

July 1, 1998

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CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95825
Attn.: Rick Breitenbach

Re: Comments - CALFED Bay/Delta Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

The Del Puerto Water District entered into the CALFED consensus-building process in good faith, believing that the stated principles were the only way to achieve the regimen necessary to meet the future water demands of population growth and agricultural survival. The District recognizes that the CALFED principle of everyone having to give up something in order to achieve consensus and reluctant agreements, is the only viable procedure that makes any sense. The District also accepts that each contending water entity will submit their list of water wants for arbitration, peer review and final CALFED recommendation. Accordingly, here is Del Puerto Water District's needs and recommendations.

The CALFED issues the District would address are as follows:

1. The need for a reliable and affordable water supply at the Delta export pumps.
2. The linkage between CALFED Delta environmental fixes and water supply reliability in the future CALFED proposals.
3. The merit of raising Friant Dam and other on-stream reservoirs.
4. The logic of an isolated conveyance facility in the Delta.
5. The argument against relying on water conservation and market pricing.

Agriculture, anywhere in California, cannot outbid urban and environmental interests for water. It must be accepted by Californians in general and in the ballot box, that a reliable and affordable food supply is mandated. Agriculture, because of the small margin of business gain, cannot financially absorb increased water costs with the same market return. Agriculture's only option is to increase production to stay in business. Increasing production further reduces return. The public benefits with cheap food, agriculture doesn't, and therefore the public should demand a reliable and affordable agricultural water supply and not outbid agriculture for water to the point of it's destruction.

Because "affordable" agriculture is dependent upon a certain volume of water every year, any perceived reallocation of water in the future or any procrastination of relying upon more agricultural water conservation in lieu of developing new water supplies is not acceptable either to agriculture or to the general public. The "mind set" of every one in California has to be that our future as a state is dependent upon meeting the water demands of a growing population while maintaining the economic water health of a reliable and affordable food supply. Logically and economically, this calls for new on-stream water storage providing multiple benefits to everyone and everyone paying through the ballot box. Economically, off-stream storage has less overall benefit, but still could be built. We believe,

without equivocation, that "iron clad" linkages, assurances and contracts between all water beneficiaries have to be forged into a "master plan" that guarantees the outcome of efforts to every Californian's benefit. The "iron clad" posture is the only method that would alleviate suspicion and mistrust among the various constituencies of water use.

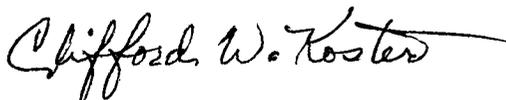
Specifically, we recommend a small (5000-7000 cfs) isolated conveyance facility with multiple outlets around the Delta. Agricultural users south of the Delta state that it is next to impossible to transfer water through the Delta on a short term basis without it. Whether to facilitate transfers, reduce fishery impacts, increase water reliability to south Delta users or exporters, the fact remains that from an engineering standpoint, when joined with increased Sacramento River flows through the interior Delta, this is the best transfer solution. Granted, politically, those that preach the "status quo" are against such a facility, but, if we are programming to meet predicted growth with an affordable and reliable water supply begetting an affordable and reliable food supply, this is the best alternative.

Water storage is mandate-linked, assured and contracted. On-stream we advocate raising Friant and Shasta Dams as well as building Auburn Dam. Friant needs increased storage to be able to service the San Joaquin River's needs, to provide a fishery (mandated), to provide southern Delta water quality (mandated by Vernalis standards), and providing increased reliability of water supply at export pumps, as well as flood control in the Delta, i.e. levee failures. Auburn Dam would provide many benefits including Sacramento flood control, water storage and dry year reliability. Raising of Shasta Dam provides storage, fishery adaptive management scenarios and increased water supply reliability. Off-stream storage facilities such as Sites, Los Vaqueros and Los Banos Grande, while beneficial, have greater power costs/year and less flood control management ability.

To reiterate a few points above as far as a viable and continuing ag. industry South of the Delta is concerned, we dwell on the water precepts of reliability and affordability of supply. We can not compensate in either the short or long term with an inconsistent, unreliable water supply. Water conservation was emphasized and implemented during the drought of the 1990's. Examples included sprays to reduce leaf transpiration, use of sprinklers, installation of drip and micro-irrigation systems, furrow damming, drain water reuse and short term under-irrigation (long term requires 10% "excess" water demands to leach salts). South of the Delta water conservation was and is practiced to its ultimate at great capital expense. To this degree, we lead the nation in water conservation efforts and technology. Except in the opinion of those urban and environmental interests who embrace panaceas at the expense of experience and common sense, there is little water benefit to further conservation efforts in our area.

In conclusion, the above statements represent our needs, wants and recommendations. Admittedly, they may, in part, be idealistic under present conditions, but the CALFED process is addressing the future water demands of California. The stance of the Del Puerto Water District is agricultural in scope and perspective, for now and the foreseeable future, resisting the urbanization of prime farmland in the San Joaquin Valley. In this sense, we feel that we are representative of Valley agriculture, which is negotiating in good faith, honoring the CALFED principles.

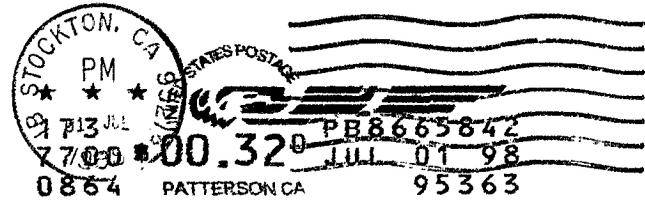
Your consideration of these comments is appreciated.

Sincerely, 

Clifford W. Koster, President of the Board of Directors
DEL PUERTO WATER DISTRICT



Post Office Box 98
Westley, CA 95387-0098

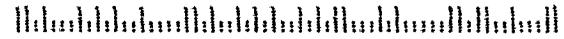


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