23443 S. Hays Road
Manteca, CA 95337
January 19, 2000

Mary Nichols, Secretary
The Resources Agency of California
Suite 134, Resources Building
1416 Ninth Street
Sacramento, CA 95814

Steve Ritchie, Acting Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, CA 95814

Dear Secretary Mary Nichols and Steve Ritchie:

The BDAC is being asked to recommend, and the CALFED Policy Group is being asked to adopt in February CALFED staff's proposed Preferred Program Alternative, or PPA. The analyses and details necessary to determine the merit and viability of this PPA can not be fully provided before the proposed date of adoption of a Record of Decision, ROD. It is, therefore, very important to address clearly, before adoption, the scope of the Preferred Program Alternative. There must also be a clear commitment to a clear process for making needed analyses of the PPA and for examining the effect of each component measure on other measures and objectives. Furthermore the PPA should clearly define who will make determinations regarding adjustments to the Plan and evaluation of the balance among conflicting objectives that results from more specific proposals. These are not just implementation decisions. I do not believe that the January 11 PPA, meets these tests.

Process

As regards process there is no clear commitment that the through-Delta conveyance plan (including North and South Delta components) will be fully analyzed and optimized for compatible resolution of all program goals. These include fishery goals, inchannel and export water quality, DO problems in the San Joaquin Ship Channel and bromides in the State Aqueduct, and the interrelation of the plan with water quality and flow for all purposes from Salt and Mud Sloughs to the central Delta, etc.

There is no clear commitment that local expertise will be involved in developing plans affecting land and water uses in and upstream of the Delta rather than merely allowing these parties to react to plans derived by staff.

There is no commitment that there will be an impartial technical review of third party, cumulative, and redirected

impacts from land and water acquisitions. EA's and FONSI's prepared by beneficiaries of transfers are not impartial and do not constitute compliance with CALFED's Mission and Policy statements.

There should be a clear commitment to these process measures.

Clarity of Scope

There is a lack of clarity of scope and intent of the PPA.

CALFED is committed to a 30 year plan, but the plan does not clearly address the anticipated 2030 population of either humans or exotics as they affect the viability of the plan.

CALFED talks of "water supply reliability", but does not clearly state what this means. It does not appear to mean that there will be an adequate water supply for urban and environmental and food production purposes, and for other social needs. CALFED talks of acre feet of "storage", but storage capacity alone does not govern what benefits will accrue. A given storage facility may have either little or substantial effect on the overall water supply depending on the type, location, and operating plan. It also may or may not provide better multiple use of water. In addition it may be a power producer or a power consumer with consequent effect on financial feasibility. CALFED has provided little information on how these features will govern selection of facilities under the PPA.

These matters should be clarified.

Depletion of Natural Resources

It is implicit in the proposed PPA that we will continue to support California's growing population in part by relying on a continuation of the unsustainable depletion of natural resources. My October 30 letter requested an examination by CALFED of the long term consequences of continuing to overdraft groundwater. The request was endorsed by BDAC Vice-chair Sunne McPeak and was discussed in our meeting with Secretaries Nichols and Lyons.

We are also destroying natural resources by accumulating many tens of millions of tons of imported salt in soils and groundwaters south of the Delta. This has a side effect of also salting up the San Joaquin River. Why does CALFED consider it

important to reduce the salinity of water exported to urban areas outside the Central Valley but not important to restore a salt balance in the San Joaquin and Tulare basins? What will be the impact on society if we continue the gradual destruction of one of the world's most fertile food producing regions?

The PPA should not be adopted without either correcting or acknowledging the adoption of this implicit decision to continue the unsustainable depletion of natural resources.

Thank you for your consideration of these concerns.

Sincerely,

Alex Hildebrand

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