



City of
Santa Monica

Craig Perkins
Director of Environmental and
Public Works Management Dept.

1685 Main Street, Suite 116
PO Box 2200
Santa Monica, California 90407-2200

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To	R. BREITENBACH	From	C. PERKINS
Co.		Co.	
Dept.		Phone #	(310) 458-8221
Fax #		Fax #	

July 1, 1998

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

RE: City of Santa Monica's Comments on the Cal-Fed
Bay-Delta Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

The City submits the following comments on the Cal-Fed Draft
EIR/EIS:

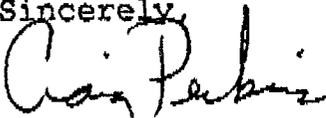
1. Cal-Fed has adopted the Department of Water Resources' Bulletin 160 water demand projections which overestimated urban demand in 1995 by 1.6 million acre feet. Future demand cannot be accurately projected using inaccurate baseline data.
2. Cal-Fed has adopted Bulletin 160's assumptions on urban water conservation potential and accepts its distinction between "applied" water and "real" water. Yet, DWR does not provide supporting information on how it calculated its conservation savings estimates. In a document as technically detailed as the Draft EIR/EIS, this analysis is clearly lacking.
3. Cost estimates for implementation of the urban Best Management Practices are too high. We suggest that the Cal-Fed access the expertise of experienced conservation professionals to assist in the calculation of the true costs of urban water conservation program implementation and use program benefit-cost analysis from a variety of reliable sources.
4. Water pricing has been excluded from the Cal-Fed discussion despite economic studies that indicate both urban and agricultural water consumers respond to price signals by increasing efficiency.

5. Local water recycling projects should be financially supported by Cal-Fed to reduce reliance on imported water.

Fear of future water shortages caused by a lack of local water resources has been the driving force behind water development in California for the last century. Dramatic population growth predictions led to construction of dams, reservoirs and aqueducts that severely impacted agricultural communities, fisheries, and ecological systems. We are now facing a similar set of choices surrounding the San Francisco Bay-Delta. Will we construct potentially destructive water projects that polarize the urban, agricultural and environmental communities, or will we invest in water conservation and water recycling programs that ensure a more sustainable water future? The City of Santa Monica has adopted the sustainable water path and, as a result, has decreased its water demand, reduced costs, and increased water reliability.

Local resource options are the "preferred alternative" from a financial, environmental, and water reliability perspective. If we fully implement these options first, we may meet the needs of the environment and have sufficient water for the future without repeating the mistakes of the past.

Sincerely,



CRAIG PERKINS
Director of Environmental and
Public Works Management

CC: John Jalili, City Manager