

August 8, 1997

CALFED
Mr. Lester Snow
Executive Director
1416 9th Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

**Agricultural and Urban Water Caucuses Policy Group
Comments on CALFED's Decision Process to Draft Preferred Alternative**

Identification of an appropriate set of evaluation criteria to identify a preferred alternative is presently among the Ag/Urban Policy Group's chief interests. We have reviewed CALFED's Decision Process document. While we agree with its general approach, we have the following initial comments which we believe are necessary refinements to the criteria.

1. Water Quality: Alternatives ought to be ranked according to drinking water quality, export salinity levels, in-Delta water quality, and the combination of these elements. CALFED should evaluate the ability of alternatives to achieve the best balance among these criteria, and to meet anticipated changes in regulatory requirements.
2. Ecosystem Quality: While it is currently anticipated that all the alternatives may be designed to achieve approximately the same baseline of environmental protection, it is not appropriate to assume that levels of environmental flows, water quality standards, or physical alternations to the system will be common to all alternatives. These should be customized to reflect the unique mix of habitat restoration strategies and water diversion patterns offered by each alternative.
3. Storage and Release of Environmental Water: The extent of storage for environmental water and additional programs, such as water transfers for environmental purposes, will affect the extent of fisheries and wildlife benefits. The sources for environmental water will vary among alternatives. Such differences must be accounted for in the alternatives evaluation process.
4. Priority for Threatened or Endangered Species: The alternatives should be analyzed in a manner that identifies the benefits provided to threatened and endangered species. Greatest consideration should be given to alternatives which promote maintenance and recovery of such species, consistent with overall ecosystem restoration.
5. Water Supply: The level, location, and reliability of additional water supplies will vary among alternatives. Greatest consideration should be given to the alternatives with the greatest increase to manageable water supplies both under dry and critical conditions as well as under average annual conditions.
6. Water Supply Reliability: CALFED should give greatest consideration to alternatives which provide regulatory certainty for water users, and which provide water supplies from the Delta on a reliable basis.

7. System Capacity and Operational Flexibility: We regard system capacity and operational flexibility as important factors which are integral to all aspects of the CALFED program (ecosystem restoration, water quality, levee system integrity, and water supply). The capacity and location of new facilities will determine the system's ultimate ability to reliably meet environmental objectives and the demands of consumptive uses. Therefore, we propose an additional category of criteria be created to treat these factors on par with the other major categories addressed in this document.

8. Transfers: Greatest consideration should be given to the alternative with the greatest flexibility and opportunities for efficient and cost-effective transfers, consistent with the CALFED solution principles (e.g. no re-directed impacts).

9. Applicability of State and Federal Funding: Consideration should be given to the applicability of State proposition 204 and Federal Bay-Delta funds. Since there are conditions and linkages attached to the use of these funds for accomplishing Bay/Delta objectives, greatest consideration ought to be given to alternatives which meet such conditions.

10. Consistency with Solution Principles: CALFED should separately assess the alternatives against each of the six solution principles. The relative qualitative rankings of the alternatives against the solution principles should consider each alternative's costs, assurances, ability to satisfy Program objectives, and ability to minimize impacts.

As a final overall comment, the use of a matrix identifying how each alternative performs against the identified criteria is a good strategy for presenting information for supporting final decisions. However, the preferred alternative should not simply be selected based on ratings in an evaluation matrix. Instead, the selection of a final alternative should be based on a number of factors including CALFED's best judgment and the level of public and stakeholder support necessary to ensure funding and implementation of the CALFED decision.

We urge you to include these suggestions in your criteria. We will continue to actively seek opportunities to comment on products developed by the CALFED Program.

Thank you for your consideration.

Very truly yours,

Dan Nelson

Byron Buck

cc:

Jean Auer, Environmental Water Caucus