

VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

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June 16, 1998

CALFED Bay-Delta Program
Attn: Mr. Rick Breitenbach
1416 Ninth Street, Suite 1155
Sacramento, California 95814

SUBJECT: LETTER OF COMMENT, CALFED BAY-DELTA DRAFT EIR/EIS; SELECTION AND FINANCING OF THE PREFERRED ALTERNATIVE

Dear Mr. Breitenbach;

At their regular meeting of June 15, 1998, the Board of Directors of the Valley Center Municipal Water District took unanimous action to direct its staff to forward the following comments concerning selection and financing of the preferred alternative in the context of the CALFED Bay-Delta Draft EIR/EIS.

After review of written materials from several sources, and extensive discussion, our Board has concluded, and wishes to enter into the public record the following comments:

Selection of the Preferred Alternative: Alternative 3 Is the Preferred Alternative -

Based upon the review of materials from several sources, it seems clear to our Board and staff that *Alternative 3* is most effective in:

Reducing the pumping related impacts on the in-Delta fishery;

Developing more new water supply;

Developing a more reliable water supply;

Improving the quality of water exported from the Bay-Delta Estuary.

If we are to invest approximately \$10.0 billion, of which approximately \$4.0 billion is estimated for Ecosystem Restoration and "common programs", then this investment must result in quantifiable enhancements in water supply, reliability, and quality, in concert with measurable and sustainable environmental enhancements and protections for the future.

BOARD OF DIRECTORS:

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Despite criticisms from the environmental community that this alternative places too much emphasis on facilities, and not enough demand-side reductions (agricultural land retirement/conservation), it is clear to our agency that, of the three, Alternative 3 will strike the best balance between providing for the necessary environmental protections for the Bay-Delta Estuary ecosystem and the reliable, high-quality water supply needed for California's future.

Financing of the Preferred Alternative: Allocation of Costs of the Preferred Alternative Should be Based on Benefits Received by All Interests and User Groups -

Though a specific program has yet to be developed, some thought has been put to program financing principles which should be the basis for how the preferred alternative is to be financed. In reviewing the various documents on implementation and finance strategy, some very strong and clear principles have come to the fore, which are:

Allocation of costs of the Preferred Alternative should be based on benefits received by the various interests and user groups;

Blame or retribution for past Delta ecosystem degradation should not be considered in allocating costs for the current project;

Ecosystem Restoration Projects (ERP) should have a stable source of revenue to provide the needed assurance that these efforts will be sustained;

Costs for the Common Elements of the Preferred Alternative should be allocated, based on benefits to all user groups, including, but not limited to, water users, recreation and fishery interests, and property owners benefitting from flood control improvements. Common Element costs which cannot be associated with specific user or beneficiary groups, should be deemed a public benefit and should be funded with Federal and State public funds;

Storage and Conveyance Facility Costs should be apportioned to the beneficiaries based upon the portion of those facilities resulting in new water development, and the portion used to facilitate the common elements and the Ecosystem Restoration Program.

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We urge that these basic principles be carried forward in the specific financing strategy and plan for the preferred alternative.

If you should have any questions or need additional information about these comments, please feel free to contact us at your earliest convenience.

Sincerely,



Gary T. Arant
General Manager
Valley Center Municipal
Water District

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