
**COMMENTS OF THREE VALLEYS MUNICIPAL WATER DISTRICT
ON**

**CALFED BAY-DELTA PROGRAM –
PROGRAMMATIC EIS/EIR**

DRAFT – MARCH 1998

June 29, 1998

1. “No Action” is impermissible.

Three Valleys Municipal Water District (TVMWD) fully agrees with the approach of the state and federal government agencies in forming CALFED. While only included in the PEIS/EIR as a baseline against which other actions may be measured, it is important to note that “no action” must be considered an unacceptable outcome. As one stakeholder in the Bay-Delta situation, TVMWD considers the CALFED Program and its successful long-term implementation as the best hope to stem the continuing decline in all four problem areas: the ecosystem, water quality, water supply, and levee/system integrity.

2. Impact of Problem Areas on TVMWD

All four of the problem areas touch on TVMWD in some way, underscoring the nature of the problems as highly interrelated. As a wholesale water provider dependent upon water exported from the Delta, TVMWD is perhaps most directly affected by restrictions on the water supply to the State Water Project (SWP). The SWP supplies 100 percent of the water to our 25-mgd Miramar Water Treatment Plant, which serves some of the potable water needs of Claremont, La Verne, Pomona, Diamond Bar, Walnut, City of Industry, and Rowland Heights. In fact, all of our nearly 500,000 residents depend in some measure on the Delta as a continuing source of export water for the SWP.

Water quality presents a problem even more pressing in some ways than the water supply issue. The problems associated with bromide and TOC in Delta export water cannot be ignored. Drinking water quality regulations are being tightened to gain better control of disinfection by-products such as trihalomethanes, suspected carcinogens that may also contribute to other serious health effects. These disinfection by-products may be impossible to control sufficiently through treatment methods (which are also very expensive). Thus, it is extremely important for the

CALFED Program to control and reduce the level of bromide and TOC at the export pumps for the SWP. Other contaminants – heavy metals, pesticides, and so on – present a lesser problem at this time, but control of all water quality degradation must remain a key focus of the Program.

Levee integrity and ecosystem restoration are also very important issues to resolve, through the indirect effect these problems have on water supply and water quality. TVMWD accepts and supports the solution principle that all four problems must be addressed concurrently, and that for a comprehensive solution to be acceptable it must not redirect impacts from one problem to another, or from one stakeholder group to another.

3. Water Use Efficiency

TVMWD is an original signatory agency to the Memorandum of Understanding Regarding Urban Water Conservation (MOU), in December 1994. The District supports water use efficiency for both agricultural and urban sectors as a part of the CALFED Program. However, the estimated urban real water savings for the South Coast urban region is substantially different from estimates made by the Metropolitan Water District of Southern California in its integrated resources planning process a few years ago. TVMWD recommends that CALFED adjust the planning assumptions and savings estimates for the South Coast urban region, consistent with the IRP water conservation savings targets of MWD, which were based on full implementation of Best Management Practices. At a minimum, the DEIS/EIR should explain the significant difference between these estimates.

In general, the Water Use Efficiency Component is inadequate in describing the measures that will actually result in the additional real water savings assumed for the CALFED Program. The additional measures CALFED contemplates to achieve its assumed results appears to come down to a single sentence (Tech. Appendix p. 5-8): “CALFED has proposed that the Council certify water supplier compliance with terms of the MOU.”

4. Water Supply

The extreme fluctuation in water flows of the rivers tributary to the Delta create a very powerful “time-value” of water. This has been demonstrated very tangibly in the on-again, off-again restrictions placed on pumping, as a way to reduce fish entrainment and mortality. The crucial point of this effect is that for a long-term program to succeed, operational flexibility must be built in to the greatest feasible extent.

TVMWD believes that maintaining current deliveries to the Metropolitan Water District should be sufficient to meet near- and medium-term needs identified in its Integrated Resources Plan. However, some increase in the SWP supplies is likely going to be needed to meet long-term future demands, and that should be one goal against which the long-term success of the CALFED Program is measured.

5. Water Quality

As in the case of water supply, operational flexibility will be enormously important to achieving better water quality for all purposes. As CALFED moves to determine a Recommended Alternative on conveyance, it is especially important to recognize the superior benefits that would result from a dual system (Alternative 3).

6. Alternatives

CALFED's analysis shows that on several very important issues, a dual conveyance system would have better results than Alternative 2, and far better than Alternative 1. In fact, it is not an overstatement to recommend that Alternative 1 be rejected as inadequate to meet the stated goals and objectives of the CALFED Program. In terms of fisheries, water quality (especially on the important issue of bromide levels), Delta flow circulation, water supply, and operational flexibility, the Draft PEIS/EIR ascribes greater benefits to Alternative 3 than to either of the other alternatives. Clearly, there are differences in the specific benefits from each specific option within the Alternative 3 "cluster"; however, as a general observation it appears that these would meet the CALFED solution objectives best.

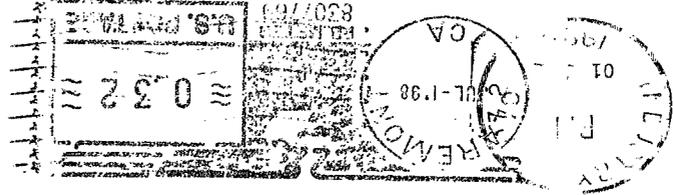
7. Assurances and Implementation

TVMWD has not made a specific recommendation for CALFED to select any particular "Preferred Alternative" because it still remains to resolve the very difficult issue of assurances. TVMWD – probably no different from other stakeholders – would like some firm basis to know that benefits will occur as projected, that operational controls are in place, and that costs will be allocated fairly throughout the long-term course of implementation. These elements are essential for all stakeholders – no matter what their specific interests – to gain the necessary confidence and trust to move forward with any concrete program of actions, when these actions will be costly and could have the potential to redirect negative consequences.

C-014367

DEPARTMENT OF
WATER RESOURCES
SACRAMENTO

98 JUL -6 AM 10:42



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

98814-8809 01

1021 Miramar Ave., P.O. Box 1300
 Claremont, California 91711-1300



C-014367