

CALIFORNIA SPORTFISHING PROTECTION ALLIANCE
2215 Eaton Avenue, San Carlos, CA 94070

June 1, 2000

Mr. Mike Madigan, Chair
Ms. Sunne McPeak, Vice Chair
Bay Delta Advisory Council
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Recommendation on CALFED solution

Dear Mike and Sunne:

Having participated in BDAC discussions of the CALFED Preferred Program Alternative and the draft recommendation you crafted, I commend you both for a spirited effort to find common ground among BDAC members. The nature of such an effort, however, often loses the specificity and actionability that makes advice meaningful and useful. The sport fishing community can agree with much of the recommendation, and can live with other parts of the recommendation. This letter raises issues of clarity, inadequacy, and disagreement on major elements of the document that prevent us from endorsing it.

Funding and Accountability

In spite of the "beneficiaries pay" principal, the fear remains that the public will pay a disproportionate and inequitable share of the CALFED program costs. Arguments continue to be made that public funding of storage and diversion facilities is appropriate because some of the water is reserved for environmental purposes. This is like telling the victim of a mugging that he is the beneficiary of the crime because, for the price of his wallet, he is allowed to live. The fish should not have to pay for their water.

Water Supply Reliability and Ecosystem Restoration

Recommendation #4 must be restated with unequivocal flow language. River and Delta flows must be provided as needed to restore and sustain the estuarian function of the Delta and the fish and wildlife that depend on it. Increased Delta outflows must not be linked to the development of additional storage capacity.

Recommendation #5 does not state a bold vision for ecosystem restoration, but provides a list of excuses for failure just as we begin the effort. We cannot accept failure to restore the ecosystem, and will not support this timid language that would pre-ordain such failure.

Recommendation #8 should include user's willingness to pay as a primary decision criterion for development of storage and conveyance facilities. Supply reliability tools such as water use reduction and water transfers will likely prove to be an attractive alternative to paying the unsubsidized cost of new surface storage.

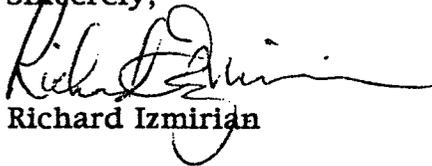
Recommendation #11 should add a bullet addressing the planning and implementation needs for sustainable fisheries, including migration, spawning, rearing, food supply, water quality, water quantity, and entrainment protection.

The third paragraph under the fifth bullet (feasibility studies for isolated conveyance) of recommendation #11 contains language that is still mysterious after several readings. This may be an attempt to justify public funding for an isolated conveyance and other facilities. This paragraph should be stricken.

Recommendation #12 would further overcommit the water resources of California by attempting to supply all demands for water. It should be recognized that, by definition, there is no shortage of market priced water, except for some limitations of conveyance, social impacts, and environmental impacts. It should also be recognized that there will always be a shortage of cheap subsidized water. The appropriate tool for addressing water supply reliability, therefore, is not to develop more subsidized water depletion from the environment, but to encourage a robust water market.

Finally, the word "balance" is used throughout the recommendation letter. In this context, "balance" is not an actionable verb, nor is it a helpful adjective. "Balance" appears to be code for increased Delta exports and further depletion of the aquatic environment. The Bay/Delta solution cannot be one of "balance", but must be a solution of appropriate and careful use of public trust resources. After five years of deliberation, I hope we can deliver that advice.

Sincerely,



Richard Izmirian

Copies:

Mr. David Hayes, Deputy Secretary of the Interior
Ms. Mary Nichols, Secretary for Resources