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Manteca, CA 95337  
May 10, 1999

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

Dear Lester:

There is merit in the objective of the ongoing studies of how to implement the EWA, and of the associated "gaming" studies to develop an efficient overall use of water for both export and fishery. However, the emphasis is almost totally on exports and on anadromous and endangered fish. There needs to be more attention to the consequences of these proposals on other interests before they can be considered for adoption.

There is little coordination between these proposals and the restoration and maintenance of water quality along the main stem of the San Joaquin River; or on the summer flows and water depths needed in the San Joaquin River and South Delta for riparian diverters, and for public trust needs in summer months; or for maintenance of adequate dissolved oxygen for fish. There is no examination of the consequences of these and other proposals involving buying water for fish flows from the San Joaquin River system which is already overcommitted and which is heavily impacted by the salt load from the CVP service area. The options for San Joaquin water management are limited by the failure to build a valley drain.

The overall system is so complex that it is sometimes necessary to start with analyses from one or two perspectives. However, there is a tendency to assume that such analyses are adequate for policy decisions. It should be clear that all such proposals in the watershed of the San Joaquin River system should await the development of a comprehensive plan to address all of the water related problems in the watershed. It can then be determined whether narrower proposals are compatible with such a plan.

In the interim we must not plunge ahead with narrower proposals such as the EWA plans, the SJRA, the alternatives proposed by the South Delta Improvement Investigation and proposals for changes in place, time and purpose of use of scarce San Joaquin water. My letters dated April 11 to Wendy Halverson, my letter to you and Secretary Nichols dated May 5, other earlier letters, and comments in BDAC meetings have raised these issues. There has, so far, been little response.