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CALFED Bay-Delta Program
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Attention: Rick Briettenbach

Dear CALFED Staff Members:

I am writing to comment on the proposed CALFED program as presented in Chico on September 15.

1. Give Greater Emphasis to Conservation

Agriculture: While farmers unquestionably depend upon adequate water, independent studies demonstrate that up to 25% additional agricultural conservation is possible, given the appropriate incentives and mandates. Your plan should acknowledge this opportunity more accurately. However, in fairness, those farmers who already conserve should not be penalized in this effort by requiring across-the-board cuts. Rather, those most able to achieve additional conservation should receive the greatest pressure and inducement.

Urban uses: While most urban areas have taken modest conservation efforts, including requiring water-conserving toilets and showers in new construction, vastly more residential and business conservation is possible. Your conservation plan must include serious incentives and realistic measures to assure deep urban conservation in landscaping, manufacturing processes, and other activities. Public, commercial, manufacturing, and residential construction and remodeling should require water-conserving fixtures and the best available technology for other conservation devices. Incentives should be provided for retrofitting existing construction, possibly including required upgrading as conditions of sale. Use of water-demanding plants and extensive lawns should be strictly limited (not just discouraged) in public and private landscaping, especially in new construction. Incentives should be provided for conversion to xeric landscaping in existing uses. Overhead watering should be limited and drip irrigation required whereever feasible.

Conservation must be utilized to the greatest extent before undertaking new surface water storage. Conservation is far less costly, quicker to implement, and much less damaging to the environment than new surface storage. Surface storage would significantly impede efforts to improve habitat and fisheries.

2. Improving Habitat

I strongly support your efforts to improve riparian and aquatic habitats. More emphasis should be placed on protecting and improving watersheds through regulation of logging, mining, grading and other activities which reduce watershed capability to store water and replenish aquifers. Concrete methods also must be provided for watershed restoration and improvement. Watershed preservation and restoration is the most natural and least costly way to improve ground water recharge and summer stream flows, while dramatically reducing flooding and improving our fisheries.

Timber management practices must be reformed, including increased setbacks for logging in riparian zones. Doing so will provide cooler spawning streams, reduce siltation and erosion, and increase watershed water retention, aquifer recharge, and flood reduction.

Farmers and timber companies have concerns about jobs lost from fallowing farm lands for habitat improvement and stream setbacks for logging, as proposed. However, habitat and watershed improvement work will directly provide similar jobs and ultimately will improve job opportunities in commercial fishing. Just as the timber industry has adapted extremely well to the loss of logging jobs, so will agriculture.

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3. Population Growth Assumptions

While significant population growth is indeed inevitable over the next few years, and must be accommodated by your plan, it would be a serious mistake to ignore overpopulation as the root cause of the water shortage. Even though overpopulation is politically a difficult topic, it must be addressed in this plan. Otherwise, all efforts to resolve the problem will ultimately prove to be futile. Inevitably, no amount of water conservation, transportation, and/or storage, and no amount of improvement in agricultural production can keep up with unbridled growth.

Most of the "developed" countries have stable populations today, very much unlike the U.S. Western Europe does not face the water or infrastructure pressures of California, principally because it has enough water and infrastructure for a stable population. Population growth is not inevitable if it is confronted. As Europe also demonstrates, a healthy economy has no need for population growth. A stable population avoids the need to play constant "catch up" and frees funds for improvements in quality of life.

While your plan cannot and should not propose solutions to our growing overpopulation crisis, it must at least acknowledge overpopulation as the root cause of our water shortage and the greatest threat to adequate water supplies. The plan must acknowledge that it is a temporary solution at best. The plan must propose to Congress and the California Legislature that serious and immediate steps be taken to address this overriding issue. To ignore the problem by proposing only short-term solutions can be compared to shifting the furniture on the Titanic as it goes down.

Thank you for the opportunity to comment.

Sincerely,

Jon Luvaas, J.D.
Mediator and Counselor at Law