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CALFED Bay-Delta Program

July 18, 2000

An Open Letter to:

The Honorable Bruce Babbitt, Secretary and  
U.S. Department of the Interior  
18<sup>th</sup> and C Streets, NW  
Washington, D.C. 20240

The Honorable Gray Davis, Governor  
State Capitol, First Floor  
Sacramento CA 95814

Subject: CALFED's "Framework for Action"

Dear Secretary Babbitt and Governor Davis:

Our organization has reviewed the referenced "Framework" document and would like to request further refinements prior to your Record of Decision. California Trout, a statewide fisheries conservation organization, has actively tracked and attempted to influence the CALFED process during the last few years; while we do not agree with some of the actions proposed in the Framework, it is a relief to see it arrive at this stage of completion.

Secretary Babbitt in a recent water policy speech stated that: "There is sufficient developed water for today and for the future, provided we use it efficiently." We agree. In a typical year, California uses 43 million acre feet of water, enough to supply more than 200 million people. The conservation and redistribution of a small percentage of that water can take care of California's water supply well into the future. During the early part of what CALFED called "Phase II," the apparent direction was to defer any decisions on adding surface storage capacity until the first seven years of water conservation and water quality actions could be measured; then a determination would be made on the need for increased surface storage. We thought that made sense for California's economy, since conservation actions are far more economical and less damaging to our ecosystems than building more dam capacity.

The Framework does not accomplish this in its present form. Instead it proposes spending \$2.9 billion on "voluntary" water conservation that aims to achieve a 2.4 % improvement in overall water use efficiency – with less than 1 % coming from California agriculture, which now uses 75% of the developed water supply. And since the plan contemplates saving so little of the current supply, the plans to add surface storage capacity naturally follow. Californians deserve a better plan than this.

Between now and your Record of Decision, we urge you to make the following refinements to the CALFED plan, in the interests of the citizens of the state:

1. Require a water conservation program for municipal and agricultural water districts that would achieve up to 10% savings by the end of the first seven years (CALFED's Stage 1). Major municipalities and actual on farm experience with more efficient methods of water usage and financial incentives have proven that a goal at that level



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is achievable and economically feasible. It will not be accomplished through CALFED's "voluntary" plan. These water conservation techniques are validated in a Pacific Institute report, *Sustainable Uses of Water-California Success Stories* and the Natural Resources Defense Council's *Agricultural Solutions-Improving Water Quality in California Through Water Conservation and Pesticide Reduction*.

2. Defer any decisions by CALFED to build more surface storage capacity - such as raising Shasta Dam - until an aggressive water conservation program has had its chance to work and can be measured. The economy of the state will be far better off. Since the increased storage in Shasta is estimated by CALFED to cost more than \$400 per acre foot, it is clear that CALFED's "beneficiary pays" principle cannot be made to work for California farms.
3. Set higher goals for groundwater storage and a changed regimen of operating existing dams for groundwater recharge. This needs to be coupled with an overdue program for the management of the state's groundwater. In view of the perceived shortage of California water supplies, the lack of controls on the uses of groundwater should not be perpetuated into the 21<sup>st</sup> century. The existing CALFED plan contemplates up to 1 million acre feet of increased groundwater storage; the Natural Heritage Institute has identified ten times more potential for groundwater storage than CALFED in their study: *An Environmentally Optimal Alternative For The Bay-Delta*. Resource conservation oriented organizations such as CalTrout prefer storage in groundwater aquifers to the more expensive, evaporation inefficient and ecosystem-damaging effects of increased surface storage in dams.
4. The CALFED plan needs a stronger water transfer program. A statewide commercial brokerage to facilitate market priced water transfers would be more effective than the clearinghouse that CALFED contemplates. A brokerage that facilitates water transfers at market prices would more readily allow water to be transferred to accommodate a growing population while providing some profit incentive to the current holders of water rights who are willing to sell.
5. The current ecosystem and estuary degradation can only be aggravated by the contemplated CALFED actions to facilitate more water exports out of the Delta. The Delta needs more water left in the Delta if CALFED is to truly achieve its ecosystem restoration goals. The more aggressive water conservation program described above would reduce the pressures for more exports and diversions from the Delta.
6. The Hood Diversion, which is a first step toward a Peripheral Canal to increase exports from the Delta, can only further degrade water quality in the Delta, even though it may improve the quality of the exported water. More aggressive actions to clean up current agricultural return flows into the Delta and the construction of an agricultural waste treatment facility and infrastructure south of the Delta makes more sense for water quality and economics than exporting more water from the Delta with a Peripheral Canal.



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7. The CALFED Framework calls for more water for the environment and the establishment of an Environmental Water Account; we look upon this as an encouraging step only so long as there are adequate assurances that the water will actually be forthcoming.
8. Add a goal to the Ecosystem Restoration Program to include doubling Central Valley anadromous fish populations through natural production from their average population levels that existed between 1967 and 1992. This is the same goal set by the California Legislature in 1998 and included in the 1992 Central Valley Project Improvement Act and which has not yet been achieved.
9. Desalinization has been treated too lightly in the CALFED program. We believe that CALFED should sponsor a high priority, subsidized program – with a sunset provision on the subsidy - to improve and make desalinization technology available to urban areas for future water supply, especially for drought periods. Although the cost of desalinization is currently high, it is too logical a solution for urban areas with the Pacific Ocean at their doorstep.

We hope that you will give serious consideration to the refinements we have suggested for the CALFED Record of Decision. We believe California's economy and ecology will both benefit.

Nick Di Croce, Board of Governors  
For California Trout

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