

## Other Correspondence

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**Assessment of CALFED's "Framework for Action"  
 by Alex Hildebrandt for the South Delta Water Agency (SDWA)**

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**Introduction**

CALFED has adopted a "Framework for Action". This document is not issued as a draft, and is apparently expected to lead to a "Record of Decision" within a few weeks. There is much that is good in the document, but it fails to resolve some very fundamental issues, and includes proposals that are in conflict with each other, and which are technically flawed. It also provides no open process for balancing among conflicting interests, and balancing the limitations resulting from limited resources and from the introduction of exotic species.

The "Framework for Action" was derived in the end by a closed door process. The public and affected parties have not been invited to comment before final adoption. The Bay Delta Advisory Council, BDAC, after years of study made recommendations in May which were largely ignored. BDAC's "General Recommendations" are merely listed in an obscure appendix, and are not implemented by the plan. Furthermore, most of BDAC's substantial specific recommendations were ignored without explanation.

In important matters the plan was developed with little participation by and attention to local interests and expertise. This was particularly true of the proposed through-Delta conveyance plan and its South Delta component.

Assemblyman Machado succeeded in obtaining some last minute improvements but the proposal is still seriously flawed.

**Specifics**

1) The plan will double the already damaging impact of the export projects on the in-channel water supply in the South Delta. The plan includes the three tidal barriers that are needed to mitigate this impact, but it then says that the barriers may only be operated when permitted by the fishery agencies. The protection of the in-channel water supply can, therefore, be denied at any time. A farmer may lose his entire crop because it can not be irrigated when needed. This is a disaster for South Delta agriculture. Operation of the export pumps and mitigation of their impacts must be tied together. Failure to do so violates CALFED's principle that one interest must not benefit at the expense of another and violates the commitment that water reliability for all interests will be improved and not degraded.

2) The plan continues to obfuscate CALFED's failure to seriously address the inadequacy of the Central Valley water supply to meet all needs during the life of the plan. CALFED talks only of "water storage" and not of "water supply". The overall supply in the Central Valley can only be increased by capturing flood flows and holding them for later use. A million acre feet of storage does not provide a million acre feet of new water supply. The "water yield" as a percent of storage capacity varies with the facility. New Melones Dam, for example, has a storage capacity of 2.4 million acre feet and a yield of about 350,000 acre feet.

CALFED's plan does not even include a process and basis (such as proposed by BDAC) for estimating the increased water supply that is needed even after all achievable increases in water use efficiency, if all urban, environmental, and agricultural needs are to be met. "Conservation" and recycling can increase the benefits from existing supplies. But they do not increase supply and can not obviate the need for substantial new supplies.

3) The plan does not propose to provide the new water supply needed (as recommended by BDAC) to displace the current and future unsustainable net long term overdraft of groundwater. We can not get through droughts if we destroy our ability to overdraft groundwater during droughts.

4) The plan provides seriously inadequate measures to address (as recommended by BDAC) the accumulation of the imported salt that is brought into the San Joaquin and Tulare basins with imported water. Many tens of millions of tons of imported salt have already accumulated in the soils and groundwaters of those basins. This accumulation will ultimately and irreversibly destroy the ability to produce food from these fertile lands.

Furthermore, several hundred thousand tons of this salt drains into the San Joaquin River every year and results in damaging levels of salinity throughout the

main stem of the river and the South Delta. It also increases the salinity of exported water.

5) The plan will result by various means in the reallocation of large quantities of land and water from the production of food for the growing population to urban and environmental use. Rural communities will also be seriously damaged by this reallocation. The plan proposes water trades which would improve urban water quality in export areas by increasing the damaging accumulation of salt in the valley.

6) The plan ignores ways in which the through-Delta conveyance of water could be improved. (Refer to SDWA's 4/25/2000 memo on "Designing an Optimized Through-Delta Conveyance System") The CALFED proposal can not even meet in-Delta salinity and dissolved oxygen standards. It continues the re-export of the salt that drains from the CVP service area to the river. It moves the cross flow of Sacramento water toward the salty western channels instead of toward the less salty eastern channels. CALFED's through-Delta conveyance plan appears designed to fail. It would thereby resurrect the peripheral canal proposal which would destroy any enforceable assurance that the Delta's in-channel water supply would be protected.

7) The plan appears to violate the Delta Protection Statutes. It also does not clearly require that only "real" water should be transferred for changes in purpose of use of water. The restriction of such transfers to "real" water is necessary to protect third parties and to comply with the intent of provisions in the CVPIA.

8) The plan proposes that existing impacts of the projects on fishery should be mitigated to the extent feasible with "no net loss to exports". It does not propose to mitigate existing impacts of the projects on the Delta's in-channel water supply and water quality and does not provide for "no net loss" of water to water users in the Delta and area of origin water users. This reverses the priority of water rights.

### Conclusion

There are other problems with the plan, but these are some of the most fundamental problems. We continue to hope that the plan will be substantially improved before the Record of Decision is adopted. If it is not improved it may be so vulnerable to attack that the good features of the plan will be lost along with the bad. It is still "the only game in town" for resolving many serious problems that are enormously complex both technically and politically. But it must be improved before it is too late.