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San Diego County Water Authority

A Public Agency

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August 26, 1998

Mr. Lester A. Snow, Executive Director
CALFED Bay-Delta Program
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VIA FAX: (916) 654-9780

Comments on Draft Staging and Implementation Plan

Dear Mr. Snow:

The following are San Diego County Water Authority staff's comments on the July 31 draft document entitled, "Developing a Draft Program Alternative". These comments are consistent with our Board's policy principles on the CALFED preferred alternative and our comments on the Draft PEIS/R. Our Board will further discuss the document at its next meeting, and we anticipate submitting additional comments after September 10

Program Staging and Linkages

We support staged implementation and linkages for all elements of the CALFED Program, including the common programs. While the draft document acknowledges the need for linkages among program elements, those linkages are not reflected in the document. The draft document establishes a lengthy list of linkages, or "pre-conditions", that must be satisfied before surface storage or an isolated conveyance facility will be considered for implementation, but establishes no such linkages for the Ecosystem Restoration Program (ERP) or the other common programs.

To be successful, the CALFED Program must provide improvements in all Program areas that are comparable over time and in magnitude. To ensure balanced progress toward all Program objectives, Section 1 of the draft document should be revised to include linkages or pre-conditions for the common programs comparable to those established for the storage and conveyance program elements. Section 2 of the document should be revised to include under each of the common programs the item "description of linkages and conditions for development". An alternative approach to ensuring balanced implementation would be to create "sub-stages" within each Program stage. The sub-stages, if judged by stakeholders to constitute balanced progress, could take the place of explicit linkages between program elements.

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Water Supply Reliability and Regulatory Certainty

We agree that there is a need to provide stability in the water resources management framework in Stage 1 until actions in subsequent stages substantively reduce conflicts in the system. The draft document suggests extending the Bay-Delta Accord (Accord) until the Record of Decision (ROD) is issued and new project operating rules are adopted. Stage 1 water supply reliability and water quality actions consist largely of planning and pilot studies. It is therefore critical that water users be assured that water supplies will not be reduced during Stage 1. We believe that the Accord, or a new agreement that provides equivalent or better protections for water users, must be extended through at least the end of Stage 1. Any new agreement adopted during Stage 1 or in subsequent Program stages must ensure that no further reduction in State Water Project supplies occurs.

Water Quality

We note that Stage 1, as described in the draft documents, contains few actions to protect or improve drinking water quality. While we are aware of no measures that could be taken to reduce bromide levels in the near term, some actions can be implemented in the near-term to reduce total organic carbon (TOC) and salinity levels. These actions include:

- Conduct pilot studies to evaluate the feasibility of removing TOC and salinity from agricultural drainage
- Relocate agricultural drains
- Implement watershed management programs
- Develop a strategy with the State Water Resources Control Board, Central Valley Regional Water Quality Control Board, and Department of Health Services to reduce impacts on drinking water quality from increased municipal waste discharges and urban runoff to the Delta and its tributaries
- Implement a monitoring plan to evaluate the impact of ecosystem restoration projects on TOC levels
- Change agricultural drainage patterns (e.g., release drainage on the ebb tide)
- Encourage on-farm water conservation measures to reduce subsurface drainage

Some or all of the above actions should be considered for implementation in Stage 1. Stage 1 should also include a study of pathogens in the Delta and its tributaries and an evaluation of measures for reducing pathogens.

Water Use Efficiency

We support the application of water use efficiency standards to all water uses -- urban, agricultural and environmental. The urban water conservation program should be based on implementation of Best Management Practices (BMPs) consistent with the Urban MOU. The Urban Water Management Plan (UWMP) certification process must

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be clear, objective, and consistent with the requirements of the Urban Water Management Act. We agree with the recommendation that the California Urban Water Conservation Council be the certifying agency for compliance with the urban MOU.

Agricultural water conservation plans should utilize a rigorous, standardized evaluation methodology comparable to that used to evaluate urban BMPs. Water conservation that reduces pollution in the Bay-Delta should be a priority.

The Water Authority and other urban agencies have made, and will continue to make, substantial investments in cost effective water conservation, recycling, and groundwater recovery programs. We project that within our service area water savings from conservation programs will increase to more than 80,000 acre-feet per year by 2015. Water recycling and groundwater recovery programs are projected to produce an additional 62,000 to 105,000 acre-feet of new water per year over the same time frame. Programs such as these could be enhanced if broader funding mechanisms are established for those measures that are not cost effective from the local perspective. The list of Stage 1 Water Use Efficiency Actions should be revised to include the expansion of existing funding programs and funding for the research and development of new technologies.

Water Transfers

We support efforts to facilitate water transfers and believe voluntary water transfers and exchanges are a critical element of a balanced CALFED Program. To achieve the goal of a functioning water transfers market, however, the development of uniform, integrated rules for approval of water transfers is needed. The development of a long-term water transfer market will also require improvements to the Delta conveyance system to allow transfer water to be moved across Delta efficiently and reliably.

We agree that data collection and public disclosure are appropriate roles for the Water Transfer Clearinghouse. The Clearinghouse should act as a gathering place for information regarding transfers and make this information available to all interested parties. As we understand the description contained in the document, CALFED is proposing the Clearinghouse to coordinate the formulation of SWRCB, DWR, and USBR policies regarding what needs to be included in a water transfer analysis, rather than implement the policies or perform analysis of the potential impacts of prospective transfers. If this understanding is correct, we agree with this proposed role. An additional role of the Clearinghouse should be to facilitate water transfers, for example, by informing potential buyers and sellers of water transfer opportunities.

Finally, it should be noted in the document that any proposals developed by CALFED regarding access to facilities and allocation of wheeling and power costs are subject to and must be in accordance with State law.

Surface Water Storage

We concur with draft document's characterization of the multiple benefits provided by surface storage and agree that CALFED should utilize a mix of water management options, including surface storage, to reduce water supply conflicts in the system. We have concerns, however, regarding a number of the pre-conditions to storage described in the draft document. The pre-conditions relating to urban and agricultural water use efficiency, for example, duplicate assurances mechanisms proposed under the Water Use Efficiency Program and constitute a second tier of sanctions to which all water users, including the ecosystem, are subject. The water user efficiency pre-conditions described in the draft document could result in a situation where all water users are punished for the actions or inaction of a few "bad actors" and, further, could place unequal burdens on certain regions in the state.

Other pre-conditions, such as those relating to groundwater and conjunctive use, pose potential "Catch-22" situations for water users. The success of many groundwater and conjunctive use projects will depend on water users' ability to divert wet year and wet period water to storage - the draft document acknowledges this fact in its description of the benefits of surface storage. "Demonstrated progress" on groundwater and conjunctive projects may be an inappropriate pre-condition for storage if new storage is required to implement those projects. A similar argument could be made with respect to water transfers. Pre-conditions for surface storage and other CALFED Program elements must be objectively defined and carefully structured to avoid potential "Catch-22" scenarios and minimize the possibility that the majority of water users will be penalized due to the actions of a minority.

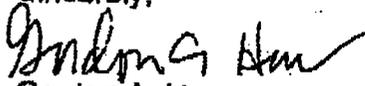
Delta Conveyance

We concur with CALFED's position that the dual conveyance alternative "must remain a viable option for future implementation." Analyses presented in the CALFED Phase 2 Report and work prepared by the Diversion Effects on Fisheries Team suggest that implementation of the dual conveyance alternative may be necessary to meet drinking water quality, water reliability, and fishery objectives. While we remain open to exploring other options for solving issues related to the Bay-Delta, the exploration of those options should not preclude or delay the implementation of the dual conveyance alternative, if that alternative is needed. To maintain the dual conveyance alternative as a viable option, feasibility studies and environmental documentation must progress during Stage 1. Permitting issues and land and/or easement acquisition issues should also be addressed during Stage 1.

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We appreciate, as always, the opportunity to provide input on the CALFED Program. Should you have any questions on the above comments or requested revisions, please call me at (619) 682-4155.

Sincerely,



Gordon A. Hess
Director of Imported Water

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