



# San Diego County Water Authority

A Public Agency  
3211 Fifth Avenue • San Diego, California 92108  
(619) 682-4100 FAX (619) 297-0511

<b>AWPRAC RECEIVED</b>		
APR 4 1 1997		
DATE	INITIALS	CODE
April 8, 1997		

Mr. Dale Pontius  
Western Water Policy Review  
Advisory Commission  
PO Box 25007, D-5001  
Denver, CO 80225-0007

Dear Mr. Pontius:

The Authority appreciates the opportunity to review the Western Water Policy Review Advisory Commission's draft Colorado River Basin Study. We found the study to be a very good overview of events occurring on the river and believe this will be a valuable publication. Our comments include updates to subjects where events are occurring rapidly, corrections, and suggested editorial revisions. General comments are provided below, listed by subject, and proposed revisions are given on an attachment in strikeout/underline format.

### Yuma Desalter (Pages 4, 103, 111)

The first *Salinity Control* recommendation (page 111) states that the Yuma Desalter should be decommissioned. (This recommendation also appears in the Executive Summary on page 4.) However, this conflicts with the recommendation given on page 103, that states that a process should be developed that, among other decisions, "should decide the future of the Yuma desalter." Meeting salinity standards is a federal obligation, and operation of the desalter should be considered as one alternative in the future process. The recommendation to decommission the desalter is premature, coming before this process is developed.

The discussion of desalter costs on page 111 should be compared to costs of other alternatives that are recommended in the draft, such as water reclamation. Also, replacement of desalter membranes is a normal practice, and is included within operation and maintenance unit cost estimates.

### Upper Basin Water Use (Page 17)

The column labeled "Entitlement" of Table 4, Annual Water Use in the Upper Basin, should be explained. Why is the total Upper Basin entitlement 6 maf, and not 7.5 maf?

#### MEMBER AGENCIES

- CITIES**
- Del Mar • Escondido • National City
  - Oceanside • Poway • San Diego

- IRRIGATION DISTRICTS**
- Santa Fe • South Bay
  - Vista

- WATER DISTRICTS**
- Helix • Otay
  - San Diego • Vallejos

- MUNICIPAL WATER DISTRICTS**
- Carlsbad
  - Olivena • Padre Dam
  - Rainbow
  - Ramona
  - Rincon del Diablo
  - Valley Center
  - Yuma

**COUNTY**  
• San Diego  
(in official)

**PUBLIC UTILITY DISTRICT**  
• Fallbrook

**FEDERAL AGENCY**  
• Pendleton Military Reservation



**Secretary Babbitt (Page 27)**

At his speech to the Colorado River Water Users Association in December 1996, Secretary Babbitt indicated that action on surplus criteria regulations would be temporarily deferred until California was able to demonstrate a strategy that would assure the state's ability to reduce its use (to the state's 4.4 maf apportionment), when necessary. The remarks on page 27 should be revised to reflect that there are conditions which must be met before surplus criteria will be formalized. See Proposed Revisions attachment.

**Supply augmentation (Page 29)**

What is the basis for the declaration that augmentation is "not a realistic option?" Unless support can be provided for this conclusion, the statement should be amended to read that an evaluation should be conducted to determine whether augmentation is a realistic option.

**California priority rights to water (Page 36)**

The text is incorrect in stating San Diego's priority rights to Colorado River water. See Proposed Revisions attachment.

**CWA/MWD negotiations (Pages 37, 105, 106)**

The Authority has not reached an accord with MWD for wheeling water in the Colorado River Aqueduct. See Proposed Revisions attachment.

**All-American Canal Lining (Page 38)**

IID has declined to sign an agreement with MWD for the canal lining. See Proposed Revisions attachment.

**Flood releases on river (Page 38)**

It is not true that the 50 maf could have been diverted if reservoirs were operated differently. When MWD is operating its aqueduct at capacity and the reservoirs are full, there is no additional opportunity to divert water. It must by necessity flow to Mexico. The sentence beginning "California points out that in the 1980s..." should be deleted in its entirety.

**Salinity (Pages 67, 69, 71)**

The discussion of salinity control program goals on page 67 should include an assessment of whether these goals are likely to be attained, given current conditions. Page 69 should be revised to reflect the fact that increased salinity levels in the San Diego region during the 1980s were a result of the return to historic flows and TDS levels on the Colorado River (after the 1983 flood flows and record-setting low TDS levels) and MWD blending practices. On page 71, in light of the listed decreases in funding for salinity control, a recommendation should be considered that would increase such funding.

**Federal water subsidies (Pages 104, 105)**

The last paragraph on page 104, which is continued on page 105, should be rewritten to restrict comments about federal water project costs to the Colorado River system of dams and reservoirs, and not other federal water projects. For example, does the “ability to pay” policy exist for the Colorado River system, or is this true only for other federal projects, such as the Central Valley Project? Also, more detail should be provided on the M&I costs listed. Is the conclusion of the CBO report cited (that users pay only 20 percent of the cost of federal water) specific to the Colorado River Basin, or does it include all federal projects in the country?

**Water Reuse (Page 106)**

The last paragraph on this page does not reflect work being done on water reuse by the Authority and other agencies. The Authority does have an “integrated water resources plan” that fully considers water reclamation and reuse as potential resources. The Authority’s Water Resources Plan was first written in 1993 and has been updated for 1997. Water reclamation is considered on an equal basis with imported water, local groundwater, seawater desalination, and conservation (demand management), as potential resources. The International Wastewater Treatment Plant will dispose of 36,000 af/yr, and not 373,000 af/yr as shown in the draft study.

**Ecosystem Sustainability (Page 59)**

The statement that “a reasonable and prudent alternative will be developed...if the BO results is (sic) a jeopardy opinion” is incorrect; RPAs are developed by the FWS to avoid the likelihood of jeopardy - not as a result of jeopardy.

Again, thank you for the opportunity to provide these comments. Should you have any questions, please feel free to call me at 619-682-4155.

Sincerely,



Gordon A. Hess  
Imported Water Manager

Attachment

PROPOSED REVISIONS BY THE  
SAN DIEGO COUNTY WATER AUTHORITY TO THE  
WESTERN STATES WATER POLICY REVIEW ADVISORY COMMISSION'S  
DRAFT COLORADO RIVER BASIN STUDY

**Page 111:**

If it is the obligation of the federal government to meet the salinity standards..."

**Page 27:**

He promised action on ~~the development of surplus criteria and regulations necessary to implement the interstate component of the Arizona Water Bank, issues of critical importance to all three Lower Basin states.~~ He also stated the need for formulating criteria that will govern the declaration of surplus conditions, but deferred making any surplus guidelines final until California puts into place a strategy to reduce demand to its 4.4 maf apportionment, when necessary. Both interstate banking and surplus criteria are of critical importance to all three Lower Basin states.

**Page 36:**

Under the Seven Party Agreement, San Diego has an equal fifth priority right to MWD for 112,000 af, although the San Diego allocation was consolidated with the MWD allocation under agreements made in 1946 and 1947, when San Diego became a member of MWD, and a seventh priority right up to 250,000 af, which is the lowest priority among California users.

**Page 37:**

San Diego decided it needed to ~~find its own additional water supplies, given its lowest priority in the Seven Party Agreement~~ diversify its sources of supply to improve reliability, and had negotiated directly with IID. ~~Although it appears that MWD and SDCWA have reached an accord on wheeling this water in the MWD aqueduct (thus precluding for now the need for San Diego to build a \$1 billion plus pipeline)...~~

**Page 37:**

Unfortunately, with heavy winter precipitation this year, some if not all of this water will be spilled, all of this water was spilled, underlining the difficulties with top water reservoir storage.

**Page 38:**

For example, MWD is also interested in pursuing a project, authorized by Congress, to line the All-American Canal under which MWD could receive or bank over 67,000 af a year for 55 years for its share of this investment. However, IID recently declined to complete an agreement with MWD for this project, and whether MWD will ever be able to participate in the project is uncertain.

**Page 69:**

North San Diego region wastewater salinity has increased over the past decade due, primarily, to increased salinity present in imported Colorado River water to the return of historic TDS levels in the Colorado River and MWD practices related to blending Colorado River water with less-saline State Water Project supplies. Salinity levels on the river had reached historic low levels after the 1983 flood flows, and rose toward historic average levels during the remainder of the decade. During this time MWD changed its blending practices to provide San Diego with a supply that was higher in Colorado River water, and thus higher in TDS.

The salinity of the Colorado River has increased from a dry season average of 485 ppm in 1986 (the lowest recorded level), to over 700 ppm in 1994. One of San Diego's solutions is to demineralize reclaimed water. The initial 2.1-mgd facility will deliver 3,500-1,200 ac-ft per year of RO product (to produce 4,000 af/yr blended supply) and is expected to have a capital cost of approximately \$7.3 million and annual operating costs of \$1.3 million.

**Page 59:**

In anticipation of this possibility, in 1994 1993 the Lower Basin states and water users created a Steering Committee to explore options under the ESA to create a proactive program that could offset any Section 7 determinations that might impact water and power uses in the Lower Basin and still meet recovery plan objectives as well as preclude the need for new listings. accommodates current water diversions and power production and optimizes future water and power development opportunities, works toward the conservation of habitat and toward recovery of species, and precludes the need for new listings.

**Page 105:**

For example, SDCWA plans to pursue additional agreements with IID to free up, through conservation and following agreements, as much as 500,000 af of water for its growing needs.

**Page 106:** The last paragraph on this page should be deleted and replaced with the following paragraph:

As part of a move toward water use efficiency, many water agencies are pursuing reuse of wastewater. The San Diego County Water Authority has developed a 1997 Water Resources Plan showing that reclaimed water use in the San Diego region will increase fivefold between 1996 and 2015, moving from 11,400 af/yr of current use up to a projected 60,000 af/yr. This includes a project for the potable reuse of water. This innovative project would utilize extensive treatment processes on wastewater, including reverse osmosis desalination, before introducing the treated water to a surface reservoir for future potable use. In its Water Resources Plan, the SDCWA evaluated reclaimed supplies on the same basis as all other potential water resources, including imported supplies, local groundwater, seawater desalination, and conservation (demand management).