



San Diego County Water Authority

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September 15, 2003

Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825
Transmitted via email: *scervantes@mp.usbr.gov*
Attention: Ms. Sammie Cervantes

San Diego County Water Authority Comments on July 2003 Draft EIS/EIR for the Environmental Water Account

Dear Ms. Cervantes:

This letter and its attachment constitute the San Diego County Water Authority's comments on the July 2003 Draft EIS/EIR for the Environmental Water Account. The San Diego County Water Authority's mission is to provide a safe and reliable water supply to our 23 member agencies serving the San Diego region. San Diego County imports between 75 and 95 percent of its total water supply from the Colorado River and the Bay-Delta system. As such, our agency is very interested in CALFED's activities concerning the Bay-Delta.

The San Diego County Water Authority is committed to the success of the CALFED/California Bay-Delta Authority effort. We have supported the Environmental Water Account pilot program as a means to help CALFED to improve continuously in the areas of supply reliability and fisheries restoration. Our comments are general in nature, and pertain primarily to the selection of a proposed action rather than to specific details of the draft EIR/EIS.

The comments in this letter and its attachment reflect the views of the San Diego County Water Authority and do not supercede or negate comments that may be made by the Water Authority's individual member agencies. The San Diego County Water Authority appreciates this opportunity to provide input on the Environmental Water Account.

Sincerely,

Gordon A. Hess
Director of Imported Water

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Project	LUP
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Attachment

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 - San Diego • San Marcos
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- San Diego

- PUBLIC UTILITY DISTRICT**
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- Hamilton • Mission • San Diego

San Diego County Water Authority Comments on
July 2003 Draft EIS/EIR for the
Environmental Water Account

1. We support the concept of the Environmental Water Account (EWA) and recognize that it has played a positive role in balancing the needs of water suppliers and the Bay-Delta ecosystem during the three years of its existence as a pilot program. For this reason, we do not support the “no action” alternative. However, we have been concerned that, if not properly operated, an ongoing EWA could degrade the quality of water exports from the Bay-Delta, make the system less flexible operationally and reduce the amount of water available for voluntary transfers from agriculture to urban areas. Like other CALFED activities, the EWA must be operated so that new benefits are shared and continuous improvement is realized in the areas of supply reliability, drinking water quality and ecosystem improvements.
2. We recognize that both the “flexible purchase” and “fixed purchase” alternatives are designed to achieve the objectives established in the CALFED record of decision (ROD).
3. We note that conditions experienced during the EWA’s pilot operations are different from those projected in the ROD. The ROD refers to purchases of 185,000 acre-feet of water per year. The EWA actually used 290,000 acre-feet in 2001 and 248,000 acre-feet in 2002, and had carryover water each year.
4. Water for the EWA has not been available in the manner envisioned in the ROD. The ROD expected that the EWA will acquire 150,000 acre-feet (81 percent of the total) south of the Delta and 35,000 acre-feet (19 percent) north of the Delta. During the first two years of its operation, the EWA acquired one-quarter of its water from sources north of Delta. This percentage may be expected to increase during dry years. The draft EIR/EIS also notes that the EWA prefers to purchase water from upstream sources because it generally is less expensive than other sources.
5. With the changed conditions noted in #3 and 4 above, we acknowledge that to choose an alternative with a fixed annual volume of water of 185,000 acre-feet would be unrealistic.
6. We also recognize that the EWA must have the operational flexibility to respond to differing hydrologic conditions and unanticipated fish behavior. As such, we support the concept of “functional equivalence” to facilitate and compensate for reduced export pumping in support of fisheries.
7. As noted in #1 above, we are concerned about the EWA’s impact on the reliability and quality of water exported from the Delta and the availability of transfer water from sources north of the Delta. This concern is heightened by the flexible purchase alternative and its “flexible interpretation” of the ROD and EWA Operating Principles Agreement that allows for the purchase of between 200,000 and 600,000 acre-feet per year and does not set limits on acquisitions in either the upstream or export areas.

8. The draft EIR/EIS concludes that neither the fixed nor the flexible alternative offers any potentially significant unmitigable impacts. However, we are concerned about the following areas as they may be affected by the flexible purchase alternative:
 - a. *Decreased levels in reservoirs that provide water to the EWA.* The draft EIR/EIS acknowledges that EWA acquisitions of stored reservoir water north of the Delta will change the rate and timing of flows into the Delta and the timing of diversions at the state and federal pumps. Operators of reservoirs providing water to the EWA must adhere strictly to the drawdown and refill criteria established in the draft EIR/EIS to mitigate for this impact.
 - b. *Impacts to tailwater flows affecting Delta water levels.* The draft EIR/EIS acknowledges that EWA acquisition of water due to idling of crops will reduce and/or change the timing of the flows available to downstream users, other bodies of water and, ultimately, the Delta. Sellers of water resulting from idled lands must be required to maintain return flows to levels that will not harm downstream users.
 - c. *Impacts to the quality of water exported from the Delta.* The EWA will act in the winter and spring to protect fish. The water lost by the state and federal projects due to pumping reductions will be made up in whole or partially by increased pumping during the summer. Delta water quality tends to be at its best during the winter and spring. Increased export pumping in the summer will degrade the quality of water within the Delta and, so, the quality of that which is exported. The EWA must use adequate volumes of carriage water to compensate for otherwise heightened levels of salinity, bromide and total organic carbons.
 - d. *Competition and priority for use of water north of the Delta during dry years, including that which may be available for transfers.* In 2002, the Department of Water Resources Dry Year Purchase Program acknowledged that the EWA had a priority for water purchases for regulatory assurances. As a result, the limited supplies of reasonably priced water upstream of the Delta went to the EWA. The draft EIR/EIS does not address this situation; the flexible purchase alternative may exacerbate it.
9. We agree that, based on its performance as a pilot program over the past three years, the EWA will improve the reliability of water supplies to the export areas and enhance Bay-Delta fisheries. It has accomplished this goal by using an approach that is more flexible than fixed. As such, we support the flexible purchase alternative for an ongoing EWA as long as the points noted in points 8a-8d above are addressed.