



February 7, 2020

Ms. Nancy Vogel
Director of the Governor's Water Resilience Portfolio Program
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Ms. Vogel:

On behalf of the 175 members of the Southern California Water Coalition, I thank you for the occasion to provide comments on the draft Water Resilience Portfolio. Our member organizations include leaders from business, regional and local government, agricultural groups, labor unions, environmental organizations, water agencies and the general public. All of these stakeholders trust in the attainment of this collaborative effort to meet the challenges presented by extreme droughts and floods, rising temperatures, depleted groundwater basins, aging infrastructure and amplified by the impacts of climate change.

First, let me take a moment to applaud the breadth of the draft portfolio. California is a complex state with a complex water supply, and it was a true herculean effort to develop this compendium of the challenges and opportunities facing the state and its communities. We took heart in the vision for the state's water future described on page 26:

What can our water future look like if we succeed? All Californians have safe and clean drinking water. Our native fish populations recover. Reliable water helps tribal governments, rural communities and agriculture thrive. Cities and towns grow while using water more efficiently. We capture, use and share water supplies to weather droughts. Our communities are safe from flood risks. And we adapt together to changes through collaborative, science-based management and strong partnerships.

We agree—this future is within reach, especially with the excellent news that a single-tunnel, modern conveyance solution remains among the key recommendations of this draft portfolio. In our view, upgrading, improving and modernizing the State Water Project's water delivery system through the Sacramento-San Joaquin Delta is vital. **In fact, we see modernized Delta conveyance as the linchpin to the state's future water resilience.** Thank you for including this important priority in the draft portfolio.

Given the broad scope of the draft portfolio and its 32 proposals for how state agencies can support supply diversification, we've chosen to prioritize our comments by highlighting those areas that we see as key for Southern California and the state as a whole in developing a resilient water supply. You'll find these as follows:





Make Delta Conveyance the Number One Priority for Building a Resilient Water Supply

The draft portfolio makes it clear on page 16: “California’s main system of water conveyance, which moves a large portion of the state’s surface water supply, continues to be under threat from flood, subsidence, earthquake, and climate change.” We agree whole-heartedly and ask for urgent action. This state-led system serves as the backbone of California’s water supply, delivering water to the homes, businesses and farms of 27 million Californians. Without it, California would have to replace 2.5 million acre-feet of high-quality water to meet average annual state demand on that system. Here in Southern California, the State Water Project represents 30 percent of the total water supply, serving 19 million people.

Water delivered through the State Water Project is a cost-effective source of water for Californians. Yet this critical supply has a weak link in its old, man-made dirt levee infrastructure found in the Sacramento-San Joaquin River Delta. Updating this system is critical to the success of the Water Resilience Portfolio. Not only will it build resilience should the “big one” hit along one of the state’s fault lines, it will also facilitate groundwater recharge in overdrawn basins and prevent saltwater intrusion from sea level rise. 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. The tunnel must be built with enough capacity to ensure 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.

In our view, a modern conveyance solution through the Delta is long overdue, has been studied for more than a decade, 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.

Encourage Collaboration and Allow Local Agencies to Plan and Adapt

Local and regional agencies should be trusted and empowered to manage their water resources and plan for the future. Thus, we applaud the draft portfolio’s emphasis on regional networks and state support. To quote the portfolio on page 16, “Effective water management and preparing for the future are best achieved at a regional scale.” Water resources in the state vary too much for prescriptive, one-size-fits-all approaches that make smart, adaptive and real-time management impossible. Instead, we urge more of the collaboration outlined within the draft portfolio, whether its among state agencies, between state and federal agencies, and between state, federal and local water agencies.

We agree that successful voluntary agreements, like those Governor Newsom has directed state agencies to work with water agencies and environmental groups to develop for the Bay-Delta Water Quality Control Plan, hold the key to improving conditions for fish and wildlife. In all matters, we encourage collaboration among interested parties, rather than litigation.

Recognize that Innovative Local and Regional Supply Projects Still Depend on Imported Supplies

We strongly support the portfolio’s stated preference for “regional supply diversification that achieves multiple benefits” and “for better water use efficiency and eliminating water waste” as found on page 17. Southern California has



made decades of smart, innovative and integrated investments in just the types of projects that are spelled out here: groundwater, recycled water, captured runoff, desalination of seawater and brackish groundwater.

However, a common perception persists that initiatives like wastewater reuse and stormwater capture and reuse—and more conservation—can replace imported water supplies for regions like Southern California. 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. It's also important to note that water conservation alone is not a path to true resilience, and that increasing water efficiency becomes more difficult over time due to demand-hardening aspects.

We Can Help

SCWC appreciates that the draft portfolio emphasizes partnerships and dialogue with local and regional water leaders. As you know, SCWC has organized a coalition of more than 300 organizations statewide that stood 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

There is much to admire in this draft portfolio and its vision for the future of California. From its emphasis on regional and local solutions, collaborative approaches, “all-of-the-above” thinking instead of prescriptive mandates, and its stated prioritization of modernized Delta Conveyance, we take heart in the potential for this statewide blueprint to make a lasting impact to be felt by future generations.

I'm pleased to answer any questions you have about these comments. Thank you again for this opportunity, and we look forward to working with you toward a future where all Californians have safe and reliable drinking water.

Best,

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

Charles Wilson
Executive Director

cc: Jared Blumenfeld, Secretary, California Environmental Protection Agency
Wade Crowfoot, Secretary, California Natural Resources Agency
Karen Ross, Secretary, California Department of Food and Agriculture