

CITY OF SAN JOSE
June 30, 1998
CALFED Phase II Programmatic EIR/EIS Comments

I. Introduction

The City of San Jose, in partnership with the Santa Clara Valley Water District, manages its water supply to serve its current population and absorb the future growth forecasted in the San Jose 2020 General Plan. The CALFED process, the City believes, is a timely opportunity to resolve the conflicts between regional water supply and environmental needs and create a statewide water management strategy that ensures water supply reliability and preserves and sustains the Bay/Delta ecosystem.

San Jose endorses the CALFED program's solution principles outlined in the Phase II Programmatic EIR/EIS. It will indeed be difficult for CALFED to strike a balance, in face of so many uncertainties, between urban, environmental and agricultural interests. Such a balance, with adequate assurances, is clearly in California's best interest. These comments, befitting the programmatic intent of the EIR/EIS, highlight the City's concerns about the overall balance of the proposed CALFED solutions package and its relationship to our local water supply and environmental protection and restoration efforts.

San Jose has already committed considerable financial resources to water reuse and efficiency programs. The Santa Clara Basin Watershed Management Initiative and Pollution Prevention Strategy for a Clean Bay are applying adaptive management principles to identify stakeholder concerns and implement restoration programs. As a major consumer of Bay-Delta water, the residents of the South Bay region expect CALFED to consider these existing efforts as contributions to the shared burden of improving the ecosystem and deliver the resources necessary to make our efforts as effective as possible.

II. General Concerns About CALFED's Program

Our main concern is that CALFED thoroughly evaluate the benefits and costs of potential management-oriented solutions embodied in the common program elements before recommending new conveyance facilities. The benefits of water efficiency and reuse, water transfers and off-Delta water quality improvement programs need to be discussed in more detail. This information would allow us to better compare the relative risks to water quality and supply reliability of the three alternatives, and thus help shape and support a preferred alternative.

San Jose would like CALFED to clarify the role of scientific monitoring and adaptive management in its decision-making process. It is unclear, in the event that alternatives 2 or 3 are adopted, whether outstanding results from the implementation of the common program in the areas of ecosystem restoration and water supply would influence the decision to build conveyance facilities. The difference that "phased decision-making",

based on the results of scientific monitoring, could make in the area of assurances should be discussed.

Also unclear is how unforeseen impacts resulting from the implementation of the alternatives would be mitigated. How would conflicts within a CALFED program be resolved? Would mitigation measures to ensure water supply reliability, for example, be implemented if they reduced the effectiveness of the ecosystem restoration program?

III. Recommendations

1. Add an educational element to the common program

A recent poll found that 70% of Californians don't know the location of the Sacramento-San Joaquin Delta! Public understanding of the statewide importance of the Bay-Delta ecosystem is critical to creating stakeholder support for a CALFED solution. San Jose recommends that CALFED add an educational element to the Common Program, and consider establishing a center, perhaps modeled on the proposed San Diego Natural History Museum, for Bay-Delta research and educational activities.

2. Clarify potential impacts of water transfers

San Jose supports the development of a water transfer and marketing program that provides a reliable water supply to the Santa Clara Valley, encourages statewide water use efficiency, reduces the need for new storage and conveyance facilities, and improves the condition of the Bay-Delta ecosystem. Water transfers that would enable the conversion of prime agricultural lands to urban uses are undesirable to the City. CALFED should clarify the impacts that water transfer and marketing schemes would have on prime farmlands and agriculturally-dependent communities.

3. Emphasize watershed-wide pollution prevention efforts to improve water quality

San Jose supports CALFED's goal to provide good water quality for all beneficial users of Delta water, and recommends that urban and agricultural stakeholders be equally responsible for improving water quality. Pollution, particularly from non-point sources, originating upstream of the Delta should be reduced to improve the quality of the South Bay's water supply. We urge CALFED to identify sources of non-point and point source pollution in the Bay-Delta watershed and implement pollution prevention efforts to improve the quality of flows destined for our water taps and the Delta.

4. Provide adequate support for water reuse programs

CALFED's proposed statewide budget of \$25 million per year for water efficiency and reuse programs is inadequate. Phase 1 of the South Bay Water Recycling Program, which developed 10,000 acre feet per year of recycled water, cost \$150 million dollars. It seems

only reasonable that CALFED should be prepared to contribute substantially more to the estimated 10 billion dollar cost of developing facilities to recycle 1 million acre feet of this valuable resource.

5. Support San Jose's existing water reuse and efficiency programs

Water recycling, a critical part of the water use efficiency component reviewed in the Programmatic EIR, is on-line in San Jose. Within the next 4 years, the South Bay Water Recycling program will deliver and estimated 20,000 acre feet per year of recycled water for irrigation, industrial, and environmental uses. This is a small, but significant, portion of the 1 million acre feet per year of water that CALFED is counting on to be recycled statewide.

San Jose supports an equitable sharing (between urban and agricultural water users) of the burden of improving statewide water use efficiency. We expect CALFED to contribute funding to maximize the effectiveness of water reuse programs throughout the state, including our own South Bay Water Recycling program.

6. Clarify a restoration goal, or ideal condition, for the Bay-Delta ecosystem

CALFED's intention- to restore the Bay Delta ecosystem- is laudable. However, the Draft EIR is unclear about a desired future condition for the ecosystem. Without a definition of a desirable ecosystem condition, stakeholders cannot adequately weigh the relative value of the proposed alternatives. We urge CALFED to adopt indicators of environmental quality relative to the beneficial uses of Bay-Delta resources and share them extensively with stakeholders before selecting a preferred alternative.

7. Include funding and technical assistance for South Bay ecosystem restoration efforts in CALFED's restoration program

The South Bay is an integral part of the Bay-Delta ecosystem. Two-thirds of the water imported by our region passes through the Delta. San Jose residents consume, reuse or discharge this water into the Santa Clara Valley Watershed. San Jose and other local and regional governing bodies are implementing the Santa Clara Valley Watershed Management Initiative (SCVWMI) to restore riparian and salt marsh habitats, abate pollution, and increase water use efficiency and reuse. The City expects the South Bay to be included in the CALFED Ecosystem Restoration Program (ERP). We expect CALFED to provide funding and technical assistance to expand City-funded restoration efforts in the South Bay marshlands and tributary watersheds.