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ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

5997 PARKSIDE DRIVE • PLEASANTON, CALIFORNIA 94588-5127 • PHONE (925) 484-2600 FAX (925) 462-3914

AUG 26 1999

August 24, 1999

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

Re: Draft Programmatic EIS/EIR

Dear Mr. Snow:

Zone 7 of Alameda County Flood Control and Water Conservation District is a water supply agency providing domestic and agricultural water to over 160,000 people in the Livermore-Amador Valley. Zone 7 was one of the first agencies to contract with the Department of Water Resources to take delivery of water from the State Water Project. Currently, SWP deliveries make up about 70% of our water supply. According to the General Plans of the cities we serve (Livermore, Pleasanton, and Dublin), the population in Zone 7's service area could increase to over 275,000 by the year 2020. Clearly, our community's future is dependent upon a suitable and long term Bay-Delta solution, which will provide a safe, high quality and reliable water supply. Our concern is with delivered water quality and dry-year reliability.

Delta-dependent water users have experienced the loss of more than one million acre-feet of water during the 1990s. As California's population continues to increase - by as many as 15 million more people by the year 2020 - it's critical that we begin to recover those supplies and provide for more. However, the CALFED program apparently provides no targets for an increased water supply. Independent analysis of the CALFED proposal shows that the program at best might provide less than 200,000 acre-feet of new water and at worst could actually reduce supplies by another 700,000 acre-feet.

- **CALFED must set water supply goals of at least a net increase of 200,000 to 400,000 acre-feet during the first seven years of this program and aggressively pursue their realization.**

At a time when California's water supply and delivery system has suffered more than 20 years of neglect and decline, the CALFED program offers no apparent commitment to invest in much-needed facilities to improve our water supply or water quality. The ability to generate additional water supplies is directly dependent on having the necessary facilities in place. CALFED appears to be delaying decisions to develop new water storage and conveyance facilities that are required just to meet existing water needs.

- **CALFED must expedite the planning and implementation of the South Delta Improvements, which hold the greatest potential for increasing water supplies during the first stage of this program. Water supply benefits of this program must be equitably balanced among urban, agricultural and environmental uses.**

The CALFED program is currently responding too slowly to rapidly toughening water quality requirements. Many urban water providers like ourselves are beginning to question whether this program will provide us with necessary water quality improvements in a timely manner. Without water quality improvements in the Delta, small agencies like ourselves might be faced with the necessity of trying to provide millions of dollars for costly new water treatment facilities to meet safe drinking water standards.

- **CALFED must develop a comprehensive timetable for meeting required improvements in**

1079(2)

drinking water quality, and set interim benchmarks to provide a method of gauging success of the program.

A fundamental flaw in California's water system over the past decade has been the increasing unpredictability of water supplies due to regulatory actions. The recent Delta smelt crisis demonstrates that water users are not immune to regulatory impacts even in wet years, and must be presumed to be at even greater risk of water shortages in dry and normal years. To ensure orderly planning by local agencies dependent on the Delta, the program must provide a high degree of operational and regulatory assurances that the program will generate promised benefits.

- **CALFED must develop regulatory and operational guarantees of actual benefits to water users in order to maintain their commitment to the program.**

State Water Project contractors have paid more than $6 billion to repay the costs for building, operating and maintaining the State Water Project. Those payments were predicated on receiving a 4.1-million acre-foot supply. More than 30 years since it began operation, the State Water Project still cannot deliver that amount of water. Now, CALFED proposes spending an additional $4.4 billion over the next seven years, much of it apparently to be raised from water user fees and charges. However, the program documents at this time provide no assurances as to the level of actual water supply or water quality benefits to be derived from the program.

- **Without clearly defined and quantifiable benefits, the CALFED program will be unable to impose appropriate water user fees to implement the program.**

CALFED began with the notion that no option would be preferred or prohibited, that the process would objectively assess all potential solutions. While earlier technical analyses demonstrated that an isolated conveyance facility had the greatest potential to improve water quality and to provide fishery benefits, most of the preliminary studies necessary to proceed with such a project have been deleted from the current planning. Failure to meet water quality goals was one criterion for triggering development of options for an isolated facility, but they have not been specified in the program's water quality goals. It is important that delivered water quality goals take into account salt (Total Dissolved Solids, TDS) impacts in the water users' service areas. Salt loadings to groundwater basins receiving Bay-Delta waters can be reduced significantly with the isolated facility option.

- **CALFED must clearly set out the conditions that will trigger a full assessment of an isolated conveyance facility, the time line for such an assessment, and a clear process for making the decision on whether to proceed with such a facility.**

We appreciate your serious consideration of these comments. Providing an adequate supply of high quality water is paramount to the well-being of our communities on local, regional and statewide levels. Thank you.

Very truly yours,

Dale Myers

Dale Myers
General Manager

cc: Each Member, Zone 7 Board of Directors

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