



california water impact network

June 9 2008

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RE: Scoping Comments for the EIR/EIS for the Sacramento-San Joaquin Bay Delta Conservation Plan

Dear Ms. Brown and Ms. Idlof:

The California Water Impact Network (C-WIN) appreciates the opportunity to provide scoping comment on the proposed EIR/EIS for the Sacramento-San Joaquin Bay Delta Conservation Plan (BDCP). We would like to add these to those submitted on May 30, 2008 on our behalf by C-WIN President, Carolee Krieger.

The BDCP, as presently constituted is fatally flawed, starting with the extremely limited delineation of the delta. By restricting the area to be considered so severely, any opportunity to increase water supply to the delta is foreclosed. For any serious habitat restoration to take place, the three causes of decline must be addressed: water exports, water quality and exotic species. And having sufficient water supply in the delta is by far the most important.

Water exports are most important because it impacts both water quality and the proliferation of exotic species. Recognizing that all of our water resources are over committed, (the State Water Board now admits that it has issues water rights permits that equal five to seven times the amount available in the state) and there is no more water to draw from, demand management is a must and holds great potential at far cheaper cost than any other solution under consideration. And it can

be accomplished in a much quicker time frame. It has the added advantage of being distributed widely all over the state.

The biggest saving in the urban sector can come from changing the plant materials used around our homes and businesses. Forty to Seventy per cent of urban water is used outside. The history of gardening is to see how many plants can be brought to California from the farthest corners of the world and grown here. And almost anything can be. It is time to promote interest in our own native plants and others from Mediterranean areas that can flourish in our climate with very little if any added water. Half to two thirds of water used for outdoor irrigation can be saved in this way.

The second biggest source of urban water savings can come from all the conservation methodologies that have been outlined by the California Urban Water Conservation Council (CWUCC). Both the Pacific Institute and DWR;s own B160-95 conclude that 30% can be saved, cost effectively and with existing technology right now.

Water reuse is finally beginning to be taken seriously. We clean up our wastewater until it is almost potable and then throw it away. The Los Angeles Hyperion Sewage Treatment Plant is the seventh largest river in the state, discharging fresh water year round to the ocean.. It makes much more sense to apply desal technology to our wastewater stream rather than to the ocean since it would need only one tenth the amount of energy to apply reverse osmosis to wastewater. Spreading this water to go through the soil until it reaches the aquifer is a good way to remove any remaining contaminants. A major public education campaign and a little money is all that stands in the way of reusing as much as 90% of our wastewater stream.

Groundwater management clearly also holds great potential. Many for our groundwater basins have been over drafted and therefore hold great potential to store wet year surpluses against dry year need. And there is growing interest in Southern California to capture rain water where it falls, and get it into the ground to augment our local water supply and reduce our need to import as much from the north. On average, about 500,000 acre feet of runoff flows to the ocean annually from the LA Basin. One tributary of the LA River, the Tujunga Wash, averages over 58,000 AFY of runoff annually.

The agricultural sector promises even more water riches. It is by far the biggest source of water quality problems to the delta especially from drainage impaired lands – land that should never have been irrigated. This land must be taken out of production, and the water rights retired as an immediate source of water to help with the delta's endangered species problems. It is the State Water Board's obligation to both allocate water in the public interest, to enforce the public trust doctrine, and to enforce water quality regulations. It has done none of them. This

must be corrected first before any serious discussion of a bay delta conservation plan can be considered.

In conclusion: To develop a real conservation plan, the delta and its watersheds must be the subject of the study so that real demand management can be implemented. Only with additional water in the delta can we begin to restore habitat and provide for a more reliable water supply.

Thank you for the opportunity to comment on this very flawed planning document.

Yours truly,

A handwritten signature in black ink that reads "Dorothy Green". The signature is written in a cursive, flowing style.

Dorothy Green, Secretary
California Water Impact Network