

CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF THE CITY ATTORNEY



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September 14, 1995

*Sept. 14
Workshop
Comments*

SEP 14 1995

Lester A. Snow
Executive Director
CALFED
Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, California 95814
FAX: (916) 654-9780

Re: Workshop on Establishing Objectives for Bay-Delta Solutions

Dear Mr. Snow:

The following comments are submitted on behalf of the San Francisco Public Utilities Commission and are directed towards the materials distributed for the referenced workshop scheduled for September 14, 1995.

1. Eco-System Quality Problem Statements

Item 5. Reduced and Altered Transport Flows.

The problem statement contends that reduced and altered transport flows hinder successful movement of juvenile fish from spawning habitats to nursery habitats in the Delta and bay. Examples include the delta smelt. There is no sound scientific evidence to support the contention that transport flows are needed to move Delta Smelt up or down stream, at least concerning flows from the San Joaquin River. Attached for your consideration is a letter to this effect from Dr. Peter Moyle, the pre-eminent expert on Delta Smelt. Therefore, San Francisco requests that the reference to Delta Smelt be removed from this list.

2. Water Supply Problems Statement

Draft page 1 of the Water Supply Problem Statement would benefit by clarifying that the focus of this section is on water quantity and not quality. San Francisco suggests that the title be amended to state "Water Supply Quantity Problems".

The first sentence should be amended as follows:

"The problem of sufficiency of water supply associated with the Bay-Delta can be divided into three basic categories: Conflict among beneficial uses, economic impacts, and water quality."

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While there is a separate water quality problem statement, water quality is a major water supply problem and should be identified as such. Further, if water quantity and quality are separated into two separate problems, the distinction should be made clear.

3. Water Supply Problem Statements

Item A.2.a.3. This problem statement is unclear. It states that water supply quantities and timing for export do not meet short-term environmental water needs. However, it fails to distinguish between environmental water needs in the Delta and those in the export areas. A distinction should be made and clarified.

Item A.2.b.3. The same problem is presented under long term needs here as under short term needs above.

Item B.1. "Bay-Delta water supplies are uncertain." This section discusses the uncertainty of water supply reliability due to the vulnerability of levees in the Delta. Added to this section should be a discussion of cross or through-delta pipelines and in-delta facilities which could be damaged by earthquake. Examples include facilities from EBMUD and San Francisco.

B.2.a.2. It is contended that urban water users cannot plan and manage for efficient water use due to the unpredictability of the water supply available in the coming season. This statement is too simplistic. Urban water suppliers are seeking to manage their water as efficiently as possible, principally through implementation of the "Best management practices." Further this statement ignores planning efforts by urban "agencies" based on firm yield, which anticipates water shortages. While perhaps certain knowledge or constant supply surplus would improve water usage, it is highly unlikely that either will occur on a long term basis.

4. Vulnerability of Bay-Delta System Function Problems

In addition to levee failure, this section should include pipelines and other water related facilities which could be damaged by earthquakes or other disasters.

5. Other Issues Raised

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Water Quality, Causes

To the section entitled "Water Quality Causes Related to Water Supply" it is suggested that the following two points be added:

- Reduced water quality increases treatment costs, and creates conditions adverse to public health.
- Reduced and fluctuating water quality impact industry costs and decrease the potential for water reuse.

Water Supply, Causes.

Under the section "Causes of Predictability Problems" the following points should be considered.

"Lack of Understanding of System Yield Decreases of Reliability of Predictions and Forecasts"

Many individual agencies understand the system yield of their rivers or water projects. It is not a question of "lack of understanding of system yield" which is the problem. Rather, it is the lack of predictability which is the problem. System yield is generally calculated on the worst case basis. Yield therefore is known, what a particular year may be is unknown.

System Vulnerability, Causes

Pipeline and facility failure should be added to this list.

Water Quality Objective Statements

Item A.1. "Reduce the level of water quality perimeters of concern to human health in raw water supply or treat to reduce concern.

Experts in water quality and public health agree that treatment is the least favored alternative for improving water quality. Rather, source protection and obtaining water from the highest and best source available are the preferred alternatives. Lack of knowledge about water treatment and certain knowledge about disinfection by-products do not make reliance on treatment as the appropriate single method to reduce concern. Therefore, this statement should be rewritten.

Item A.5. "Reduce the level of water quality perimeters of concern to human health in raw water supply or treat to reduce concern.

See comment to A.1. above.

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Vulnerability of Bay-Delta Systems Functions, Objective Statements

Pipelines and facility failures due to earthquakes should be added to this list.

Thank you for this opportunity to comment. Questions should be directed to Utilities General Counsel, Thomas M. Berliner at (415) 554-4295.

Respectfully submitted,

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