

February 4, 1999

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Lester A. Snow
Executive Director
CALFED
1416 9th Street, Room 1155
Sacramento, CA 95814

Dear Mr. Snow:

The Southern California Association of Governments (SCAG) reviewed the Revised Phase II Report for the CALFED Bay-Delta project. On behalf of the SCAG membership, we extend our congratulations to CALFED for reaching this critical milestone in the Bay-Delta process.

As you may recall, about a year ago representatives of CALFED met with SCAG representatives to discuss the importance of the Bay-Delta project to the southern California region. As a result of that meeting, SCAG initiated a Water Policy Task Force that has actively monitored the Bay-Delta project and other water issues critical to our region.

Attached are comments that our Water Policy Task Force prepared in response to the CALFED Phase II Report. We hope that you find these comments useful and positive to your efforts in developing a CALFED solution to the Bay-Delta issues. Our comments reflect those issues that most concern our region: water quality, costs and financing, inadequacies in the proposed staging approach, Delta conveyance, water conservation, and assurances. We anticipate that our comments will be adequately addressed in the forthcoming draft programmatic EIS/EIR.

We would also like to convey our concern regarding your current outreach efforts in the SCAG region. To our knowledge, only one public workshop has been scheduled for southern California, and that was held on January 28th in San Diego. We feel strongly that this is inadequate and would obviously not allow the Bay-Delta project proper exposure within the southern California region.

We would like to invite you and your staff to conduct a public meeting at the SCAG office in downtown Los Angeles. We will make our facilities available to you at no cost and will assist you in preparing such a meeting. We feel strongly that this proposed meeting will provide our membership with an opportunity to understand the complex nature of the Bay-Delta project, and

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what this process means to southern California overall. We look forward to your response to this invitation.

Again, congratulations on reaching the completion of the Phase II Report. If you would like to discuss this matter further, please contact Rich Macias of my staff at (213) 236-1805. On behalf of SCAG, we wish you continued success and look forward to hearing from you.

Sincerely,

Robert T. Bartlett
Regional Council President
Southern California Association of Governments

Attachment

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**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
CALFED BAY-DELTA PROJECT COMMENTS
ATTACHMENT**

PROPOSED STAGING APPROACH

CalFed has developed a very complex staging approach for the Bay-Delta solution. We are concerned that this staging approach will be a prolonged labor-intensive process that may delay decisions and skew the focus on long term solutions, especially those that will benefit southern California. We are interested in streamlining the decision-making process and maintaining the ability to establish strong assurances that southern California's interests are met.

The proposed staging approach also raises concerns regarding the regulatory and entitlement processes necessary for program and project implementation. It is strongly recommended that detailed feasibility studies, environmental analyses and reviews, and in particular, necessary permits, be conducted as early as is practicable during Stage I, to save time, resources, and to expedite project implementation wherever possible.

WATER QUALITY ISSUES

The proposed Stage I actions, though comprehensive in scope, are top heavy with environmental restoration, and other such programs. SCAG applauds the CalFed commitment to environmental quality and habitat restoration. However, additional focus is needed on directly improving water quality in Stage I. The most critical concern that our region has with respect to the Bay-Delta project is the quality of water that will be available for export. It is imperative to the State and our region, that water quality initiatives and programs be increased, and given the highest of priority in Phase I, and throughout the Bay-Delta project implementation phases.

PROJECT COSTS AND FINANCING

While the Stage II Report details an extensive cost and subsequent financing programs for the project, we note that projected cost estimates are preliminary and subject to further refinement. However, we recommend that strict controls be in place for establishing firm and reliable cost estimates for all stages of the project.

We support in concept the "beneficiary pays" philosophy proposed by CalFed. The Stage II Report indicates that although this philosophy is to be paramount, project benefits, beneficiaries, and associated costs and user fees remain to be developed. We understand that this will be a very difficult methodology to process. However, we recommend that all financing methodologies be developed with extensive stakeholder input, and that fair-share and equitable cost allocation and financing programs be proposed.

WATER CONSERVATION

Southern California maintains some of the most progressive water conservation programs in the nation. We are impressed with the emphasis that the Stage II Report gives to such initiatives, and recognize the continued need for such programs in our region. However, we are concerned that water conservation programs throughout the state are not well balanced, and that a system of equitable credit for water conservation efforts be established and implemented, so that southern California may receive the credit and recognition that it deserves.

Progressive and innovative conservation efforts should be encouraged throughout the state. Cleaner agriculture is a form of water conservation. The feasibility of "organic" horticulture, and other "clean" farming practices should be analyzed for feasibility in Phase I. We would also encourage community based conservation efforts that focus on water efficient infrastructure through "livable- community" concepts in both urban, and suburban environments.

DELTA CONVEYANCE

We recognize the current and historic issues related to developing an "isolated facility" that would divert water from the Delta region. SCAG has forecast an increase of 6 million residents in southern California by 2020. In addition to this, over 16 million residents, and a strong 500 million dollar regional economy depend on a quality, affordable, and reliable water supply. These are staggering statistics that our region and the State as a whole have to accept. Nothing will impede this future growth in our region. Because we are faced with this dilemma, it is important to our region that all feasible alternatives be seriously evaluated.

We recommend that CalFed continue to objectively evaluate the feasibility of the "isolated facility" alternative, as well as off-stream water storage facilities. Previous CalFed analysis indicates that these alternatives will provide positive water quality, wildlife, and environmental benefits, and thus should not be ignored. We recommend that these alternatives be expedited and analyzed to the fullest extent possible in the Programmatic EIS/EIR, and beyond in Phase-I implementation.

We would also like to bring to your attention that Federal Clean Water Act standards will soon be revised. We anticipate that it will be difficult to comply with stricter standards, and believe that the "isolated facility" alternative is best suited to addressing long term and reliable water quality improvement and maintenance of transferable waters.

ASSURANCES

Our region is concerned with equity. Any CalFed solution must result in assurances that all components of the project will provide regional, as well as statewide benefits in an equitable manner. A balanced approach is essential. Environmental considerations, infrastructure development, "soft and hard" solutions, must be objectively evaluated, selected, and implemented for the benefit of all, but with a priority and focus on improving water quality, and providing a reliable water supply.