

98-448



## MEMORANDUM

**To:** Lester Snow, Steve Ritchie, CALFED  
**From:** Jeff Ohmart, MWDOC  
**Cc:** Stan Sprague, Keith Coolidge, MWDOC  
**Date:** December 11, 1998  
**Subject:** Comments on Revised Phase II Report, dated December 9, 1998

The following are specific comments to the Revised Phase II Report:

1. Water Management Strategy, page 25, table titled, "Potential Water Supply Reliability Measures".

Footnote 1 pertaining storage should clarify that the evaluation, permitting and construction of new surface storage (beyond the Shasta expansion) that could occur as a Stage I action is not included in the potential water supply estimates or cost estimates.

2. Water Management Strategy, page 28, the second to the last bullet on water quality.

Water quality actions, in Stage I and the long-term, must reach beyond addressing "salinity in the system". This bullet should be revised to read, "...to address drinking water quality and water quality for resource management particularly bromide, TOC, salinity, pathogens, pesticides, heavy metals and all other constituents potentially harmful to human health or, that could result in a decline of the beneficial use of water due to poor quality (e.g. high TDS water reduces potential for groundwater conjunctive use and recycling).

3. Section 4.1 Staged Implementation and Staged Decision Making, page 48, third to the last tick mark in the last bullet, referring to water supply reliability.

This refers to water use efficiency, water transfers and storage as a "bundle" to meet CALFED water supply reliability goals. CALFED must be careful how water supply reliability is characterized to avoid the misperception that water use efficiency performance goals are a prerequisite to moving forward with transfers and storage. This is not the case. Rather than "bundling" these items should be referred to as separate, distinguishable tools, or elements, of the water supply reliability program.

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4. Water Quality Programs, page 56 bullet one titled, "Drinking Water".

This discussion lists reduced salinity as an action yet, on page 55, paragraph 2, under "Water Quality Targets" salinity is not mentioned and no targets or discussion on reducing salinity variability is given. Page 55 should list a salinity target of 125 ppm.

This target level is consistent with the outcome of the water quality discussion in the Babbitt/Dunn negotiations and is required to enhance water resource management objectives such as conjunctive groundwater use and recycling in urban areas. The alternative is to re-include a discussion on salinity in the Water Quality section and pronounce this target level. Lower salinity from the Bay-Delta is a critical outcome of the preferred solution and efforts to achieve lower salinity should commence early in Stage I.

5. Water Quality Program, page 54

The water quality program must include interim measurable benchmarks in Stage I for drinking water constituents of concern and other harmful constituents (including salinity) to gauge the effectiveness of the program.

6. Conveyance, page 87, first paragraph.

While the factors determining the best conveyance alternative will be continually reevaluated in Stage I, the decision to move forward with an isolated facility should be made when scientific evidence and economic evaluation prove the isolated facility to be the best alternative for the long-term solution. Whether it be in the first year or fourth year of Stage I, if the evidence presents itself, the decision should be made and not delayed due to the political difficulty of making such a decision.

7. Conveyance, page 88, 2<sup>nd</sup> to last bullet.

The concept of a Delta Drinking Water Council to evaluate progress towards meeting CALFED's water quality goals has merit. Urban water users responsible with meeting drinking water quality objectives for human health should be included as representatives on this council.

8. Section 5.1 Stage I Actions, Isolated Facility, page 117

Actions listed in Stage I include:

- ✓ Prepare project environmental documentation.
- ✓ Conduct feasibility studies.
- ✓ Conduct field studies.
- ✓ Assess right-of way issues.

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All actions are listed as commencing on or after year 4 of Stage I. All these actions, including the 404 permitting process for the isolated facility, should commence in year 1 of the Stage I package, rather than year 4, so that if a determination on the basis of need is made, the isolated facility can be implemented without additional delays.