

ASSOCIATION OF CALIFORNIA WATER AGENCIES  
**REGION 10**

Orange County and San Diego County  
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June 11, 1998

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CALFED Bay-Delta Program  
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Attn: Rick Breitenbach

CALFED Bay-Delta Program:

This letter is a follow-up to the public hearings on the Draft Program EIS/EIR announced by CALFED. We represent the Association of California Water Agencies (ACWA), Region 10, which is composed of agencies from both Orange and San Diego Counties.

FIRST, WE SUPPORT THE SOLUTION PRINCIPLES as presented on page 5 of the Programmatic EIS/EIR Executive Summary: To resolve California's water problems, the Delta must be fixed first.

SECOND, we agree with CALFED's water efficiency goals. ACWA REGION 10 SUPPORTS A STRONG WATER ETHIC: Orange and San Diego Counties have invested millions of dollars in local water management programs that reduce imported water demands.

- a. The Orange County Water District is developing the Orange County Groundwater Replenishment System. This project by the year 2020 will provide 100,000 acre feet of new reclaimed water;
- b. The San Diego County Water Authority estimates that by 2015, San Diego County will gain 100,000 acre feet through water reuse and groundwater development;
- c. Attached for details is a copy of the University of California Cooperative Extension Study: It evaluates the use of reclaimed water on avocados. Entitled, "Avocado Pilot Project", it shows extended effort to diversify and expand water supply;
- d. All new golf courses built in San Diego County must use reclaimed water; In Orange County, the Green Acres Reclaimed Water Project provides reclaimed water for golf courses in Costa Mesa, Santa Ana and Fountain Valley, as well as irrigation for public parks, business properties and school grounds in both communities. In south Orange County, the Irvine Ranch Water District, the Moulton Niguel Water District and the El Toro Water District sell reclaimed water;

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- e. In both counties, water agencies have adopted the best management practices for conservation. Local water agencies in San Diego County spend more than \$5 million annually on conservation. And such practices save more than 20,000 acre feet per year in that County. In Orange County, the Municipal Water District of Orange County and its member agencies have implemented an aggressive conservation program, especially in a ultra-low flow toilet campaign. For example, a Municipal member, the Mesa Consolidated Water District, recently distributed 600 ULF toilets which resulted in a savings of 20 acre feet.
- f. The Mesa Consolidated Water District and the City of Long Beach have developed colored water programs. This high quality water comes from deep aquifers but it is the color of tea and has an unpleasant odor. Long Beach has a new treatment plant that cost \$51 million with 25 color wells and 7 new ones planned, each costing from \$750,000 to one million. Mesa Consolidated projects \$7 million to develop such water. Further, the Irvine Ranch Water District and the City of Huntington Beach plan similar programs. BUT, FULL REALIZATION OF THESE INVESTMENTS DEPENDS UPON A SUCCESSFUL CALFED SOLUTION TO RESTORE THE DELTA. The draft Programmatic EIS/EIR unfortunately does not provide details on the incentives CALFED will use to implement best management practices. Nor does CALFED state have agencies that have already adopted demand management programs or develop new water sources will be rewarded. We suggest that CALFED work closely with the California Urban Water Conservation Council.

THREE, BOTH ORANGE AND SAN DIEGO COUNTIES BELIEVE THAT THREE ELEMENTS OF THE CALFED PROGRAM ARE OF BOTTOM-LINE SIGNIFICANCE AND MUST BE PART OF WHICHEVER ALTERNATIVE IS ADOPTED:

1. DELTA EXPORT WATER MUST BE OF THE HIGHEST POSSIBLE QUALITY. Two reasons exists: (a) For reclaimed water systems to be efficient, Delta export water must contain as few salts and total dissolved solids as possible. Refer again to the Escondido Avocado Study: A cover sheet summarizes the need for higher quality water. Further, the San Diego County Water Authority has negotiated an agreement with the Imperial Irrigation District to transfer 200,000 acre feet per year of Colorado River water that is to be conserved by improved irrigation practices: To fully utilize this water, 200,000 acre feet of low TDS water from the Delta will be required.

And (b) based upon important public health concerns and goals, Delta water users must deal with more restrictive EPA requirements regarding disinfection by-products. The recently released study by the Department of Health Services about probable connections between trihalomethanes and first trimester miscarriages is a case in point. Due to population size, Region 10 and Southern California will pay a higher proportion of costs associated with a CALFED Delta solution. If poor quality water comes with that solution, our region will also

then have to pick up higher water treatment costs. That circumstance jeopardizes public support.

2. THE ULTIMATE CALFED SOLUTION MUST ASSURE OUR REGION WITH CERTAINTY OF DELIVERIES. The patchwork approach of the past due to pumping and water quality problems in the Delta was expensive and unreliable for Southern California.
3. THE CALFED SOLUTION MUST PROVIDE SO-CALLED "NEW WATER". There are two elements of the CALFED process that would advance that goal. (a) Water marketing or water transfers are important to both ecosystem restoration and water supply reliability. Water marketing, also, provides perhaps the greatest potential for "new water" supplies. The issues and concerns of the Water Transfer Policy detailed on page 59 of the Phase II Interim Report must all be resolved. To implement a system of water marketing will require institutional changes, e.g., how subsidized water will be handled in the marketplace. Further, CALFED will need to spell out water rights, water quality protection by avoiding agricultural run-off and third party impacts. (b) A second element deals with operational efficiency throughout the year: The ultimate CALFED Delta Solution must meet criteria by which the Delta can operate most efficiently.

WE URGE CALFED TO ACCELERATE DISCUSSIONS ON THE RELATIONSHIP OF ITS ALTERNATIVES TO DELTA OPERATIONAL EFFICIENCY AND WATER SUPPLY, INCLUDING ESPECIALLY A WATER MARKETING SYSTEM. Region 10 believes that urban, agricultural and environmental groups as well as Southern California and rural counties have common interest in both these elements.

FOUR, REGION 10 HAS DEEP-SEATED CONCERNS OVER THE FINANCIAL IMPACTS OF ANY ADOPTED CALFED SOLUTION. Generally, the most populated region, Southern California, will wind up paying for the larger sum of any solution. Specifically, CALFED must understand that Region 10 people will be asking what the region will get in return for that investment. So far, CALFED does not seem to have a handle on that issue. And, perhaps CALFED should not do so until after the EIS/EIR process has been completed.

However, there has been a funding process for ecosystem restoration, e.g., Category III Projects and Proposition 204. CALFED should at least indicate the categories that will need further funding, e.g., watershed management, land acquisition, monitoring or administration. Region 10 members generally have no concept as to what the CALFED price tag will be.

If Region 10 members are to support future bond issues related to the Delta, they need to better understand the CALFED financing structure and overall budgetary plans.

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FIVE, ALL ELEMENTS OF THE CALFED SOLUTION MUST MOVE FORWARD TOGETHER. Our region must have the assurance that its investment in the Bay-Delta ecosystem will result not only in restoration of our state's ecologic treasure, but will also in improvements in water quality, reliability and water supply. These assurances are vital if Region 10 is going to accept the payment coupons attached to the CALFED solution.

Thank you for your consideration of our concerns.

Sincerely,



Philip L. Anthony  
Director, Orange County Water District  
Chair, ACWA Region 10

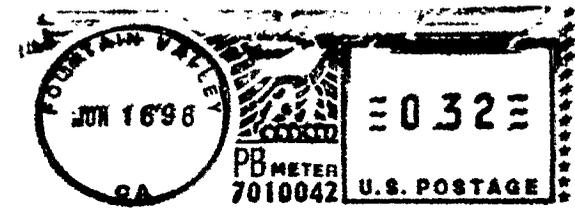


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cc: Gene Harris, President, ACWA  
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