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CalFed
The Resources Agency
1416 Ninth Street
Room 1311
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Gentlemen:

This is in response to your September 8th transmittal of "Draft Plan to Implement Exhibit C of the Framework Agreement."

I agree that there should be a single Program Director. The problem is where will you ever find the super human person to control the myriad of regulators. Your organization reminds one of the definition of a camel: "a horse designed by a committee."

The most grievous error in all the most recent Delta planning studies has been the lack of quantification of foregone economies if a real solution is not soon implemented. It's not the "Water Future", it's the future economic stability of the State and an assured reasonable protection and enhancement of certain environmental values.

I don't believe the Agreement identifies either the public values or the problems associated with them. Until the problems are fully identified and understood, it is impossible to logically address solutions. Of the values listed, the reliability of water supplies is not spelled out. To me this is the most important deficiency in the Delta and impacts 2/3 of the State's population and most of the expressed environmental concerns.

Bulletin 160-94 clearly shows a critical deficiency in supply and discusses only in general terms many of the "economic costs of unreliability". But the bulletin does not quantify these costs and I have yet to see any of the study groups (BDOC and those working on the mandates of CVPIA) addressing this issue. Between the regulators under ESA and CVPIA, large quantities of previously committed (and contracted for) water have already been reallocated to new functions. There certainly is nothing wrong with addressing the environmental deficiencies; they should and mostly can be corrected. But to do so by simply trading one significant economy for another is economic anathema. Without "new" water supplies, the deficiencies will never be accommodated. The economic costs are in the billions if all of the following are considered:

*Reduced sport and commercial salmon catches and their related industries

- *Reduced recreational values at the key (Shasta and Oroville) storage reservoirs now severely overworked
- *Future treatment costs of Delta export water will be in the billions because of quality problems
- *Reduced crop and land values associated with the unreliable water supplies to the multi-billion dollar agribusiness
- * Unreliable water supplies adversely affecting the economic climate causing business and industry to consider locations out of state.

Obviously we're talking real money!

Deep in the text of Bulletin 160 there is a reference to "The Westside Sacramento Valley Storage and Conveyance Concepts". With the addition of up to 2 million acre feet of new water, the concepts provide an unlimited variety of options to manage the water supplies in the best interest of the environment. As San Francisco, East Bay and Los Angeles have gone to the high quality source; so, too, the concepts separate the water from the fish and from the River and Delta quality problems. The additional water and plumbing options provide the greatest opportunity to fully address essentially all the existing water supply and environmental concerns including flushing of the Delta estuary.

The future security of California's economy is at stake. It's water development has for some years now been in a state of regression. With the growing economic costs of unreliable water supplies, we cannot afford not to seriously consider every option to recover those costs. I recommend the above concepts be given positive consideration in addressing alternative solutions to the Delta. The problems of the Delta go far beyond the Delta itself.

Sincerely,



Joseph E. Patten