Response to MWD White Paper #2

Each bullet point summarizes a claim made by MWD in its second white paper on the operations of California Waterfix. We debunk each claim in what follows.

o California WaterFix would increase water supply reliability.

On July 17, 2017, Tom Birmingham of Westlands Water District claimed that from early 2017 storms, exporters would have received an extra 800,000 acre-feet of water for south-of-Delta storage, but there was not space to store this water in south-of-delta reservoirs. In other words, the system can only divert what it can store. He also said that exporters would see the most benefit by diverting during high water events during dry years from the Sacramento River. However, as droughts will become more frequent and prolonged, opportunities for such diversions will become more infrequent. This is also the exact time period in which science shows that the Delta needs a greater amount of freshwater diversions.

o California WaterFix would improve export water quality.

This is true, but the white paper ignores the fact that the substantial improvement in export water quality (in the form of reduced salts) comes at the expense of Delta water quality where salts in Delta river channels and in water supplies will increase. Removing fresher Sacramento River flows by WaterFix would deprive the Delta of fresh water it badly needs. CA WaterFix has failed to analyze drinking water quality impacts on the City of Stockton, and numerous groundwater wells for urban and rural drinking water supplies.

o California WaterFix would enhance ecosystem fishery habitat through the Delta.

The habitat restoration actions they claim in the white paper are mitigations for *past project impacts*. These actions are already owed to the public and the Delta for past damage by the state and federal water projects activities in the Delta, not for WaterFix impacts expected in the future. Also, the scale of these mitigation projects is insufficient when there are no commitments for more fresh water flows into and through the Delta for fish. White Paper #2 uses these restoration projects to greenwash WaterFix.

o California WaterFix responds to climate change risks to state water supply.

CWF provides only a partial response to climate change, one that remains really vulnerable to climate change risks. Loss of snowpack means less water overall available for the long run. Risk of more, or more recurrent extreme storms and floods means less overall reservoir storage available (since reservoirs are California's first line of defense in controlling floods), even if new reservoirs are added. Consequently, big storm gulps, coupled with less overall storage (in the forms of both snowpack or reservoirs) means declining overall supplies—and likely more expensive water from the tap, especially if California WaterFix tunnels are built.

o CWF allows flexible pumping operations in a dynamic fishery environment, and to comply with salinity and flow criteria required by the State Water Board.

Rising sea levels mean that California WaterFix and flood control officials should be investing in raising Delta levees to protect CWF's vaunted flexible operations against sea level rise flooding potential. Through-Delta flows for export at the South Delta pumps must continue to be protected by Delta levees. And with the supposed WaterFix flexibility will come more reverse (that is, upstream) flows in the lower Sacramento River that would harm fish and other water users like East Bay Municipal Utility District, especially in drought years. EBMUD serves 1.3 million Bay Area customers. Many farmers, water agencies, and environmentalists protest this claim by WaterFix before the State Water Board.

o California WaterFix is sized to protect the Delta environment.

The white paper description focuses on the reduction in size of the diversion facility, but the *tunnels* of WaterFix remain large enough that they could accommodate expansion of the diversion facilities to a capacity of 15,000 cubic feet per second (cfs) from the present 9,000 cfs. All they would have to do is add two more diversion intakes with 3,000 cfs capacity each. Other than that, there is nothing else about the Tunnels' size that truly protects the Delta environment, when its operations will destroy ecosystems, degrade water quality and harm the region's economy.

o California WaterFix claims to avoid impacts to Delta communities.

Construction of the Tunnels will clog Delta roads with construction traffic—from workers, supply trucks, large equipment, and so on—and for 14 years, it is expected. The communities of Clarksburg, Hood, Courtland, Locke, and Walnut Grove are directly in the path of this sustained activity. The expected impacts of CWF construction on these unique communities is contrary to the Delta Reform Act, which mandates protection of unique Delta communities for their natural, agricultural, and recreational value.

The City of Stockton was ignored by Paper No. 2's discussion of how CWF avoids impacts to Delta communities. Stockton diverts water much of the year from its Delta water diversion on Empire Tract along Disappointment Slough. No water quality measurements were used by DWR in evaluating the impacts of the CWF to drinking water quality in Stockton. WaterFix supporters ignored Stockton—Restore the Delta's home base—until just recently.

o California WaterFix claims "adaptive management" as an imaginary "hall pass" to inoculate itself against unforeseen\ impacts, while still protecting fish and Delta communities from Tunnels operations.

WaterFix supporters' use of adaptive management lacks any "robust framework" or research program and funding. WaterFix provides no such assurances. But they criticize present fish protection regulations as "restrictive" while ignoring that those

restrictions came from previous scientific adaptive management research. CWF supporters want it both ways: to have the greenwashing benefits of “adaptive management” while they would complain when scientific results must impose restrictions on future WaterFix diversions.