00081

LAS VIRGENES MUNICIPAL WATER DISTRICT
EST. 1958
Dedicated to Quality Service

OFFICERS

President
**Harold V. Helsley**
*Director, Division 3*

Vice President
**Ann Dorgelo**
*Director, Division 5*

Secretary
**Glen Peterson**
*Director, Division 2*
MWD Representative

Treasurer
**Gordon L. Knopp**
*Director, Division 1*

**Ken Rufener**
*Director, Division 4*

**James E. Colbaugh**
*General Manager*

**Wayne K. Lemieux**
*Counsel*

HEADQUARTERS
4232 Las Virgenes Road
Calabasas, CA 91302
(818) 880-4110
FAX (818) 880-9077

WESTLAKE
FILTRATION PLANT
(818) 889-4741
FAX (818) 991-9329

TAPIA WATER
RECLAMATION FACILITY
(818) 591-1207
FAX (818) 591-1282

RANCHO LAS VIRGENES
COMPOSTING FACILITY
(818) 878-1310
FAX (818) 878-1316

MEMBER AGENCY OF THE
METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

MAY 0 4 1998

April 28, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Attention: Mr. Rick Breitenbach

Subject: **Comments Regarding Draft Programmatic EIR/EIS For the CALFED Bay-Delta Program**

Dear Mr. Breitenbach:

Las Virgenes Municipal Water District ("District") is pleased to provide comments on the subject draft programmatic EIR/EIS for the CALFED Bay-Delta Program. Our Board of Directors has considered the matter and has determined the proposed Alternative Three best serves the interests of the District by enhancing water quality and reliability while also promoting the environmental considerations of the Delta.

The District is a member agency of the Metropolitan Water District of Southern California ("MWD"). We have no local source of water (wells, watershed runoff, or the like) to meet our potable water demands to serve our customers. We are 100% reliant on MWD imported and treated water to satisfy our needs. The water MWD receives from the State Water Project imported from the Bay-Delta represents our sole source of supply. Thus, we are very concerned with the issues of water movement to the south. Restoration and preservation of impaired habitat and ecosystems, operational flexibility, water supply reliability, and enhancements to overall water quality are paramount issues for our District.

The three basic alternatives differ in how water would be moved and stored within the Bay-Delta system. All three have been evaluated by technical staff and public working committees considering such criteria as benefits to water quality, impact on fish and wildlife, total cost and operational flexibility. Many of the issues identified and evaluated require further study and public discussion and this dialog will contribute to CALFED's ability to make an informed and workable decision on the matter. For ease of discussion, the three alternatives are summarized below:

- Alternative 1: To operate existing Delta channels, install fish screens and barriers, make minor adjustments to channels, and consider storage.

C-010255

C-010255

- Alternative 2: To enlarge existing Delta channels to move water across the Delta more easily, install operable fish screens and barriers, make other significant improvements to the Delta, and consider storage.

- Alternative 3: Similar to Alternative 2 except it also adds a new channel around the eastern portion of the Delta and provides additional Delta and off-aqueduct storage capabilities.

All three alternatives move water through the Delta from the river entrances on the north to the pumping stations on the south. The Delta is composed mostly of peat, a rich organic material. As the water passes through the Delta under current conditions, it picks up a significant amount of the organic material present. When this organic-rich water is transported to the south and treated with chlorine disinfectant there is a chemical reaction and the formation of trihalomethanes (a known deleterious disinfection by-product with regulatory limits). Alternatives 1 and 2 do little to change the course of water movement through the Delta, thus continuing the organic loading of the water and the problem of trihalomethane formation when the water is chlorinated. However, Alternative 3 provides a water path around the Delta to the east, which minimizes the organic loading of the water transported, thus improving the overall quality of the water received by the southern interests while also restoring a more natural flow of water within the Delta. This higher quality water precludes the need for costly treatment facilities downstream to meet the regulatory requirements for drinking water standards.

Operational pumping limitations due to a number of factors are considered important and deserve consideration in the evaluation process. Water flows through the Delta vary significantly year in and year out depending on the amount of rainfall received in the watershed areas. This varying flow can contribute to the amount of saltwater intrusion into the Delta from San Francisco Bay during natural low water flow years. This poses a significant operational constraint on the pumping capabilities from the Delta region. The pumping stations for the Central Valley Project and the State Water Project are located on the south side of the Delta. Because of the flow characteristics of the Delta, these pumping stations are particularly susceptible to saltwater intrusion. This intrusion, in the form of bromides in the water, is deleterious to agricultural water use and to normal disinfection treatment methods. The outcome of this bromide intrusion is a shutdown of the pumps to avoid pumping the water to the south. This condition is detrimental to the water users, agricultural and urban, to the south. Migration of sensitive or endangered species of fish may also affect operational pumping capabilities, especially under natural low water conditions. Presence of the fish in the vicinity of the pump intakes will cause an overall shutdown of the pumps. All of these negatively affect the interests of the water users to the south.

The above conditions are significant and can be mitigated with improved natural and stabilized water flow through the Delta. This is achieved with the provision of adequate water storage facilities in the Delta area, the major watershed areas around the Delta, and off-aqueduct impoundment. Release of water from these storage facilities can supplement natural flows and stabilize Delta conditions. This storage can be in existing or augmented aboveground reservoirs, replenishing groundwater basins, and improvements to in-Delta water storage capabilities. During periods of low natural flow, the actual flows in and through the Delta can be enhanced with release of water from storage and the use of groundwater in selected areas. During periods of high natural flows the storage facilities, above and below ground, can be replenished. Suitable off-aqueduct storage facilities to the south can augment flows in the aqueducts during selected periods when the Delta pumping plants need to be secured (for sensitive specie presence or maintenance requirements).

Water supply reliability is of paramount concern to all water using interests. The combination of the through-Delta improvements, storage enhancements, and operational considerations discussed above contribute to reliability in the water supply. The implementation of effective water transfer policies can also provide a positive contribution as well. Water transfers must ensure an effective and protective market that will provide critical ecosystem flows without regulatory action and will result in a reduction of drought-induced economic damage.

Concomitant with the provision of adequate water supply from the Delta to meet southern needs, is the sincere commitment to enhance and improve water use efficiency. This commitment takes the form of effective irrigation and planting cycles for agricultural users to the strict water conservation measures of the urban users. The District espouses a philosophy of water conservation measures including:

- Conducting school education and awareness programs
- Providing incentive programs for use of low-flow toilets and shower heads
- Use of drought-tolerant landscaping
- Use of proper irrigation practices
- Providing residential water use monitoring and budgets
- Providing maximum beneficial re-use of our reclaimed water from our wastewater treatment operations

Las Virgenes Municipal Water District is committed to participation in the CALFED process to achieve a solution to the restoration and health of the Bay-Delta. Our whole livelihood and that of our customer base is completely dependent upon a successful resolution of the many issues. The issues of water quality and supply reliability can be achieved with the understanding and compromise of many varied interests. Environmental restoration and preservation are critical to endangered specie and

habitat and, in turn, to the overall health of the Delta. Without this, all proposed actions fail miserably. Our Board strongly endorses adoption of Alternative 3 as the preferred alternative for the final EIR/EIS.

Solutions are there and we all must stay focussed with the process to seek attainment of our mutual goals.

The District point of contact on this matter is our Planning Administrator, Gene Talmadge, and he can be reached at 818.880.4110, Fax 818.878.195, or e-mail at gtalmadge@lvmwd.dst.ca.us.

Sincerely,

Harold V. Helsley,
President

HVH:CET:alw

C:\FILES\Word\cet\CALFED EIR-EIS Response1.doc

C-010259

C—010259

LAS VIRGENES MUNICIPAL WATER DISTRICT
EST. 1958

4232 LAS VIRGENES ROAD
CALABASAS, CALIFORNIA 91302-1994

CALABASAS CA APR 29'98 0322
PB METER 7000639 U.S. POSTAGE

DEPARTMENT OF WATER RESOURCES SACRAMENTO 98 MAY -4 AM 11:58

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth St., Ste 1155
Sacramento, CA 95814