

**Comments on Dec. 9, Phase II Report from Ag/Urban Caucuses**  
December 11, 1998

With only twenty-four hours to respond to the latest CALFED draft, our comments are limited to a short-list of major points. Individual agriculture and urban water agencies will be providing additional comments on sections such as water use efficiency, water quality and water operations. Extensive input is also being provided via the Babbitt-Dunn meetings.

We are, however, providing detailed comments on Section 5: Draft Implementation Plan on the Stage 1 actions. These comments were compiled by the Ag/Urban Caucuses on the prior draft Phase II Report and time does not allow for a complete update to match this draft. As with prior Ag/Urban submittal comments, our comments are in italics and the footnotes reflect previous comments not addressed by CALFED in the current draft. The large majority of our Stage I action comments still apply.

Overall Comments (page numbers might not match exactly)

Storage

While we see more discussion on storage (p 80-84) and a table listing the reservoir sites retained for future evaluation (p 82), we still do not see that the fundamental need for storage (both groundwater and surface) is firmly established. Storage is needed to meet three of the four CALFED objectives of water supply reliability, water quality and ecosystem quality. In the list of actions (p 114) under surface storage, the decision on need, feasibility, permitting and possible construction still resides in years 5, 6, and 7 of Stage 1. This is not acceptable.

Conveyance

The words describing through - Delta conveyance (p 42) and the possibility that an isolated conveyance facility will be needed to meet drinking water quality and fish recovery objectives are much improved over the first draft. However, the isolated conveyance option (p 117) still reads with a bias against it. The option should be studied openly, evenly and objectively without a pre-conceived bias against its need.

Assurances

Several references are made in the document to "bundling of actions" (as on p 84 and p 128). However, the report still presents bundling as a rough concept, rather than identifying the specific Stage 1 actions that will be bundled. Ag/Urban has provided detailed comments and recommendations on the creation of three distinct bundles or substages for Stage 1, linking actions via three Programmatic EIS/EIR Supplements that address the purpose, need and cumulative effects of each substage, insuring that all programs and actions move ahead together.

1999 Actions

Ag/Urban advocates a strong start in the early years in all program areas. Previous comments have requested that many actions (such as South Delta Conveyance Improvements and Groundwater Storage Projects) be advanced in the early years (1999 - 2001). None of these recommendations were reflected in the current draft and, in fact, the CALFED 1998-99 action list has been deleted and moved into Stage 1. Only financing actions remain in 1999 (p 139).

User Fees

The user fee section (p 138) reads like a mechanism that must be in place and operational by the end of 1999 (p 140). Ag/Urban recommends that the "user fee" tool be studied and evaluated during Stage 1 as a possible means of financing program components.

Clean Water Act  
Section 404

This section is very well-written and advocates the establishment of need for program facilities at the programmatic level with expedited and limited 404 permit evaluation to follow at a site-specific level (p 152). This process needs to be reflected in earlier report sections on Storage and Conveyance.

Cost Estimates

Ag/Urban has provided written comments on each program area in the Cost Table (p 141), commenting on both the total program costs as well as the assumed cost-sharing. None of our comments have been reflected to date. We refer you to our prior comments and wish to add the following:

- 1) Conservation total should be increased by 700 million with 350 million additional under both state and federal.
- 2) Water Quality should be increased to accommodate the salinity reduction program as previously stated.
- 3) A new program area entitled "Environmental Water Account" should be added and appropriate dollars shown.
- 4) Funds should be designated to assist the mountain/rural counties with planning activities (such as the evaluation of PG&E facilities).
- 5) Storage numbers are seriously low and do not reflect/support the list of actions in Stage 1, as previously stated.

Water Operations

Ag/Urban representatives have been deeply involved in these discussions, working toward an operational solution. Comments will be provided under separate cover.