

February 8, 2011

Comments on north-south water transfer proposal

To Brad Hubbard
Bureau of Reclamation

I attended the “scoping” meeting in Chico (January 11th) on the north-south water transfer proposal. These transfers – whether they are a “project” or a “plan” or some other scheme – constitute an ill-conceived, poorly disguised and unwarranted subsidy of agribusiness. As someone who grew up here, playing in and protecting Butte County’s creeks, I am acutely aware of water’s preciousness – and precarity – in northern California. Studying water in college and graduate school, I also know that there are ways to live well and wisely with the water that we have, and in ways that support all life. I know that there are wise alternatives to this proposal. And so, like many other people in the area around Chico, I am firmly opposed to any north-south water transfers.

But it is not up to me to make the argument against such transfers. It is up to the proponents to make an argument for them. And it is the job of government agencies working in service of all people, not just the richest, to fairly and fully examine all angles of the possible water transfer. This hopelessly nebulous proposal was brought to the public prematurely. Without the details of any actual proposal in hand, the public is not able to adequately comment on this vague proposition. We can only ask questions. I hope that these and many other questions will be addressed in the EIR/S.

Why is this water needed? By whom? For what purpose? What will the environmental effects, positive or negative, of this water be on the San Joaquin Valley and River ecosystem? Who will benefit economically from this water? Who and what will suffer? What state-wide water policies support or conflict with these proposed transfers?

When will this water be transferred? Will the public be notified of these transfers, and have case-by-case opportunities to comment? What constitutes a drought? How will global climate change affect the supposed need for water transfers? Will these transfers truly alleviate a shortage in supply? If northern California is also experiencing drought, why would it be reasonable or justifiable to deprive northern ecosystems of water for the sake of southern orchards? Why should junior water rights holders farming in inappropriate locations be given precedence over the uses of water by senior water rights holders and for farms, ecosystems, and homes in the Sacramento Valley? Please provide a detailed monitoring and mitigation plan concerning ground- and surface- water impacts in the Sacramento Valley. And please be transparent about

the political rationale for transferring this water. What role does financial and political power play in deciding how water is allocated?

Who will sell the water? What effect will groundwater replacement for irrigation have on the regional hydrology, including the aquifers, creeks, wells, and springs? Who will be liable for any adverse effects to these water systems? What effect will groundwater replacement have on groundwater quality – including movement of heavy metals into drinking water? What effect will groundwater replacement pumping have on river and creek levels, and on the viability of these waterways for aquatic life and salmon migrations? Where is the baseline data, and what does it say? What will the cumulative impacts be? How can we predict these effects with any accuracy, given the current dearth of knowledge about regional groundwater systems? Be honest about scientific uncertainty.

What are the alternatives to these proposed transfers? What are the benefits – social, economic, and environmental – of retiring cropland on the west side of the San Joaquin Valley? What are the benefits of water conservation, in both agricultural and municipal uses? I want to see a full, fair, and thorough investigation of these alternatives.

With many others in northern California, I reject the attempt to take the water we all rely on. It is insulting to have the Bureau introduce a proposal utterly lacking in substance, justification, or honesty. Without a project description, everyone can only guess at the effects.

I ask that you use the space of the EIR/S to tell us how, and why, we can and should formally say “No” to this proposal.

Sincerely,

Elicia Whittlesey
Butte Valley, California