

January 17, 2011

Mr. Brad Hubbard
Bureau of Reclamation
Sacramento, Ca.

“The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.”

The “American Public” is a much broader and more important interest than the corporate farming interests represented by San Louis and Delta Mendota Water Authority. There are thousands of people in the north state that rely on the Tuscan Aquifer for their economic interests, environmental interests and for water for their home and farm use. Any proposal to pump groundwater in a sustained way to replace irrigation water previously obtained from surface water has been proven to affect the Tuscan Aquifer. In 1994 there was sustained pumping to replace water sold south and we had numerous well failures in the Durham area. Until long-term studies can prove that there will be no effect, no agency can claim there will be any mitigation that will work. I am personally dependant on a spring fed home water system, possibly linked to the Tuscan Aquifer. I live in the foothills outside of Oroville. When my spring fails because of sustained pumping of water from the Tuscan Aquifer will the Bureau of Reclamation find some way to mitigate that?

The Bureau is involved in a court case right now challenging the EA and FONSI for the NEPA Document for the 2010-2011 CVP Water Transfers. For the bureau to start another, longer plan for water transfers with no decision on this court case seems like very poor planning. These “scoping meetings” are premature and have no actual proposal to comment on. There is no project to develop any EIS on, no concrete figures of how much water SLDMWA is looking to buy, and no statement about who is willing to sell water (therefore no locale to pinpoint any environmental impacts). The North valley is a huge and diverse area, for the bureau to lump it all into an EIS for some undefined amount of water grab will probably soon be found to be illegal.

I don't know about NEPA but for CEQA the “Lead Agency” is the agency with authority to accept or deny the EIR (EIS for NEPA) and to develop and approve mitigation measures needed. How in the world does SLDMWA become a “Lead Agency” in this proposal when they are the “customer” and “end user”? SLDMWA benefits from, initiates the need, sets the price, and now, with this proposal, becomes the environmental and economic watchdog for these undefined water transfers. Talk about “the fox guarding the henhouse!”

Historically the area encompassed by SLDMWA was used mainly for “Truck Farming”. The seasonal nature of this allows a farmer to change his crops to allow for the cyclic drought and wet years of California’s climate. In Northern California we have a mixture of crops with orchard crops making up a large percentage of the plantings. Our average rainfall is large enough that we seldom need to irrigate in the winter and spring, and the groundwater table is stable. The central valley uses 3 to 4 times the yearly water needs of the same crop grown in the north state. The rice farms that usually make up the “willing sellers” in this project have neighbors who have orchard crops and depend on the ground water for their crops viability. These “willing sellers” and “willing buyers” are also mostly made up of large corporate farms with their short term outlook for profit and loss that drives them to look at water as a commodity rather than an environmental and economic resource.

Water is not a “resource” to be mined and sold for profit. Water is a right and an ecological need for us in the north state. To make a long term commitment to sell water for marginal farming and to plan to do so in “drought years” when north state flora and fauna are at their most vulnerable seems unconscionable to me. For the bureau to rush to judgment on this issue because of a manufactured “need” for water by farmers who are trying to farm crops ill-suited to the desert they live in, without first addressing the very real concerns of the broad cross-section of people at the meeting in Chico, would be completely abrogating the duties listed in their “Mission Statement” quoted as the first lines of this letter.

Thank You,
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