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September 1<sup>st</sup>, 2008

The Honorable Phil Isenberg  
Chairman, Delta Vision Blue Ribbon Task Force  
650 Capitol Mall  
Sacramento, CA 95814

Re: Delta Vision Blue Ribbon Task Force Strategic Plan

Dear Chairman Isenberg,

Thank you for inviting Calleguas to comment on the most recent draft of the Delta Vision Blue Ribbon Task Force Strategic Plan. The future of California's Bay-Delta is of great importance to this agency. More than 75% of Ventura County residents and businesses depend entirely on Calleguas for their water or require Calleguas water for blending. Nearly 100 percent of our water is imported through the State Water Project. And, while we have been working aggressively to develop groundwater storage, expand recycling and increase conservation, the reality is that imported water remains our base supply. In other words, the water that we store underground, recycle and conserve starts out as imported water from the State Water Project. Therefore, our single greatest priority is the reliability of that supply.

Rather than make specific comments on this third draft of the Strategic Plan, we would like to share our observations for your consideration.

**Reliability Not Quantity**

Contrary to the popular characterization of State Water Contractors, Calleguas does not need more water from the State Water Project. What we need is certainty.

Calleguas receives its State Project water through Metropolitan Water District of Southern California (Metropolitan). Unlike other Metropolitan member agencies, however, Calleguas relies on the State Water Project as our single source of supply. In the event of an emergency disruption, the District must survive on its own water stores. There is no pipeline connecting Metropolitan's Diamond Valley Lake and Colorado River supplies to our region.

California's propensity for earthquakes poses a triple threat to Calleguas' reliability. A pipeline break in our service area, in the California Aqueduct or in the Delta threatens our ability to ensure customers a safe drinking water supply. Seismic dangers are greatest in the Delta where the lack of clearly defined infrastructure makes repairs challenging, and seawater intrusion could contaminate supplies for years.

For Calleguas, the single most important element in the Delta Vision Strategic Plan is securing water supply reliability.

### **Sustainable Exports**

Fundamental to water management is that customers want (need?) more water when nature provides less. The Public Policy Institute of California report "Envisioning Futures for the Sacramento-San Joaquin Delta" points out the damage that can cause when diversions from the Delta are greater in dry times (when inflows are lowest) than in wet years. We need to reverse this trend, and divert when water is plentiful if we are to reduce our impact on the Delta ecosystem. This requires operational and regulatory flexibility so that the water systems are adequately sized and can flex with real-time conditions.

It makes sense to Calleguas that diversions should be curtailed when inflows are reduced. Likewise, we see no merit in arbitrarily capping exports when wet weather provides that alternating balance of supply. Flow monitors and water quality data should inform the operation of the Delta water system, both its inputs and its outputs, in a scientifically unbiased manner. Calleguas is weathering the "Wanger" pumping restriction better than most, in part, because diversions in wet years allowed Metropolitan to store water for use during this current drought. This should be the model of the State.

### **Quality**

Water Quality is another factor contributing to the decline of Delta species, and it creates challenges for water providers as well. Treatment costs rise as quality degrades. Additionally, agencies run the risk of creating disinfection byproducts as water treatment intensifies. Water quality is another Delta challenge that would benefit from ongoing monitoring, so contaminants can be identified and arrested before they become a source of degradation.

### **Infrastructure**

From our perspective, these three water supply objectives: reliability, sustainability and quality are best achieved by controlling the variables in the water delivery equation. Calleguas has long supported improved conveyance as a means to segregate municipal and agricultural supplies from the Delta estuary environment to secure water deliveries. Properly operated, conveyance infrastructure has the added advantage of improved water quality for both species and people. However, segregating supplies does not mean operating the water project in isolation. Water management must be done in manner that takes the health of the entire Delta into consideration.

### **The Watershed Management Approach**

Calleguas is a wholesale water supplier, yet we lead the local watershed planning effort in our region. Why? Because the Calleguas Creek Watershed had serious water quality challenges, and it was apparent that we could solve our problems better by working together than at cross-purposes. Through monitoring and research, we identified all the stressors to our water resources and found that we shared responsibility for the degradation with a variety of stakeholders in the region. Together, we worked with local regulatory agencies to develop standards and implementation projects to solve the water quality problems for the benefit of the entire watershed. Today, Calleguas sees water supply as one element in an array of interrelated resources in a watershed, and we believe we can best manage that resource by working cooperatively with other stakeholders to attain our watershed objectives.

The Calleguas Creek Watershed Steering Committee has been successful because the group is organized under a common purpose to improve the health and sustainability of the watershed. Subcommittees work toward improvements in specific areas, such as water quality, flood protection and habitat management, within that context. Participants are held accountable for specific standards by various regulatory and legal mandates. In deed, the regulatory agencies involved in the watershed have recognized the value of disparate groups working as a collective body. These agencies have demonstrated a willingness to work with watershed stakeholders to help them achieve standards and avoid penalties that would drain resources from solutions for the region.

We offer up the Calleguas Creek Watershed Steering Committee as a positive example of a governing board for the Bay-Delta, where each agency maintains its role and authority but shifts its focus to collectively achieve the overarching goal of sustainability. To that point, we would urge the Blue Ribbon Task Force to carefully consider the goal of the Strategic Plan. The Delta Vision declared that the ecosystem and water supply are co-equals, but a more unifying policy objective is needed to implement the Plan.

### **A Unified Front**

While Delta interests do not fall neatly into two camps, the main tension remains in water interests believing environmental restrictions unnecessarily limit their access to water and environmental interests believing that water diversions harm the Delta ecosystem. What California needs is a holistic watershed management approach that seeks the management of Delta resources for benefit of all users. Rather than co-equals, water (like other Delta resources) should be managed for its beneficial uses – including municipal uses -- in a manner that protects the environment and supports long-term sustainability of the Bay-Delta watershed.

The Honorable Phil Isenberg

September 1<sup>st</sup>, 2008

Page 4 of 4

As stakeholders in California's water future, we have more in common to unite us than differences to divide us. What we lack is trust. We believe trust can be developed with proper representative governance and a common vision.

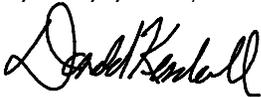
### **Emergency Preparedness**

Calleguas believes that the threat of Delta collapse is a real and immediate danger to California water supplies. While governance, protocol, research and facilities are under review and development, we urge the Blue Ribbon Task Force to work with DWR to issue an emergency preparedness program that can assure water supply reliability in the intervening years.

Calleguas supports the call for regional reliability, and we are working on local supply development to reduce our dependence on the Delta. However, these projects will take years to come online, and until they do, we must have confidence that the State has adequate emergency preparations.

Finally, we would like to acknowledge the tremendous time and commitment that you and the other Task Force members have contributed to this effort, including numerous public meetings around the state. Thank you for your consideration of our comments and for your dedication to this Delta Vision effort.

Very truly yours,



Donald R. Kendall, Ph.D., P.E.  
General Manager

Cc: Delta Vision Blue Ribbon Task Force Members  
Calleguas Board of Directors