), changing hydrology, and sea level rise indicate that the significant stresses exerted by climate change will reduce Delta exports by 500,000 acre-feet per year and north-of-Delta carryover storage will diminish by 1.5 million acre-feet. The analysis indicates that average maximum temperatures are projected to increase around 4.4 – 5.8 degrees Fahrenheit by the mid-century and 5.6 – 8.8 degrees Fahrenheit by the late-century.⁴
- **Sea-Level Rise:** Analysis of sea-level rise indicate that roughly 1-2 feet of sea-level rise is projected by the mid-century, and the most extreme projections indicate up to 8-10 feet of sea-level rise by the end of the century. The effects of storm surges could be more immediate and damaging to existing levees and

² Lawrence Berkeley National Laboratory – *A Low-To-No-Snow Future and Its Impacts on Water Resources in the Western United States*, October 26, 2021

³ California Department of Water Resources – *Climate Change and Water* – [Climate Change and Water \(ca.gov\)](https://www.ca.gov) – accessed August 2022

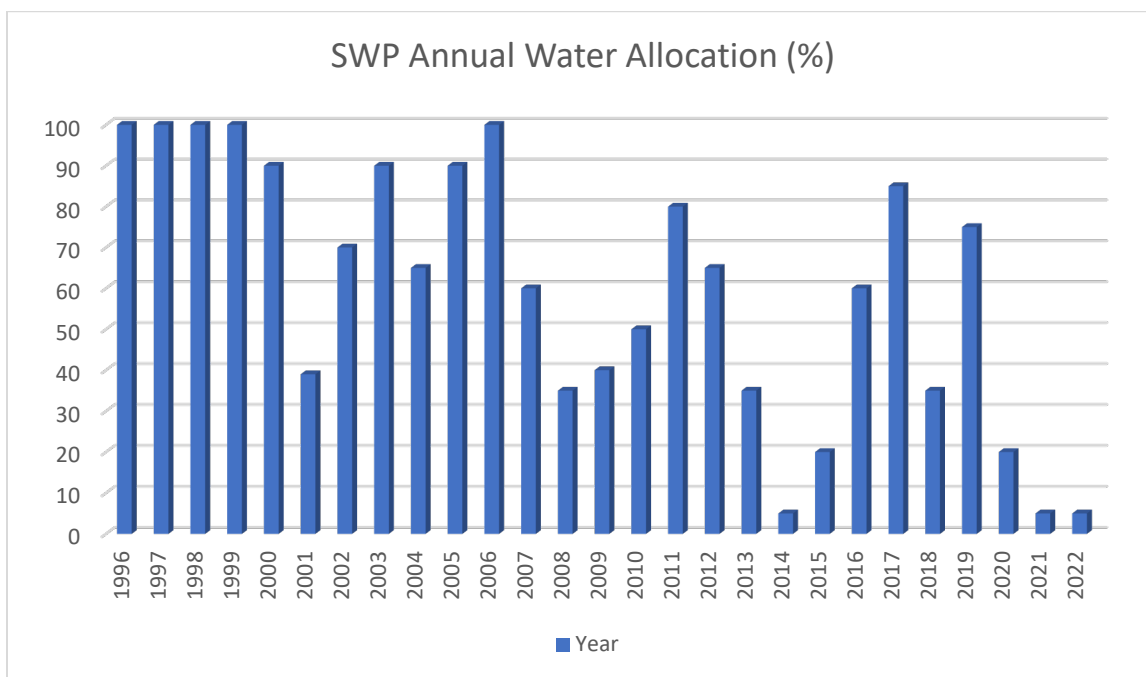
⁴ California’s Fourth Climate Change Assessment, “Mean and Extreme Climate Change Impacts on the State Water Project,” Wang, J., Yin, H., Anderson, J., Reyes, E., Smith, T., Chung, F. – August 2018

Delta land behind the levees, below sea level.⁵ As sea levels continue to rise, the Delta will be faced with increasing saltwater intrusion into the inner Delta, which threatens clean water supplies conveyed by the single water diversion point in the South Delta.

- **Seismic Risk:** Rising sea-level could threaten the viability of the local Delta levee system, putting the drinking water supply system for millions of Californians at perpetual risk. According to the U.S. Geological Survey, there is a 72 percent chance of a 6.7 or greater magnitude earthquake occurring in the San Francisco Bay Area by 2043 that could cause levees in the Delta to fail, crippling the state’s ability to deliver clean water.⁶

Addressing the climate crisis requires transformational, systems-wide changes, and unprecedented collective action. California is driving toward these shifts through an increasingly integrated approach, with a broad range of plans that advance climate action. The proposed Delta Conveyance Project is a climate adaptation strategy that is designed to help California address its changing climate future.

While many of scientific evaluations of climate change examine California’s potential future under a changing climate, the evidence of climate change is already exemplified in the frequently changing hydrology that the State Water Project has been experiencing over recent years.



As evidenced by the annual State Water Project allocations, particularly over the past 15 years, the unpredictability of California’s water supply for state water contractors has shifted dramatically. Not only has the State Water Project been unable to achieve a 100 percent allocation of supply in the last 16 years, the unpredictable availability and extreme variability of water supplies on a year-to-year basis has created an untenable situation for water managers planning the reliability and resiliency of water supplies for their communities.

⁵ California’s Fourth Climate Change Assessment, “Statewide Summary Report,” August 2018

⁶ California Department of Water Resources – *Why Delta Conveyance* – June 10, 2019

Capture and conveyance of water in and through the Delta is an important adaptation strategy to mitigate potential water system losses in other areas due to changing precipitation patterns and seasonal runoff. The Delta Conveyance Project is expected to allow continued water deliveries and operational flexibility should catastrophic levee failure from seismic activity, extreme weather, pressure from sea-level rise, or other disasters that may temporarily disrupt routing or quality of surface water supplies.

The proposed Delta Conveyance Project will ensure that the State Water Project can capture, move, and store water when it is available, even through extreme weather events and climate trends. The proposed project is an essential climate adaptation strategy and a crucial part of Governor Newsom's portfolio approach to water management, helping California water agencies develop their local water supply projects.

Delta Conveyance Embraces the Commitment to Protection and Advancement of the Human Right to Water

Many disadvantaged communities and water ratepayers across California need an affordable, high-quality water supply, especially as the cost of living continues to escalate and external factors – like drought and climate change – continue to exacerbate water affordability challenges for millions of Californians. Affordability of reliable water directly impacts our society's quality of life.

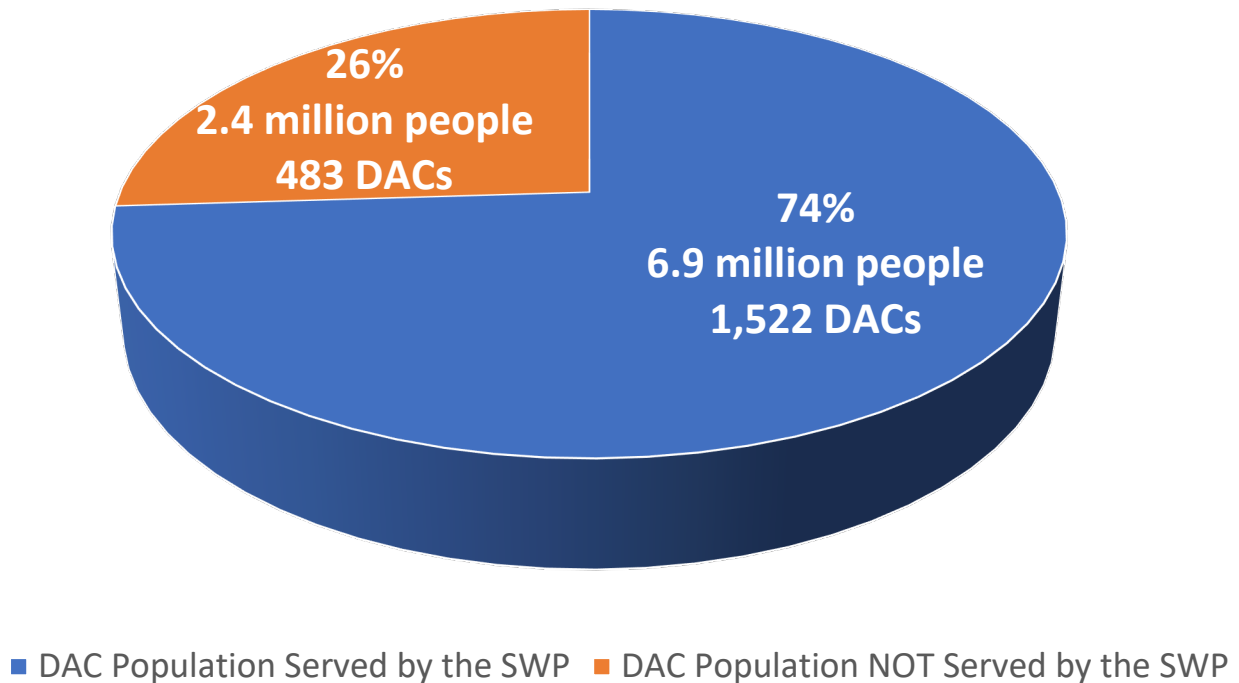
Water supplies delivered through the State Water Project from the Sierra Nevada snowpack source remains the most affordable option to consumers, especially compared with development of new local water supply projects. A basic tenant of affordability is to efficiently use existing infrastructure to the greatest extent achievable. Failure to construct the Delta Conveyance Project risks loss of use and underutilization of the investments made by taxpayers and ratepayers of the State Water Project over decades. Replacement of the water supply available from the State Water Project is not readily affordable, and certainly not simply feasible to accomplish. Moreover, the water quality benefit of the State Water Project for all users is irreplaceable.

More than 27 million Californians rely on imported drinking water conveyed through the Delta. This imported water also serves millions of acres of local agricultural lands and vital wildlife refuges. The reliability of that imported water supply is threatened by a variety of real-time risks, including climate change, sea-level rise, increasing regulatory restrictions, seismic risks, and deteriorating ecosystem conditions. The Delta Conveyance Project will help address many of these challenges.

In a catastrophic failure of the existing State Water Project delivery system or inattention to addressing real-time climate change risks to the system, lower-income and disadvantaged populations would be most negatively affected by the impacts. Scarcity of resources and substantially less affordable water supply options would exacerbate water affordability challenges for millions of Californians and strike at the heart of efforts to be stewards of the Human Right to Water.

In addition to the increased water security, climate adaptability, and environmental benefits the Delta Conveyance Project would provide, it is particularly important for the approximately 1,500 disadvantaged communities throughout the state that rely on the State Water Project for affordable, clean water. The State Water Project provides approximately three-fourths of California's disadvantaged communities with some or all of their water supplies.

Disadvantaged Communities (DACs) Served by the SWP



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The Delta Conveyance Project provides important protections against the potential for public health and safety impacts on Californians – including millions of disadvantaged Californians – from reduced quantity and quality of State Water Project deliveries, ensuring that the promise advanced by the Human Right to Water is recognized and advanced in a meaningful way.

Importantly, the Draft EIS for the Delta Conveyance Project analyzes disproportionate impacts on minority and low-income communities (environmental justice communities) from construction, operation, and maintenance of the project. While an environmental justice analysis is not required by CEQA, state policies and statutes do instruct state agencies to consider the impacts of action on environmental justice communities. This coalition also encourages an evaluation of the **benefits** to environmental justice communities and the stewardship of the Human Right to Water as a result of advancement of the Delta Conveyance Project to protect drinking water accessibility, availability, affordability, and quality.

Delta Conveyance Protects the Southern California and Statewide Economies

A stable economy relies on solid infrastructure, a healthy workforce, and stable supply chains. Each of these economic pillars is impacted by climate change. With an increasing number of, and more severe, wildfires and droughts, California's economy is already experiencing the economic instability caused by climate change.

Water delivered through the State Water Project remains the most cost-effective source of water for Californians and fuels our state's economy, which is the fifth largest in the world. However, the weakest link of the State's water delivery system – which is the Sacramento-San Joaquin Delta – has a local human-made dirt

⁷ Data represents an approximation of DACs served by the State Water Project per the [SB 535 CalEnviroScreen Data](#)

levee infrastructure that is old and highly vulnerable to the natural forces of earthquakes, sea-level rise, floods, and climate change. Over the past several decades, billions of dollars of investments have been made in the State Water Project, and the Delta Conveyance Project is the next essential investment. Building a large-capacity single tunnel under the Delta protects the state's most valuable and affordable water supply and protects the public's investment in the State Water Project.

Southern California accounts for approximately 60 percent of the state's population and the region is an economic driver for the state. In an analysis by the UCLA Anderson School of Management, Southern California's gross domestic product reached \$1.6 trillion in 2021, which places the region as the 13th largest economy in the world (between Australia and Brazil)⁸. In most years, water supplied by the State Water Project is the single-largest source of supply into the region, and the economic sustainability is directly tied to the reliability of water supplies conveyed through the State Water Project, which makes the Delta Conveyance Project an essential component of economic sustainability for the region and the state.

Water plays many roles in California's economy. Every business and household uses water for a variety of purposes, both to support daily human needs and in the production of agricultural and industrial products and other goods and services. Safe drinking water is invaluable to the California economy, preventing waterborne illness and death. Water management itself is an important sector of California's economy. Numerous public agencies and private businesses manage water supplies and wastewater, provide flood protection, and help support environmental amenities. These activities directly account for billions of dollars in operating and investment expenditures, as well as value-added economic activity associated with related and indirect industry.⁹

Clean, reliable water supplies provide numerous economic benefits to the entire Southern California region and the state. Direct investments in water infrastructure ripple throughout the entire economy by creating new jobs, expanding business opportunities, and fostering economic competitiveness. In a snapshot analysis focusing solely on San Diego County investments in water infrastructure over the past 20 years, the San Diego Economic Development Corporation released an economic analysis relating to water infrastructure investments in 2018. The analysis found \$2.4 billion of investments in regional water reliability infrastructure has had the economic effect of generating approximately \$4.8 billion in total economic impacts within the region, supported approximately 1,500 jobs annually, and resulted in nearly \$1.8 billion in local wages and salaries¹⁰. Similarly, an analysis undertaken by the Los Angeles Economic Development Corporation regarding the regional economic benefits of the Metropolitan Water District of Southern California's Regional Recycled Water Program, concluded that the direct expenditures on labor, materials, power, construction, and more by Metropolitan Water District will work its way through the economy and create indirect and induced benefits for a wide range of businesses. State and local governments stand to gain as well from the hundreds of millions of dollars in tax revenues that the program will generate¹¹.

Not only will the Delta Conveyance Project have the intended effect of protecting and sustaining California's robust and world-leading economy, the project will also create direct economic stimulus through job creation and operations investments, plus the added benefit of the multiplier effect from infrastructure investment by generating tremendous economic activity for related, peripheral, induced, and indirect industries that will also benefit economically from advancement of the Project.

⁸ UCLA Anderson School of Management – Yu, William – *UCLA Anderson Forecast* – December 8, 2021

⁹ Public Policy Institute – *Water and the California Economy* – May 2012

¹⁰ *The Importance of Water Reliability to San Diego's Economy* – San Diego Economic Development Corporation – June 2018

¹¹ *Metropolitan Water District: Regional Recycled Water Program* – Institute for Applied Economics – Los Angeles Economic Development Corporation – August 2021

Conclusion

Our collective support for the Delta Conveyance Project cannot be underscored enough. There are tremendous multi-benefits associated with this project, and we have focused on emphasizing the direct benefits of the project as a climate adaptation strategy, as a means for providing stewardship toward advancement of the Human Right to Water, and for protection of the Southern California and statewide economies. But, there are many additional positive and beneficial attributes of moving forward toward approval of a Record of Decision on the Final EIS to begin construction on the Delta Conveyance Project, including:

- Protection of water supplies against climate impacts, including sea-level rise which threatens to impede fresh water and impact water quality
- Enabling local water supply projects by providing baseline flows for recycling, groundwater recharge, and potable reuse
- Facilitating capture and storage of water from wet years and large storm events
- Guaranteeing flexibility in the statewide water supply grid
- Improving water quality
- Enhancing affordability by blending costs of State Water Project water and local supply projects

The Delta Conveyance Project represents a landmark investment in the state's aging water infrastructure – and a vital project for California's future. The Delta Conveyance Project will modernize and upgrade a key section of the State Water Project, and this state-of-the-art water conveyance solution will ensure that nearly 27 million Californians will have clean, reliable, and affordable water for generations to come.

The proposed Delta Conveyance Project is a very different project from previous conveyance proposals. DWR took a fresh look at everything, and the current proposed project reflects significant changes and improvements to minimize impacts. Ultimately, the project has been downsized, refined, re-routed, and redesigned. In addition to the design changes to minimize impacts, the proposed project also includes a Community Benefits Program to ensure the communities most affected by construction of the project are provided the means and resources to achieve local benefits, and a commitment to ongoing community engagement with environmental justice communities, Tribes, and Delta communities.

Now is the time to act and move forward to protect California's water security. We greatly appreciate your consideration of our foregoing comments on the Draft EIS, and we encourage adoption of a Record of Decision on the Final Environmental Impacts Statement and the advancement of this essential project. Please don't hesitate to reach out to Charles Wilson, Executive Director of the Southern California Water Coalition, at cwilson@socalwater.org or at (949) 632-2074, if you have any questions regarding this comment letter.

Sincerely,

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