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TESTIMONY OF STOCKTON EAST WATER DISTRICT
CALFED BAY-DELTA HEARING
Stockton, California
August 18, 1999

We are pleased you have selected Stockton to begin the public hearing process – San Joaquin County is vitally interested in the protection and restoration of the Delta. This community is located in the Delta and relies on the Delta for water for a variety of uses including agricultural and recreation. The San Joaquin County economy is a billion dollar economy that could be destroyed by an ill-fated plan.

Tonight I would like to share with you Stockton East's general concerns with the CALFED Bay-Delta process. We will be submitting detailed written comments on the Programmatic EIS/EIR at a later date.

At the outset, Stockton East wants to voice its support for the important comments made by Assemblyman Machado at the beginning of this evening. In addition, Stockton East supports the statements made earlier by Supervisor Cabral of San Joaquin County, and the statements made by other public agencies within the County. San Joaquin County is unified in its position on CALFED - and our unified voice must be heard.

The first priority of CALFED must be to improve San Joaquin River water quality and water supply. CALFED should not be funded if the first phase of funding does not ensure that the South Delta barriers are installed and operated as needed for water quality, water levels and dissolved oxygen. CALFED should not be funded if the first phase of funding does not ensure that the dissolved

oxygen problem in Stockton is resolved and funding for the establishment and implementation of salinity standards on the entire stem of the San Joaquin is provided.

CALFED's mission is to restore ecological health to the Bay-Delta. A comprehensive solution to San Joaquin River issues is an essential component of this process; no plan to improve the Delta can succeed without it. This comprehensive solution must be imbedded in CALFED before CALFED and its other components can proceed.

CALFED's own solution principles include **equity**, **no redirected impacts**, and **reduction of conflicts in the system**. In order to be consistent with these principles, any enhancement in water supply reliability for Delta exporters must also include water supply reliability for areas of origin; any improvements in water quality for Delta exports must also include water quality improvements for areas of origin. The CALFED concepts of equity and balance must be adhered to at every level, particularly since the program is dealing with public funds.

The current draft of the CALFED Water Quality Program Plan does not make salinity a high priority, and does not propose timely actions for salinity reduction in the San Joaquin River. There is no need for another "management plan" to reduce drainage and salt load to the San Joaquin River: numerous plans currently exist, and CALFED must identify and implement the best of those plans in the near term. No plan to restore the Bay-Delta watershed can be achieved without solution of this long-standing problem.

One of the chief difficulties we have in commenting on the documents, besides their sheer mass, is that many of the programs are not fully defined or developed. While the documents address the Water Management Study, this study has not yet been completed so we are unable to comment specifically on water storage proposals. Water storage elements, both surface and ground, must be an integral part of the CALFED solution, or CALFED will provide no solution at all. We are pleased with the inclusion in the Phase II Report of the potential development of a groundwater recharge project in Eastern San Joaquin County. We will work with CALFED to insure that appropriate water storage proposals are developed in a timely manner for inclusion in the overall CALFED Solution.

Despite our previous comments, the Ecosystem Restoration Plan contains alarming proposals. The proposed actions items on the Stanislaus and Calaveras rivers are not supported by scientific data, and their inclusion would appear to contravene CALFED's policies and goals. In order to "fix" the Bay-Delta system, realistic goals must be identified that are scientifically supported. As you know, the Calaveras River is SEWD's main source of surface water. Implementation of actions proposed in the Ecosystem Restoration Plan for the Calaveras River would devastate the economy in San Joaquin County, without evidence that the actions are scientifically supported or needed.

The Ecosystem plan identifies increased water supply strategies for the Calaveras River in order to develop supplemental water for fish. These proposed strategies to increase water supply on the Calaveras River have already been

identified for increased supply to San Joaquin County, and many are being implemented by Stockton East Water District. Competition from CALFED for water for fish restoration projects is inappropriate when that same water is needed and being relied on for water supply for San Joaquin County residents.

Another area of concern is lack of attention to area of origin protections. The Phase II Report is silent on area of origin protections. We believe that either area of origin protections must be specifically recognized and adhered to, or areas of origin must have their needs identified and met through CALFED planning and financing.

The focus of the Water Quality Program Plan must be improvement in water quality for all purposes: municipal, agricultural and environmental. The current draft of the Water Quality Program Plan does not make salinity a high priority, and does not propose timely actions for salinity reduction in the San Joaquin River. Plans to develop another "management plan" to reduce drainage and reduce total salt load to the San Joaquin Valley is not a solution. CALFED must take the lead on San Joaquin River salinity problems and insure that a plan to reduce salinity is both confirmed and implemented in the near term. No plan to restore the Bay-Delta watershed can be achieved without solution of this long-standing problem.

Another chief concern of the Water Quality Program Plan is the failure to address a long-term solution. If the goal of the CALFED Bay-Delta program is to truly restore and fix the Bay-Delta estuary, CALFED must work to find a long term solution to the water quality problem in the San Joaquin River. CALFED

should not arbitrarily drop from consideration construction of an out of valley drain to the ocean simply because it is controversial. We need CALFED to take an aggressive leadership role in ensuring that a long term solution is developed and implemented.

Finally, we are pleased that the Financing Plan for Storage recognizes that "for certain groundwater storage projects, public funding may be appropriate to ensure implementation and local support". However, in order to fully comply with area of origin protections, the Financing Plan should clarify that for certain area of origin projects, low interest loans and grants more akin to those identified for the Water Use Efficiency Program should be made available for the Storage Program as well. Clarification of funding assistance of areas of origin must be specifically acknowledged and spelled out in any final implementation plan.

CALFED has the opportunity to provide real solutions by comprehensively addressing the important problems in the Delta – including problems of water quality in the San Joaquin River and South Delta. Or, CALFED can be another failed attempt to fix the problems of some at the expense of others Thank you.