

**Organization**

**Comment on Water Use Efficiency 1996**

BDAC

Alt1: Retirement of 80,000 acres of farm land would be very disruptive to local economy, measure to restore shallow water habitat and protect it from exotic aquatic plants need defination. Use of reclaimed water for agriculture must be in situations where it will not create or exacerbate problems with toxic ions, soil and water salinity, and disposal of salt load to maintain balances.

Alt2: most alternatives should include spring and fall fish barrier at the head of old river and middle river, grantline and old river(near tracy)tidal barriers.

Alt3: No Correction of flood problems or mokelumne river system. This and other alternatives seem to consider the reliability of water for the export without also addressing reliability for those who divert for local use in the delta.

The isolated facility could exacerbate problems of stagnant channel reaches where salinity can not be controlled and where young fish suffer from high residence time and increased time.

ALT8: The chain of lakes need more description regarding intake and releases for the agriculture needs. It also needs an analysis of the water loss due to the increased evaporation from flooded islands as compared to consumptive use by agriculture on those islands.

In this and other alternatives the discussion of benefits from purchase of upstream water sometimes seems to assume that this is new water rather than a relocation in time of flow from an overcommitted system in order to benefit fish while degrading the water supply for diverters from the stream system.

ALT9: Discussions here and elsewhere seems to assume that upstream water purchases would improve water quality in the south delta even though it is released for the pulsed fish flow.

ALT9: How will it be assured that the new reservoirs are filled only with new yield due to capture of flood flows and that the isolated facility will not be in used to bypass the delta with water diverted during low flows.

Demand Management  
Advisory Committee(DMAC)

Use of DSM as a core actions to all CALFED Alt, the challenge of meeting dry year demand and ensuring the reliability of supplies. A balanced approach in the formulation and development is important.

Contra Costa County Water  
Agency

Twenty draft alternative solutions don't represent reasonable approaches to these problems. No justifications for moving the state and federal water project diversion points out of the delta. A common pool Ensures a balanced distribution. System Reoperation alternatives, we believe that a more detailed description of each alternative is required to effectively evaluate them. Core actions component of the alternative be expanded to guarantee extensive habitat restoration, levee stablization and demand reduction as these tasks.

Process more thoroughly consider the sources of water toxicity, particularly from agricultural drainage.

Shasta Tehema Bioregional  
Council

It is critical that CALFED's alternative be broadened to include management, conversation and restoration on the watersheds in the area of origin. Water must be regarded as a producer with three dimensions quantity, quality, time. None of these critical issues has been addressed in the CALFED document except in the very narrow context of the estuary itself.

The cost and benefit of maintaining healthy watersheds have been ignored in your process and are tremendously underestimated in the great water debate.

Direct control technique for prevention and control of potential wildfire damage is critical to long term watershed management. This means making a forest healthy and vigorous by silvicultural, management, and sanitation measures. These issues also have all but ignored in the CALFED documents.

We agree with the concept of core actions for delta ecological restoration. It does not appear workable to consider this as a separate alt. The proposal for level of low, moderate and extensive ecological restoration should be discarded. Core actions should be formulated with a number of features as now described in many of the alt.

It is unlikely that fish and wildlife agencies would accept "low" or "moderate" levels of the ecosystem restoration when a "high" level is on table. Our agency will not accept mandated demand management as part of any CALFED program nor will we accept taking land out of production as a method of reducing demands for delta water. Water users have already agreed to reduce water diversions from the delta and it will be inappropriate to expect further reductions in Delta export on the part of these water users.

Alt now formulated now do not give adequate consideration to meeting short or long term water supply needs.

CALFEDS core actions focusing on Increasing Water Supply Predictability is not accepted to agency because such a core action could be more misconstrued to mean that less water more often is acceptable to the water users. That is not so. The water users must have their water supplies increased, as opposed to made more predictable.

We would object to a state policy that establishes water transfers as a primary method of increasing the water supply for one set of water users by reducing the supply related economy of another set of users.

It seems more appropriate to say that Alt 2 is more like a core action rather than alt. We further support evaluation of CUWA findings.

Alt 3:

There are unknowns and questions about the affordability and physical feasibility of large siphons under the Sacramento River and through the Central Delta.

Alt 8:

The stakeholder have prepared an alt similar to this that should be given further consideration.

Alt 10:

This meets the test but may not be implemented without consideration of water quality flows in Central Delta.

Alt 12:

this may overcome deficiency of alt 10.

Alt 16:

More examination of affordability and implementability may show it to be impractical.

Alt 11:

stakeholder have prepared a similar alt submitted in their comments on feb 15.

Agency agree with CUWA that none of the system reoperation alt are acceptable because they fail to meet the water users needs or CALFED's solution principles, especially regarding durability and reduction of impacts. The agency hopes that the concept of "pay for what you get" is woven into your program, including core actions. With the rising costs of SWP water and its diminishing availability, we cannot afford additional costs for a delta solution without getting more water.

The notion that demand management can be considered as a part of solution, at least with respect to agricultural sector is simply unrealistic. The concept of taking additional land out of production as means of reducing demands for Delta water is not acceptable.

Strategy p. 9 - Include demand management by better MULTIPLE use

Explain p. 5 - 'allowing high flood peaks to continue'. Who gets damaged, p. 9 - Add risk of losing Delta configuration., p. 9 - Descriptions should include downsides, e.g., isolated proposals include less assurance that Delta configuration will be protected.

#### Definitions

- 1) What is meant by 'marginal' land if it is financially viable?
- 2) Water yield rather than storage is significant (e.g., alt A, p. 1).
- 3) It should be clear that 'obtaining' San Joaquin water means reallocating from one use to another, not new water.
- 4) The term 'pollution' is being used for very different constituents with different effects, causes, and potential controls; salinity, natural toxins, trihalomethane precursors, man made chemicals, oil, etc. This is too broad to be lumped together.

#### Specific comments

- 1) Why fallow only farm land and not residential gardens and golf course. They consume a great deal of water, and they don't produce food.
- 2) Retiring land for salinity control is not the only solution (p. 3, Alt C), discuss alternatives,
- 3) P. 3 Alt C - Isolated facilities provide quality benefit or some impact others. Explain both sides.
- 4) Some habitat proposals seem to have been made without looking at the terrains.
- 5) The chain of lakes proposal Will evaporate a lot more water than 13 Used farm the same islands. This must be acknowledged.

#### General Comment

The components that have been assembled for each alternative are to a significant degree arbitrarily assembled. I believe many of us would prefer that they be combined in different ways. We should first examine the viability and pr and cons of each component. (They almost all have both benefits and impacts), We should then see why a given component is compatible or incompatible with other components. At that point each of us could suggest different ways of combining the components. If we do not go through that process the SDAC will be asked to accept combinations of components that may be proposed without adequate examination of pros and cons, and which inevitably reflect the level of knowledge and the biases of those largely anonymous parties who propose the alternatives. This process would reduce the likelihood that a final alternative Ca be criticized because it contains components that have not been adequately

Consulting Engineer

Core actions should be given three columns of Activities, Objectives, Benefits. A better concept would be to have essential actions formulated as the initial set of core actions to be implemented in stage I. Base the structure of the alt on four solutions for delta water flow and aquatic habitat conditions ie to fix the delta

1. Through delta
2. Large eastside Conveyance
3. Dual Conveyance
4. No Action

Each of these should be combined with balanced approach actions to meet major objectives such as New storage, Ecosystem restoration,demand management, water supply improvement, levee system vulnerability.

California Striped Bas  
Association

Bay Delta does not adopt goal of CVPIA of doubling anadrmous fish. Strped bass should be given equal treatment in Bay Delta program as it is in CVPIA. There is no clear indication for implementation of changes in pumping restrictions. We support demand management.

Delta Protection Commission

alts that remove lands from ag use will have a serious , negative impacts on regions economic health. Full consideration be given to impacts of retiring additional ag lands.