

Contents

1		
2	Common Response 4: No Project Alternative Description and Analysis	2
3	Overview	2
4	Location of the No Project Alternative Analysis in the EIR	2
5	CEQA Requirements.....	3
6	Purpose of the No Project Alternative Analysis.....	4
7	Description of the No Project Alternative	8
8	Commenter Preference for the No Project Alternative.....	9
9	Effects of Implementing the No Project Alternative	10
10	References Cited	12
11		

Common Response 4: No Project Alternative Description and Analysis

Overview

This Common Response addresses the common themes and topics raised in public comments on the Delta Conveyance Project (project) Draft Environmental Impact Report (EIR) related to the No Project Alternative. These themes include but are not limited to the following:

- California Environmental Quality Act (CEQA) requirements for describing the No Project Alternative.
- Locations of the No Project Alternative description, timeframe, analyses, and potential impacts contained in the EIR.
- Requests for comparisons between the No Project Alternative and other project alternatives.
- Geographic scope of the No Project Alternative.
- Impacts of the No Project Alternative.
- Commenter preferences that the California Department of Water Resources (DWR) select the No Project Alternative from the alternatives available.

For information regarding the range of feasible alternatives developed and evaluated in the EIR, please see Common Response 3, *Alternatives Development and Description*. For information regarding the climate change analyses throughout the EIR, including Chapter 30, *Climate Change*, and the multiple appendices analyzing 2040 conditions, which include a climate change scenario, please refer to Common Response 6, *Climate Resilience and Adaptation*.

Location of the No Project Alternative Analysis in the EIR

Comments indicated confusion about where the No Project Alternative analysis was located within the EIR. Sometimes comments combined this confusion and commenters' other contentions with the description of the No Project Alternative, the description of the No Project Alternative analysis under CEQA, or the supplemental analyses provided in the appendices. This section explains the differences between the multiple analyses contained within the EIR related to the No Project Alternative.

The analysis of the No Project Alternative is included in Chapters 5 through 32 of the Final EIR in the sections titled *No Project Alternative*. This analysis complies with CEQA Guidelines Section 15126.6(e), which directs that an EIR shall evaluate a specific alternative of "no project" along with its impact. The No Project Alternative analyzed in the Final EIR resource chapters includes descriptions of conditions at approximately 2040, which is when the project is expected to be operational. More information about why the 2040 No Project Alternative was used to analyze effects of not implementing one of the project alternatives can be found in this Common Response in the section titled *Purpose of the No Project Alternative Analysis*. In addition, Appendix 3C, *Defining Existing Conditions, No Project Alternative, and Cumulative Impact Conditions*, includes detailed descriptions of the existing conditions, the No Project Alternative, and cumulative impact conditions used in the CEQA analysis.

The following appendices compare the No Project Alternative in 2040 against the other project alternatives in 2040, which DWR provided for informational purposes. The climate change scenario under the 2040 condition for the No Project Alternative is the same scenario used for the project alternatives in the 2040 appendices. Therefore, the comparisons between the project alternatives and the No Project Alternative are appropriate because they use the same climate change scenario.

- Appendix 5B, *Surface Water 2040 Analysis*
- Appendix 6A, *Water Supply 2040 Analysis*
- Appendix 7A, *Flood Protection 2040/2072 Analysis*
- Appendix 8C, *Groundwater 2040 Analysis*
- Appendix 9L, *Water Quality 2040 Analysis*
- Appendix 12C, *Fish and Aquatic Resources 2040 Analysis*
- Appendix 13F, *Terrestrial Biological Resources 2040 Analysis*
- Appendix 15C, *Agricultural Resources 2040 Analysis*
- Appendix 16B, *Recreation 2040 Analysis*
- Appendix 20C, *Delta Conveyance 2040 Traffic Analysis*
- Appendix 22B, *Energy 2040 Analysis*
- Appendix 23F, *Air Quality and Greenhouse Gases 2040 Analysis*
- Appendix 24E, *Noise and Vibration 2040 Analysis*
- Appendix 26A, *Public Health 2040 Analysis*
- Appendix 30A, *CalSim 3 Results Sensitivity to 2040 Climate Change and Sea Level Projections*

The long-term analyses in these appendices supplement the analyses in the EIR, which evaluate potential impacts of the project based on 2020 baseline conditions. Appendices were prepared for the resource chapters that incorporated modeled analysis results when evaluating impacts. These appendices are provided for informational purposes and to help decision makers and the public better understand whether any of the modeling results documented in the resource chapters would be different when considered under future conditions, once construction is complete and the project is fully operational. This supplementary analysis of comparing the No Project Alternative in 2040 against the other project alternatives in 2040 is not required by CEQA and is not used to support the CEQA conclusions provided in Chapters 7 through 32. However, the appendices demonstrate that impacts of the proposed project and project alternatives would be similar under the 2040 scenario after mitigation included in the EIR.

CEQA Requirements

CEQA Guidelines Section 15126.6(e) directs that an EIR shall evaluate a specific alternative of “no project” along with its impact. (This CEQA requirement is described in the *No Project Alternative* section of Chapter 3, *Description of the Proposed Project and Alternatives*, and in the *No Project Alternative* and *Cumulative Impact Analysis* sections of Appendix 3C.) For a “development project” such as the proposed Delta Conveyance Project, “the ‘no project’ alternative is the circumstance under which the project does not proceed. If disapproval of the project under consideration would

1 result in predictable actions by others, such as the proposal of some other project, this ‘no project’
2 consequence should be discussed. [And] where failure to proceed with the project will not result in
3 preservation of existing environmental conditions, the analysis should identify the practical result of
4 the project’s non-approval” (CEQA Guidelines § 15126.6(e)(3)(B)).

5 In addition to describing and defining the “no project,” CEQA Guidelines Section 15126.6(e)(3)(C)
6 directs that, “After defining the no project alternative ... the lead agency should proceed to analyze
7 the impacts of the no project alternative by projecting what would reasonably be expected to occur
8 in the foreseeable future if the project were not approved, based on current plans and consistent
9 with available infrastructure and community services.”

10 Purpose of the No Project Alternative Analysis

11 The purpose of the No Project Alternative analysis is “to allow decisionmakers to compare the
12 impacts of approving the proposed project with the impacts of not approving the proposed project”
13 (CEQA Guidelines §15126.6(e)(1)). The EIR discusses two points in time when evaluating the No
14 Project Alternative: 2020 and 2040. Some commenters have expressed confusion about the
15 existence of two No Project Alternatives. To clarify, the 2040 No Project Alternative is the CEQA No
16 Project Alternative as it considers what would be reasonably expected to occur in the foreseeable
17 future if the project were not approved, based on current plans and consistent with available
18 infrastructure and community services. Because the Delta Conveyance Project is anticipated to be
19 fully constructed and operational by 2040, the effects of not implementing the project would occur
20 around the 2040 timeframe. Therefore, the 2040 No Project Alternative is used for the CEQA
21 analysis and includes modeling and analyses of what would reasonably be expected to occur in the
22 foreseeable future if the project were not approved. What the Draft EIR called the 2020 No Project
23 Alternative represents the effects of not implementing the project in 2020, which is the CEQA
24 baseline for the alternatives analysis in the EIR. As described in Chapter 4, *Framework for the*
25 *Environmental Analysis*, in the section titled *Baseline Assumptions and Alternative Comparisons*, the
26 CEQA baseline was developed to assess the significance of impacts of the alternatives in relation to
27 the existing facilities and ongoing programs and physical environmental conditions generally at the
28 time of the 2020 Notice of Preparation release. Because what the Draft EIR called the 2020 No
29 Project Alternative is the same as the CEQA baseline, the 2020 No Project Alternative is not analyzed
30 separately for CEQA impacts or discussed in the resource chapters of the EIR.

31 Several comments on the Draft EIR raised issues with the 2040 No Project Alternative timeframe
32 and asserted that it cannot be compared to the 2020 timeframe used for the impact analyses
33 associated with the project alternatives. These comments assert that the No Project Alternative
34 *should* be compared against the existing conditions in the same way that the project impacts are
35 compared against existing conditions. The comments assert that this “equal” analysis is required to
36 allow for comparative conclusions between the effects of the No Project Alternative and the project’s
37 impacts. However, as discussed above, and per Section 15126.6(e) of the CEQA Guidelines, the
38 purpose of the No Project Alternative under CEQA is to analyze what would occur in the absence of
39 the project, which DWR accomplished through an analysis of future conditions at 2040, when the
40 project would be operational. All project alternatives are compared to the 2020 baseline.

1 As discussed in Common Response 3, the purpose of the project alternatives analysis is to determine
2 whether there are reasonable alternatives to the project that would “feasibly attain most of the basic
3 objectives of the project but would avoid or substantially lessen any of the significant effects of the
4 project” (CEQA Guidelines § 15126.6(a)). In the EIR, the impacts of the project alternatives are
5 provided to determine whether a different alternative would have fewer significant effects while
6 still feasibly attaining the project’s objectives. DWR used 2040 as the timeframe for the No Project
7 Alternative CEQA analysis, and Table CR4-1 summarizes major activities that could reasonably
8 occur before 2040 under the No Project Alternative and whether they are the same as existing
9 conditions.

1 **Table CR4-1. Summary of Key Activities of No Project Alternative as Compared to Existing Conditions**

Reasonable Future Actions	No Project Alternative (Under the 2040 Scenario)	Are Existing Conditions the Same as the No Project Alternative?
SWP Facilities and Operations	Continued operation of the existing SWP facilities to divert, store, and convey SWP water consistent with applicable laws, regulations, and permit conditions and with SWP contractual obligations for water deliveries, as described in Chapter 3, <i>Description of the Proposed Project and Alternatives</i> , and Appendix 3C, <i>Defining Existing Conditions, No Project Alternative, and Cumulative Impact Conditions</i> . No changes to the SWP facilities in the Delta to address water supply reliability and related objectives identified in Chapter 2, <i>Purpose and Project Objectives</i> , as described in Chapter 3 and Appendix 3C.	Yes, as described in Chapter 3 and Appendix 3C.
SWP ESA/CESA Requirements	Remain subject to the current take limits for listed species and other current requirements of the ESA and the CESA, as described in Chapter 3. Actions required by the two 2019 Biological Opinions on the coordinated long-term operations of the CVP and the SWP (U.S. Fish and Wildlife Service 2019; National Marine Fisheries Service 2019) and the 2020 Incidental Take Permit for long-term operations of the SWP (California Department of Fish and Wildlife 2020), as described in Chapter 3.	Yes, based on current knowledge and limited to existing conditions, including programs adopted during 2020, as described in Chapter 3.
Land Use and Growth	Changes in land use and urban growth expected in 2040 as described in Appendix 5A, <i>Modeling Technical Appendix</i> , Section A, <i>Modeling Overview</i> , and Section B, <i>Hydrology and Systems Operations Modeling</i> .	No, based on existing land use and adopted growth plans.

Reasonable Future Actions	No Project Alternative (Under the 2040 Scenario)	Are Existing Conditions the Same as the No Project Alternative?
Potential Actions by Public Water Suppliers	Different water supply and water reliability actions that California water suppliers other than DWR would likely perform, as described in Appendix 3C, which may include the following. • Water conservation programs aimed at water use reduction/efficiency targeting landscaping, commercial and multifamily housing sectors, and individual habitats. • Water recycling projects involving further treatment of treated wastewater that is currently discharged to the ocean, bays, streams, or lands and using it for non-potable uses such as landscape and agricultural irrigation, commercial, and industrial purposes. • Groundwater recovery projects involving treatment of high-salinity or contaminated groundwater for potable uses. • Groundwater management consisting of use of existing groundwater supplies, but also conjunctive use of water (i.e., coordinated management of surface water and groundwater supplies). • Water transfers and exchanges or water purchases on the open market.	Similar, but fewer possible actions by water suppliers other than DWR in the near term.
Climate Change and Sea Level Rise	Climate change and sea level scenario in 2040 as described in Appendix 3C and Appendix 5A, Section B.	No, climate change and sea level rise are not considered as part of existing conditions in order to isolate impacts that are directly attributable to the project as described in Chapter 4, <i>Framework for the Environmental Analysis</i> , and Appendix 3C. Please also See Common Response 1, CEQA Process, General Approach to Analysis, and Other Environmental Review Issues, regarding baseline and climate change.

1 CESA = California Endangered Species Act; CVP = Central Valley Project; DWR = California Department of Water Resources; ESA = Endangered Species Act; SWP = State
2 Water Project.

Description of the No Project Alternative

The information used to describe the No Project Alternative (2040) is based on CEQA Guidelines Section 15126.6(e)(3)(C), which requires DWR to analyze the impacts of not implementing the Delta Conveyance Project by evaluating what would “reasonably be expected to occur in the foreseeable future” without project approval “based on current plans and consistent with available infrastructure and community services.” The key limiting language is the phrase “based on current plans and consistent with available infrastructure and community services.” This qualifying language guided the assumptions DWR made regarding what could reasonably be assumed for the foreseeable future when analyzing the effects of the No Project Alternative.

The No Project Alternative assumptions include those related to the State Water Project (SWP) and the Central Valley Project (CVP), ongoing programs and policies by governmental and nonprofit entities, projections related to climate change, and assumptions related to annual actions that vary every year, as discussed below. The assumptions recognize that each public water agency may adjust actions identified in its water management plans or operational plans, and they include facilities under construction as of January 15, 2020 (the publication date of the project’s Notice of Preparation), because such actions and facilities are consistent with the continuation of existing management direction or level of management for plans, policies, and operations. The No Project Alternative assumptions also include facilities and programs that received approvals and permits in 2020, because those programs were consistent with existing management direction as of January 15, 2020.

The types of actions that PWAs may take under the No Project Alternative or cumulative assumptions are discussed in Appendix 3C. Approval of the project neither prevents nor requires the pursuit of any potential future local water supply projects by State Water Contractors. Please see Common Response 5, *Public Water Agencies Water Management Practices*, for information on the additional projects that State Water Contractors are implementing apart from the Delta Conveyance Project to ensure California’s water resources are being used efficiently and sustainably.

Potential differences between the projects that PWAs may pursue under the No Project Alternative assumptions are unspecified and uncertain. The No Project Alternative assumes the continued operations, maintenance, enforcement, and protection programs by federal, state, and local agencies that affect or could be affected by the Delta Conveyance Project. The Delta Conveyance Project is a water reliability project, and if it were not approved, there would be an increased need for PWAs to improve local water supply sources through other projects. These projects would likely be in the same vein as other water reliability projects already being developed by public water agencies. Such actions to improve local water supply sources have not been considered as a project alternative on their own because, among other reasons, they fail to meet both the fundamental project objective to restore and protect reliable SWP supplies from the Delta and the majority of the basic project objectives, as discussed in Common Response 3.

The EIR analysis is based primarily on the geographic locations of the PWAs, which span four geographic areas of California—northern coastal, northern inland, southern coastal, and southern inland—as described in Appendix 3C, in the section titled *No Project Alternative Assumptions for Water Agency Actions*. CEQA Guidelines Section 15126.6(e) does not place limits on the scope of geography that a no project alternative incorporates into its analysis if including these areas helps the decision makers and public understand the effects of not implementing the proposed project. The geographic regions used to inform the analysis are based on the areas that public water

agencies oversee in the state. Because conditions under the No Project Alternative would require public water agencies to improve local sources of water supply through other projects within these geographic regions, the No Project Alternative analysis is required to analyze the effects of those actions within these same regions. Projects pursued within both the northern and southern coastal regions may include desalination, recycling, water conservation/water use efficiency, groundwater recovery, and groundwater management. Within the northern inland region, desalination and recycling projects may be pursued. Within the southern inland region, groundwater recovery, recycling, groundwater management, and water conservation/water use efficiency projects may be pursued.

Specific projects are listed in the table titled *Descriptions of Programs, Projects, and Policies Considered for Existing Conditions, No Project Alternative, and Cumulative Impact Analysis*, found in Appendix 3C. This table indicates which impact analyses—existing conditions, No Project Alternative, or cumulative—have included a given project. Several commenters on the Draft EIR identified specific projects (e.g., Los Vaqueros Reservoir, Del Puerto Canyon Reservoir) and questioned their inclusion in or exclusion from the No Project Alternative analysis. As discussed above, the purpose of the No Project Alternative is to allow DWR and other decision makers to consider the environmental effects that could occur in the absence of the project; therefore, the specific water reliability projects included in the No Project Alternative analysis are limited to those that would be pursued by public water agencies involved in the Delta Conveyance Project and that would likely be implemented if the Delta Conveyance Project were not approved. Del Puerto Canyon Reservoir, for example, was not included in the No Project Alternative analysis because that project is independent from the approval of the Delta Conveyance Project. Many of the No Project Alternative evaluations have a qualitative discussion of projects likely to be pursued absent the proposed project because of the limited information known about these projects. A number of commenter-cited projects (e.g., Bay-Delta Water Quality Control Plan Updates, Del Puerto Canyon Reservoir) are included in the cumulative impact analysis, as identified in Appendix 3C. Please see Common Response 1, *CEQA Process, General Approach to Analysis, and Other Environmental Review Issues*, regarding a discussion of the projects and the approach to the cumulative impact analysis in the EIR.

Commenter Preference for the No Project Alternative

Multiple comments on the Draft EIR requested that DWR select the No Project Alternative or explained the commenter's preference for the No Project Alternative over other alternatives. A summary of the CEQA requirements for the scope of alternatives and explanations for why other commenter-suggested alternatives were not chosen for analysis in the EIR can be found in Common Response 3. The commenters' recommendations that DWR not approve the project or that DWR approve the No Project Alternative will be considered by DWR before the agency determines whether to approve one of the alternatives analyzed in the EIR, including the No Project Alternative.

DWR will not approve the proposed project or select an alternative (other than the No Project Alternative) unless it has certified a Final EIR, adopted findings, developed a mitigation monitoring and reporting program, and adopted a statement of overriding considerations. DWR has not, therefore, rejected the No Project Alternative. As discussed in Common Response 3, however, many of the reasonably foreseeable actions that make up the No Project Alternative do not address the basic objectives of the Delta Conveyance Project. For example, the No Project Alternative would not address the risks to SWP supplies from the Delta presented by climate change, sea level rise,

1 flooding, and earthquakes. This means that the No Project Alternative itself does not address the
2 project's objectives.

3 **Effects of Implementing the No Project Alternative**

4 Multiple comments described commenters' belief or assertion that the No Project Alternative would
5 have no impacts or limited impacts, but the Draft EIR does not support this conclusion. As described
6 in Chapters 5 through 32 of the EIR, not implementing the Delta Conveyance Project—that is,
7 choosing the No Project Alternative—would have a wide range of implications on multiple
8 environmental resources in different geographies. Some of the changes and physical environmental
9 impacts that would result from choosing the No Project Alternative are listed here.

- 10 • Decline in water supply reliability from the SWP as well as changes in water quality associated
11 with SWP supply and existing production from groundwater and recycling-dependent sources in
12 service areas of public water suppliers. (See the *No Project Alternative* section in Chapter 6,
13 *Water Supply*.)
- 14 • Continued persistent threat of seismic activities on Delta levees. (See the *No Project Alternative*
15 section in Chapter 7, *Flood Protection*.)
- 16 • Increase in simulated water surface elevations in the Sacramento River that could result in
17 increased flood risk in the Delta due to changes in hydrology and sea level rise resulting from
18 climate change, since the high-water stage in the Delta channels is mostly influenced by tide and
19 storm surges. (See the *No Project Alternative* section and the table titled *Water Surface Elevation*
20 *Differences for the Project Alternatives at Select Locations in the Sacramento River between the*
21 *American River Confluence and Sutter Slough Relative to 2022 Conditions* in Chapter 7.)
- 22 • Degradation in quality of receiving waters, including the ocean, under operating conditions of
23 some water supply or reliability projects (e.g., water recycling, desalination plants, brackish
24 water desalination) throughout public water supplier service areas, depending on the location,
25 timing, and type and size of the projects. (See the *No Project Alternative* section in Chapter 9,
26 *Water Quality*.)
- 27 • Fewer or no construction-related impacts on multiple resources (soils, wildlife, agriculture,
28 recreation, aesthetics, cultural resources, mineral resources, paleontological resources, Tribal
29 cultural resources) in the Delta because construction of the project would not occur in the Delta.
30 (See Chapters 11, 13, 15, 16, 18, 19, 27, 28, and 32, respectively.)
- 31 • Numerous construction-related impacts on multiple resources (soils, wildlife, agriculture,
32 recreation, aesthetics, cultural resources, mineral resources, paleontological resources, Tribal
33 cultural resources) associated with constructing water supply or reliability projects throughout
34 public water supplier service areas, depending on location, timing, and type and size of the
35 water supply or reliability projects because construction of a wide variety of projects could
36 occur. (See Chapters 11, 13, 15, 16, 18, 19, 27, 28, and 32, respectively.)

37 In some instances, the impacts associated with the No Project Alternative and the potential effects of
38 actions taken by water suppliers outside the Delta may be managed, reduced, minimized, or avoided
39 through various environmental compliance requirements, engineering design, potential best
40 management practices, potential environmental commitments, or potential mitigation measures—
41 some of which may be similar to mitigation proposed in the Draft EIR, including the following.

- Requirements to conform with CEQA and other regulations protecting surface water quality, and environmental commitments and best management practices to protect water quality during construction activities. (See the *No Project Alternative* section in Chapter 9.)
- Design and construction to address site geologic and seismic conditions and conform with building code requirements. (See the *No Project Alternative* section in Chapter 10, *Geology and Seismicity*.)
- Requirements to conform with CEQA and other regulations protecting Tribal cultural resources, which may include mitigation measures such as Tribal monitoring, implementing avoidance and minimization measures for known resources, and development of resource-specific treatment plans. (See the *No Project Alternative* section in Chapter 32, *Tribal Cultural Resources*.)
- Requirements to conform with CEQA and other regulations protecting paleontological resources, which may include mitigation measures such as requiring paleontological monitoring in areas known to have geologic units sensitive for paleontological resources and requiring stop-work measures in the event that unexpected fossils are encountered. (See the *No Project Alternative* section in Chapter 28, *Paleontological Resources*.)

But some of the actions listed above would be under the control of other agencies or private actors, and it would be speculative for DWR to assert that the impacts associated with the No Project Alternative would be adequately managed or mitigated or avoided.

Moreover, according to the United States Geological Survey (USGS), there is a 72 percent chance of a 6.7 or greater magnitude earthquake occurring in the Bay Area by 2043, and that could cause levees in the Delta to fail. This could result in significant amounts of saltwater being drawn into the Delta region, raising salinity levels and crippling the state's ability to deliver fresh water because of the location of the State Water Project's (SWP) only diversion in the Delta. Of the over 1,100 miles of Delta levees, many are not in a condition to withstand significant shaking (Chapter 1, Introduction, Section titled Delta Levee Risk). DWR has invested millions of dollars to reinforce many Delta levees through the Delta Levees Special Flood Control Projects and Delta Levees Maintenance Subventions programs and will continue to do so under both the No Project Alternative and all of the other alternatives considered in the EIR. However, even with levee improvements, the extensive Delta levee system will remain vulnerable to a major earthquake (Chapter 1, Introduction, Section titled Delta Levee Risk). An earthquake could cause a possible outage in water supply delivery lasting anywhere from several months to several years to perform necessary levee repairs and restore salinity levels to where the SWP could resume normal operations. Cessation of SWP operations of this magnitude would have catastrophic social and economic effects, including a loss of water necessary for public health and safety (Chapter 1, Introduction, section titled California Water Supply). Each year without "A Big One," the risk of disruption from a major earthquake significantly increases. The Pacific Ocean's plate moves 50 millimeters per year making California overdue for a major earthquake event (DWR 2023). Although no one can definitively say exactly when a major seismic event would occur, experts agree that it is not a matter of "if," but a matter of "when." Under the No Project Alternative, SWP would continue to rely solely on south delta diversions, which would increase the risk that a major earthquake would disrupt SWP water supply deliveries and result in associated economic and environmental impacts.

As discussed above in the section titled *Commenter Preference for the No Project Alternative*, DWR will consider all of the information presented above and in the EIR concerning the No Project Alternative, as well as information on the proposed project and other alternatives in deciding how to

1 proceed. This decision will not be made until DWR has certified a Final EIR, adopted findings,
2 developed a mitigation monitoring and reporting program, and adopted a statement of overriding
3 considerations.

4 References Cited

5 California Department of Fish and Wildlife. 2020. *California Endangered Species Act Incidental Take*
6 *Permit No. 2081-2019-066-00. Long-Term Operation of the State Water Project in the*
7 *Sacramento–San Joaquin Delta*. Sacramento, CA: California Department of Fish and Game,
8 Ecosystem Conservation Division.

9 California Department of Water Resources. 2023. *How the Delta Conveyance Project Would Make*
10 *California's Water Supply More Resilient Against Earthquakes*. July 24. Sacramento, CA. Available:
11 [https://water.ca.gov/News/Blog/2023/July-23/How-Delta-Conveyance-Project-Makes-](https://water.ca.gov/News/Blog/2023/July-23/How-Delta-Conveyance-Project-Makes-California-Water-Supply-More-Resilient)
12 [California-Water-Supply-More-Resilient](https://water.ca.gov/News/Blog/2023/July-23/How-Delta-Conveyance-Project-Makes-California-Water-Supply-More-Resilient). Accessed: October 9, 2023.

13 National Marine Fisheries Service. 2019. *Biological Opinion on Long-Term Operation of the Central*
14 *Valley Project and the State Water Project*. Consultation tracking number WCRO-2016-00069.
15 October 21. National Marine Fisheries Service, West Coast Region.

16 U.S. Fish and Wildlife Service. 2019. *Biological Opinion for the Reinitiation of Consultation on the*
17 *Coordinated Operations of the Central Valley Project and State Water Project*. Service File No.
18 08FBTD00-2019-F-0164. October 21. Sacramento, CA.