



JUN 19 1998

01049

C A L I F O R N I A A V O C A D O C O M M I S S I O N

June 17, 1998

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814
Attn: Mr. Rick Breitenbach

Re: Draft Programmatic Environmental Impact Statement/Environmental Impact Report

Dear Mr. Breitenbach:

We appreciate the opportunity to review and comment on the Draft Programmatic Environmental Impact Statement / Environmental Impact Report for the CALFED Bay-Delta Program. These are the joint comments of the California Avocado Commission and the Southern California Agricultural Water Team. We also appreciate the enormous undertaking this project represents and commend all involved in this effort. Our comments, although critical of the document, are offered in a constructive spirit to ensure that the selected plan and programs are satisfactory to all stakeholders and that impacts are fully understood.

The Southern California Agricultural Water Team represents a diverse group of agricultural interests with a common goal of securing state, regional, and local agricultural water supply and management programs that provide affordable, adequate quality water for agri-business use. Our vision is a dynamic, diverse, and sustainable coastal Southern California economy and environment, enriched by a viable agricultural sector.

Water costs, water rate stability and predictability, water supply reliability, and water quality are of paramount importance to the region's farmers. Water costs for many crops in coastal Southern California are at or above the water price threshold due to unprecedented water rate increases since 1990. These increases are the result of capital improvements designed to meet more stringent drinking water standards and to restore the region's water supply reliability as the result of changed operational conditions for our major sources of supply. Substantial water conservation improvements in the region have also contributed to increased unit water costs due to the large fixed cost component of these projects. In some cases, retail agricultural water rates in the region are as high as \$800 per acre-foot per year, representing about 75 percent of crop production costs.

Clearly, the ability of Southern California agriculture to bear further rate increases without adverse effects is limited. At stake is the viability of an economic sector that generates between \$40-50 billion annually in direct, indirect, and induced outputs.

Our comments are based on a review of the Programmatic EIS/EIR Executive Summary and the Programmatic EIS/EIR Technical Appendix. We have also attended CALFED briefings on the documents. In general, we find that the documents lack specificity. For example, evaluations of the impact of each alternative are incomplete, and details on financing solutions are not included. The absence of this information makes it difficult to provide meaningful comments.

We believe consideration should be given to water quality improvements for Delta water supplies. Source control and water quality management in the Delta can be an extremely important and cost effective means of meeting drinking water standards for all Delta water users. Addressing the issue at the source minimizes the need for extensive and costly treatment by every water agency that receives supplies from the Delta.

The evaluation of the impact on water supply seems to be limited only to the amount of water available. This should be broadened to address the socio-economic impacts associated with these varying levels of supply, which should be examined statewide and regionally for each alternative.

The growth-inducing impact discussion in the document is overly generalized and contains highly speculative conclusions. Many factors affect growth more than the availability of water. The document concludes that: 1) adequate supplies and improved reliability will lead to a loss of critical habitat, 2) water supply benefits to SWP and CVP service areas outside the Central Valley will come at the expense of the environment, and 3) that growth is inevitable although exact locations are unknown. No attempt was made to support these conclusions or to consider the environmental impacts of inadequate or unreliable water supplies.

The alternatives rely heavily on water conservation, reclamation, and water transfers in meeting water needs. The use of quantitative water targets for conservation places a disproportionate burden on those who have already implemented a high degree of urban and agriculture water conservation, such as users in the South Coast region. We believe that adoption of an affordable, Best Management Practices approach would be more equitable and effective.

Given that most portions of the state are (or will be) water deficient, the importance of water transfers may be overly optimistic. It is likely that waters potentially subject to transfer or conservation will be needed in the area of origin.

For water reclamation to play a more meaningful and increasingly important water supply role, substantial infrastructure investment is necessary. Water quality management efforts, too, must be increased, and changes in local and regional water supply plans and programs will also be needed. Most current water reclamation efforts are small scale and many satisfy a created demand as opposed to an existing demand.

Water quality aspects are also major considerations in the effectiveness of water conservation and water reclamation. Lower quality results in less conservation and reclamation, with a corresponding impact on local ground and surface waters. Conversely, better quality water generally leads to less water use and greater conservation and reclamation potential. Realistic goals for water conservation and reclamation cannot be set without defining the quality of the Bay-Delta water supply. It is unrealistic and unacceptable to simply set goals and expect local and regional agencies to spend whatever it requires to meet them. Most of these items will entail substantial investment. Consequently, required investments should be considered in the cost analysis and impact assessment, and in the financing of the selected alternative.

Substantial capital improvements are now underway in the South Coast region and other parts of the state. These improvements are designed to increase reliability that was lost when operational changes were made in the management of various supply sources. There are serious concerns regarding the potential for stranded investments resulting from the use of different water supply and management strategies by local and regional interests versus those adopted for the Bay-Delta. Local, regional, and state water supply and management plans should not be considered independently or thought of as mutually exclusive. We recommend that the impact analyses for the alternatives include an appraisal of the alternative's compatibility with regional/local water supply and management plans.

Also of major concern are the cost, funding, and financing of the selected alternative, including any implied or inherently mandated unfunded regional and local water infrastructure and management improvements. No information was provided in the draft environmental document on these matters. There are limits on the amount that agriculture and other economic sectors can pay for water. As noted earlier, some of these economic sectors are at or near this price threshold. Providing water at the lowest possible cost while realizing socio-economic and environmental goals and maximizing benefits must be one of CALFED's guiding principles.

June 17, 1998

In our view, California's public water infrastructure and water management programs have but one defining purpose. They must allow individuals, communities, and businesses across the state to prosper, and collectively realize the achievement of socio-economic, environmental, and quality of life goals in a sustainable manner. There needs to be a clear and comprehensive statement of statewide socio-economic and environmental goals relative to the Delta and the role of public water infrastructure, management programs, and operations in achieving these goals.

We support the CALFED process, but we are concerned that, thus far, there is more process than substance. While there is a need to involve all interested parties, a protracted process leaves CALFED increasingly vulnerable to abuses. We believe substantial work remains to be done before a preferred alternative can be identified. Accordingly, we recommend bringing increased focus to the work that lies before CALFED.

Again, we appreciate the opportunity to comment on the draft environmental document, and look forward to continuing to participate in the process.

Sincerely,



Tom Bellamore
Senior Vice President
California Avocado Commission



Don Reeder
Chairman
Southern California Agricultural Water Team



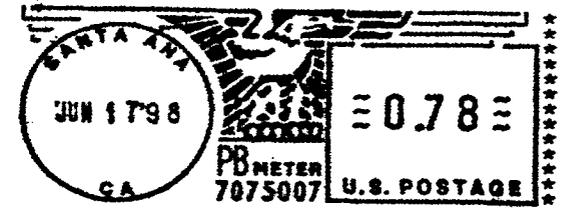


CALIFORNIA AVOCADO COMMISSION
1251 E. Dyer Road, Suite 200, Santa Ana, CA 92705-5639



CALIFORNIA AVOCADO COMMISSION
1251 E. Dyer Road, Suite 200, Santa Ana, CA 92705-5639

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814



DEPARTMENT OF
WATER RESOURCES
SACRAMENTO
98 JUN 19 AM 10:42