

Draft Community Benefits Program Framework

1.0 Introduction

The proposed Delta Conveyance Project includes a Community Benefits Program that would be implemented separate from, and in addition to, the mitigation required under the California Environmental Quality Act (CEQA) and other environmental regulations. This Community Benefits Program Framework (Framework) identifies the goals, objectives, and potential components of the proposed Delta Conveyance Project Community Benefits Program. The Framework also details the steps the California Department of Water Resources (DWR) will undertake in development of the Community Benefits Program, including ensuring opportunities for meaningful community participation. The Framework was informed by public input received through interested party interviews, workshops, and public comments, as described herein. The Community Benefits Program is presented as a component of the proposed Delta Conveyance Project and, if DWR approves the Delta Conveyance Project, the Community Benefits Program would be a part of that approval and implemented consistent with all other components of the Delta Conveyance Project. While approval of the Community Benefits Program as described in this Framework would be included in CEQA approval, specifics regarding implementation of the program would continue to be developed and finalized after that approval. Specific actions of the Community Benefits Program may require additional environmental review and permitting prior to the approval and construction of that action. The draft EIR will include a chapter that includes information on potential impacts from Community Benefits Program actions.

A community benefits program is a set of commitments made by project proponents and created in coordination with the local community to address local effects that may occur from large infrastructure projects. These commitments are usually made separate from, and in addition to, permit conditions or environmental mitigation required through CEQA or other environmental regulatory compliance processes because environmental regulatory or review processes, such as CEQA, have very specific, and sometimes limited (e.g., limited to the “physical environmental conditions”), regulatory parameters regarding identification of impacts and the associated mitigation that may not consider other potential effects outside of those parameters. These commitments can include a wide range of local benefits, including economic and social benefits from job training programs and local hiring targets, or funding for local improvement projects, such as parks and other recreational facilities. The purpose of these commitments goes beyond traditional concepts of “environmental mitigation” to foster goodwill and address some of the non-environmental adverse effects local communities may encounter during long construction periods. DWR recognizes that the community in which project facilities may be sited would not receive direct benefits from this major capital construction work (e.g., State Water Project water supply reliability) and seeks to provide benefits to the local community through these commitments.

The Community Benefits Program for the Delta Conveyance Project is one of three distinct, but complementary processes intended to address effects within the local communities, as shown in Figure A. The other two processes are the more traditional concept of mitigation, which is used to address Delta Conveyance Project environmental impacts related to compliance with specific regulatory requirements (e.g., CEQA), and an Ombudsman Program (Attachment 1-B), which

1 provides a clearinghouse and single point of contact to streamline information, support, and
 2 applicable construction impact-related claims and ensure appropriate compensation as a result of
 3 direct construction-related impacts.

Three Distinct But Complementary Processes		
Regulatory Mitigation	Community Benefits Program	Ombudsman Program
Purpose: Address project impacts related to specific regulatory requirements (e.g., CEQA/NEPA)	Purpose: Provide resources to direct benefits toward communities most impacted by implementation, based on community collaboration.	Purpose: Clearinghouse single point of contact to streamline information, support and claims. Includes facilitating the process for obtaining just compensation for direct construction impacts

4
 5 **Figure A. Complimentary Processes to Address Effects on Communities**

6 Large infrastructure projects such as the proposed Delta Conveyance Project inevitably create
 7 effects on the communities and the local environment in which they are built. Some of these effects
 8 are likely beneficial. Not only will construction of the Delta Conveyance Project provide increases in
 9 economic activity in the Delta, but the Delta Conveyance Project may also have ancillary benefits
 10 through the Community Benefits Program in terms of hiring programs, infrastructure, and possibly
 11 multipurpose facilities that can serve the community for years to come. DWR recognizes, however,
 12 that the implementation of the Delta Conveyance Project may also adversely affect the Delta’s
 13 unique values through construction activities and envisions a comprehensive Community Benefits
 14 Program as a way to work collaboratively with Delta communities to identify and build-in additional
 15 aspects of the Delta Conveyance Project that can provide benefits to these Delta communities.¹ In
 16 addition, a Community Benefits Program would provide opportunities for Delta communities to
 17 engage and articulate ways the Delta Conveyance Project can alleviate potential conflicts with local
 18 Delta land uses related to the unique cultural, recreational, natural resource, and agricultural values
 19 of the Delta as an evolving place (Delta as Place).²

20 Creating a Community Benefits Program is an acknowledgment that: (1) the direct project benefits
 21 related to State Water Project water supply reliability do not directly benefit the communities of the
 22 Delta; (2) the project, if approved, could have potential adverse effects that Delta communities
 23 experience through the term of construction; and (3) the limitations of traditional CEQA and other
 24 required environmental mitigation typically do not address all adverse effects on the local
 25 communities.

¹ Delta Communities includes the area comprised of the six Delta counties of Alameda, Contra Costa, Sacramento, San Joaquin, Solano, and Yolo.

² In November 2009, the Sacramento–San Joaquin Delta Reform Act (Delta Reform Act) was passed. The Delta Reform Act established the State policy of coequal goals for the Delta: “The ‘coequal goals’ means the two 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” (Water Code § 85054). The coequal goals were developed to provide policy direction for state agencies as they move forward on various actions that would support achievement of the goals.

1 Local communities can have a direct role and voice in generating and prioritizing actions that can be
2 implemented as part of the Delta Conveyance Project Community Benefits Program and, with
3 respect to the anticipated fund as described below, a role in bringing forward and implementing
4 certain actions to contribute to the Delta community. The community development opportunities
5 are substantial and will benefit from local insight in the coordinated development and
6 implementation of the Community Benefits Program.

7 **2.0 Identifying Potential Participants**

8 The potential participants in the Delta Conveyance Project Community Benefits Program include a
9 wide range of entities, including those from the local Delta communities that may be adversely
10 affected from the approval and implementation of the Delta Conveyance Project. Individuals and
11 entities may participate in the development and implementation of the Community Benefits
12 Program in a variety of ways and can be grouped into five major categories.

- 13 • **Tribal interests:** Individual Tribal members, various Tribal Governments, and Tribal
14 nongovernmental organizations (Tribal NGOs).
- 15 • **Delta community members:** Individuals who live or work in the Delta, of which disadvantaged
16 community members are a subset.³
- 17 • **Government entities:** Including Delta Stewardship Council, Delta Protection Commission,
18 Sacramento–San Joaquin Delta Conservancy, and Delta Counties and municipalities.
- 19 • **Nongovernmental organizations (NGOs):** Organizations that function independently of any
20 government.
- 21 • **Other Delta users:** Individuals who utilize the Delta for recreation or other uses but do not live
22 or work in the Delta.

23 Although DWR encourages subject matter expertise input from all potential participant categories,
24 some parties such as government entities and NGOs are generally better organized and funded to
25 provide technical input into Delta programs. Thus, DWR’s outreach for the Community Benefits
26 Program focused on accommodating groups that would have a more difficult time engaging, namely
27 Delta community members (including disadvantaged community members) and Tribal interests, by
28 providing easily accessible venues and translation services.

29 **3.0 Community Benefits Program Core** 30 **Commitments, Goal, and Objectives**

31 The development of the Community Benefits Program will be achieved in a manner that is
32 consistent with these core commitments. It will be:

- 33 • **Transparent:** An open process to allow for effective collaboration.

³ *Disadvantaged community* is defined in this document as having a residence in Delta census tracts and either a household income below 80% of statewide median household income or non-white ethnicity of any income bracket.

- 1 • **Constructive:** Participation in good faith with the local Delta community to create a positive
2 legacy.
- 3 • **Inclusive:** Broad participation to expand the capture of a diverse set of voices.
- 4 • **Fair:** Benefits related to and commensurate with localized nature of effects.
- 5 • **Unconditional:** Participation in the Community Benefits Program and allocation of community
6 benefits are not dependent on support for project.

7 The goal of the Community Benefits Program is to define a set of commitments made as a part of the
8 proposed Delta Conveyance project and created in coordination with the local community to create
9 lasting, tangible, and valuable economic and social benefits to the residents, businesses, and
10 organizations experiencing localized Delta Conveyance Project construction effects that go beyond
11 those that can be addressed through traditional environmental mitigation.

12 The creation of a Community Benefits Program for the Delta Conveyance Project would seek to meet
13 the following objectives.

- 14 1. **Provide a mechanism for Delta community members and others to identify opportunities
15 for local benefits.**⁴ Delta community members may have differing priorities than government
16 entities and NGOs. A concerted effort will be made to engage individual Delta community
17 members to assign Community Benefits Program priorities that consider input from all potential
18 participants.
- 19 2. **Provide a mechanism for the project proponents to demonstrate good faith,
20 transparency, and accountability to the community through formal commitments
21 developed with input from community members and others.** All the identified interested
22 party groups previously discussed are essential in the development of a mechanism for
23 transparency and accountability but, in any mechanism, the Delta community members would
24 be important in supporting a feedback loop for implementation.
- 25 3. **Be implemented in a manner that contributes to the protection and enhancement of the
26 unique cultural, recreational, natural resource, and agricultural values of the Delta as an
27 evolving place.** Although it is not the responsibility of any individual project to advance the
28 achievement of the coequal goals, this objective acknowledges the Delta Reform Act's vision for
29 achieving the coequal goals and that the Community Benefits Program would be implemented in
30 a manner that would contribute to the Delta as an evolving place.

31 **4.0 Outreach for the Community Benefits Program** 32 **Framework**

33 DWR set forth a collaborative approach to provide the local Delta communities and Tribal interests
34 the opportunity to participate in the development of the Community Benefits Program and, if the
35 proposed Delta Conveyance Project is approved, would provide the opportunity for continued
36 collaboration in the implementation phase. Local communities are best equipped to tailor benefits to

⁴ Outreach for this Framework focused on the six Delta counties of Alameda, Contra Costa, Sacramento, San Joaquin, Solano, and Yolo; however, a determination on the geographic prioritization of local benefits will be made through future stakeholder engagement and eventual implementation of the Community Benefits Program.

1 their particular needs. As noted above, DWR has communicated that community benefits are not
2 dependent on support for the project. The outreach process DWR implemented included the main
3 phases as described below.

4 **4.1 Preliminary Community Input**

5 From September 30 to December 11, 2020, DWR conducted the *Your Delta, Your Voice* survey
6 (*Environmental Justice Community Survey Report*). The purpose of the survey was to gather
7 information to accurately reflect how the members of disadvantaged Delta communities value the
8 region's cultural, recreational, and natural resources and to gather input about ways the Delta
9 Conveyance Project may cause impacts on these resources or potentially bring benefits to Delta
10 communities. A secondary purpose was to increase awareness of the Delta Conveyance Project and
11 raise interest in participating in public engagement among disadvantaged communities in the Delta.
12 Although the concept of a community benefits program for the Delta Conveyance Project was
13 announced after the environmental justice survey was developed, input from the survey was
14 considered in the development of the Delta Community Fund and Economic Development and
15 Integrated Benefits discussed in Sections 5.1 and 5.2 below.

16 **4.2 Initial Information Sharing and Gathering**

17 DWR prepared a concept paper to describe the potential for community benefits and thoughts about
18 the process for developing the Community Benefits Program in collaboration with the community.
19 As part of a DWR presentation, staff outlined the concept to the Delta Conveyance Design and
20 Construction Authority's Stakeholder Engagement Committee (SEC) on December 9, 2020 (and also
21 presented an update at the April 28, 2021, SEC meeting; Attachment 1-C). Between February 1 and
22 March 19, 2021, initial input was solicited via targeted interviews of 44 people (Attachment 1-D).
23 DWR interviewed people who represent different interests in the Delta region and people who
24 participated in CEQA scoping meetings. Interview participants represented agricultural interests,
25 state and local government, environmental justice and disadvantaged communities, recreation
26 interests, community groups, and natural resources interests. DWR used the information collected
27 during the interviews to prepare materials for the Community Benefits Program workshops.

28 **4.3 Community Benefits Program Workshops**

29 Public workshops were utilized to solicit input for the development of this Framework, including
30 objectives, potential components, and the community engagement process. Workshops were held
31 virtually (with closed captioning online or by phone) because of the coronavirus disease 2019
32 (COVID-19) pandemic occurring during the outreach efforts. Each public workshop included
33 simultaneous translation in both English and Spanish. All relevant information was posted on the
34 Delta Conveyance Project website in English and Spanish ([https://water.ca.gov/Programs/State-
35 Water-Project/Delta-Conveyance/Community-Benefits-Program](https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Community-Benefits-Program)), including registration
36 information, agendas, presentations, public workshop summaries, and a recording of each public
37 workshop (public workshop materials can also be found as Attachments 1-E to 1-G). Additionally,
38 DWR provided an email address and form (Attachment 1-A) on the DWR website for those who
39 could not attend workshops to provide input. The first public workshop on April 14, 2021, focused
40 on the overall concept, objectives, and potential categories of benefits for inclusion in a fund. The
41 second public workshop on May 6, 2021, focused on the Delta Community Fund and soliciting input
42 on fund categories and potential actions that it could fund. The third public workshop on May 25,

1 2021, focused on Economic Development and Integrated Benefits and on process and next steps in
2 development of the Community Benefits Program. Specific workshops for Tribal communities,
3 including invited Tribal leadership, representatives, and members, as well as other non-Tribally
4 affiliated Tribal persons, were held on May 17 and October 25, 2021, and covered all topics from the
5 three public workshops (Attachment 1-I).⁵ DWR used feedback from the workshops to revise the
6 objectives, components, and process ideas that had been developed based on prior public
7 engagement efforts. The feedback has been incorporated into this Framework. A final workshop was
8 held on November 17, 2021, to present numerous case studies of other community benefits
9 programs. Panelists from these other projects shared their firsthand experiences with different
10 types of organizational structures, development processes, important milestones, and lessons
11 learned.

12 **5.0 Community Benefits Program Components**

13 Two main components for the Community Benefits Program are being proposed to meet the
14 program objectives, the Delta Community Fund and the Economic Development and Integrated
15 Benefits. These components, implemented as part of the proposed Delta Conveyance Project, would
16 work in conjunction to provide benefits associated with direct Delta Conveyance Project activities
17 and support community benefits independent of Delta Conveyance Project objectives.

18 **5.1 Delta Community Fund**

19 The Delta Community Fund (previously titled “Delta as Place Fund” in early outreach materials)
20 would include a community-driven approach for fund management for local residents, leaders, and
21 other participants to be directly involved in implementation of local actions that contribute to Delta
22 as Place.

23 The Delta Community Fund’s objective would be to finance actions that can help to protect, enhance,
24 and sustain the unique cultural, historical, recreational, agricultural, and economic values of the
25 Delta as an evolving place, in a manner consistent with the Delta Reform Act’s coequal goals.⁶
26 Potential actions funded by the Delta Community Fund would be in addition to the required
27 environmental mitigation for certain Delta Conveyance Project impacts identified in CEQA and other
28 environmental compliance laws and regulations, including mitigation to address certain Tribal
29 Cultural Resources.

30 Incorporating input from the outreach processes described above, participants suggested the
31 following resource categories for potential actions that could be financed by the Delta Community
32 Fund.⁷

⁵ It should be noted that the Tribal Workshop materials were available in English only and the May 17 workshop was not video recorded. All relevant information for the Tribal Workshop was posted on the Delta Conveyance Project Tribal Engagement website (<https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/Tribal-Engagement>)

⁶ See footnote 2

⁷ The original categories discussed in the interview process were modified so that the natural resources category was separated into the habitat conservation category and the water and air quality category. Additionally, the original jobs and training category was separated into the economy and education and workforce development categories, and K-14 education was added.

- 1 • **Water and Air Quality** includes actions with the objective to enhance air and water resources
2 needed to support healthy communities, such as addressing local issues with pollutants,
3 invasive plant species, dust, and road congestion.
- 4 • **Public Safety and Emergency Response** includes actions with the objective to increase the
5 ability of Delta residents and visitors to live, work, and play safely in the Delta, such as
6 increasing law enforcement and fire protection and keeping recreation areas safe and clean.
- 7 • **Recreation** includes actions that could expand public access to fishing, birding, walking,
8 bicycling, water sports, and other recreational uses.
- 9 • **Habitat Conservation** includes actions with the objective to improve or increase habitat for
10 natural communities.
- 11 • **Culture and History** includes actions that could celebrate the array of cultures that thrive in the
12 Sacramento–San Joaquin Delta or preserve historic assets for the public to appreciate and enjoy.
- 13 • **Economy** includes actions with the objective to enhance the vitality and prosperity of Delta
14 communities, such as tourism and transportation.
- 15 • **Infrastructure** includes actions that could improve transportation and communication
16 connectivity in the Delta. It may also include other types of infrastructure needs identified by the
17 community.
- 18 • **Agriculture** includes actions with the objective to enhance agricultural tourism, marketing, or
19 access to markets and ideas to incentivize agricultural innovations and wildlife-friendly
20 agriculture.
- 21 • **Education and Workforce Development** includes actions in support of K-12 education, new or
22 enhancement of existing programs, or other ideas to enhance educational opportunity or
23 workforce development.
- 24 • **Levee Maintenance and Improvements** includes actions with the objective to maintain and
25 improve existing levees beyond DWR's existing levee maintenance Subventions and Special
26 Projects programs.

27 A list of potential actions suggested through the outreach process for funding through the
28 Community Benefits Program can be found for each category in Attachment 1-F. These benefit
29 categories were discussed in more detail during the second Workshop on May 6, 2021, and Tribal
30 Workshop on May 17, 2021. The public workshop included breakout sessions to facilitate active
31 discussion. While the discussions at the public and Tribal workshops yielded some additional
32 potential actions and more detailed variations on the potential actions listed, the above categories
33 proved comprehensive enough to capture them all; therefore, additional revisions to the categories
34 were not made. Community input regarding prioritization of potential actions will be considered as
35 the Community Benefits Program is developed.

36 5.2 **Economic Development and Integrated Benefits**

37 Economic Development and Integrated Benefits (previously titled “Project Implementation
38 Commitments” in early outreach materials) would include benefits that would be realized through
39 construction of the Delta Conveyance Project facilities and may include:

- 40 • **Economic development** through targeted hiring programs and business participation
41 programs.

- 1 • **Integrated Project Benefits or “leave-behinds”** through commitments to create multipurpose
2 project facilities or repurpose and leave-behind certain construction-related project features for
3 the communities’ benefit.

4 Targeted hiring programs provide an opportunity to increase participation of socially or
5 economically disadvantaged workers in a project or program; help create long lasting economic
6 stability for targeted workers extending to economic stimulus within their communities; and are
7 most successful when they include partnerships with existing jobs training, pre-apprenticeship, and
8 other workforce development organizations to help create a pipeline of qualified workers. Target
9 goals vary and are set by the different agencies developing the programs. However, typically
10 targeted workers include those who are economically disadvantaged, veterans, custodial single
11 parents, people lacking a GED/HS diploma, those with former incarceration/criminal record,
12 homeless, women, and minorities.

13 The presentation in the third public workshop on May 25, 2021 (Attachment 1-G), provided case
14 study examples of several targeted hiring programs that differed in their goals, management
15 structure, implementation, and monitoring. Input during that workshop included questions
16 regarding the role of unions in hiring programs and implementation details that have not been
17 decided yet.

18 Business participation programs combat the effects of past discrimination and increase the
19 participation of various disadvantaged businesses in public contracting; provide guidance or
20 mandates that a percentage of all services, goods, or materials is contracted to targeted businesses;
21 direct contracting or contracting advantage to specific business types where a characteristic such as
22 location may provide benefit in performance of the work; and help create sustainable businesses
23 and economic stimulus—close to 50% of all Californians are employed by small businesses. Target
24 goals vary and are set by the different agencies developing the programs; however, typically
25 targeted businesses include small business, micro-business, disabled veteran-owned, woman-
26 owned, minority-owned, and local.

27 The presentation in the third public workshop on May 25, 2021, also provided case study examples
28 of several business participation programs that differed in their funding, management structure,
29 implementation process, and oversight. Presenters acknowledged that there are certain best
30 practices for targeted hiring and business participation programs but, through the Community
31 Benefits Program, interested parties have an opportunity to shape these elements in a way that
32 would provide the most benefit for Delta communities. During the Tribal Workshop on May 17,
33 2021, a participant recommended that Tribes have access and understanding of the use of Tribal
34 Employment Rights Ordinance (TERO), and stated that even though TERO is a federal ordinance
35 specific to reservations, a similar mechanism could be used for the Delta Conveyance Project to
36 support Tribal businesses and hiring of qualified Tribal members. TERO requires that all employers
37 who are engaged in operating a business on reservations give preference to qualified Native
38 Americans in all aspects of employment, contracting, and other business activities.

39 Additionally, the public workshop on May 25, 2021, included a discussion of methods to reduce
40 overall construction disturbance at some locations by co-locating community beneficial facilities.
41 The foundational elements for those community beneficial facilities would be to minimize
42 disturbance to the community during construction of both Delta Conveyance Project and community
43 beneficial facilities, and construction of the community beneficial facilities might be expedited. Some

1 examples of potential Integrated Project Benefits discussed during the workshop are listed in the
2 following sections.

3 **5.2.1 Examples of Potential Integrated Site Beneficial Uses Suggested** 4 **through Outreach**

5 Some examples of potential integrated site beneficial uses discussed during the May 2021 public
6 workshop are as follows.

- 7 • Local or regional community art program (murals, sculpture gardens)
- 8 • Local 4-H club experimental plots
- 9 • Gardens (e.g., Chinese Garden near Locke)
- 10 • Playgrounds, soccer fields, etc.
- 11 • Delta educational facility
- 12 • Walking trails (e.g., Bouldin Island perimeter)
- 13 • Natural habitat areas (upland sandhill crane foraging area)
- 14 • River overlook
- 15 • Educational kiosks (e.g., history of Delta)

16 **5.2.2 Examples of Potential Utility and Logistics Dual Benefits** 17 **Suggested through Outreach**

18 Some examples of potential utility and logistics dual benefits discussed during the May 2021 public
19 workshop are as follows.

- 20 • Access roads—widening of Twin Cities Road near Interstate 5 interchange
- 21 • New roads/improvements for Mountain House area/Byron Highway congestion
- 22 • Fiber optic—high-speed internet turnouts
- 23 • Electrical power—local drops/upgraded services
- 24 • Access roads—expand some access road features to provide bike lanes
- 25 • Emergency response equipment/facilities
- 26 • Shared emergency response helicopter pads (especially at southern sites)
- 27 • Shared park-and-ride lots/electric bus service/electric vehicle charging infrastructure following
28 construction
- 29 • State Route 12 expansion/new bridge on Bouldin Island (central alignment alternatives
30 [Alternatives 1, 2a, 2b, and 2c] only)

31 Community input regarding Integrated Project Benefits included some uncertainty regarding
32 placement of community beneficial facilities in locations of Delta Conveyance Project facilities since
33 different regions of the Delta have different local needs. Further, participants suggested that
34 community beneficial facilities should not result in increases to the footprints of Delta Conveyance
35 Project facilities.

6.0 Steps to Further Develop the Community Benefits Program

This Framework, informed by the above outreach efforts, describes the basic components of the Community Benefits Program if the Delta Conveyance Project is approved. One consistent theme in comments from the community is the need for the program to be transparent and to ensure accountability. What follows are the steps DWR will take to further develop the program in a transparent and accountable manner.

Delta Community Fund

The following elements will be developed with community input for the Delta Community Fund component of the Community Benefits Program.

- Purpose and guidelines.
- Criteria for potential actions to be financed.
- Funding limits and possibly specific potential actions to be financed. Alternately, identify a process an entity could use to prioritize potential actions within a specified funding limit.
- Technical support to be provided and corresponding funding limits.
- An implementation plan with performance measures, including a schedule and milestones.
- How funds will be administered.
- Expectations for oversight, reporting (transparency), and public engagement.

Economic Development and Integrated Benefits

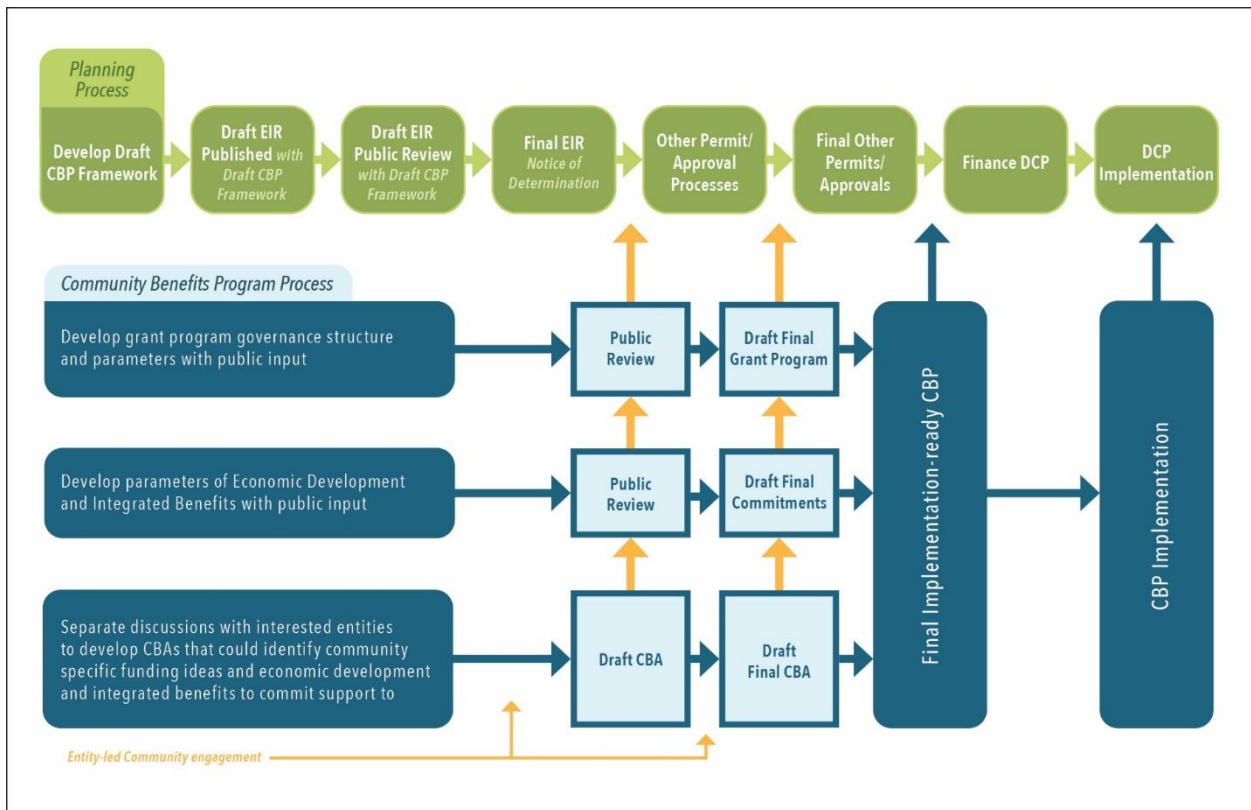
The following elements will be developed with community input for the Economic Development and Integrated Benefits component of the Community Benefits Program.

- Purpose and guidelines.
- Criteria for economic development programs/integrated project benefits.
- Funding limits for specific targeted hiring/business participation commitments and/or specific leave-behind commitments.
- Specific identification of leave-behind commitments. Alternatively, identify a process an entity could use to prioritize leave-behind commitments within a specified funding limit.
- Technical support to be provided and corresponding funding limits.
- How funds will be administered for technical support.
- An implementation plan with performance measures, including a schedule and milestones.
- Expectations for oversight, reporting (transparency), and public engagement.

Community Benefits Programs are unique to both the projects and the communities they are supporting. DWR will implement an approach that supports a wide and diverse audience and encourages broad community involvement. This may include a grant program approach that could be supplemented by one or more Community Benefits Agreements (CBAs). These CBAs may also supplement commitments associated with economic development or integrated benefits and be

1 developed with a single entity representing a single geographic location or town, with an entity
 2 representing a larger region, or in combination. CBAs can provide an opportunity for more targeted
 3 collaboration with communities. Exploring town/regional interests will proceed simultaneously to
 4 development and finalization of the EIR.

5 Commitment to implementing the Community Benefits Program, as described in this Framework,
 6 would be part of the decision process for the Delta Conveyance Project following certification of the
 7 EIR and receipt of all other essential permits and approvals. No decisions will be made, no
 8 commitments implied, and no CBAs will be finalized until completion of CEQA review and DWR
 9 approval of the proposed Delta Conveyance Project. A conceptual process schematic is shown in
 10 Figure B. Conceptual Community Benefits Program Decision Making Process.



11
 12 **Figure B. General Process for Development of Community Benefits Program**