

98-411

# TULARE LAKE BASIN WATER STORAGE DISTRICT

ESTABLISHED 1926

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November 24, 1998

Lester A. Snow  
Executive Director  
CALFED Bay- Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA. 95814

Re: Agricultural Water Use Efficiency Focus Group

Dear Lester,

I recently was handed two pieces of correspondence regarding agricultural water use efficiency:

1. Page 51, Work in Progress, Staff Draft, Draft Preferred Program Alternative, November 3, 1998: "Agricultural Water Use Efficiency Assurances - In the March 1998 draft EIS/EIR, CALFED proposed that a stakeholder group, Agricultural Water Management Council, serve as a forum for demonstration of efficient water use in the agricultural sector. There has been dissatisfaction with this proposal. (Emphasis added). In response, CALFED will convene an informal focus group of stakeholders and agency representatives that can offer guidance for further refinement of the agricultural water use efficiency program. In acting on guidance received, CALFED will proceed with program refinement in an open public process."

"The ultimate goal for CALFED is to develop agricultural water use efficiency assurances that are acceptable to major stakeholder groups and CALFED agencies. This might include an approach that has a high likelihood of identifying opportunities for efficiency improvements and implementing those that are cost-effective for them or are not reasonable under particular local conditions."

As underlined in the above, since it is only the environmental groups that are dissatisfied, why is this not qualified? Someone unfamiliar with the background on this issue would assume that dissatisfaction has been expressed over a broad spectrum. As I stated to Tom Goring today, the only comments received on the draft EIR/EIS critical of the AB3616 process and the Council come from the environmentalists. Therefore, it can be assumed that the drivers for the Ag Water Use Efficiency Focus Group are the environmentalists. The whole process appears to discredit the work and negotiations on the Memorandum of Understanding developed by agricultural and the environmentalists as well as the Agricultural Water Management Council.

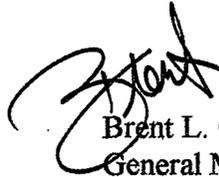
2. Agricultural Water Use Efficiency Focus Group - With reference to your Memo of November 20, 1998, and again my discussion with Tom Goring today, I understand that the

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representatives on the Focus Group only include environmentalists and representatives of CVP Contractors. Setting your directives to the Group aside, I fail to understand why there are no non-CVP Contractors included on the Group, such as Kern County, the Kings River service area, or the Turlock, Modesto, and Merced areas. I'm sure the CVP representatives can well represent the overall agricultural prospective. However, the CVP Contractors are under federal mandate for developing water management plans. Included in those plans are both tiered pricing and specific water measurement programs. These are not mandated in the Ag Water Management Council's MOU, but are addressed in the cost-benefit analysis as an exhibit to the MOU. It appears that your staff is seeking support for the environmentalists' position of making the AB3616 process mandatory since that group is now denying any association or concurrence in the negotiations leading up to the MOU. It seems that in order to have a balanced process, representatives of non-Bureau water suppliers should be included on the Focus Group.

I look forward to your reply.

Yours truly,



Brent L. Graham  
General Manager

Copy to:

AB3616 Ag Water Management Council  
Tom Gohring  
Greg Young