



March 10, 2020

Delta Conveyance Scoping Comments
Attn: Renee Rodriguez
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Dear Ms. Rodriguez:

RE: Notice of Preparation of Environmental Impact Report for the Delta Conveyance Project

On behalf of the 200 members of the Southern California Water Coalition, I thank you for the occasion to provide comments on the scope of issues and alternatives to consider in developing the Environmental Impact Report for single-tunnel Delta Conveyance. Our member organizations include leaders from business, regional and local government, agricultural groups, labor unions, environmental organizations, water agencies and the general public.

SCWC has consistently supported efforts to upgrade, improve and modernize the State Water Project's water delivery system through the Sacramento-San Joaquin Delta. We believe it is a vital project to allow water to move more reliably through the Delta. We appreciate Governor Newsom's support for a one-tunnel project and its inclusion as a key recommendation within the draft Water Resilience Portfolio.

In our view, a modern conveyance solution through the Delta is long overdue, has been studied for more than three decades, and should be moved forward now in order to secure the state's water supply from seismic vulnerabilities, sea level rise and other climate realities, which are well-documented through science. Below are our specific comments on four key areas of interest to Southern California.

1. Project Flow Capacity is Key

We support a tunnel capacity of up to 7,500 cfs as the right size for the proposed project. In that capacity range, the project brings the most benefits in addressing impacts of climate change and risk of earthquakes while protecting water quality, supply reliability and native fish populations. Smaller capacity proposals simply do not provide the same value for the cost of construction.

A tunnel size of up to 7,500 cfs with intakes above the anticipated sea level rise also ensures flexibility and efficiency in our water supply, enabling us to capture more water during wet years so it can be stored for dry years as well as preserve and recharge groundwater supplies.





2. Consider Carbon Emissions from Existing Farming on Delta Islands

As the environmental review process advances, it is critical that any examination of the probable effects of the project's construction on air quality and greenhouse gas be considered within the context of the massive concentrations of carbon dioxide historically, and currently, being emitted by long-standing farming practices on peat soils in the Delta..

The U.S. Geological Survey, California Department of Water Resources, HydroFocus and the University of California at Berkeley have been studying subsidence and GHG emissions since the 1980s and have found significant effects. Drained and cultivated organic soils continue to oxidize, subside and emit an estimated one to two million tons of CO₂ released into the atmosphere each year. Eliminating those emissions would be the equivalent of removing 300,000 vehicles from California's roads.

Some say that current farming practices on much of these lands are unsustainable, with the interior of Delta islands sitting as much as 30 feet below sea level and sinking every day. These practices also increase risk of the devastation that sea level rise or an earthquake could have on these friable levees built more than a century ago. We urge a holistic view of air quality and greenhouse gas emissions that not only looks at construction's effects but also at the larger landscape of current and harmful land use practices. Preservation and protection of the Delta "as a place" must account for the realities of carbon emissions caused by historical and current farming practices.

Fortunately, Delta island farmers have begun the inevitable conversion of this land into wetlands, swapping harmful agricultural practices for the restoration of habitat supporting wildlife. Farmers may soon be able to sell carbon capture and reduction credits at scale to help reduce the state's emissions. The Delta Conservancy through the Delta Carbon Program aims to complete the first-ever third-party verification of wetlands that quantifies the carbon emission reduction estimates from 1,600 acres of managed wetlands on Sherman and Twitchell islands operated by the California Department of Water Resources and we hope that these findings will inform a full view of air quality and greenhouse gas emissions related to construction of the Delta Conveyance project.

3. Local Supplies Require Reliable Imported Supplies

For decades, Southern California has invested in smart integrated water supply solutions such as groundwater recharge and storage, recycled water, captured runoff, and desalination of seawater and brackish groundwater.

However, a common misperception persists that initiatives like wastewater reuse, stormwater capture and reuse, household rain barrels and water use efficiency can replace imported water supplies for Southern California. This thinking ignores critical facts about the region's hydrology, the water conservation measures already in place, and the importance of this region and its residents, businesses and farmers to the state's economy.

Indeed, Southern California has invested—and will continue to invest—heavily in these types of programs that improve regional resilience and stretch scarce water supplies. However, these types of projects cannot entirely replace imported supplies. What they can do is ensure that we make the best possible use of our imported supplies by doubling or even tripling their use through water recycling and groundwater recharge and storage projects that allow us to use each drop



more than once. Of course Southern California will continue to leverage technology and behavior change to reduce water use—however many agree that increasing water efficiency becomes more difficult over time as demand hardens.

4. Project Benefits Far Outweigh Its Costs

Southern California’s \$1.6 trillion economy depends on a reliable supply of water from the State Water Project as part of the planning for future water supply resiliency. Thirty percent of our water supply comes from the State Water Project in an average year, sustaining life in our homes, businesses, communities, farms and environment.

This water supply is not just alimetal, it is one of the most affordable. The costs associated with alternative water supply solutions such as desalination, contaminated groundwater clean-up and stormwater capture and reuse can be significant and hard to meet in disadvantaged communities. By contrast, high-quality water from the State Water Project is affordable, even with construction of the single-tunnel conveyance project. That’s because past investments in the system have yielded that benefit. We must not turn our back on the past investments in this system. Instead we should acknowledge their value and make the additional investment toward modernization.

We Can Help

SCWC has organized a coalition of more than 300 organizations statewide that stand in support of a Delta Conveyance solution. The full list can be viewed here: <https://www.socalwater.org/supporters>. We are always available for collaboration and discussion, and to bring water leaders and experts from across our region and the state together.

Conclusion

We believe that 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, while safeguarding one of the richest ecosystems in the world.

I’m pleased to answer any questions you have about our comments on the scope of issues and alternatives to consider in developing the Environmental Impact Report for single-tunnel Delta Conveyance. Thank you again for this opportunity, and we look forward to working with you as the EIR process moves forward.

Best,

A handwritten signature in black ink, appearing to read "Charles Wilson", is written on a light-colored rectangular background.

Charles Wilson
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