

JUN 26 1998

WEST ORANGE COUNTY
WATER BOARD

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June 22, 1998

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

Alexander Bowie, Legal Counsel
4920 Campus Drive, Suite A
Newport Beach, California 92660

Subject: Comments on the CALFED Draft EIS/EIR

Dear Mr. Breitenbach,

I am writing on behalf of the West Orange County Water Board regarding the CALFED Draft EIS/EIR. The West Orange County Water Board (WOCWB) is a Joint Powers Agreement between the Cities of Garden Grove, Huntington Beach, Seal Beach and Westminster for the purpose of purchasing water from the Municipal Water District of Orange County, and transporting it via two large capacity feeders owned by the Joint Powers Cities.

WOCWB is committed to wisely and efficiently using integrated water resources to meet water needs and cost-effectively meeting future water demands. The water resources in Southern California include groundwater and other local supplies, water use efficiency, recycling and water imported from the Colorado River and State Water Project. To that end, we strongly support a consensus based CALFED solution that provides equal benefits to urban water users, agriculture and the environment.

WOCWB concurs with the Municipal Water District of Orange County (MWDOC) that the CALFED solution must be a comprehensive package that includes:

Water Supply Reliability

The solution must enhance the State Water Project (SWP) supplies by improving, with certainty, the ability to transport water from source areas to the SWP while protecting environmental and other beneficial uses of the Bay-Delta. This can be achieved only by providing a Delta fix that contains a levee restoration program, conveyance enhancement program and the addition of new storage. It must also implement a single, manageable system of regulatory certainty as part of the CALFED preferred solution.

Water Quality

Protection of the public health through drinking water quality must be a major objective of the CALFED solution. Higher source quality water must be provided for drinking water consumption, groundwater recharge and recycled water development and to balance with the hundreds of millions of dollars water purveyors are investing in advanced treatment technologies.

Water Transfers

The urban water use community recognizes water transfers as a necessary and beneficial aspect of water management in California. However, water transfers alone are not the solution and are plagued with constraints that currently prevent development of a free market. These constraints include both physical and regulatory roadblocks that must be solved as part of the CALFED solution. Real physical limits exist today in the Delta because of lack of pumping capacity and facilities to move the water to be transferred. Regulatory and statutory changes to streamline the transfer process and mitigation of third party impacts from the area of origin to the point of delivery are essential to the success of a water transfer program. A Delta fix is the first, and perhaps most important, step in achieving a thriving transfer market.

Water Use Efficiency and Recycling

The urban Water Use Efficiency component of the CALFED solution must be linked to implementation of Best Management Practices that are determined cost-effective on the local level. Likewise, recycling investments must continue to be justified locally. CALFED should focus its efforts on removing regulatory impediments to the recycling project development process while addressing source water quality concerns. To maximize water use efficiency and recycling program implementation, substantial state and federal funding will be needed to help agencies meet conservation and recycling objectives.

Cost Allocation and Assurances

The CALFED solution must be a cost-effective solution, with equitable allocation of costs commensurate with benefits received from improvements in the Bay-Delta if Southern California is going to be asked to pay its share of any CALFED solution. While this should be expected, Southern California should not be made to pay for improved benefits received by the agricultural community or for restoration of the environment. The agricultural community should pay for their benefits and the general public should pay for the benefit of a restored environment.

Because assurance and financing, including cost allocation principles, are key elements of any proposed solution, no CALFED package can be deemed complete and selected for implementation until an assurance package and finance package have been developed that are acceptable to stakeholders and the CALFED agencies.

Ecosystem Restoration

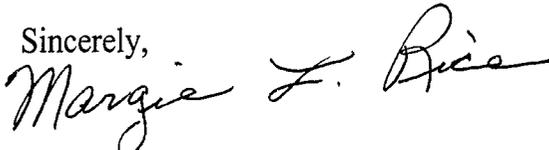
We support the CALFED solution that contains a comprehensive and affordable ecosystem restoration program that will enhance the ecological health of the Bay-Delta and is consistent with cost allocation principles. As part of this support, the urban water community requires that environmental restoration measures work, are paid for by the general public and are implemented through fiscally sound management practices.

A Complete Package

We support a complete package to ensure the CALFED Program remains intact as a single, focused, program so that environmental enhancements, water supply reliability and drinking water quality improvements move forward together. Political pressures and an aggressive timeline cannot be allowed to move one component of the program ahead of, or to the detriment of, any of the other CALFED programs. Statewide consensus and support of the CALFED solution can only be achieved through the principle of "getting better together."

In closing, we support the CALFED process and look forward to working with CALFED and other stakeholders to gain a Bay-Delta fix that will work for the long term.

Sincerely,



Margie Rice

Chairperson

West Orange County Water Board

cc: West Orange County Water Board of Directors
Municipal Water District of Orange County
Jeffrey R. Reana, General Manager/Engineer



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