

Briggs comments on:

DRAFT THE ENVIRONMENTAL WATER ACCOUNT
CONCLUSIONS TO DATE AND AN IMPLEMENTATION PLAN
July 23, 1999

It looks as if we are shifting the water quality concerns into a "mitigation" mode and away from an "active player" mode in the EWA. Fine, as long as the quality issues remain part of the real-time picture. Predetermined mitigation measures may work in most cases but there could always be an unforeseen result from an operation that would require a flexible WQ mitigation measure.

WQ assets could be handled by the water users who would effectively divide their chips between supply and quality, leaving the negotiations essentially 2-D. As long as water user policy people understand the tradeoffs between assets and benefits.

The current document correctly acknowledges that operations can positively and negatively affect quality and that net negative ones will be mitigated. Other improvements to the document are the mention of specific examples.

Some detailed comments....

II. PROBLEMS/ISSUES/CONSTRAINTS

13. Shifts in export patterns to reduce fish salvage would have mixed effects on urban water quality.

Reductions in February and March exports would result in lower dissolved organic carbon in urban water supplies. Higher summer and fall exports could increase salt concentrations of export water.

Well put. Please retain.

III. STEPS IN IMPLEMENTATION

A. Resolving Issues

19. Water Quality Effects - responsibility for any water quality effects caused by EWA actions should be resolved. Specifically, shifts in export timing that result in a decline in average or specific delivered water quality should be mitigated.

Suggested new second sentence

Specifically, shifts in export timing that increase average (quarterly or annual) drinking water constituents of concern (TDS, Br, Cl, TOC) should be mitigated.

B. Developing EWA Assets

28. Assets - to be effective the EWA needs real assets. The EWA storage, pumping, and conveyance assets must be secured and agreements must be developed with the owners of those assets concerning payment for and operation of the assets. Agreements or contracts must be executed for water transfers (including options), efficiency, and reuse assets of the Environmental Water Account For example: water assets could be in the form of contracts with the projects. Other assets would include guaranteed funding through appropriation, user fees, etc. Other guarantees may include contracts or rules for access to and use of project facilities. Guarantees may also include water rights or exemptions from water quality standards for specific actions.

Can we clarify the meaning of "exemptions from water quality standards" in the last sentence? I do not know what is implied.

C. Operational Capabilities, Governance, and Rules

32. In-Delta Storage - If the Delta Wetlands project is to be part of EWA, drinking water issues concerning that project must be resolved.

This is good language. Please retain.