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May 20, 1998

Lester Snow, Executive Director
CALFED BAY-DELTA PROGRAM
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Public Comment on Phase II Interim Report

Dear Mr. Snow:

We would like to be on the record related to our organization's response to the subject report. California Trout is a fisheries conservation organization with more than 5,000 California citizens as members. We have a long history of working cooperatively with public agencies in finding common ground for water and river related issues; we feel that we have been influential well beyond our numbers.

Our comments cover three subjects:

- Water Conservation
- Measurable Objectives for Recovery Actions
- Additional Time to Complete and Review Phase II.

Water Conservation.

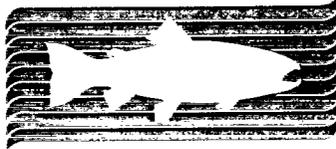
Our main concern in reviewing the Phase II report is the lack of attention to aggressive conservation approaches as a solution to California's water supply and quality issues. Contrary to the assumptions in your report, we believe that California has already developed an adequate water supply to see us through the next two decades. The challenge is to apply rigorous conservation standards that will affect a redistribution of the existing supply and contribute to solving the water quality issues. We believe that your organization has not been willing to tackle the difficult issues related to California agricultural water usage and its impact on supply.

Our main two points are these:

1. Market pricing - or something close to market pricing - of agricultural water will cause significant reductions in water demand.
2. CALFED has a responsibility to pursue pricing policies that cause demand reductions and redistribution of existing state water supplies.



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On the subject of water pricing, the recently drafted State Water Plan indicates that a 10% increase in the price of agricultural water could produce a 3.2% reduction in demand, based on a computer simulator. Since that magnitude of price increase is modest (\$1 to \$4 per acre foot for Central Valley farm corporations), and since a 3.2% demand reduction is more than 1 million acre feet of water, this seems like a direction to be aggressively pursued by CALFED. A goal of 10% reduction in water usage by agriculture would appear to be an achievable goal in view of agriculture's own experience with water conservation measures. A modest 10% reduction in agricultural water usage, through pricing, will solve California's forecasted water supply problem well into the next century

On our second point: CALFED has a responsibility to the citizens of California to pursue policies that cause demand reductions and redistribution of existing state water supplies. We know that corporations, when faced with increasing supply costs, and in a competitive price environment that won't let them simply increase their prices, will invest in technologies that cause efficiencies in their operations; California agricultural corporations are no different. And we also know that most of California agricultural production is dominated by large corporations. We have learned that whenever we subvert our free market economy, as we do with the current artificially low contract pricing of CVP and SWP water to agriculture, we create anomalies such as the way water is currently used in California. Urban areas have proven that water usage can be reduced by more than 30% when faced with equipment pricing incentives and baseline/tiered pricing. A 10% reduction in agricultural water usage would seem like a very achievable goal. CALFED has a responsibility to the citizens of California to pursue that kind of goal.

We believe that the urbanized population of California understands that the further "development" of water supplies through massive diversionary projects without meaningful conservation measures will perpetuate wasteful water use practices. It will do little to solve Delta water quality problems and will continue the decline of our state's native fisheries. On the other hand, modest conservation measures applied primarily to agriculture, but also to urban areas, can produce the desired results without a multi billion dollar "isolated" Peripheral Canal.

We ask you to apply this type of conservation and measure the actual results over a period of years before you decide whether California actually needs the large construction alternatives that you seem to favor.



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Measurable Objectives for Recovery Actions.

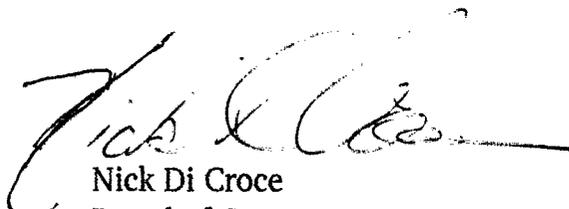
As a part of the Ecosystem Restoration Programs there is a discussion of 700 actions that are expected to result in greatly improved ecological health for the Bay-Delta system. Adaptive management, scientific oversight, and program review will guide implementation over a 20 to 30 year implementation period.

These are all statements of good intentions and actions that we would concur with. What we did not see, however, were measurable performance standards and objectives that can make the adaptive management philosophy work. In the words of Dr. Peter Durcker: "If it cannot be measured, it cannot be managed." With the amount of study effort that has gone into the Phase II Interim Report, it would appear that measurable objectives and standards would be a part of the work. CalTrout and the citizens of California need to see measurable criteria and time frames for ecosystem restoration so that we know what goals you are committing to. We suggest you take the additional time required to define measurable criteria for the actions embodied in the Ecosystem Restoration Program.

Additional Time to Complete and Review Phase II.

With the volume of information CALFED has prepared to date, it is nearly impossible for the public and their elected officials to fully comprehend this mass of information. And with the need, as expressed above, to define measurable objectives, the CALFED process should not be rushed with unrealistic deadlines. In our attendance at of CALFED briefings, we have heard a number of people testify that they needed more time to digest the report. It is also readily apparent that additional time is needed to gain the consensus building that is so important to your success. Given the impact of CALFED decisions, we suggest that you avoid a rush to judgment and take the time to build a good consensus of all interests.

California Trout appreciates the opportunity to comment on your Phase II Interim Report and we look forward to your favorable attention to our stated concerns.



Nick Di Croce
Board of Governors



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