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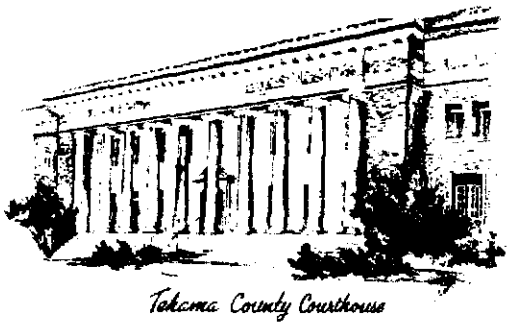

Richard Robinson
Chief Administrator

September 14, 1999

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

RE: CALFED BAY-DELTA PROGRAM
Programmatic Environmental Impact Statement/Environmental Impact Report

Dear Mr. Snow:

This letter and its attachments are sent to you as the County of Tehama's comments regarding the CALFED Bay-Delta Program, Programmatic Environmental Impact Statement/Environmental Impact Report (PEIS/EIR). By doing so it is the County's intent to participate fully in the administrative process and these materials are submitted for your review and consideration in that context.

The Northern Sacramento Valley CALFED Advisory Group reconvened last week to assess how the CALFED Bay-Delta Program (CALFED) draft preferred alternative will impact the Sacramento Valley. Participants at this meeting expressed unease and dissatisfaction with the direction CALFED appears to be heading, especially with the Record of Decision looming less than one year from now. Those of us in the Sacramento Valley are very concerned that select elements of CALFED's proposed program are currently being implemented well in advance of EIS/EIR public input and a Record of Decision and that many of the issues conveyed to CALFED by this group over two years ago still remain unaddressed.

Specifically, what benefits does the CALFED proposed solution bring to the Sacramento Valley? In its current form, there appears to be limited benefits in this plan for Northern California water users. The preferred alternative provides no new water for our region, and advocates that water and land will be removed from agriculture to compensate for Bay-Delta problems that were not caused by our actions. CALFED has advocated that "we all get better together with no redirected impacts". Not only are we not getting better, but our region will bear the brunt of redirected impacts. We feel that the proposed solution emphasizes the interests of the Bay-Delta and the exporters that rely upon it. We are alarmed by several premises interwoven through the draft preferred alternative:

The solution provides no new water to the Sacramento Valley and does not appear to compensate for water already lost due to Central Valley Project Improvement Act (CVPIA) and the Endangered Species Act (ESA).

CALFED must provide assurances that all aspects of water management - including new surface storage as well as groundwater storage - will move forward together with equal emphasis. Assurances can only be achieved through actions that demonstrate that these programs will move forward. We cannot bear the risks associated with holding off on new surface storage until "soft path" measures are satisfied.

Additional specific information on storage and conveyance facilities is needed to fully link background studies to proposed actions. For example, the size and configuration of the proposed Hood diversion and conveyance modification is not disclosed in sufficient detail. On the other hand, the criteria for triggering an open door to expansions and extensions to this facility are overly rigid.

The Environmental Water Account (EWA) requires additional explanation and assurances that: 1) Clear and practical criteria that will hold EWA Agencies accountable for their actions; and 2) program water acquired north of the Delta will impart and benefit local water supply reliability, environmental and economic benefits.

CALFED should develop a "Local Coordination Plan" that clearly shows how all CALFED program elements, particularly those involving groundwater or acquisitions of land and water, will be implemented in concert with input from local interests. CALFED must define the assurances that will ensure that projects initiated within the scope of the preferred alternative will meet criteria established by area-of-origin in protections, local laws and ordinances and local Groundwater Management Plans.

CALFED's restoration efforts must consolidate the myriad of ongoing agency programs into a cohesive plan that focuses on maintaining existing habitat and fully utilizes public lands prior to acquiring new land. CALFED should carefully consider and plan to avoid adverse social, economic, environmental or third party effects to local communities before embarking on a large-scale ecosystem restoration program. When unforseen events occur, CALFED must immediately mitigate such events with locally approved measures.

CALFED should summarize existing regulatory programs, explain associated authority and develop a coordinated plan that shows how conflicts between the Endangered Species Act, Clean Water Act, Central Valley Project Improvement Act and other regulatory mandates will be resolved.

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Sacramento Valley water use efficiency will not produce new water to satisfy Bay-Delta needs. We are concerned that the preferred status given to users who somehow comply with efficiency standards may in effect elevate those water rights above "non-compliant" users (see page 124, Revised Phase II Report). Where is the "base line" for conservation efforts drawn? CALFED must absolutely avoid advocating crop control and/or land fallowing as a method of securing program water from the Sacramento Valley.

Our discussion of these concerns, as well as our views expressed over two years ago regarding flood control, new facilities, groundwater and other area-of-origin concerns have been expanded upon in the document that is attached. We urge that you consider these critical issues as you refine a solution to satisfy the environmental and water supply problems of the Bay-Delta. Definite steps are proposed to take care of Delta exporters and environmental concerns in your plan. We need specific assurances of additional surface water supplies and/or supply reliability for the Sacramento Valley. The north state ecosystem and economy can not be sacrificed to improve the Delta and south state water supply.

Our concerns need to be addressed in detail by CALFED. We want substantiated, straight forward answers to our questions and welcome the opportunity to meet with you to discuss these issues face-to-face. If you have any questions or would like to arrange a meeting with our group, please do not hesitate to contact Ernie Ohlin, Water Resources Manager of the Tehama County Flood Control and Water Conservation District, at 530-385-1462.

Sincerely,

Ross Turner, Chairman
Tehama County Board of Supervisors

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Northern Sacramento Valley CALFED Advisory Group
Groundwater Issues

It is apparent in some of the solutions currently proposed by CALFED are short-term fixes which may not adequately address the long-term water supply problems of the Bay-Delta, and to a greater degree, the unmet needs of Northern, Central and Southern California. There is considerable local concern relative to proposed CALFED solutions involving Sacramento Valley groundwater banking and conjunctive use. We support these programs when they are administered by local agencies and supported by local residents with the potential impacts being closely scrutinized. We believe, however, studies will show that many areas of the northern Sacramento Valley, especially west of the river, do not exhibit the optimal surface water/groundwater relationship necessary to sustain a long-term conjunctive use program and therefore would incur significant unmitigated impacts. The long-term ability of the groundwater resources to sustain local demands must not be sacrificed to fulfill the water needs of central and southern California. CALFED must focus on realistic, broad, long-term solutions with well defined components.

- **The CALFED preferred alternative should propose actions which will effectively address the water supply problems of the entire state in addition to the more limited scope as defined by the Bay-Delta issues**. CALFED solutions involving local groundwater should ultimately be integrated with the proposed solutions of other programs to provide a resolution to the entire California water supply problem. At this point in the CALFED planning process the criteria and objectives for each of these programs should be clearly separated and easy to understand. The preferred alternative should adequately address these separate criteria through integrated solutions.

- **Conjunctive uses definitions and programs proposed in the current CALFED planning process must prove to be reliable and consistent upon actual implementation**. The CALFED proposed conjunctive use/groundwater banking program must contain formal agreements between local, state and federal regulatory agencies to insure that the proposed solutions will not be supplemented in the future by uncertain, additional requirements. For example, CALFED must ensure that the amount of water currently sought is an upper limit and will not be increased in the future. A well-developed conjunctive use program, where applicable, should provide hard copy assurances for local needs first, then address additional solutions.

If CALFED is to fulfill its purpose, it must look at future, long-term supplies for the entire state while fixing the Delta. This philosophy is incorporated into the recommendations presented below:

1. **New surface water facilities must be equally emphasized with groundwater banking and conjunctive use by CALFED**. Offstream storage would not only provide additional flood control capability, it will also provide a net gain of water from winter storm flows that are otherwise surplus or simply "lost" to the ocean. We strongly suggest that using Northern Sacramento Valley groundwater as a "supply" source presents a short-term, highly variable, unsubstantiated and quite possibly, unreliable source of new water for CALFED and other state and federal programs.

   Conjunctive use may be an effective tool, but only if adequate surface storage, recharge facilities and associated plumbing facilities are also constructed. In addition to a number of "new water" supply benefits, additional key local improvements would be realized through the flood control and recreation benefits provided by new surface water impoundments. Finally, one of the strongest advantages to North-of-Delta storage is the ability to release water in a timely manner for fish passage. All of these aspects would impart healthy economic and environmental benefits to the region.

2. **CALFED must assure Northern Sacramento Valley water users that their proposed groundwater programs will coordinate and adhere to applicable local groundwater management plans, monitoring programs, and city and county groundwater ordinances**. The CALFED conjunctive use plan prepared for each sub-basin should reflect, foremost, the unique local concern and ground water management authority exercised therein. Those local residents, as represented by their governing boards, water agencies and local ordinances, must be brought into the decision-making process for any proposed groundwater extraction proposals in the Sacramento Valley. All potential participants in the Northern Sacramento Valley should be notified and provided a fair and timely opportunity to take part in the proposed program <u>at the time of its conception</u>.

3. **CALFED and DWR must assess the combined impact of all proposed water acquisitions on the Northern Sacramento Valley including impacts associated with the E.W.A.**
   Potential impacts for the proposed additional groundwater extraction programs must be assessed by CALFED including, but not limited to: A. Subsidence B. Permanent decline of groundwater levels (Mining) C. Surface water/groundwater interaction and the impacts to surface supplies (i.e. Sacramento River and its tributaries) D. Decline in groundwater quality. E. Significant drop in summer groundwater levels with increased pumping costs.

The Northern Sacramento Valley has a very real concern regarding groundwater recharge under CALFED's proposals to date. The lack of live streams in summer and fall, the lack of storage facilities on most streams, and a commitment by CALFED to prioritize Delta In-Basin requirements over recharge of Northern Sacramento Valley aquifers has generated serious questions regarding if, when and how recharge would occur if a basin were evacuated, or even partially evacuated, particularly in successive drought years. Currently, DWR and State Fish and Game programs along East-side tributaries are satisfying in-stream environmental demands by replacing surface water use with local groundwater extractions. This not only potentially depletes the local groundwater resources, but also eliminates that deep percolation recharge element provided by the applied surface water.

Most Northern Sacramento Valley basins currently enjoy excellent water quality. Thorough studies, including the possible health effects and increased water treatment costs, should be made regarding the potential for deterioration of water quality. These studies and the resulting baseline information from them need to be a matter of record prior to any detectable degradation of water quality. Loss of water quality by extensive groundwater extraction is, in all probability, irreversible, due to unreliable winter rainfall or snow pack.

Many areas of the Sacramento Valley typically experience lowered groundwater levels during the summer irrigation season when groundwater pumping exceeds the aquifer recharge rate. In many areas, groundwater levels decline from late spring until July or August, at which time they may begin to recover. Additional proposed groundwater extraction from these areas may lower groundwater levels further. Any significant decline in pumping levels will require extension of pump columns, turbine modifications and increased horsepower requirements. A thorough study of these costs and identification of parties responsible for payment is imperative in order to analyze the full impact of increased groundwater pumping.

All of these impacts should be evaluated by factoring into the assessment the importance of ultimate water needs, existing water rights and Area of Origin priority of Northern Sacramento Valley Counties. These possible effects have the potential to impact the local agricultural economy, and therefore the economy of Northern Sacramento Valley Counties. Local affordability and reliability of drinking water supplies and the development potential of local properties will also be effected. Further, subsidence presents a threat to structural integrity of flood control facilities and other infrastructure. A water level decline can result in the possible degradation of riparian habitat dependent on the surface/groundwater interaction.

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Future growth and urban expansion in the Northern Sacramento Valley will depend on local groundwater for its water supply. An "ultimate needs" analysis should be completed for the entire region to determine if there is groundwater available for possible export before considering future demands from the area.

These impacts must be fully addressed by CALFED immediately, before implementation of any proposed conjunctive use programs.

CONCLUSION

The Sacramento Valley aquifer system is highly variable, complex, and not well understood. By its very definition "conjunctive use" requires the combined use of groundwater and surface water supplies, using groundwater to a greater extent in dry years and allowing recharge of the groundwater basin through dependence on surface water in the wet years. It is clear that a large area of the Northern Sacramento Valley does not have a surface water supply and is totally dependent on groundwater. There should be no evacuation or transfer of groundwater out of any area where groundwater is the only source. A conjunctive use program in parts of the Northern Sacramento Valley is a possibility if operated within the controls of groundwater management plans and local regulations and ordinances designed to protect these groundwater basins from over-draft, subsidence, and un-mitigated third party impacts. The long-term ability of the groundwater resources to sustain current and future local demands is imperative.

FLOOD MANAGEMENT ISSUES

The CALFED Bay-Delta Program has developed a long-term comprehensive plan that seeks to restore ecological health and improve water management for beneficial uses of the Bay-Delta systems. Many of the activities proposed in this plan will directly impact water users in the Sacramento Valley. At this critical point in the CALFED process, we have developed the following recommendations for the consideration and acknowledgment by CALFED. These recommendations have been developed with the intent to ensure that CALFED addresses the crucial elements of cost effectiveness, practicality and true long-term program efficiency in their proposed solutions.

1. **CALFED solutions should provide flood control enhancement** through the development of new surface storage, coordinated management and operations of proposed facilities and improved re-operation and maintenance of existing storage reservoirs and flood control projects. **Specific concerns applicable to the entire CALFED study area include the following:**

iii. **CALFED must construct offstream storage of surface water in the Sacramento Valley, with attendant flood control features**. Northern Sacramento Valley water users support the development of west-side storage facilities. The Sites off-stream storage reservoir provides one such facility, as does the development of other west-side dam sites, preferably above Red Bluff. ***Benefits could include: improved* fish passage at Red Bluff Diversion Dam; less dependancy on the direct Tehama-Colusa Canal - Sacramento River connection; water to the west-side *districts; temperature control; increased prime spawning* habitat; and a possible solution to the federal fish passage issue.**

In addition to the obvious flood control and "new water" supply benefits, additional key local improvements would be realized through recreation benefits provided by new surface water impoundments. One of the strongest advantages to north-of-delta storage is the ability to release water in a timely manner for downstream fish passage. All of these aspects would impart healthy economic and environmental benefits to the region. CALFED should recognize that new reservoirs will not completely eliminate flood flows, which are necessary to maintain downstream riparian habitat, meander belts, and gravel recruitment.

CALFED should also work with DWR and the Bureau of Reclemation with the intent of maximizing allocations for flood control storage in existing State Water Project (SWP) and central valley project facilities.

ii **The carrying capacity of existing flood control channels must be maintained or improved through CALFED**. There must be a flavor of compromise reflected in the CALFED plan which attempts to merge environmental solutions and flood control solutions. The goals of those who support the reversion of river systems back to a "natural" meandering state are sometimes at odds with those who are charged with protection of property and lives. It is apparent that significant habitat acquisition and restoration efforts are already underway in the Sacramento Valley. We acknowledge that this effort is an important component of the CALFED Bay-Delta plan. However, many urbanized and established agricultural areas in the valley rely heavily on attendant flood control facilities to provide protection for those areas.

Given the established level of development that exists in the valley, the reversion of the Sacramento River back to the state that existed before the arrival of Europeans 200 years ago, is simply not practical or feasible. Many reaches of the Sacramento River and its larger tributaries, including the Feather River, the Sutter Bypass and the Yolo bypass are, in essence, delivery channels for the Central Valley Project and the State Water Project. Local agencies are charged with maintenance duties for these channels. In those areas where authorized flood control and bank stabilization projects exist, proper maintenance of channel capacity must be supported by CALFED. Measures which provide flood control benefits may also be "fish friendly" (i.e. improved fish passage during periods of low flow) through their implementation and provide environmental enhancement.

iii. **The impacts associated with the development of setback levees must be closely scrutinized by CALFED.** In Sutter and Yolo counties, a large mass of riparian habitat is already contained within the existing levee system. Setting these levees further back from the river will create a much larger interior area, particularly along those reaches where the setback levee will be constructed on ground that is significantly lower than that underlying the existing levee (which is the case in Sutter County). In order to maintain levee height in low areas, the new setback levees will have to be built larger than the existing structures, as such, setback levees constructed along both sides of the stream will require additional land just to accommodate the new levee structure. To what level of protection will these new set back levees be constructed? Will they qualify for PL 84-99 assistance if damaged?

- The impacts associated with the loss of existing land to setback levee construction and riparian corridor enhancement must be fully evaluated by CALFED. Areas protected by levees are generally productive agricultural land, rural residential developments, or urban areas. Removing this land from the tax roll to allow for expansion of riparian habitat presents a loss of tax base to local government, possible relocation of residences and businesses, and a decline in food production,

as well as the possibility of third-party impacts from the introduction of endangered species to adjacent lands.

iv **CALFED agencies must develop assurances of a "safe harbor" program that will encourage landowners to participate in the development of habitat enhancement programs.** There is very little certainty associated with the Endangered Species Act. CALFED must establish parameters for the impacts of future endangered species listings. CALFED and the SB 1086 process should provide incentives to encourage local landowners and resource agencies to participate in this program. Local water users, agencies and landowners are very concerned with current mitigation measures that are perceived to be arbitrarily enforced by regulatory agencies. CALFED can help to create a more cooperative atmosphere between regulatory agencies and local interests. Perhaps future mitigation measures should be performed through the regulatory agencies charged with enforcement of the ESA, with partial or full funding provided by those agencies. CALFED might first consider purchasing flood-prone lands at fair market value and converting those lands to conservation uses and mitigating tax revenue loss.

v. **Northern Sacramento Valley landowners and businesses must be assured that CALFED ecosystem restoration efforts will not threaten essential facilities at critical locations.** CALFED must ensure that bank protection will be maintained, or enhanced, at specific locations (hard points), including, but not limited to the following:

- Public facilities (bridges, highways, parks, flood control works).
- Substantially developed areas (cities, towns, & residential developments).
- Quasi-public & private infrastructure, such as pumping plants.

CALFED should coordinate with SB 1086 which is developing "hard point" nomenclature.

vi. **The ERP natural process replication proposals should be proceeded by a process that encourages public participation and comprehensive planning, provides assurances regarding impacts to landowners and respects existing land and water uses.** On an unprecedented scale, the ERP places particular emphasis on the replication of natural processes - artificial replication of flow and temperature regimes, inundation of flood plains, river meander, and sediment transport. The purported goal of these projects is laudable - the reactivation of natural processes to enhance habitat for fish and wildlife species. Many of these actions, however, may result in unpredictable and changing river conditions that could directly impact agricultural diversions and protective fish screens, and may increase conflicts with state and federal endangered species regulations. These actions may also adversely affect the viability, operation and management of local

agencies that provide necessary water supply, drainage, flood control, bank protection and other services to area landowners.

2. CALFED must address several unique issues which directly relate to the **Sacramento River proper**. These issues include the following:

i. It appears that all, or parts of, the SB 1086 Advisory Council ongoing plan development for the Upper Sacramento River may be enveloped by CALFED. The 1086 Committee has proposed the development of Conservation Areas along the Sacramento River, which would be managed by a local entity comprised of landowners, local environmental interests and local agency representatives. **The establishment of this entity, controlled and managed by the local stakeholders, should be retained by CALFED.**

ii The "limited meander" concept may result in significant upstream and downstream flooding impacts, particularly in those areas close to "hard points". If a local landowner agrees to participate in a CALFED "ecosystem restoration" project that ultimately contributes to increased flooding to another party, who will assume the responsibility for the damages? **CALFED must establish responsibility for potential liability caused by "limited meander".**

iii. **The permitting process must be streamlined and a mechanism provided for funding of authorized flood control and bank protection works on the Sacramento River and its tributaries**. Each county in the northern Sacramento Valley handles management of flood control and bank protection on the Sacramento River in a unique manner. In Sutter and Yolo counties numerous reclamation districts share this responsibility. Tehama County has a county-wide Flood Control and Water Conservation District. Butte and Glenn counties currently have no agencies charged with these duties.

The disparity that is apparent between individual counties is reflective of the lack of focused direction towards this issue at the federal level. Emergency bank protection along the Sacramento River is nearly impossible to fund under the current "Federal Levee Policy". Maintenance and repair operations along the river are encumbered by numerous, difficult, and inconsistent permitting requirements. **CALFED, as a multi-agency organization working in cooperation with the SB 1086 process, is in an excellent position to effectively streamline and coordinate the environmental permitting process on the Sacramento River.**

River bank repairs are becoming increasingly difficult to complete due to limited revenue sources at the local level. Local program administration of uniform flood control and bank protection management criteria must be applied for the length of the upper Sacramento River. In those areas where flood control agencies are

funded by local property taxes, the revenues are barely sufficient to keep up with O & M expenses and flood damage repairs, particularly since the passage of Proposition 13.

As previously stated, the Sacramento River, Feather River, and the Sutter / Yolo bypass systems are, in essence, delivery channels for the Central Valley project and the State Water Project. Local agencies are charged with maintenance duties for these channels. Proposed higher releases and/or reoperation from Shasta Dam will cause river levels to remain higher for extended periods of time. This in turn will super saturate the river banks causing more bank erosion. How will this be mitigated? Also, the sustained higher river levels will limit the time to repair numerous facilities at low flow. How will this be mitigated? No funds are currently provided by any state or federal agency to assist with these costs. Outside funding must be provided to local flood control agencies to assist in their efforts, which indirectly benefit all the customers supplied by the CVP and SWP. CALFED should consider proposing a "wheeling charge" during the delivery season which could benefit those local agencies performing maintenance of these facilities.

CONCLUSION

The proposed solutions will improve flood prevention through the development of new surface storage, improved operations of proposed facilities and enhanced re-operation of existing flood control facilities. Associated with these improvements, CALFED must develop a proper mitigation policy for implemented actions and ensure guaranteed protection of specific hard points on the Sacramento River and its tributaries. Any proposed "limited meander" concept should be backed up with a plan that establishes responsibility for associated liability. The concept of developing a local management entity in the Sacramento River meander zone comprised of landowners and local environmental interests and resource managers (similar to that proposed by the SB 1086 Committee) should be retained by CALFED. Finally, the current, cumbersome permitting process must be streamlined, coordinated and a stable, sufficient funding source must be developed to support maintenance, operation and repairs of authorized flood control and bank protection works.

STORAGE AND CONVEYANCE ISSUES

1. **CALFED must construct facilities for offstream storage of surface water in the Sacramento Valley.** Offstream surface storage provides a much greater degree of flexibility and control than the other storage options considered by CALFED. Effective planning for extreme event --floods and droughts-- can be best accomplished through the development of new surface storage facilities. When excess surface waters are controlled closer to their areas of origin, significant downstream damaging impacts can be prevented.

   Northern Sacramento Valley water users strongly support the development of west-side surface storage facilities. The off-stream storage reservoir located west of Colusa at Sites, as proposed by CALFED, appears to be extremely cost effective, while having a minimal environmental impact. The storage and conveyance component inventory recently released by CALFED identifies several other surface storage facilities on the west side of the valley which also merit serious consideration by CALFED. These projects include, but not necessarily limited to Cottonwood Creek, Red Bank and the Thomes-Newville complex. In addition to these locations and the large Sites project, CALFED should also evaluate the development of smaller reservoirs in western Yolo County, along Oat Creek, Sand Creek and Wilson Creek.

   One of the most significant advantages of north-of-delta storage is the ability to time releases of water for all uses and to supplement seasonal flows to the Sacramento River. In addition to the obvious flood control and "new water" supply benefits, additional key local improvements would be realized through the recreation and economic benefits provided by new surface water impoundments.

2. **The CALFED conveyance scheme combined with the development of new surface storage should include the extension of the existing Tehama-Colusa Canal system.**

   Reliable year-round, fish-friendly water diversions into the Tehama-Colusa Canal can be accomplished by either the installation of effective fish ladders at Red Bluff Diversion Dam or the construction of a completely new screened pumping facility near the current Red Bluff Diversion Dam. Extension of the Tehama-Colusa Canal will provide the following benefits:

   - The capability to transport large volumes of water to a major off-stream storage facility (i.e., Sites Reservoir)
   - The ability to supplement the water supplies to other existing west-side facilities (i.e. Lake Berryessa)
   - The flexibility to provide water releases anytime and at numerous locations along its current 110 mile length to augment Delta flows and provide other environmental benefits.
   - Improved conjunctive use opportunities in Yolo County.

The size and configuration of the proposed isolated conveyance facility is not disclosed in sufficient detail. There is some discussion of a 2,000 to 4,000 cfs diversion, but little or no discussion regarding the configuration for the proposed upper limit of this range. The process of triggering additional conveyance facilities, beyond the scope discussed elsewhere in this report, should be addressed in detail by CALFED. Furthermore, the triggering criteria is overly rigid, in stark contrast to its vague and ambiguous context. If we are to be shackled by rigid standards (50 ppb bromide, 3 ppm TOC), there should be some demonstration of why these were chosen and a scientific analysis of whether or not they can be attained. It is premature at this time to set an arbitrary numerical standard as the basis for this important decision.

CONCLUSION

Northern Sacramento Valley water is a critical community resource. The CALFED Bay-Delta solution must employ a storage and conveyance scheme that provides new water supplies, not a reallocation of existing supplies from one area or purpose to another. New water can be most easily developed by capturing excess Sacramento River flows that currently pass by the Delta and through the San Francisco Bay without providing appreciable benefit. In this way, a progressively increasing water supply system can keep pace with the long-term water needs of a growing California, without adversely impacting the economic viability of communities reliant on their existing local water supplies.

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