

**PRELIMINARY LISTING
MULTIPLE CONCEPTUAL COMMENTS**

- ▶ The bulletin does a good job of presenting a balanced overview of California water demands and supplies, and options for meeting future needs. The bulletin has fundamental flaws in methodology, and should not be used to support CALFED-related decisions. DWR should convene an outside peer review committee for the bulletin. Change the demand forecasting methodology now, and for the next bulletin.

- ▶ The planning process used in the bulletin for evaluating ways to reduce future water shortages was appropriate. The planning process was inappropriate.

- ▶ The State of California should take the lead in _____. (Select one of the following phrases: developing new facilities, promoting water conservation, providing financial assistance to local agencies to develop new supplies, requiring local agencies to price their water in a manner that reflects its true cost.)

- ▶ The bulletin should place more emphasis on _____. (Select one of the following phrases: flood control, non-point source pollution control, cleaning up agricultural drainage, forest thinning as a source of water supply, quantifying the water required to maintain California's present agricultural production.)

- ▶ California's future water needs can be met without new facilities (especially reservoirs). Increased emphasis on conservation and transfers will meet California's future needs. California's future needs cannot be met without new facilities (especially reservoirs).

- ▶ The bulletin's switch to an applied water use approach for presenting the water budgets is appreciated. The bulletin should not use an applied water use approach because it grossly overstates environmental water use. The applied water approach is easier to understand. The applied water approach is more

confusing.

▶ The bulletin should not count environmental water use as it does. The bulletin puts environmental water use into the proper perspective with other California water uses' i.e., that it is California's largest water using sector. The environment is not California's largest water using sector -- the environment once had 100% of the water supply, and now it has less than half. North Coast wild and scenic rivers should not be counted as environmental water use because no one is planning to develop them.

▶ Agree with bulletin's treatment of groundwater overdraft as a shortage. Including overdraft as a base year shortage is an improvement over Bulletin 160-93. Groundwater overdraft is not a shortage.

▶ Bulletin 160 needs more emphasis on good groundwater data.

▶ CVPIA B(3) water [supplemental water purchase program] does not represent a future shortage. CVPIA B(3) water clearly represents a future shortage.

▶ DWR ignores the future potential for water markets. The future market for water transfers will be much less than shown in the bulletin.

▶ Water transfers are a reallocation of existing supplies, and do not meet future long-term needs. Have more discussion on competition for water supplies available for transfer. Add text on conditions associated with purchase of CVPIA B(3) water. SWP supplemental purchase program deferred -- reduces future supplies.

▶ If there is no rationing, there must not be a shortage. (What is the definition of shortage?) Demand is a function of price. Show how supply and demand depend on cost.

▶ Show range of uncertainties associated with CALFED, FERC relicensing, CVPIA fishery flows, etc.

▶ Acknowledge multiple benefits of water conservation and water recycling (i.e., benefits in addition to water supply). Conservation and recycling should be treated as new supplies, regardless of where they are located (i.e., in inland areas). The bulletin properly recognizes that conservation and recycling do not create new supplies in inland areas.

▶ The bulletin overestimates potential demand reduction from implementing BMPs/EWMPs. Agencies are only obligated to implement measures that are

cost-effective for their service areas. It is unrealistic to assume any conservation beyond BMPs/EWMPs; such conservation cannot be accurately quantified. The bulletin places undue reliance on conservation as a panacea to address shortages.

- ▶ Water conservation should not be implemented unless it is cost effective -- often, it is not cost-effective. Water "savings" from higher priced water don't necessarily result in depletions (e.g., inland areas).

- ▶ Need more data on conservation (both explanation of information in bulletin, and data to substantiate forecasted conservation). Add discussion of CVPIA water conservation plans.

- ▶ There are no data on city/county implementation of AB 325 (model landscape ordinance. AB 325 only covers large turf areas, does not relate to what urban residential conservation might be (relative to options for future conservation).

- ▶ Much more conservation is possible than is shown in the bulletin. Price should be used to enforce conservation. Reduction of outdoor water use for landscape is not costly, and can be phased in over time. Conservation should be required in inland areas because it has benefits in addition to water supply.

- ▶ More emphasis needs to be placed on environmental water conservation.

- ▶ Appreciate recognition of real water/new water issues. Real water issue is just DWR protecting SWP supplies.

- ▶ "Area of origin" will be a source of future supply. Need more emphasis on the State's area of origin responsibilities. Need more recognition of area of origin constraints on water transfers.

- ▶ Questions about source of data used for water recycling (the WaterReuse Association survey). Suggest include as appendix.

- ▶ Colorado River discussion -- update to December 1997 version of 4.4 Plan. Update CALFED text. Update ESA listings (new fish species).

- ▶ Add text on global climate change, long-term weather forecasting.

- ▶ The bulletin should evaluate more land retirement. The bulletin should evaluate less (or no) land retirement. The bulletin's land retirement assumptions are flawed because (assorted reasons). Bulletin does not analyze/discuss effects of CALFED proposed land retirement/land conversion (i.e., conversion

of agricultural land to habitat).

- ▶ Bulletin should discuss effects of local land use planning/growth/open space preservation/Cortese bill on water use.
- ▶ There should be more reliance on desalting (by other people).
- ▶ Need more detail in summaries of recommended options -- specific projects, not categories of projects.
- ▶ Level of detail in bulletin, level of detail of analysis -- to much, not enough.