



December 13, 2022

VIA email to deltaconveyancecomments@water.ca.gov

Department of Water Resources
Attn: Delta Conveyance Office
P. O. Box 942836
Sacramento, CA 94236-0001

RE: Comments on Draft Environmental Impact Report (DEIR) for Delta Conveyance Project

Dear Department of Water Resources:

The League of Women Voters of California appreciates the opportunity to comment on the current plan for Delta water conveyance.

The League has long-standing policies supporting reduced reliance on water exported through and around the Sacramento-San Joaquin Delta in favor of local reuse, wastewater recycling, and stormwater capture. In the Delta Reform Act of 2009, the California Legislature declared its intent to achieve two coequal goals for the Delta: providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem, which goals include reducing reliance on the Delta in meeting California's future water requirements.¹

However, it is clear from the DEIR that protection of—and even increase in—water project deliveries is the overriding objective of this plan.² Furthermore, the plan pursues consistency with the state's Water Resilience Portfolio, an

¹ Cal. Water Code §§ 85054, 85021.

² Delta Conveyance Project Draft EIR, Table 6-0, p. 6-3; Table ES-4, p. ES-51.

administrative document not subject to legislative input or review and hence not responsive to decisive public input, which the League strongly supports.

The State Water Project and federal Central Valley Project were developed and hold water rights based on precipitation conditions in the 20th century, which we now know were atypical in terms of 21st century surface water availability.³ In *Sustainable Water and Environmental Management in the California Bay-Delta*, the National Research Council of the National Academies has said that “The assumption that past climate is a reasonable approximation of the future is no longer valid....”⁴ This document makes it clear that the objective now should be to manage water scarcity.

Development of water infrastructure should follow, not precede, review of long-standing water project rights by the State Water Resources Control Board, making this project’s consideration premature. The Water Board itself concluded in 2009, that “[t]he best available science suggests that current flows are insufficient to protect public trust resources.”⁵ That conclusion represented flows under pre-drought conditions. We now face a warmer, drier climate, with an associated demand for more sustainable uses of our limited water supply.

The League has supported Water Board efforts to complete the Bay-Delta Plan to establish water quality control measures and flow requirements needed to provide reasonable protection of beneficial uses in the Delta and the Estuary. Given the National Research Council’s finding that in some basins, including those of the Bay-Delta, available supply is overallocated by more than 800 percent (measuring supply as average annual runoff)⁶, it is alarming that all of the alternatives in the DEIR increase water exports from the Delta.

The League of Women Voters of California looks forward to the day when the Department of Water Resources commits to protecting the Delta and the Bay-

³ <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=13274>

⁴ <https://nap.nationalacademies.org/read/13394/chapter/4#38>

⁵ https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/final_rpt080310.pdf

⁶ <https://nap.nationalacademies.org/read/13394/chapter/4#40> (p. 40)

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Delta Estuary by developing sustainable, regional projects that recognize the actual amount and timing of water available for all public uses

Sincerely,

A handwritten signature in black ink that reads "Carol Moon Goldberg". The signature is written in a cursive, flowing style.

Carol Moon Goldberg
President