

**Regional Council of  
Rural Counties**

98-292



1020 12th Street  
Suite 400  
Sacramento, CA 95814  
(916) 447-4806  
(916) 448-3154 (fax)

October 14, 1998

Mr. Lester Snow  
Executive Director  
CAL-FED Bay-Delta Program  
1416 9<sup>th</sup> Street, Room 1155  
Sacramento, CA 95814

**PRESIDENT**  
RICHARD DICKERSON  
Shasta County

**FIRST VICE PRESIDENT**  
RAYMOND J. NUTTING  
El Dorado County

**TREASURER**  
CLAUD R. NEELY  
Lassen County

**SECRETARY**  
EDWARD T. BAMERT  
Amador County

**EXECUTIVE COMMITTEE**  
LINDA ARCULARIUS  
Inyo County  
THOMAS FARNETTI  
Mono County  
JERRY GIARDINO  
Siskiyou County  
ROBERT A. MEACHER  
Plumas County  
BILL MERRIMAN  
Lake County  
JOE RIVERO  
Merced County

**IMMEDIATE PAST PRESIDENT**  
KEN MARKS  
Tuolumne County  
**DIRECTOR EMERITUS**  
PATTI MATTINGLY  
Siskiyou County  
**RCRC STAFF**  
MARCIA L. BASQUE  
Executive Director  
DAVID R. FRENCH  
Director, Governmental Affairs

**MEMBER COUNTIES**  
ALPINE      MERCED  
AMADOR     MODOC  
BUTTE       MONO  
CALAVERAS   NEVADA  
COLUSA      PLACER  
DEL NORTE   PLUMAS  
EL DORADO   SAN BENITO  
GLENN       SHASTA  
INYO         SIERRA  
LAKE         SISKIYOU  
LASSEN      TEHAMA  
MADERA      TRINITY  
MARIPOSA   TUOLUMNE  
YUBA

Dear Lester:

The Water Committee of the Regional Council of Rural Counties is very concerned regarding a recent proposal before the CALFED Bay-Delta Program Ecosystem Restoration Roundtable and the CALFED Agency Policy Group. These concerns are centered on a last-minute proposal being made by the U.S. Bureau of Reclamation and CALFED staff to use \$14.5 million in FY98 Bay-Delta Act funds to acquire a partial interest in lands which would be acquired as a portion of the so called Madera Ranch groundwater banking project to be located within the County of Madera.

On September 21, 1998 this project was presented to the Ecosystem Restoration Roundtable by a spokesman for the Bureau of Reclamation and the Trust for Public Land. Ecosystem Roundtable member, John S. Mills (RCRC) expressed serious concerns regarding the technical details of the project, the lack of local support for the project, as well as the process by which the project was being advanced. Through the discussions at the Roundtable it became clear other members of the Roundtable shared these concerns. The Roundtable did not recommend funding for the project. CALFED's own scientific Integration Panel also did not recommend the project.

We do wish to point out that we believe that this project may indeed have considerable long-term merit for a variety of CALFED interests. However, the details of the project are unknown, and the matters of uncertainty are very serious.

The Madera Ranch project targets alleged "surplus" water (in the San Joaquin River and/or the Delta) which we believe already belongs to, or is needed by, someone or something else. To the best of our knowledge, there is no surplus water on the San Joaquin River except in infrequent flood conditions. There are in fact Area of Origin (Tuolumne) claims for water on New Melones Reservoir which the Bureau of Reclamation claims it cannot honor due to inadequate water supply.

Madera Ranch  
October 14, 1998

Similar issues arose during the State Water Resources Control Board hearing on the Bay-Delta Water Quality Objective, the Vernalis Adaptive Management Plan proposal (which also uses San Joaquin water supplies), was sharply criticized for its potential to adversely affect area of origin users in upstream areas.

The Madera Ranch Project is being advanced in the face of significant opposition from local interests. The opposition includes the local farmers, the Madera County Board of Supervisors, the Merced County Board of Supervisors, the Madera County Farm Bureau and individual citizens. That opposition is a result of a number of unanswered questions, such as the impacts to adjoining private agricultural lands, the impacts to the area groundwater quality and quantity, and the impact on the groundwater levels of the area. The project is being handled in a way that, in our view, substantially undermines the scientifically-driven, collaboration-based priority setting process that the Ecosystem Roundtable and the CALFED program have used as an objective.

We also wish to point out that the land values of surrounding agricultural lands are approximately \$500/acre whereas the proposed values used in the Madera Ranch Project are over \$3,400/acre. We do not believe that adequate data is available to justify those values. We do not believe that this would be a fiscally prudent method to expend tax payer dollars.

There are, as noted, dozens of additional questions that need to be answered as part of the Bureau's proposal: proposed purchase price, hydro-geologic uncertainties, local landowner concerns, etc. – and we are confident that they will be answered (and/or the proposal suitably modified) if sufficient time is provided. On the given "fast track" schedule there will be no opportunity to solve the project problems in advance of spending funds.

Ironically with the storage" issues now playing such a critical role in CALFED, it would be a shame to see a potentially meritorious groundwater storage project "hit the wall" in a premature rush to fund it.

Madera Ranch  
October 14, 1998

Finally, in closing, you should know that when the Ecosystem Restoration Roundtable decided in May, to recommend to CALFED that the same \$14.5 million be reserved for water (not land) acquisitions, a central point of agreement was that how those funds were eventually used would become "a critical laboratory for assurances" for the CALFED program as a whole. We can only hope that, in considering the Bureau's Madera Ranch proposal early next month, the CALFED management and policy groups will appreciate the importance of that admonition, and at the very least slow things down so that a robust package of assurances, including the concerns identified herein, can indeed be developed as a fundamental part of the package.

Thank you for your consideration of the concerns raised in this letter. If you have any questions, please do not hesitate to contact David French or Valerie Justice at (916) 447-4806.

Sincerely,



Dick Dickerson, President  
RCRC - Board of Directors

Enclosures indicating strong local opposition

cc: Congressman Radanovich  
Congressman Doolittle  
Congressman Herger  
Congressman Fazio  
Bob Faber, Subcommittee on Water and Power  
David Guy, CA Farm Bureau  
Tom Graff and David Yarden, Env. Defense Fund