



County of Orange
Planning & Development Services Department

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DATE: February 24, 1998

TO: Orange County Board of Supervisors

FROM: Orange County Water Task Force and the
Southern California Water Committee -
Orange County Technical Task Force

SUBJECT: Recommended Position Paper for the Cal-Fed Process

BACKGROUND

A "Technical Task Force" was created by the Orange County Caucus Trustees of the Southern California Water Committee in September of 1997 to address specific water topics and unifying Orange County's voice in responding to the issues identified as critical to maintaining the quality and reliability of Orange County's water supplies. The first topic to be reviewed by the Task Force is the Cal-Fed Process for "fixing" the Bay-Delta and related water management operations for the State Water Project (SWP).

The Orange County Caucus members of the Southern California Water Committee include:

Robert Bein	Robert Bein, William Frost & Associates
Jim Blake	Director, Metropolitan Water District of So. Cal.
Col. Jack Foley	Chairman, Metropolitan Water District of So. Cal.
Robert Seat	SeaTree Nurseries
Supervisor Todd Spitzer	Third District, County of Orange

RECOMMENDED ACTION

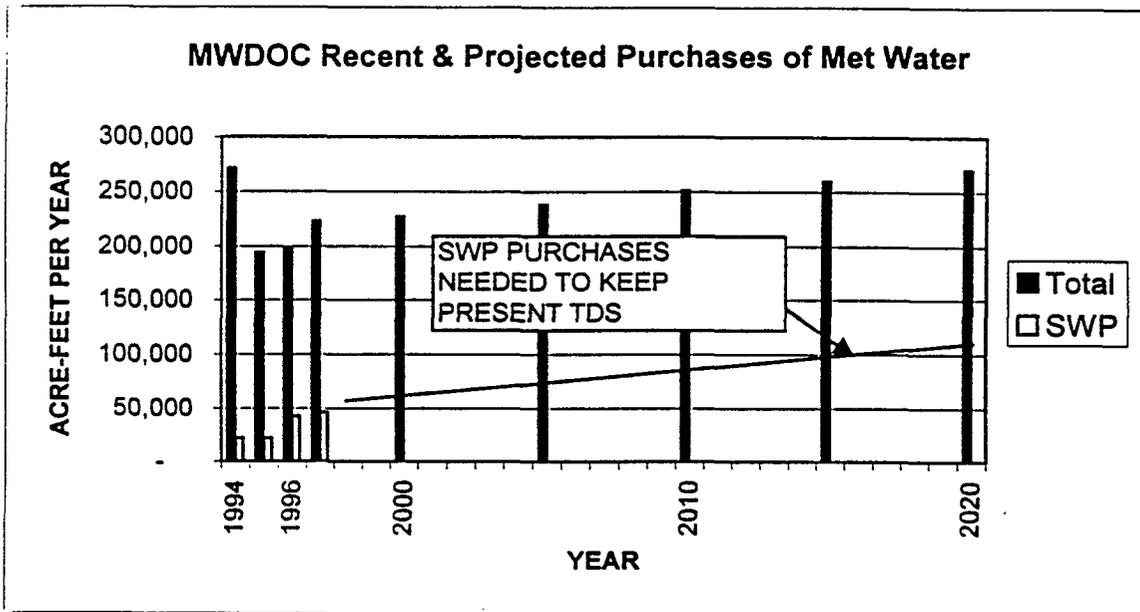
The Orange County Board of Supervisors is requested to receive the position paper and direct that County comments on the forthcoming Cal-Fed EIS/EIR reference the identified concerns.

ORANGE COUNTY'S PERSPECTIVE

The use of SWP water is a critical component in achieving high quality local water supplies. Although only a quarter of our total imported water demand, the high quality of SWP water is critical for reducing salinity in water recycling programs and the conjunctive use programs of our groundwater basins. In addition to salinity issues, SWP water supplies are needed to maintain low bromide and organic content for meeting blending objectives under future

anticipated water quality standards. The expansion of water use efficiency programs, including wastewater recycling and conjunctive use management of groundwater basins, to meet Orange County's increasing population and water demand requirements are dependent on reliable delivery of low-salinity water from the SWP.

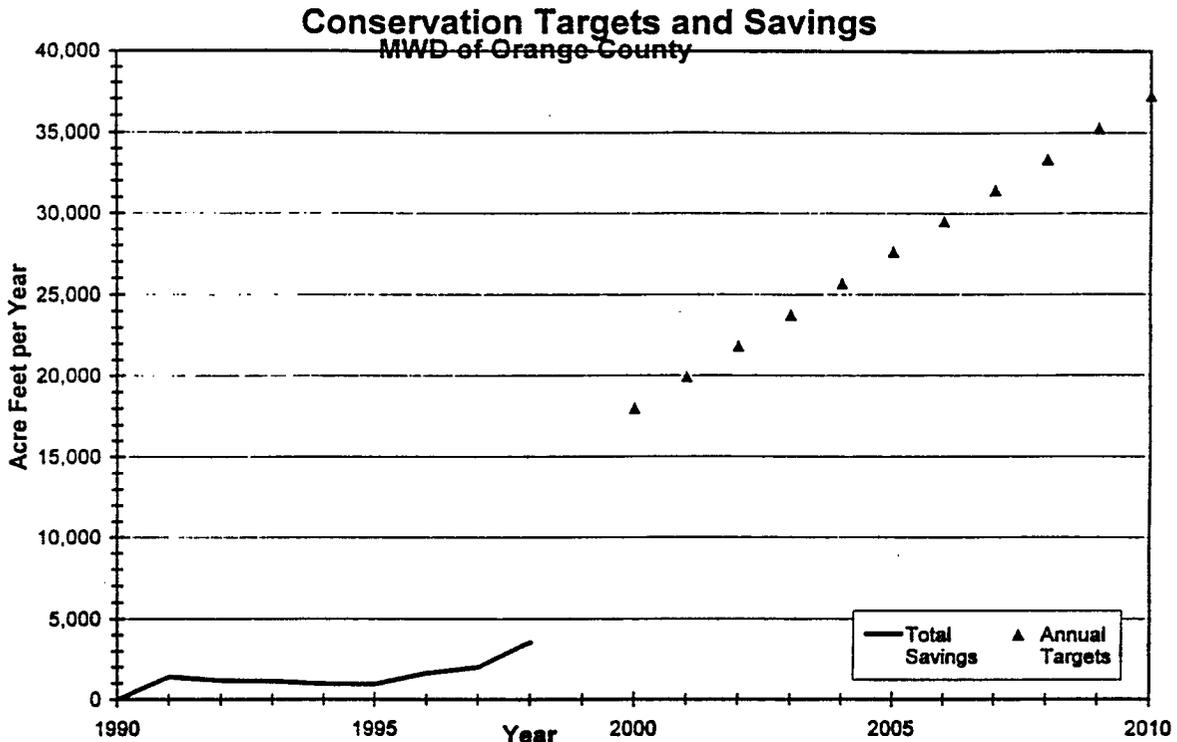
The following Graph No. 1 demonstrates existing and estimated demand for the member agencies of the Municipal Water District of Orange County (MWDOC).



GRAPH NO. 1

To offset demand for the more expensive imported water, local agencies participate in water conservation and recycling programs. Controlling water rate increases with these programs has proven effective through reduction of consumer water demand. Graph No. 2 (on Page 3) demonstrates MWDOC's data from their conservation (toilet and showerhead retrofit) programs.

Throughout the state, the California Urban Water Conservation Council (CUWCC) and its signatory organizations has led the challenge to guide efficient water management by urban water agencies. With the establishment of CUWCC's Best Management Practices (supported by Orange County Board of Supervisors in 1991) a coordinated effort began for focusing on the most effective water conservation programs, and supporting their implementation in all urban communities. Table No. 1 (on Page 4) identifies the status of these BMP's in the MWDOC service area.



GRAPH NO.2

The draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is to be distributed to the public in the next few weeks. State law requires that the EIS/EIR consider alternatives that (1) offer substantial environmental advantages over the primary project proposal, and (2) may be feasibly accomplished in a successful manner considering the economic, environmental social and technological factors involved. Specifically, the document must describe "... a range of reasonable alternatives to the project ... which would feasibly attain most of the basic objectives of the proposed projects but would avoid or substantially lessen any of the significant effects of the project ..."

Project objectives can be invoked at the findings stage of the review process as a basis for rejecting alternatives as infeasible. Before approving a project, the agency must also find either that the project's significant environmental effect have been avoided or mitigated or that unmitigated effects are outweighed by the project's benefits. The purpose of the requirement that an agency consider feasible alternatives is to determine if there is an alternative capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance. The EIR must discuss such alternatives "... even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." If alternatives are rejected, and EIR "... must explain why each suggested alternative either does not satisfy goals of the proposed project, does not offer substantial environmental advantages or cannot be accomplished."

**Urban Water Conservation
Best Management Practices
Implementation Status in the MWDOC Service Area**

Best Management Practice:	MWDOC/Member Agency Implementation Status:
1. Residential Water Use Surveys –	Surveys increasing over last few years, total surveys needs to increase significantly
2. Residential Plumbing Retrofits –	Retrofits are ongoing through Res. Surveys, low-flow device saturation to be evaluated, 70% saturation needed
3. Distribution System Water Audits, Leak Detection and Repair -	Majority of agencies (all but two) meet minimum unaccounted for water threshold of 10%
4. Metering with Commodity Rates –	Vast majority of water is metered and billed for according to volume of use
5. Landscape Programs –	Educational programs ongoing, irrigated area measurements underway to set budgets, other supporting efforts developing
6. High-Efficiency Clothes Washers –	As a new BMP, cost effectiveness needs to be evaluated and funding partner commitments to implement
7. Public Information Programs –	MWDOC and member agencies continue to provide public information through numerous activities
8. School Education Programs –	MWDOC continues to administer a regional educational program for K through 12 grades
9. Commercial, Industrial and Institutional Programs -	Top 20% users have been identified, 200+ sites surveyed with specific recommendations suggested, retrofit incentive program to start in February 1998
10. Wholesale Agency Assistance Programs -	MWDOC and Metropolitan continue to provide both technical and funding assistance on various programs
11. Conservation Pricing –	Eight out of 23 agencies have inclining block rate structures, remaining agencies have flat rate structures
12. Conservation Coordinators –	All agencies have a staff person assigned usually on a part-time basis
13. Water Waste Prohibition –	Most all agencies have waste prohibitions however, many need additional requirements
14. Ultra-Low-Flush Toilets –	Programs underway since 1993 with 70,000 + retrofits however, implementation rate is lower than BMP requirement

Since alternatives are analyzed, in part, by determining whether the alternatives achieve the basic project objectives, it is suggested that the Orange County Caucus review the EIR/EIS to determine that the basic objectives stated therein encompass the needs of Orange County, as well as determining which of the alternatives best meets those needs.

The following recommendations have been prepared by the Technical Task Force for your Board and the Orange County Caucus of the Southern California Water Committee (SCWC). They were reviewed and revised by the Orange County Water Task Force on January 22, 1998. The recommendations are intended to assist in policy level analysis of State Water Project issues as they are addressed by the SCWC and other local agencies.

- Supply - provide for reliable physical and regulatory conditions allowing for increased water supply reliability through additional water supplies in higher runoff years. Cal-Fed Alternative 3 includes a "Dual Delta Conveyance" facility which offers the greatest opportunity for flexibility in water management for the Bay-Delta.
- Delta Restoration - restore environmental conditions in the Bay/Delta watersheds which will provide regulatory certainty and predictability of exports, along with the ability to obtain all of the necessary permits to meet the above objectives.
- Salinity Management - assure that salinity levels in Delta exports maximize the opportunities for reclamation and groundwater management. Cal-Fed Alternative 3 includes a "Dual Delta Conveyance" facility and offers the greatest opportunity for bringing low-salinity water to the SWP.
- Drinking Water Quality - provide water quality in Delta exports which will allow meeting existing and future drinking water quality standards utilizing known and cost effective treatment technologies. Cal-Fed Alternative 3 includes a "Dual Delta Conveyance" facility and offers the greatest opportunity for bringing the highest quality water to the SWP.
- Water Transfers - provide the necessary institutional, regulatory, and physical conditions which will enhance opportunities for water transfers. Implementation of Cal-Fed Alternative 3 includes a "Dual Delta Conveyance" facility to provide the most stable environmental conditions which increases opportunities for water transfers to the SWP.
- Water Efficiency - identify and implement programs to assure cost-effective water management to reduce water waste and to conserve resources. Orange County water agencies are state-wide leaders in water recycling and water conservation programs. The investments in local programs that reduce imported water demand should be emphasized as demonstrations of local interest and assurance in meeting demand reduction targets. Continue these efforts and support similar programs in other urban communities.

- Affordable Cost - provide options which can be financed in a manner which doesn't disrupt capital improvements in the region or long-term rate targets. Encourage support for annual state and federal funding for Cal-Fed restoration projects according to appropriate cost sharing agreements and the phasing plan milestones approved for the Preferred Alternatives.
- Institutional Reform - fully consider the pros and cons of institutional reform which result in sustainable solutions that have necessary adaptability, integrated and consolidated decision-making, and stakeholder participation including significant roles for environmental and water user interests.
- Assurance Agreements - develop effective assurances for all interests that specify the benefits of a delta solution to be commensurate with investments and that mutually agreeable protections are consistent with other Bay-Delta watershed uses and interests. A solution such as Cal-Fed's Alternative 3 which performs at a technically superior level in many of the areas described above should be matched with effective assurances for a complete 'preferred alternative.'
- Overall - be willing to pay for improvements that will meet water quality and water supply reliability targets and needs from the State Water Project system. The Cal-Fed team should prepare long-range programmatic tasks linking Bay-Delta restoration, water export milestones and funding mechanisms that establish and maintain public outreach for the Cal-Fed program and the selected alternative. Cost containment and equitable apportionment of costs and responsibilities are critical. Support local agencies needing assurances for water quality and storage while providing for Delta restoration. The environment, water supply, and water quality improvements are issues of great importance to the environmental and economic well-being of the state and nation. Southern California should therefore financially support only its fair share.

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Distribution:

Technical Task Force Members
Joan Anderson, SCWC