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The Pacific Coast Federation of Fishermen's Associations (PCFFA) cannot support the preferred alternative for the following reasons:

**1. PROMOTES A PERIPHERAL CANAL.** A peripheral canal around the Delta, no matter what it is called, will not protect salmon, but instead put healthy and abundant Sacramento fall-run chinook stocks at risk in the hope of perhaps eliminating entrainment and losses in the Delta in the spring of remnant San Joaquin runs. Moreover, a peripheral canal will simply increase the level of Delta exports, when more water is needed to go through the Delta - not less, and reduce water quality in the Delta. The peripheral canal was a bad idea 40 years ago, although clearly better than the proposed barrier at the Carquinez Strait; it was a bad idea 18 years ago when proposed in SB 200; and it is a bad idea today.

**2. PROMOTES ADDITIONAL SURFACE WATER STORAGE.** Reliance on new surface water storage facilities is a bad idea for a number of obvious reasons. First of all, new surface water storage facilities do mean "new" water. They simply change flow regimes in rivers and ultimately reduce river flows and flows through the Delta. There is no "new" water available unless global warming significantly increases California's annual rainfall or water is brought in from the outside (e.g., desalinization, water tankered in from Canada or Alaska).

Second, new surface water storage facilities may take as long as 20 years to come on line. There are other, and more expedient ways of achieving the same amounts of water; namely through water conservation, water reuse, and use of available groundwater storage.

Third, surface water storage results in significant losses of water to evaporation and most surface water storage facilities over the course of years lose capacity as they silt in.

**3. NO GROUNDWATER MANAGEMENT MANDATE.** A fatal flaw in California water law is a lack of mandatory management of groundwater across the state. A statewide, comprehensive groundwater management program is essential for two reasons. First, management is needed to prevent groundwater overdrafts that can destroy aquifers and increase demand for more diversions to replenish poorly managed groundwater basins and/or increase demand for more surface water storage. How can we manage water in California if groundwater resources are not also managed?

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Second, there is no incentive to store water in groundwater basins by individuals or water agencies if anyone can tap that water at any time with no restriction. Groundwater basins are the cheapest, most environmentally friendly, expedient and efficient (no evaporation) way to store water. But groundwater storage on a broad scale will not happen absent management to control who can make withdrawals.

4. NO MANDATE FOR GROWTH PLANNING AROUND WATER AVAILABILITY. The preferred alternative is at best a sham. It promises water supply and reliability but, in fact, cannot make any such claim absent a state program to plan growth around available water supplies. New growth, particularly that with inflexible water needs (i.e., urban, industrial) will constantly put strains on available water supplies and make the state's water supply increasing unreliable. To assure existing water uses are protected (e.g., fisheries, agriculture, current urban needs) the state will need to require that new growth revolve around the availability of water to support it and not by taking water from other uses (e.g., fish, farms) or assuming that if the growth takes place a water supply will follow it.

5. NO PLANS FOR NEW WATER. Finally, the preferred alternative does not provide for any new water for a state population expected to grow to 50 million by 2020 when existing water supplies are inadequate in many years to meet current needs and demands. Specifically, there needs to be an alternative that seriously considers desalinization plants to supply most urban water needs. Desalinization mimics natural processes. It does pose certain environmental problems, (i.e., screening intakes, disposal of brines, and energy use and pollution related to energy generation) and is expensive. However, most, if not all, of the environmental problems could be resolved. There are, for example, promising new technologies utilizing hydrogen for energy generation. While desalinization water costs for agriculture would be prohibitive, they are not unreasonable for urban use. Thus, fisheries, agriculture and the environment could continue relying on water supplied by rainfall (rivers, reservoirs, etc.) and plan around the vagaries of this natural water supply, while most urban use could be serviced in a dependable and reliable, albeit more expensive, desalinization system.