



**Del Puerto
WATER
District**

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:

These comments are submitted on behalf of the Del Puerto Water District ("District") in response to the above referenced document. The District is dedicated to providing its landowners and water users with an adequate, affordable and reliable water supply. Toward this end, it has contracted with the Bureau of Reclamation to receive up to 140,210 acre feet of Central Valley Project (CVP) water deliverable from the Delta-Mendota Canal for both irrigation and M & I uses on approximately 46,000 acres of prime agricultural land in San Joaquin, Stanislaus and Merced counties. Dependent upon the export of Delta water supplies, our landowners and growers have been severely and disproportionately impacted by laws and regulations aimed at Delta restoration. It is past time that these problems were responsibly addressed and that solutions be appropriately financed. More importantly, it is time that the burden for restoring and protecting the Delta be assumed by all Californians rather than continuing to balance the state's water budget largely on the backs of our CVP Delta-dependent farmers.

Prior to the recent drought, supply shortages were experienced only once in the District's thirty-five year history. Beginning in 1990 (and for seven of the last nine years), the District has experienced both drought-related and legislative/regulatory imposed water shortages. In 1993 for example (a 150% of normal hydrological year), the requirements of the Endangered Species Act and the disproportionate impacts associated with implementation of the Central Valley Improvement Act south of the Delta resulted in only a 50% water supply to our users. During this same timeframe, the District has experienced a 1000% increase in its water costs to its farmers (from \$4.00/AF to \$40.00/AF, including a \$6.00+/AF surcharge dedicated toward environmental restoration efforts) due to newly imposed legislative and contractual requirements. As a result, district users have become more reliant and dependent upon the availability of limited groundwater supplies to supplement these reduced, unreliable and costly surface water supplies. They have also become some of the most efficient agricultural water users in the world.

Having experienced such grave difficulties in securing necessary water supplies the last several years due to environmental problems in the Delta, we know better than most how much California relies on the Delta as a source of water. CALFED recognizes the challenge of restoring the Delta ecosystem and provides valuable funding for a variety of programs that we support as essential to achieving this goal. A stable Delta environment is absolutely critical in helping to meet the state's current and growing need for water. CALFED makes a long overdue investment in California's water supply system

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and is an important element in protecting the state's jobs, economy and environment. Indeed, the prospect of not addressing the problems associated with the Sacramento-San Joaquin Delta ecosystem immediately casts a shadow over the entire state's future economic viability.

Over the past three years, the District has invested many hours and substantial dollars in support of the collaborative CALFED process. The District has participated into the CALFED consensus-building process in good faith, believing that the stated principles are, perhaps, the only means available of achieving the program's all-important mission and primary objectives. The District recognizes that the CALFED principles of "equitability" and "no significant re-direction of impacts" mean that everyone has to give up something ("to share the pain") in order to achieve success. Our farmers and landowners have already suffered more than our fair share.

What follows is a brief summary of the recommendations of the Del Puerto Water District to the Program as outlined in the Draft Programmatic EIS/EIR.

1. WATER SUPPLY AND STORAGE: To meet the water quality and supply needs of agricultural, urban and environmental water uses throughout the State, the CALFED solution must provide for substantial new water yield from both on- and off-stream storage sites north, south and adjacent to the Delta.

2. AGRICULTURAL LAND/WATER CONVERSION AND RETIREMENT: The District opposes the widespread conversion/retirement of agricultural land and its associated water resources as contrary to CALFED's stated principles, damaging to our agricultural interests and potentially devastating to both the State's economy and the nation's food supply.

3. WATER CONVEYANCE ALTERNATIVES: Improved conveyance is absolutely essential to meet CALFED objectives and improve water reliability south of the Delta. The District believes that an isolated facility is necessary to optimize long-range CALFED solutions.

4. WATER USE EFFICIENCY: The District supports the continued voluntary implementation of efficient water management practices either as endorsed by AB3616 Agricultural Water Management Council and/or as approved by the US Bureau of Reclamation (USBR). As the very first District to develop and implement a USBR approved Water Conservation Plan (1994), we have already demonstrated our highly efficient agricultural water use. Any possible increase in overall efficiency will not create "new" water supplies for the State nor will it result in reduced demands for Delta water supplies. Further conservation efforts will in no way mitigate the need for improved conveyance linked to expanded storage facilities.

We would encourage CALFED to support our ongoing local efforts toward improved efficiency and to provide a similar standard of efficiency for all current and any new, scientifically-supported environmental water uses. We also believe that before meeting the "new" water needs of the State, CALFED must find ways of replacing and improving the reliability of the contractual water supplies already taken from us for environmental uses through regulatory, legislative or Bay-Delta Accord actions.

5. TRANSFERS: The District has a long history of voluntary water transfers that ensure available supplies are being put to maximum beneficial use. CALFED must recognize that water transfers do not create additional water supplies and provide little

or nothing by way of a CALFED solution in the absence of storage and conveyance capacity enhancement. CALFED should remain focused on resolving/removing the physical impediments to already viable transfer mechanisms.

6. COST ALLOCATION: While the District supports a "benefits-based" approach to cost allocation, it strongly objects to any effort to require agricultural users to pay to replace water already taken from them for environmental uses. Furthermore, we feel that any new water supplies developed for long-term environmental uses are developed in the public interest and should be paid for at public expense.

In addition to these brief comments, the Del Puerto Water District joins in and incorporates by reference the comments submitted by and on behalf of the Agricultural Water Caucus, the Central Valley Project Water Association and the San Luis and Delta-Mendota Water Authority regarding the above referenced document. Further comments on behalf of the District have been submitted under separate cover by Board President Clifford W. Koster.

Your consideration of these comments is greatly appreciated.

Sincerely,



William D. Harrison
General Manager

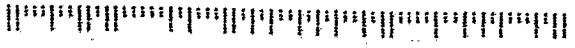


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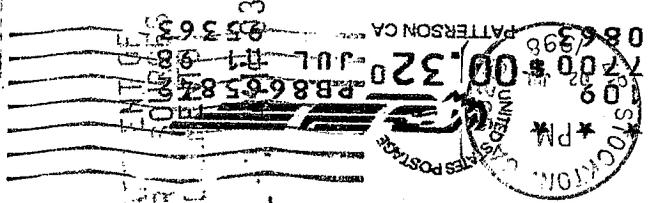
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