



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

December 1, 2022

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Director Karla Nemeth
Department of Water Resources
P.O. Box 942836
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Dear Director Nemeth:

Metropolitan Water District of Southern California Draft Environmental Impact Report
Comment

As general manager of the Metropolitan Water District of Southern California, I thank you for the opportunity to comment on this proposal to modernize State Water Project infrastructure in the Sacramento-San Joaquin Delta as contained in the Delta Conveyance Project Draft Environmental Impact Report (draft EIR). This process comes at a critical time for water management in Southern California and for the entire Southwest. We collectively must find the courage and the wisdom to take bold steps to address the impacts of climate change or we will suffer the consequences of inaction.

My Board of Directors has diverse perspectives, including on Delta conveyance. I see this diversity as one of our great strengths. It motivates us to work collaboratively to make progress. I firmly believe that all members of our Board share the values of securing water supply reliability in an environmentally responsible way. There is no better example than how the Board recently - and unanimously - voted to update our Bay-Delta policies, which are attached. The three primary policy objectives are:

- Promote a sustainable Bay-Delta within Metropolitan's One Water Approach to Water Management
- Support Statewide and Regional Actions that Further the Coequal Goals established in the Delta Reform Act
- Address the risks associated with climate change

Also attached is a staff analysis of the draft EIR that was distributed to our 26 Member Agencies to help them in their own processes to develop comments. I hope you find these insights useful as well.

For Southern California, the future of the Delta is interconnected with the future of our other imported supply, the Colorado River, which faces historic shortage conditions and additional

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reductions in water use that have yet to be identified. The State Water Project has experienced historically low deliveries during this drought, triggering various forms of mandatory conservation for more than 6 million Southern California residents. These conditions have also worsened ecosystem challenges throughout our river systems.

Metropolitan is preparing for the prospect of another dry year and a water future increasingly shaped by the accelerating impacts of climate change. We are prepared to propose continued emergency conservation measures for the portions of our service area that are uniquely dependent on State Water Project supplies, but all of the service area may face mandatory conservation measures in the months ahead in order to help manage conditions on the Colorado River. The unfolding events provide a stark backdrop that reinforces the need to take numerous actions in the face of climate change through Metropolitan's emerging One Water approach to water management to secure a resilient portfolio in the decades ahead.

Metropolitan faces the tremendous responsibility to advance resilient water supplies regionally as well as to look beyond our borders and consider statewide needs. This outward-looking ethic is reflected throughout our Bay-Delta policies.

I would like to review the draft EIR as it relates to the Board's three Bay-Delta policy objectives:

1. Promote a Sustainable Delta within Metropolitan's One-Water Approach

Our Board sent a powerful message about Delta sustainability by placing the protection of aquatic resources on equal policy footing as the protection of water supplies. We simply can't do one and not the other. The project's required compliance with state and federal environmental laws can provide important environmental protections that will be of great interest to my Board as permit conditions are finalized in the future. We care about the future of the Delta for many reasons including our role as landowners of four vital Delta islands. Our Board is in the middle of a process to identify ways to ensure that these islands are sustainable and contributing to restoration goals in the decades ahead.

Metropolitan's emerging One Water approach to water management embraces the Delta Reform Act policy of reduced reliance on the Delta through improved regional self-reliance. Metropolitan has spent \$1.5 billion over many years to underwrite conservation, recycling and groundwater recovery. But more is needed, so Metropolitan is accelerating efforts at regional self-sufficiency. As examples, Metropolitan has launched the environmental review process for Pure Water Southern California, a partnership with the Los Angeles County Sanitation Districts and a number of other agencies to construct one of the largest recycling projects in the world. And the Board has recently adopted a model ordinance encouraging the removal of non-functional turf throughout our service area and continues to support conservation and other water use efficiency efforts throughout our service area.

The drought and our changing climate have reinforced that storage is also critical. The construction of Diamond Valley Lake more than two decades ago has allowed Southern

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California to take advantage of wet moments in the Delta when the State Water Project can divert and convey supplies Metropolitan moved into storage for later use during dry years. The SWP must continue to be part of our solution.

The attached staff review goes over many critical issues related to the project such as tribal engagement as well as the proposed alignment and how it avoids the central Delta and other design refinements to reduce impacts. These and other efforts to advance Metropolitan's policy objective of Delta sustainability should continue.

2. Support State and Regional Actions that further the Coequal Goals in Delta Reform Act

As you know, the Delta Reform Act established two coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place.

Community benefit programs are becoming increasingly common for projects of this scale and will likely be critical for the success of DCP. The proposed program holds the prospect of being part of a broader set of Delta actions so that nobody is left behind. Identifying meaningful, durable benefits for the Delta through the community benefits program is critical to meeting this Metropolitan policy objective. We look forward to working constructively with you and with interested stakeholders to make this program a success.

The Board policies are designed to help inform deliberations on future decisions such as Delta Conveyance and not to pre-determine the outcome. The project's attributes to improve State Water Project reliability can help inform a discussion on achieving the coequal goals. Those improvements are detailed in the attached staff analysis, including the project's ability to withstand seismic events, levee failures and the resulting salinity intrusion that would risk the loss of water supplies for 27 million Californians.

3. Address the Risks Associated with Climate Change

The Board is in the middle of a multi-step process to address the water risks posed by climate change. Given the great uncertainties about our future climate, we have analyzed four different scenarios of varying supply and demand impacts. Next year, our discussions will focus on an Implementation Plan that will help shape our One Water portfolio of supply actions, system improvements and conservation efforts.

We have presented the Board with the water supply analyses included in the draft EIR, which show two different futures facing California water depending on whether the proposed Delta Conveyance project moves forward or does not. We noted in particular how the project is designed for as much as 10 feet of sea level rise and how new intakes in the north Delta improve the project's future ability to capture water at the wettest moments in the Delta. Our Board will

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be considering a range of information as part of its deliberation process, and our staff seeks to provide additional analyses of the project to inform our Board's decision-making process.

Metropolitan's Board previously approved funding for the ongoing planning activities for the Delta Conveyance Project. Our Board has yet to decide on supporting and financing the project itself. That decision will be informed by the information contained in the final EIR, along with additional information to be developed in the months ahead outside of the EIR process, including various permit conditions and a project cost-benefit analysis.

Separate from our comments on the draft EIR, I would like to request DWR's assistance with analysis that could help State Water Project Contractors in their respective long-term planning efforts. These analyses would look at the impact of climate change on the SWP at least fifty years from today and could consider a range of plausible operating conditions. As contractors consider continuing to invest in the current SWP infrastructure and future improvements, it is necessary to understand how the supply provided by this system may change under projected climate scenarios and given regulatory uncertainty that may play out over a full investment cycle. This analysis would also allow contractors to understand how improvements to the system, like DCP, might provide water supply resilience under the same climate scenarios.

In closing, thank you for consideration of our thoughts and comments during this critical moment in the planning process. We hope to be constructive participants in the months ahead so we can provide our board with the necessary information to make an investment decision in light of both the environmental impacts as well as the economic costs and water supply benefits.

Sincerely,



Adel Hagekhalil
General Manager

cc: Delta Conveyance Office, California Department of Water Resources:
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Enclosure