

98-412

23443 S. Hays Road
Manteca, CA 95337
November 25, 1998

Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, CA 95814

State Water Resources Control Board
901 P Street
Sacramento, CA 95814

Dear Lester and Members of the SWRCB:

I am writing to protest the modeling assumptions used in the November 24 Status Report on Modeling the CALFED Bay-Delta Storage and Conveyance Refinement Process. The analyses assume that the SWRCB will approve the San Joaquin River Agreement and will permit the USBR to carry out its New Melones Interim Operation Plan. This then assumes that the SWRCB will approve a planned violation of the Vernalis salinity standard that is both frequent and substantial as demonstrated in USBR and SJRA analyses recently presented in SWRCB hearings. It also assumes that the Board will approve an alternative for providing VAMP flows that is inefficient in the use of water, and that depletes summer flows needed for water quality and for downstream riparian and public trust needs, and that provides no net improvement in the serious deficiencies in water quality downstream of the Merced River, and does nothing to protect salmon smolts that migrate before and after the 31 day pulse. The report does not even address how the results would be altered if these assumptions are not approved.

In the presentation on November 24 of storage analyses it was assumed that further consideration of a storage proposal would be dropped unless it could be justified solely for urban water supply. This may result in dropping proposals that are not cost effective for that sole purpose, but which would also have benefits for power, flood control, water quality, and public trust purposes. Other on-going analyses of "tool-boxes" by CALFED groups are also heavily weighted toward project water supplies and anadromous and ESA fish protection with little attention to impacts on water supplies for non-project water users and on other public trust needs.

Lester Snow and State Water Resources Control Board
November 25, 1998
Page 2

I believe that CALFED is headed for trouble if it does not produce more balanced analyses and if it appears to assume that the SWRCB will approve whatever CALFED proposes.

Sincerely,


Alex Hildebrand

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