

September 14, 1995

Carlos Madrid, Chair  
SJVDIP Management Group  
Department of Water Resources  
P.O. Box 942836  
Sacramento, Ca. 94236-0001

Dear Carlos,

We are writing in response to your letter of July 19, regarding the desire of the Management Group to consider possible redirection of the San Joaquin Valley Drainage Implementation Program. The proposal contained therein raises a number of serious concerns.

Your letter states that "questions have been raised about the adequacy and long-term suitability" of the Drainage Program's 1990 Management Plan recommendations. As you know, the Drainage Program was the result of a six year long, multi-agency collaboration between the state and federal governments in which all affected interest groups were fully involved, including a substantial effort by a broadly based Citizens Advisory Committee, of which we all were a part. As such, the Program's Management Plan recommendations are the result of the most comprehensive consensus effort ever undertaken to understand and manage the drainage problems of the San Joaquin Valley. In short, there already exists a Plan of Action for drainage and the 1990 Management Plan is it. Although like all blueprints it will require adjustment as it is implemented, the Plan does not need to undergo serious revision; it does however need to be aggressively pursued.

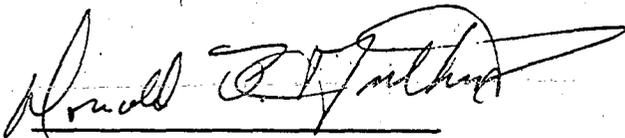
The draft work statement for developing a Plan of Action, enclosed with your letter, emphasizes that "it is necessary that planning for a permanent solution be pursued." We emphatically disagree that tackling what you have termed a "permanent" solution is necessary or appropriate at present. While it is true that the in-valley management recommendations of the Drainage Program are not likely to solve all the Valley's drainage problems for all time, "most, if not all, of the actions proposed in the recommended plan would be required as the first phase of any out-of-valley export system" (Management Plan, page 121). The Drainage Program also concluded that salt removal or export would not be required in the Valley for decades. Not only were out-of-valley options found not to be immediately necessary, but the Drainage Program was also unable to identify economically or environmentally feasible options for export of salts. In particular, resolution of questions concerning the environmental feasibility of salt removal or export remains linked to implementation of the interim measures recommended in the Drainage Program.

Therefore, the most appropriate first step toward designing a "permanent" solution is to evaluate the Valley's long-term salt balance needs following thorough implementation of the interim plan. It would be counterproductive to pursue a "permanent" solution of doubtful feasibility before long-term drainage management needs and the opportunities to meet them are better understood. Implementation of the interim plan gives us a chance to do so.

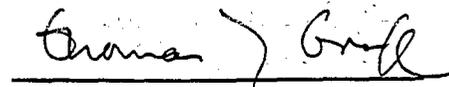
Rather than revisiting the 1990 Management Plan recommendations or moving prematurely toward a permanent solution, it appears to us to be more appropriate to focus on efforts to make the Implementation Program more effective in realizing the Drainage Program vision. Progress has been lacking in several areas. The formation of institutional structures to implement the Drainage Program on a valleywide basis has not been achieved. Despite the creation of federal and state programs to implement the land retirement recommendations in the 1990 Management Plan, no significant land retirement activity has occurred. Regulatory activities to manage and reduce drainage discharge continue to be inadequate. We suggest that efforts focused on these and similar issues are more deserving of the SJVDIP's energies over the next few years.

In summary, having participated for many years in the Drainage Program and its implementation phase, we stand ready to continue to cooperate with you and others in implementing its findings, and to improve the effectiveness of implementation activities. However, initiatives to promote a "permanent" solution, such as the activities proposed in your letter, are not consistent with the primary purpose of the SJVDIP, and we would not support consideration of proposals along these lines at this time.

Sincerely,



Donald Anthrop



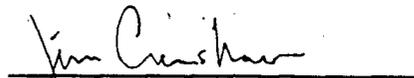
Thomas J. Graff



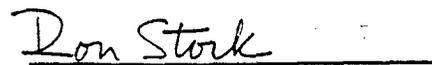
Jean Auer



Polly Smith



Jim Crenshaw



Ron Stork