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December 16, 1997

Tib Belza & Roger Strelow
Co-chairs, BDAC Water Transfers Work Group
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Sirs,

CAFF is supportive of the Water Transfers Clearinghouse as outlined in the 12/2/1997 memo from Michael Heaton. The memo describes an information clearinghouse to analyze and monitor long-term, cumulative impacts of transfers. We have the following suggestions and concerns regarding this proposal:

1. In addition to the collection of a variety of data on water that are listed in the memo, the clearinghouse will need to collect information on indicators of economic trends in selling regions. This might include data on unemployment and employment, county property tax trends, and county social service expenses.
2. It will be important that the clearinghouse use scientifically defensible methodology that is consistent from region to region and from year to year. In some cases, this will be straightforward. For example, unemployment data is already collected by the state Employment Development Department, thus the clearinghouse would simply need to transfer that information over from an existing data base. In other cases, such as the measurement of groundwater levels, current information is spotty and uncoordinated and may need to become more systematic. We believe that clearinghouse functions might best be achieved by a statewide rather than local entity.
3. As stated in the memo, it will be critical that the clearinghouse remain a neutral provider of information. This is not at all consistent with the proposal also made in the memo, that the clearinghouse become a broker of transfers. The purpose of the clearinghouse is to assess third party impacts. Promoting and profiting from transfers is not compatible with analyzing their negative impacts. We would be unable to support the clearinghouse if the brokering function was included.

Thank you for your attention.

Sincerely,


Judith Redmond
Director Emeritus

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