

July 15, 1998

Comments by Alex Hildebrand on July 8, 1998 Draft Entitled
Developing a Draft Preferred Program Alternative

- should to be well economic include growth*
- 1) Page 6, 2a. The issue is not just economics. More expensive water treatment may be necessary to avoid the adverse impacts of a canal.
 - 2) Page 6, 2d. There must not just be a commitment to preserve the Delta, There must be assurances that the commitment is implementable including necessary permits and financing for any facilities and O and M costs needed to protect Delta in-channel water supplies.
 - 3) Page 6, 2k. The agreement must address long term operating assurances, not just "initial operating criteria".
 - 4) There must be a clear commitment to increase the available water supply at least sufficiently to meet future water needs for environmental and urban purposes. If this is not done the water for those needs will obviously be reallocated by various means from an agricultural supply that is already inadequate to grow an adequate and nutritious food supply for the 2030 population. The commitment should be to achieve a specified and adequate increased water yield, not just reservoir space. The optimum mix of offstream, onstream, and subsurface storage space to produce this yield can then be determined.

to extent can say what supplies can do in future

This has been a long task issue

Increased yield can only derive from capture of flood releases. All other Central Valley water is already being beneficially used. Water is not created under ground. Groundwater is percolated surface water. Offstream and underground storage space can not be filled fast enough to capture short term flood releases. These storage spaces are primarily useful to receive flood water first captured in onstream reservoirs. Furthermore, they are typically large power consumers instead of power producers.

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- 5) Page 7, 4c. The financial burden for replacing water previously taken from agriculture such as by the CVPIA should not be a burden on those receiving the replacement water.
 - 6) Page A-2. The effort is to "facilitate" water transfers. Whether doing so is "efficient" in the long term social interest is debatable. The reference should also be expanded to say "while providing protection for all legal users of water other third party impacts-----" The water transfer framework should also state that conflicts will be avoided with land use policy, e.g., the purpose of Williamson Act dedications of land to agriculture should not be frustrated by the marketing of water appurtenant to those lands.