



Delta Counties Coalition

Contra Costa County | Sacramento County | San Joaquin County | Solano County | Yolo County
"Working together on water and Delta issues."

February 21, 2025

SENT VIA EMAIL (climatechange@deltacouncil.ca.gov)

Delta Stewardship Council
ATTN: Morgan Chow
715 P Street, 15-300
Sacramento, CA 95814

Re: Public Review Draft, Delta Adapts: Creating a Climate Resilient Future

Dear Ms. Chow:

The Delta Counties Coalition¹ ("DCC") represents the five counties that comprise the California Delta and the four million residents who live in our communities. These comments pertain to the **Delta Stewardship Council's** (Council) November 2024 *Public Review Draft, Delta Adapts: Creating a Climate Resilient Future*² ("Plan").

New Isolated Conveyance is not a Legitimate Strategy for Adaptation

The Plan inappropriately prioritizes new isolated Delta conveyance as a **measure to "modernize" Delta Conveyance** to ensure water supply reliability in the face of climate change. (Plan, p. ES-14, see also pp. 7-9 to 7-10.) New Delta conveyance, however, is neither modern, nor a resilient adaptation measure. According to the U.S. Environmental Protection Agency:

Climate resilience and adaptive capacity can be generally defined as the capacity of a system to maintain function in the face of stresses imposed by climate change and the ability of a human or natural

¹ DCC is a coalition consisting of five Delta Counties, including Contra Costa, Sacramento, San Joaquin, Solano, and **Yolo County**. **The DCC's mission embraces but is not limited to the following** goals: to protect and improve water quality in the Delta region, to ensure representation of local interests in Delta governance, to support local flood risk reduction, to protect the existing water rights held by Delta users and the water rights priority system, and to protect and restore the Delta ecosystem.

² Available at: <https://www.deltacouncil.ca.gov/delta-plan/climate-change>

system to adjust to climate change by moderating potential damages, taking advantage of opportunities, or coping with the consequences.³

The Plan should not assume that new isolated conveyance is necessary to adapt to a changing climate. **The Council’s approach ignores the fact that** such new infrastructure, in addition to being infeasible due to its massive costs, would irreparably and unnecessarily harm the Delta, and if built, would have little flexibility to change with future conditions.

New isolated conveyance, even if operated in conjunction with existing through Delta conveyance, would also create new capacity for increased exports and reduce water quality in the Delta. Such new conveyance is inconsistent with the mandate of the Delta Reform Act to reduce reliance on Delta water supplies while protecting the Delta as a place. (Wat. Code, §§ 85021, 85020, subd. (b).) As identified in the Delta Plan (Chapter 3, Figure 3-7), water recycling and urban water use efficiency alone can provide 1.7-to-5.4-million-acre feet of water. The Plan should promote these options, along with making improvements to through Delta conveyance to improve water supply reliability in a changing climate.

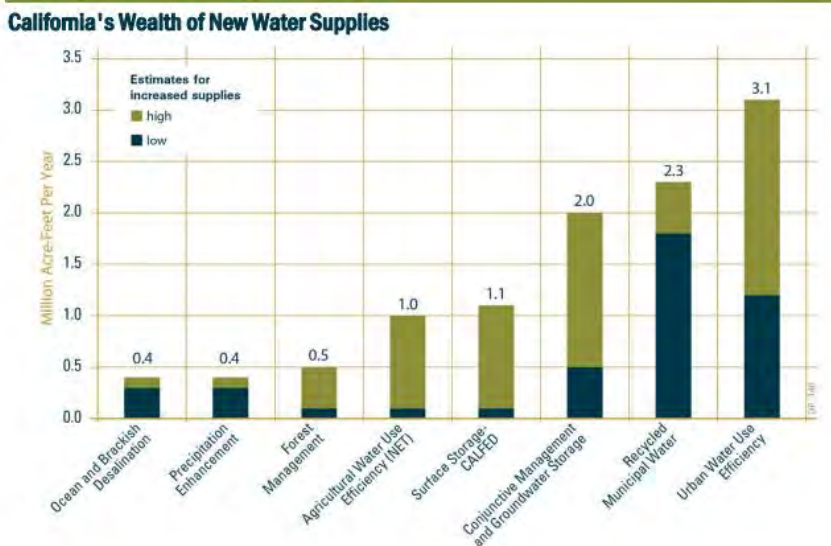


Figure 3-7 DWR estimates that California could further reduce its water demands and increase water supplies by 5 to 10 MAF per year over the next 30 years through the use of existing technologies.
Source: DWR 2009

The DCC continues to promote improvements to our existing through-Delta conveyance system as the appropriate water conveyance strategy for the Delta. To **strengthen the Adaptation Plan’s commitment to supporting maintenance of the** Delta levee system, the DCC suggests amending implementing action *FL-2-4: Secure sustainable State and federal funding*, to specify securing permanent

³ <https://www.epa.gov/climate-change-land-and-emergency-management/resiliency-and-adaptive-capacity#:~:text=Climate%20resilience%20and%20adaptive%20capacity,such%20measures%2C%20as%20summarized%20below.>

funding for the Delta Levees Maintenance Subventions Program. The Subventions Program provides partial reimbursement to local maintenance agencies and reclamation districts for the upkeep and repair of the extensive Delta levee network. This program not only protects vital water supplies, infrastructure, transportation routes, and energy corridors but also preserves ecosystems and habitats within the region. Investing in proactive maintenance and improvements that meet modern levee standards increases the resilience of the Delta region and better prepares the state to withstand challenges of future climate change, sea-level rise, flood, and other risks.

Plan Should Balance Ecological Restoration with Agricultural Preservation

The Plan emphasizes ecological restoration as a means of reducing flood risk. For example, implementing action *FL-7-1: Incentivize land use practices that enhance the resilience of Delta ecosystems, such as restoring wetlands and conserving agriculture*, is proposed as a means of advancing *Strategy FL-7: Use Land Use and Urban Planning to Reduce Flood Risk*. (Plan, p. 4-17.) Ecological restoration that converts lands in productive agricultural use should be avoided. Agriculture is a significant part of the economy for Delta Counties. In 2016, Delta farms and related food and beverage manufacturing supported over 23,000 jobs across California and \$4.6 billion in output.⁴ The Delta is also the largest contiguous block of prime agriculture in the state. The Plan should specify that restoration be sited to preserve existing agriculture, consistent with the policy of the Delta Reform Act to protect agricultural values. (Wat. Code, § 85020, subd. (b).) The Plan should not promote the flooding of productive agricultural lands as an adaptation. Rather, the Plan should promote continued investments by all beneficiaries to maintain and improve our levee system by all beneficiaries, local and statewide.

Continued Engagement is Needed for Plan Development and Implementation

The Plan embraces a wide range of strategies to reduce flood risk, restore ecosystems, protect agriculture, and ensure water supply reliability. The geographic scope of the Plan encompasses land within the five counties represented by the DCC. Many of the strategies and implementing actions directly implicate the interests of the DCC counties. For example, strategy *FL-7: Use Land Use and Urban Planning to Reduce Flood*, and implementing action *FL-7-2: Develop Delta-specific climate informed model floodplain management ordinances and building codes for local customization and adoption* are relevant to, and should be developed in coordination with, stakeholders such as the DCC counties. (Plan, p. 4-17.) The DCC and its respective counties are available to the Council for ongoing engagement with the Council regarding Plan development and implementation.

⁴ Delta Protection Commission, *The State of Delta Agriculture: Economic Impact, Conservation and Trends* February 3, 2020, pp. 1, 38, available at: <https://delta.ca.gov/wp-content/uploads/2020/07/Ag-ESP-update-agricultural-trends-FINAL-508.pdf>.

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Thank you for considering these comments. Please contact our DCC Coordinator, Elisia De Bord, at deborde@saccounty.gov or 916-874-4627 if you have any comments or questions.

Sincerely,



Patrick Hume, Supervisor
Sacramento County



Oscar Villegas,
Supervisor Yolo County



Shanelle Scales-Preston, Supervisor
Contra Costa County



Mitch Mashburn, Supervisor
Solano County



Steven Ding, Supervisor
San Joaquin County

cc: Delta Protection Commission