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Lester Snow, Executive Director
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Dear Lester:

I propose that the agenda for the next BDAC meeting include deliberation by BDAC regarding several proposals that are included in the June 25 and July 19 packets. These are proposals regarding which some BDAC members have expressed concern, but which remain among the alternatives without resolution of the concerns.

1) The June 25 and July 19 packets, each on page 36, propose reducing agricultural water "demand" by substantial permanent and temporary fallowing of agricultural land "to make water available for other uses." You have since backed away from permanent fallowing, but not from the proposal to "maximize the potential for temporary land fallowing." The BDAC should discuss and advise as to whether this is in the public interest.

Why should the agricultural industry be the only water dependent industry to give up dry year water and how does the proposal comply with the solution principles of providing a "reasonable balance of reliability", and "avoiding redirected impacts", and minimizing "economic impacts at the regional level?"

Periodic shut down of any industry involves unemployment, local economic impacts, loss of cash flow to service debt (except for the willing sellers), loss of customers, and loss of service businesses who cannot survive the shutdown, such as parts and equipment suppliers, contract services, food processors, etc.

2) To what extent should we foster reallocation of water by transfers and what type of transfers? Transfers among agricultural water users is a long established and desirable practice. Why don't we also encourage transfers among urban water users, including municipal industries and individual residential water users, just as we do among farmers? What are the social implications of encouraging transfers of water to a different basin and purpose of use whenever a willing seller benefits regardless of impacts on local employment, downstream water users, etc.? (Note the Herrick-Hildebrand critique of the proposed "Model Water Transfer Act" which we previously sent to you).

3) The program talks of seeking durability, e.g., page 3 of Objectives in the June 25 packet. What California population are we planning for, and what water supply will be needed to meet that population's needs for residences, jobs, manufactured goods and food? Durability will not be achieved if those needs are not met.

4) How can we ignore the economic and social consequences of failing to provide a drain to restore the salt balance in the south Central Valley? That salt balance was destroyed by the importation of a very substantial salt load via the Delta Mendota Canal.

5) How do we reconcile the proposal throughout the program for substantial "purchase of water on the San Joaquin River system", (e.g., page 29, June 25) with the principle of avoiding "redirected impacts"? Why do we not propose to supply this water either by developing new yield or by purchases from users of DMC water instead of from water short tributaries. Reallocation of agricultural water on the tributaries not only depletes agriculture on the tributaries, it also reduces downstream summer streamflow needed for water quality, for riparian diversions, for resident fishery, and for consumptive public trust purposes.

6) If we propose substantial conversions of agricultural land to wetlands shouldn't the proposals include development of new water yield to replace the water supply lost to non-environmental purposes? An acre of wetland consumes substantially more water than an acre of farmed land.

These questions and issues are matters of policy which I believe should be addressed now and not buried in the PEIS process. The PEIS is not a policy document. I hope your will agree.

Sincerely,



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