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UPPER SAN GABRIEL VALLEY
MUNICIPAL WATER DISTRICT

September 15, 1999

Mr. Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Room 1155
Sacramento, CA 95814

Subject: CALFED Bay-Delta Comments

Dear Mr. Snow:

The Upper San Gabriel Valley Municipal Water District is the MWD member agency providing supplemental water to the more than one million residents of the San Gabriel Valley.

We have a number of serious concerns regarding the direction of the CALFED Bay-Delta Program. These concerns are best expressed in the attached "1999 North-South Talks" letter sent to Governor Davis and Secretary Babbitt. Please consider the points raised in this letter to represent the views of the Upper District Board of Directors.

In addition, we are also concerned that your estimates for development of recycled water projects to meet a portion of the State's growing water demand are overly optimistic. Our recent experience in trying to develop a 10,000 acre-foot per year groundwater recharge program using tertiary treated recycled water to replace imported MWD water has met with serious obstacles in obtaining State Health Department approvals. It appears to us that the development of these types of recycled water projects will be seriously delayed or halted because of Health Department water quality concerns.

Thank you for considering our comments.

Very truly yours,

Marvin J. Cichy
President

Attachment

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DIRECTORS: MARVIN JOE CICHY, PRESIDENT • KENNETH R. MANNING, VICE-PRESIDENT • FRANK F. FORBES, SECRETARY/TREASURER • DR. TONY FELLOW • R. WILLIAM "BILL" ROBINSON

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cc: The Honorable Bill Clinton, President
The Honorable Barbara Boxer, U.S. Senator
The Honorable Dianne Feinstein, U.S. Senator
The Honorable John T. Doolittle, Chair, House Subcommittee on Water and Power Committee
The Honorable Mike Thompson, Member of Congress
The Honorable Wally Herger, Member of Congress
The Honorable Doug Ose, Member of Congress
The Honorable John Burton, President Pro Tempore, California State Senate
The Honorable Antonio Villaraigosa, Speaker, California State Assembly
The Honorable Scott Baugh, Assembly Minority Leader
The Honorable Maurice Johannessen, Chair, CALFED Oversight Committee
The Honorable Wesley Chesbro, California State Senator
The Honorable Jim Costa, Chair, Senate Agriculture & Water Resources Committee
The Honorable Ross Johnson, Senate Republican Leader
The Honorable Tim Leslie, California State Senator
The Honorable Sam Aanestad, California Assembly Member
The Honorable Richard Dickerson, Vice Chair, Assembly Water, Parks & Wildlife Committee
The Honorable Mike Machado, Chair, Assembly Water, Parks & Wildlife Committee
The Honorable Rico Oller, California Assembly Member
The Honorable Virginia Strom-Martin, California Assembly Member
The Honorable Helen Thompson, California Assembly Member
The Honorable Gray Davis, Governor of California
Bruce Babbit, Secretary, United States Department of the Interior
Patricia Beneke, Assistant Secretary, Water and Science, Department of the Interior
Eluid Levi Martinez, Commissioner, Bureau of Reclamation
Mary Nichols, Secretary, California Resources Agency
Tom Hannigan, Director, California Department of Water Resources

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1999 North-South Talks

Regional Council of Rural Counties
Southern California Water Committee
Metropolitan Water District of Southern California
Santa Clara Valley Water District

August 6, 1999

The Honorable Gray Davis
Governor of California
1st Floor, State Capitol
Sacramento, CA 95814

Mr. Bruce Babbitt
Secretary, United States Department of Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Governor Davis and Secretary Babbitt:

The Regional Council of Rural Counties, the Southern California Water Committee, the Metropolitan Water District of Southern California and the Santa Clara Valley Water District are gravely concerned regarding the direction of the CALFED Bay Delta Program. It has always been our belief that the CALFED solution would be a balanced, comprehensive solution, which would address many of the Delta's environmental problems, as well as our state's most pressing water issues. We now believe that unfortunately, CALFED is placing good science and tough decision making aside, in favor of an approach which will jeopardize real progress.

There is a compelling need to address the drinking water quality for all Californians as part of any CALFED solution. This is just as important as the other CALFED principles of achieving improvement in the environment and water supply reliability. Adequately addressing each of those components would assure balance in a CALFED solution. However, recent actions, as well as statements from CALFED officials indicate that CALFED is not pursuing a path that will achieve a balanced solution. Drinking water quality and water supply reliability for Californian's may be the first casualties of taking that path.

In December of 1998, CALFED made a number of commitments in the Phase II Report that represented progress on a critical policy framework. In the last six months, CALFED has made little progress and appears to have retreated from those key elements.

CALFED's own technical appraisal, as well as independent analysis carried out by others, indicates that a dual conveyance facility may have potential to satisfy the comprehensive Bay Delta solution principals and program objectives. Furthermore, the creation of new surface and groundwater storage and the reoperation of existing investor owned hydroelectric projects, coupled with an adequate water transfer program (which incorporated due regards to third party impacts) and water conservation improvements, are necessary elements to a solution. We understand the assurance and political questions which must be answered on these issues and stand ready- at each end of the state- to work jointly to address them.

We believe that any adequate Record of Decision, must address all viable options in the CALFED Program in order to meet existing environmental adequacy standards as laid out in federal statute. The Record of Decision must address the full range of reasonable alternatives to achieve environmental recovery, water quality and water supply reliability. It is premature to remove or de-emphasize key components. The CALFED environmental document must also include programmatic findings sufficient to move forward that CALFED must assess the role of all viable options to a balanced solution- regardless of prevailing political winds.

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We strongly urge that the comprehensive solution include the necessary analysis of all conveyance options, all storage and reoperation of investor owned hydroelectric facility options and that they are analyzed in a manner which will support a Programmatic Record of Decision.

Negotiations must be completed in the CALFED's programmatic EIS/EIR and Record of Decision that will support the concept of "a deal is a deal." We believe that such regulatory assurances, for all Californians, is a key to provide long term support for any CALFED solution.

The CALFED environmental document must provide drinking water quality and salinity targets. The signatories agree that the need for a safe drinking water supply for all Californians, which will meet the existing and future regulatory requirements, is critical to protect the public health. In addition, high quality, low salinity source water is necessary for the successful implementation of water recycling and groundwater programs that are critical to the north and south state. CALFED's final programmatic EIS/EIR and the Record of Decision must establish a specific schedule for the quantifiable, verifiable, achievement of long-term water quality (and salinity) objectives. This schedule should specifically include interim targets which are monitored and reported.

CALFED's Watershed Management Program must be improved in level of emphasis as well as integration with the Water Quality and Water Supply Reliability Programs, and the Ecosystem Restoration program. CALFED does not currently have adequate, professional staff, with experience in upper and lower watershed processes, detailed to this critical element of the solution. The Watershed Management Program has the potential to be a key element for a sustainable, long-term CALFED properly supported and funded solution. The signatories of this letter wish to emphasize their support for, and expectation of, a strong, visionary, watershed program as part of any CALFED solution. We offer to roll up our collective sleeves and work with both of you to achieve that goal.

The signatories further agree that any CALFED solution must honor the "Area of Origin" protections- a past generation's "assurance" to this generation. Furthermore, CALFED's solution must help achieve the promise of that past assurance. The inventory of existing investor owned hydroelectric facilities are the most likely, achievable source for most of the source Counties to acquire a reliable, affordable, water supply. Much of the Area of Origin needs could be met out of those existing investor owned hydroelectric water facilities as a method to reduce impacts on downstream demands. Those facilities once properly re-operated could help reduce the total cost for new storage in the CALFED solution. Finally, those facilities could provide support and flexibility for downstream conjunctive use operations.

Conjunctive water use programs may provide local, regional and statewide benefits across a broad spectrum of environmental and economic interests. Conjunctive water use programs should be locally sponsored and support local groundwater management programs. Furthermore, conjunctive use projects should be consistent with local water resources plans and ordinances.

To achieve broad public support in all of California, the above elements represent key decisions and actions that are essential to the CALFED Program's success. The CALFED program must also re-engage the participation of all stakeholders in a more positive constructive process and integrate stakeholder representatives in the near term and long term decision making process.

Without the direct and influential leadership which can only be provided by you two top ranking state and federal officials and the demonstration of equitable participation of all interests, this important process to solve problems in the Bay Delta may fail. We respectfully request a meeting with both of you personally to discuss these points in more detail.

Very truly yours,

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Raymond James Nutting
President, RCRC
Supervisor, El Dorado County

Stephen A. Zapoticzny
Chairman, Southern California Water Committee

Larry Wilson
Chairman
Santa Clara Valley Water District

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