CALIFORNIA FARM BUREAU FEDERATION
DEPARTMENT OF ENVIRONMENTAL ADVOCACY
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MEMORANDUM

TO: STEIN BUER

FROM: DAVID J. GUY

DATE: July 8, 1998

RE: CAL-FED PROGRAM LINKAGES

At the last BDAC meeting, you and the Cal-Fed staff indicated that you were focusing on "Developing a Draft Preferred Program Alternative" and particularly the example on potential conditions/linkages for future decisions. Like others, we believe that this example is an excellent way to focus a constructive dialogue on the important issues in the Cal-Fed process. We offer the following comments to your June 17, 1998 version of this document.

1. Surface Storage

Cal-Fed has indicated that storage is included in every alternative, yet storage continues to take a back seat to all other program components. Storage must be a common program in Cal-Fed that is developed in tandem with the other program components. It is hard to envision a delta solution that will not result in significant redirected impacts without a meaningful storage component. From a practical standpoint, water supply reliability will depend on a mix of water storage, water transfers and other management tools. Storage must therefore move forward at the same pace as, and in conjunction with, all of the other program components. It is ludicrous to suggest that we have to reallocate agricultural water (i.e., water transfers and water efficiency) before we conserve new water by storage. Water transfers and water efficiency should not be conditions precedent to surface water storage.

Within the storage program, we agree with the discussion on page 5 which indicates that progress must be made for surface storage before groundwater storage programs are implemented. This makes sense from a hydrologic standpoint, since groundwater storage will only be meaningful in tandem with surface storage.

2. Agricultural Land Fallowing

Contrary to good public policy and the Cal-Fed solution principles, Cal-Fed continues to advocate for significant agricultural land fallowing in the Cal-Fed process. We believe that in this example, Cal-Fed must commit to avoid fallowing agricultural land, except in very limited circumstances. Even in many of these limited circumstances, there are available non-agricultural lands to satisfy many of the Cal-Fed needs without jeopardizing agricultural lands. This should be recognized in your example.

3. Assurances

Assurances are described in the Stage 1 Implementation, but not in the conditions or linkages, which is confusing. There are certain assurances that will need to be developed as interim assurances, such as providing meaningful water rights protections, including both riparian and overlying groundwater rights. As an example, certain elements of the program, such as water storage, cannot move forward until there are assurances that farmers and other landowners' water rights will be protected. Additionally, there must be assurances that agricultural land will not be fallowed as part of the program. We therefore suggest that assurances be directly linked to your example and be specified in as much detail as possible. To assist in this process, the assurances workgroup should also be working on the same example.

4. Program Linkages

It is stated that progress in one resource area needs to be linked to progress in all other elements of the Preferred Program Alternative. (Draft, p.4.) It is not clear what this means, but we submit that resource area must be defined to include both geographic areas as well as the on-the-ground activity, i.e., farming or habitat purposes. Without this type of linkage and equity across different regions of the state, there is little incentive for certain areas of the state to participate in this process. From our standpoint, this means that farmers and ranchers in all parts of the state must see immediate progress from Cal-Fed--it cannot be deferred for 20 years.

5. Efficiency v. Reallocation

We are disappointed that Cal-Fed continues to confuse water efficiency and water reallocation. As previously discussed, it makes no sense to require water to be reallocated (i.e., transferred) before surface storage is constructed, particularly since properly developed surface storage can avoid having to reallocate the water in the first place. Granted, water users need to strive for prudent and efficient water use, but this is a much different concept than reallocating water. Cal-Fed should take this distinction seriously and begin to clarify rather than cloud this issue.

Thank you for your continuing efforts to lay out the program in a way that helps the parties better understand how the different program components fit together. We look forward to further discussion on this topic.

DJG:mo
cc: Lester Snow
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