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June 27, 1998

Lester A. Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Mr. Snow,



Before the public comment period expires on July 1, I wish to offer some comments on CALFED's Draft Programmatic EIS/EIR. After carefully reading the document's Executive Summary and Phase II Interim Report, it strikes me that all 12 variations of CALFED's three basic "program alternatives" suffer from one common flaw, and that CALFED might be missing an historic opportunity for charting a genuinely new course for California's water future.

The common deficiency to which I refer is the disappointingly weak "Water Use Efficiency" component that sets such low goals for water conservation, especially in the critical area of agricultural water consumption. CALFED anticipates annual net water savings of only 160,000 acre feet from agricultural conservation (as opposed to 740,000 from urban conservation!) and admits that its program "does not include a strong component of direct demand management actions such as agricultural land conversion to reduce water diversions or reduce and delay the need for storage facilities. The analysis of alternatives should include varying ranges of demand management, including reclamation, conservation, pricing, and land retirement/fallowing" (Interim Report, p. 56).

Indeed, each of these alternatives, plus others, must be built into the CALFED program in order to establish agricultural water conservation as CALFED's Number-One long-term priority.

Everyone familiar with California water politics understands that agriculture consumes 80 percent of the state's developed



water supply, and that its share has fallen just five percent since 1960. While I don't often find myself in agreement with the Metropolitan Water District of Southern California, surely MWD general manager John Woodraska was correct when he observed that "If the farmers can get by with 75 percent of the state's water during droughts, instead of 80 percent, then we've basically solved our water crisis."



Acting wisely and aggressively upon this fundamental truth should be CALFED's foremost objective. CALFED should take its Water Use Efficiency component back to the drawing board and, in consultation with non-CALFED agencies such as the US and California state departments of agriculture, come back with an innovative package of agricultural water conservation programs and proposals. These might include an array of state and federal tax credits and/or low-interest loans to encourage the adoption of water efficient crops and technology; requirements that irrigation districts using CVP and SWP water adopt water conservation and groundwater management plans complete with conservation goals; government programs to identify and develop commercial markets for water-efficient crops; government subsidies to promote the fallowing of land devoted to water-intensive crops such as cotton and alfalfa (fallowing should be used as a short-term strategy to promote eventual crop conversion); and subsidies to help Southern California purchase additional Colorado River waters from Arizona and the four upper Colorado Basin states, now that Interior Secretary Babbitt has approved inter-state water transfers.

Certainly, strong efforts must be made in ag water conservation before urban taxpayers and voters can be expected to approve any new dam or aqueduct projects. I, for one, am opposed to undertaking any such projects until California has first achieved a 5 percent transfer of existing supplies from agriculture to other uses.

Even then, however, I would not support some of the projects currently envisioned by CALFED. Under no circumstances, for example, should the Sites-Colusa Reservoir be built, especially when the much preferable alternative of enlarging Shasta remains



feasible. Similarly, the expansion of Millerton Reservoir should be favored over the creation of the proposed Los Banos Grande Reservoir.

Most importantly, CALFED should rule out any and all plans for a Peripheral Canal. This environmental and political disaster should remain exactly as the voters of California left it on June 8, 1982: dead and buried. Instead, CALFED should help firmly establish as a basic principle of policy that all Sacramento River water exported to Southern California must first flow through the Delta. This is the only way to guarantee that 1) the Delta will receive sufficient amounts of fresh water, and 2) Southern California will remain concerned about water quality in the Delta.



Unfortunately, my points of view are not very congruent with CALFED's 12 proposed plans. The Peripheral Canal lurks within all 5 variations of Program Alternative 3, and new surface storage projects are included in Alternatives 1C, 2B, 2D, and 2E. Depending upon which projects are actually selected to implement them, these alternatives may or may not be acceptable. In the end, I can only endorse Alternatives 1A, 1B, and 2A. Even they, however, like all the rest, need a vastly improved Water Use Efficiency component.

Only by taking up the great challenge of agricultural water conservation will CALFED fully realize the tremendous and historic opportunity it has been given to forge a new path in water resources planning and development. As the events of the last two decades have shown (e.g. the Mono Lake decisions, the defeat of the Peripheral Canal, the Auburn Dam stalemate, Water Resources Control Board Decision 1630, and the passage of the Central Valley Project Improvement Act of 1992), the era of dam building and reckless environmental rearrangement is over. CALFED's final proposal should reflect these developments by providing our state with a bold blue-print for the Twenty-first century, one that

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emphasizes conservation, reclamation, and coordinated management rather than the discredited and destructive practices of the past.

Sincerely,

A handwritten signature in cursive script that reads "Michael Magliari".

Michael Magliari



cc: Hon. Patrick Johnston, California State Senate  
Hon. Kevin Shelley, California State Assembly  
Hon. John Garamendi, former Deputy Secretary, United States  
Department of the Interior

