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Mr. Phil Isenberg, Chair
Delta Vision Blue Ribbon Task Force
c/o California Bay-Delta Authority
650 Capitol Mall, 5th floor
Sacramento, CA 95814

RE: Draft Delta Vision Strategic Plan

Dear Chairman Isenberg,

I am presenting these comments on behalf of the CALFED Water Quality Subcommittee. As the current chair of the Subcommittee I have had the privilege of working with this dynamic and knowledgeable group for the past six years. With members representing most of California's largest urban users of Delta water and a broad range of stakeholder interests, this group has unique experience and perspective on Delta water use and water quality issues. The following is a summary of the discussion and comments of the Subcommittee from our discussion of the subject plan during our July 10, 2008 Subcommittee meeting. The comments are specifically on the June 18, 2008 Preliminary Staff Draft but also apply to the July 11, 2008 Second Staff Draft.

The Subcommittee's comments focused almost entirely on strategies, actions, and performance targets in the Governance and Water Supply Reliability topic areas with particular concern expressed about the water recycling and water conservation actions. One general comment that had broad support within the subcommittee was concern over the short time frames for review of the various iterations of the draft strategic plan. This schedule does not allow for thoughtful and deliberative comment on the plan.

Governance and Finance

The Subcommittee voiced concerns that the proposed governance structure is unclear and that an additional layer of government might be unduly burdensome. The governance structure should be clearly articulated and there should be additional opportunity for comment.

Water Supply Reliability

Several Subcommittee members were concerned about the water recycling

and water conservation actions and their associated performance targets. The Subcommittee members believe that water use efficiency and water recycling should be more closely integrated in the strategic plan.

The Subcommittee is concerned that the performance targets may be unrealistic and may not be flexible enough to recognize regional differences. In some instances, there are numerous constraints on water recycling including public health considerations, public acceptance, demand issues, financial considerations, and infrastructure. Opportunities for water recycling projects tend to be site specific and vary considerably by region. Opportunities for water use efficiency also vary greatly. Some agencies have already achieved a great deal in the way of water use efficiency and water recycling and this should be taken into consideration. There is also a great deal of variability in the opportunities for water use efficiency in the industrial sector (for example, water is a major ingredient in some products and reduction in "consumption" translates directly into less product). The metrics identified should be clarified, should allow for regional and local conditions, and should also distinguish consumptive use, where water is lost to evaporation, from recyclable water.

With regard to the performance targets outlined for concentrations of contaminants (constituents) in Delta water, the need for improvement varies considerably between the many contaminants (constituents) of concern and beneficial uses. Further, it is premature to require an overall reduction in concentration with no relationship to the specific contaminant (constituent) or associated risks.

We also recommend that the water quality impacts of proposed storage options (ground or surface) be evaluated as part of a feasibility study. Aquifer storage can introduce contaminants into the water that must later be treated such as nitrate or naturally occurring arsenic. Some surface storage options can create problem levels of organic carbon. The range of potential water quality impacts should be evaluated when considering treatment costs, health effects, and "usability" of the stored water.

The Subcommittee recognizes the challenges facing the Task Force because these are many of the same issues that they have been struggling with since (and even before) the beginning of the CALFED Program. We understand the need to take bold action in the Delta and to set the bar high for long-term performance targets but we also encourage the task force to take advantage of the depth of experience in our agencies and stakeholders to establish a flexible and realistic plan. Thank you for considering our comments.

Sincerely,

Greg Gartrell
Chair, Water Quality Subcommittee
Bay Delta Public Advisory Committee