

MOUNTAIN COUNTIES WATER RESOURCES ASSOCIATION

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February 23, 1995

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State Water Resources Control Board **BY FAX**
901 P Street
P.O. Box 100
Sacramento, CA 95812-0100

Re: Consideration of Water Quality
Control Plan for the San
Francisco Bay / Sacramento-San
Joaquin Delta Estuary - Notice
of Public Hearing-February 23,
1995

Dear Board Members:

These comments are submitted to the SWRCB on behalf of the Mountain Counties Water Resources Association in connection with the above-captioned Hearing. We ask that these comments be made a part of the administrative record in this proceeding.

The Membership of the Mountain Counties Water Resources Association (Mountain Counties or Association) includes the counties, and water districts and agencies, as well as private financial, engineering, legal consultants, and public utilities that are located within the "Foothill" or "Mother Lode" region of California. A Brochure describing the Membership and Goals and Purposes of the Association is enclosed for the SWRCB's ready reference.

In recent years these rural and semi-rural counties have experienced high population growth rates which are straining the water supply capabilities of many of our members. These members are trying to plan for and meet their future growth, but in many cases they are handicapped by a lack of adequate water. A substantial part of the water from this area was prior-appropriated by more populous downstream Valley and urban areas. As the "counties-of-origin" for much of California's water, we see the need for the more active pursuit of our diminishing water supplies for use in our own areas. It is the goal of our membership to initiate developments within our boundaries which will supply our needs, and which will also make water surplus to those needs available to other areas downstream.

A major limitation on meeting those goals are ever-increasing and post-hac environmental flow requirements which are straining the existing consumptive water supply. Further, there appears to be little consideration given today to building additional storage to capture wet year flows, like this year, for use in meeting these increasing environmental requirements. For instance, the Bay-Delta standards and the "consensus" agreement put a tremendous demand on the yield of New Melones Reservoir to meet downstream water quality and fishery mitigation requirements. There are additional storage alternatives and possibilities which could supply water for both environmental and consumptive needs. For instance, a multi-purpose Auburn Dam on the American River could be a source of water for both purposes.

What the Mountain Counties does not want to see happen in subsequent phases of this SWRCB proceeding is for additional environmental water demands to be made on existing upstream water supplies and storage, or on yet unappropriated water, which will have the effect of precluding any additional water development by the Mountain Counties to meet their increasing growth.

In implementing the Bay-Delta standards the SWRCB (1) should recognize and follow area of origin and watershed protection principles, (2) should recognize the impacts of Delta exporters' diversions and require those diverters to mitigate their adverse environmental impacts, (3) consistent with principles 1 and 2, the State Board must rely on the priority system to allocate responsibility for Bay-Delta water quality objectives and flow requirements, in other words, the responsibility for meeting new and increasing environmental demands should first be met by prior diverters and not all taken out of the hide of developers of any remaining unappropriated water, (4) municipal and domestic use should receive no special preference in the allocation of responsibility to maintain Bay-Delta water quality objectives and flow requirements, and (5) the State Board should prepare an EIR which fully considers the significant impacts on the environment caused by the Board's actions, including any increased water demands and consequent limitations it causes on the Mountain County region.

The rural and semi-rural nature of the Mountain Counties creates some special problems, some of which are discussed above, which need to be considered when implementing Bay-Delta water quality standards. Many of these counties are water-short and the cost of their developing new storage will be far higher per acre - foot than any previously developed water supplies. This cost problem should not be further exacerbated by loading up these projects with contemporary and even untested notions of Bay-Delta environmental water quality requirements, instead of more fairly spreading those costs around.

As if that were not enough, the limited year-round resident populations of our region will not be able to bear the per-capita costs and rate impacts of developing new water supplies burdened by increased environmental demands to benefit the downstream Bay-Delta area.

Our Sierra region, which has essentially lost its mining and timber economies, is being asked to serve as the recreational playground for the rest of California, if not the U.S., and this places a large physical and cost burden on its limited water supply infrastructure which should not be aggravated by inordinate environmental demands on its existing and remaining unappropriated water resources.

We thank the Board for this opportunity to comment and ask that the Association's comments be given careful consideration because the economic future of our region is at stake.

Respectfully submitted,



Christopher D. Williams
Executive Director