

Committee on Resources

Subcommittee on Water & Power

Witness Statement

United States House of Representatives
Committee on Resources
Subcommittee on Water and Power
The Honorable John T. Doolittle, Chairman
Written Testimony of Richard M. Moss, General Manager
Friant Water Users Authority
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MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE:

I very much appreciate being given the opportunity to testify before the Subcommittee to provide some analysis of the potential of the CalFed process to meet the expectations, and more importantly, the needs of the people of the Friant Division Service Area of the Central Valley Project ("CVP") and the San Joaquin Valley in California.

Introduction

I am Richard M. Moss, the General Manager of the Friant Water Users Authority. The Friant Water Users Authority is a joint powers authority formed under state law comprised of 25 member agencies that all get water from the Friant Division of the CVP.

The Friant Division service area is comprised of approximately 1 million acres of the world's richest farmland. It ranges from the southern part of Merced County all the way to the Grapevine in Kern County. The majority of the service area is in Madera, Fresno, Tulare and Kern counties. This one-million-acre area annually produces about \$4 billion in gross agricultural production. We grow a tremendous variety of crops. The majority of the area is dedicated to permanent plantings of grapes, nuts, tree fruit and citrus. We also have a significant amount of row and field crops, as well as leading the nation in dairy production. This area is truly unique in its quality of agriculture and in its ability to produce all of this on small family farms that average approximately 100 acres in size. The area is also renowned for its highly efficient use of irrigation water, having been a "hot bed" for the development of drip and low volume irrigation technology. We can boast of some of the highest irrigation efficiencies found anywhere in the world.

The Friant Division of the CVP consists of Friant Dam and Millerton Lake on the San Joaquin River northeast of Fresno, the 152 mile Friant-Kern Canal that runs south all the way to Bakersfield and the 36 mile Madera Canal that runs north to the Chowchilla River. The Friant Division of the CVP annually delivers approximately 1.5 million acre-feet of water. This water supply is principally used as a supplemental water supply providing only 1.5 acre-feet per acre on the average. However, there are some parts of the service area that rely totally on the Friant Division water as their sole source of supply. The area is blessed with good quality groundwater aquifers. Groundwater is the firm source of supply for the majority of the service area. The Friant Division is unique in the west in that it employs a two-class system of water

deliveries. The Class 1 water is the first water to develop behind Friant Dam and is delivered to those parts of the service area that have limited or no access to groundwater supplies. The Class 2 water develops only after the Class 1 demands have been met and is delivered to those parts of the service area that can rely on groundwater. Class 2 water is typically used to replenish the groundwater through "in-lieu" recharge, providing growers with surface water in-lieu of using their wells, and through direct recharge -- percolating water in recharge basins, natural water ways and unlined canals into the underground aquifers. The Friant Division has been in service for 50 years and has been successful in arresting the serious condition of groundwater overdraft that existed prior to the project. It should be noted, however, that a condition of critical groundwater overdraft still exist in parts of the service area and in neighboring areas in the southern San Joaquin Valley.

The majority of the water rights to the San Joaquin River allowing for the diversion of water at Friant Dam were obtained by the U.S. Bureau of Reclamation through purchase and exchange agreements with the individuals and entities that held those rights at the time the Friant Division was developed. The single largest of these agreements requires annual delivery of 840,000 acre-feet of water to the central San Joaquin Valley near Mendota (commonly referred to as the Exchange Contract). Thus, the Friant Division is dependent upon other features of the CVP, including Shasta Dam, the Tracy Pumping Plant and the Delta-Mendota Canal, to facilitate this required exchange. It is important to note that if for some reason the U.S. Bureau of Reclamation is unable to meet the demands of the Exchange Contract out of Delta export supplies, the Exchange Contract provides for the release of water from Friant Dam to meet Exchange Contractor demands.

The Friant Water Users Authority and CalFed

In the context of additional background information, it will be useful to understand how my agency and its water users' view of the importance and relevance of CalFed has changed over the past several years.

The Friant Water Users Authority has had an evolving view of CalFed. The exposure of most of our members to issues of the Delta was one-step removed in terms of direct impacts. The long-standing priorities for Delta export pumping have to date insulated the Exchange Contract from water supply reductions caused by regulatory limitations on the export pumps. The upper mainstem of the San Joaquin River (from Friant Dam to the confluence of the Merced River) has not seen regular flows in it since the construction of Friant Dam that would hydraulically connect it to the Delta and thus Friant water users to many of the Delta issues.

This limited exposure to issues of the Delta has changed significantly over the past ten years for Friant water users. The insulation from impacts associated with Delta export pumping limitations has been eroded. Regulatory reductions in Delta export pumping, especially for the CVP, are limiting export water supplies to the extent that the U.S. Bureau of Reclamation is precariously close to not being able to meet Exchange Contract commitments for alternative supplies in very dry years. Of course, for this to happen, all other CVP export water contractors (including urban water contractors) would have their CVP contract water supplies reduced to zero. Clearly a crisis is in the making from a number of different respects.

Coming out of the 1994 Bay/Delta Accord, the California State Water Resources Control Board was charged with allocating out the responsibility for meeting the flow and water quality standards to the water right holders for waters tributary to the Bay/Delta. On the San Joaquin River, the responsibility for meeting the new standards was negotiated and agreed to by the major water right holders on the river. This agreement is known as the San Joaquin River Agreement and was formally adopted by the State Board in December

1999. The Friant Water Users Authority is a signatory to this agreement. This agreement provides for a twelve-year timeframe to test theories of river flow augmentation combined with export pumping regimes and operation of a barrier at the head of the Old River Channel, designed to provide the greatest benefit, in terms of survival, for fall run Chinook salmon. The technical aspects of the San Joaquin River Agreement are known as the Vernalis Adaptive Management Plan or VAMP. In essence, twelve years have been provided for the users of waters from the San Joaquin River (including Friant water users) to develop a long-term sustainable plan for the protection of San Joaquin River fisheries based upon sound scientific evidence that will be generated from the VAMP analysis.

Litigation brought in 1989 by a number of environmental and fishing organizations seeks to return sufficient flow to the upper mainstem of the San Joaquin River for the restoration of a salmon fishery. This litigation (known generally as *NRDC vs. Patterson*) directly involves the Friant Water Users Authority and waters of the Friant Division of the CVP. A stay to this litigation was reached in November of 1999 that allowed the parties a limited period of time to explore ways of restoring flow and natural processes to the upper mainstem of the San Joaquin River which would provide for the restoration of a fishery while not adversely impacting the available water supply or cost of water to Friant water users. In the summer of 1999, CalFed supported the effort to stay this litigation by funding a pilot project jointly sponsored by parties to the litigation. This pilot project provided for new flows to be released from Friant Dam and the return of the water to the Friant Division service area, along with the purchase of water from outside of the Friant Division to cover any channel or conveyance losses. More importantly, it provided the opportunity for disparate interests to work closely together for their mutual benefit. This cooperative venture was integral to getting the parties to put the litigation on hold in order to spend time and resources researching San Joaquin River restoration in ways that keeps Friant Division water users, and the economy that depends upon Friant water, whole.

These changes have brought the focus of Friant water users more clearly and more directly to the Delta and thus to CalFed. While our previous interest in the CalFed solution was one of being supportive of a few of our member agencies that directly use Delta export supplies and supportive of neighboring export interests, our primary focus was to ensure that nothing that was generated by CalFed would have adverse cost or water supply implications for our member agencies. Our views about CalFed have now evolved to where a reasonable and balanced CalFed solution is critical to the future of our member agencies. Positive improvements in water supply availability to support environmental water needs for the restoration of the San Joaquin River are now a necessary outcome of CalFed. As well, return of export pumping reliability is extremely important to create water supply stability within the region. Instability stifles creativity in managing the water supplies of the region and keeps all of the interests in the narrow mode of thinking just of their own needs.

My testimony herein is specifically presented on behalf of my agency and the needs of my member agencies. It should be noted, however, that it is significantly influenced by what I believe to be the regional needs of the San Joaquin Valley and Sacramento Valley.

Principles to Guide CalFed: Then and Now

In preparation of this testimony, I found it useful to review two documents collaboratively developed by agricultural interests from the Sacramento and San Joaquin valleys in which I was directly involved. The first of these documents is known as "Principles to Guide the CalFed Process, Sacramento Valley and San Joaquin Valley Water Users, August 1, 1996," (hereinafter referred to as the "1996 Principles Document") attached as Exhibit A. This document lays out the guiding principles or standards for what CalFed was to

study, and what the water users expected as an outcome of the CalFed process. It also provided a list of important project components that they believed should be evaluated in-depth in CalFed's environmental impact report and study. The second document is a very recent document prepared by a group (similar in composition to the group that prepared the first document) of Sacramento Valley and San Joaquin Valley water users. It has been used for briefings of federal legislators and others and was published on March 21, 2000 (hereinafter referred to as the "2000 Actions Document") attached as Exhibit B. This second document was presented as a positive first step towards resolving the issues that CalFed has been dealing with. It is the Sacramento and San Joaquin Valley water users' most recent description of their expectations for a successful CalFed outcome.

These two documents provide some interesting insight as to what Central Valley water users believed was important for a CalFed solution set near the beginning of the CalFed process and what we are very concerned about now as we near the end of the first phase of CalFed planning, where long-term decisions are about to be made. The following subtitled paragraphs will describe both the areas of consistent approach and the areas of changed approach by the water users and reasons for the change. It will lay out a very consistent theme of the need for balanced decision making and the sharing of CalFed improvements. It will describe a growing concern that as we near the end of the CalFed planning process, certain major aspects of an acceptable CalFed solution may not be included in the final product.

The 1994 Accord Foundation - Both the 1996 Principles document and the 2000 Actions Document rely upon the fundamental agreements achieved in the 1994 Accord. In particular, the Accord must be considered the irreducible minimum from which water supply improvements must be measured. It also, correspondingly, provides the maximum regulatory loss of water the water users are to endure while CalFed improvements come on line. In the 1996 Principles Document, it is clearly assumed that the Accord is this irreducible minimum, warranting little in terms of discussion. In the 2000 Actions Document, it is clear that additional regulatory taking of water supplies over the intervening years has challenged this assumption. Thus, the foundation from which to build upon for the CalFed process has a major weakness that needs to be fixed in order for CalFed to proceed beyond the planning phase. An immediate return to water supply availability forecast as a result of the 1994 Accord is required.

Continuous Improvements and Balanced Sharing of Benefits - With the Accord as the foundation from which improvements are to be measured, the 1996 Principles Document describes a balanced program of improvements, where linkages exist between improvements made to benefit the major interests. The intention was to provide something to keep everyone at the table; where no one interest got "too far ahead" in terms of having their long-term needs met. The 2000 Actions Document again lays out this principle as a "fundamental goal" of the CalFed process. A balanced sharing of improvements is key to CalFed success.

No Redirected Negative Impacts - In 1996, CalFed was clearly envisioned by the agricultural water users as a potential forum to resolve some long standing problems, a place where the potential existed to make needed improvements to California's water policy and infrastructure. It was not viewed as much of a threat to continued water use. The 1996 Principles Document describes needed assurances for areas of origin and protection of water rights and priorities. It does not specifically address the principle of not redirecting negative impacts - solving one problem and creating more problems elsewhere. The water users assumed this principle was in play in 1996. In the 2000 Actions Document, this principle is now expressly described. Unfortunately, in the intervening years, suspicion has crept into the relationship between the CalFed agencies and the agricultural community. Most recently, with the development of the concept of regional water management strategies and the closed-door nature of the negotiations going on between the state and federal governments, there is grave concern that regions will be pitted against each other within the

agricultural and urban water communities. Concern exists that the water user voice on these issues will become increasingly disharmonious, with a few agricultural interests in particular, being negatively impacted by CalFed programs and driven to the margin as a result of this regional dividing strategy by the CalFed decision makers.

Good Science is Key - Good, neutral science must be at the heart of all of the decisions that drive the CalFed process and programs. The 1996 Principles Document spoke to the need for a scientifically based program of ecosystem improvements and protection. It also endorsed the use of adaptive management, where new information generated from monitoring and analysis of past actions taken, is used in future decision making. The 2000 Actions Document takes this a step further. In it a scientific review panel is called for that would provide scientific oversight of future Endangered Species Act, Ecosystem Restoration Program, Environmental Water Account actions and other CalFed implementation programs. At a minimum, CalFed agency decision-makers need to be publicly responsive to the views of this unbiased scientific review panel.

Partnerships with Local Interests - The need to partner with local interests in the development of CalFed projects and programs has always been part of the vision for CalFed by the water user community. Certainly much of what has been embraced in terms of improved water management and conservation requires active involvement and participation of the local water management agencies. The history of CalFed, until relatively recently, has been a process of much collaboration and consensus. Thus, it was assumed that the implementation of CalFed projects and programs as well would similarly involve all of the stakeholders. CalFed has openly supported, as an assurance, the need to obtain local support for their programs. Unfortunately, the implementation of some of CalFed's programs has not fully lived up to this assurance. Thus, in the 2000 Actions Document the water users make specific reference to the involvement of certain water management agencies, as a minimum, in the implementation of the list of water management projects described in the document. An example of the kind of CalFed action that generates concern about the lack of local involvement was CalFed's involvement in contemplating the purchase of the Madera Ranch property in Madera County for a groundwater water banking project. It appeared that this project was moving ahead on a deliberate course with major CalFed (or CalFed agency) funding driving it. Yet, there was major concern from the local interests about the technical feasibility of the project. The local interests only saw the potential for adverse impacts to their groundwater and local economy, without any upside for them. There were no local benefits contemplated from the project at that time. It took the direct involvement of Congressman Radanovich and State Senator Jim Costa to have CalFed drop the purchase of this property as a CalFed project. Even now, there continues to be concern in the area that there will somehow continue to be CalFed involvement and support of this project as it gets recast as a private for profit venture. Until the Madera Ranch groundwater banking project has answered all of the technical questions and provides significant local benefits, it will engender major local opposition. The obvious lesson to be learned here is to involve the local community right from the beginning. Not having local support and involvement from the beginning can easily result in the demise of otherwise good projects or programs.

Reducing Conflicts in the Delta - Ostensibly the original primary purpose of the CalFed long-term planning process was to reduce the water supply, water quality and environmental conflicts in the Delta. Certainly, the recent past, including this past year's operations, are not indicative of state and federal agencies working together to reduce conflicts in the Delta. Further, it would appear that the preferred alternative for a Delta plumbing fix of a Dual Facility is staged for development in such a way that it is effectively precluded from ever being constructed. The "word on the street" is to try and find your water supply and water quality improvements elsewhere, as significant changes in the Delta plumbing are not on the horizon. This relatively

new concept of regional water management strategies under consideration by the state/federal negotiators would appear to bear this rumor out. The 1996 Principles Document focused primarily, as CalFed was also doing at the time, on describing what a balanced CalFed solution for the Delta would entail. Ecosystem improvements and protections were linked to actions that would improve water quality, actions that would improve water supply reliability and actions that would improve the overall system reliability with a comprehensive program of Delta levee improvement and maintenance. The 2000 Actions Document focuses on a beginning list of specific programs and projects that will result in near-term and continuous water supply and water quality improvements. Huge investments in ecosystem improvements have already been made. This coupled with the water supplies lent to the environment under the Accord, real improvements in the environment of the Delta are being realized. It is time for commensurate improvements in water supply and water quality to occur.

New Storage is Key - As was indicated earlier, in the Central Valley water users 1996 Principles Document the focus was on the Delta and what projects or programs would reduce the existing conflicts in the Delta. Storage was mentioned as a necessary component to addressing the problems of the Delta, but doing so in combination with a Delta plumbing fix to optimize the results. Analysis in the intervening years has confirmed the need for additional water storage in northern California, in or adjacent to the Delta, south of the Delta and on the San Joaquin River. Storage cannot replace a Delta plumbing fix, but it is clearer than before that significant new water development is going to be needed to meet the competing demands for water within California. The 2000 Actions Document lists storage projects to be investigated and seeks to move storage from just being on a list of issues to argue over in the future to a list of definitive actions to be aggressively pursued in the near term. The CalFed solution must provide a clear pathway for new storage development, not just a dead-end listing of potential failed efforts.

"Deal is a Deal" Certainty - What clearly is shaping up as the biggest concern in reaching an acceptable CalFed decision is obtaining certainty as to limiting the potential for additional regulatory actions that would adversely impact water users. Water users cannot deal from a foundation of insecurity. As has been noted earlier, creativity is stifled when water users are constantly worried about the next regulatory action. Frankly, CalFed cannot build projects fast enough to keep up with the current pace at which water is being reallocated away from existing beneficial uses for environmental purposes. This point can not be stated strongly enough. CalFed will quickly fail unless some certainty of future water supplies can be re-established.

There are other important points contained in the two attached documents, including the concepts of affordability/beneficiary pays, the role of conservation and water transfers, and land retirement that are threshold standards which a proposed CalFed solution will be measured by the water community. I would hope that the Subcommittee will adopt all of these standards in their measurement of what a successful CalFed solution would entail.

CalFed Ecosystem Investments

Let me take a few moments to address the amount of investment in and commitment to the ecosystem that has been made by CalFed since its inception as an entity.

With the passage of the Central Valley Project Improvement Act (hereinafter referred to as "CVPIA") in 1992, a new chapter was opened in the manner in which the Central Valley Project is operated. Not only were ecosystem improvement objectives set on a par with or superior to the traditional objectives of the project, a new program for investing in ecosystem improvement came into being.

The creation of CalFed, the passage of State Proposition 204, the passage of the federal authorization for CalFed funding and subsequent appropriations actions by Congress have all contributed to an enormous revenue stream for investment in ecosystem improvements. When combined with CVPIA funds, these programs have been investing over \$100 million a year in ecosystem improvements.

There is a continued belief that there is a direct relationship between improving fishery populations and improving the performance and reliability of the water management infrastructure. While the biologists counsel "patience", there is increasing concern that the relationship between investment in ecosystem improvement and fishery populations is difficult to discern. While we can have a high level of confidence that some site-specific investments (the screening of a previously unscreened diversion for instance) will produce fishery benefits, it is unclear that system-wide benefits are accruing at a rate commensurate with the high rate of investment.

This apparent "disconnect" may be temporary and response may soon be visible, however, it has significantly shifted our focus to the plain fact that scientific uncertainty is the dominant feature of the ecosystem improvement landscape.

Clearly CalFed regulatory agencies routinely take action without the benefit of a complete scientific understanding that benefits will actually accrue (to say nothing of the fact that they routinely ignore the socio-economic consequences of their actions). Three compelling examples illustrate this: the "smelt crisis" of last spring, the "spring run salmon/water quality crisis" of last December, and the scientifically faulty decision of the U.S. Fish and Wildlife Service to list Sacramento split tail as threatened. Each one of these actions has caused great disruptions to California's water management system with little or no demonstrable benefits for the species.

On the other hand, science indicates action needs to be taken in a number of areas, but progress is slow, disjointed or ineffective. Three examples in this area are: the installation of the barrier at the Head of Old River, exotic species, and major unscreened power plant diversions in the western Delta.

It is against this backdrop that these comments on the CalFed ecosystem investment program are made:

1. While the water users have aggressively supported appropriations for the CalFed program, we have been largely disappointed that a balanced program of action has not emerged. Little action has been taken by CalFed to improve the performance of the water system in terms of water supply and quality. In fact, one million acres of CVP served lands has a 40 percent reduction in supply this year and the projects' largest municipal contractor has a 25 percent cutback. This is occurring while all reservoirs are starting the season full and California has been blessed with the wettest six years in a row since record keeping began.

2. The process by which CalFed makes investment decisions has been continually improving and is certainly superior to the process employed by the Department of Interior for CVPIA expenditure decisions. Currently the rate of actual expenditures lags far behind appropriations and should be of concern to Congress and the program managers. For the water community, the slow rate of expenditure translates into a delay in fishery benefits, which equals continued diminished reliability in the water system.

CalFed needs to do a better job of prioritizing expenditure decisions where the greatest benefit can be derived. For instance, while purchasing farmland and easements in the Sacramento Valley for conversion to wildlife habitat may meet the objectives of some program elements, it has little measurable benefit for the

Endangered Species Act listed fisheries of concern.

3. The benefits of ecosystem investment need to be better tracked and displayed. Much is made of adaptive management and learning from experience. There is, however, little information available from project monitoring that will inform subsequent investment decisions. The projects funded by CalFed must do a better job of stating up front what the species population benefits will be and subsequently showing the results of the action. If you cannot see the species population benefits, you must question the efficacy of the investment decision.

4. The scientific understanding must be improved. Gone are the days when the simplistic notions of "more flow equals more fish" or "the export pumps are the problem" should rule the management of the system or ecosystem investment.

After 20 years of spending \$15 million per year on the Interagency Ecological Program that focuses on improving our scientific understanding of the Delta, it appears little more is truly understood. Yet, if the Delta is a problem for our fisheries, then why is it that so little of the CalFed and CVPIA financial resources have been dedicated to addressing the issues there? We need to place the burden for improving Delta conditions on the scientific community and demand results.

There is no disputing the reality that true socio-economic damage results from restricting project operations. This fact must be balanced with the fact that scientific uncertainty limits our ability to help the fisheries. If CalFed is to be balanced, priorities must be equal. Expenditures must be made in a manner that results in balanced benefits for the human and fishery systems.

5. Currently there is inadequate coordination between the management of the CalFed and CVPIA programs. In fact, duplication and competition are obvious in a number of areas. This is needless and wasteful. It is one ecosystem and the approach to addressing its needs must be singular. Just because there are multiple agencies and multiple authorities, it does not follow that there should be multiple programs to address the same needs or issues. California does not need two (or more) fish screening programs, ecosystem improvement plans, water acquisition programs, land acquisition programs, species recovery plans, fish passage programs or duplicate management "super structures" to oversee the Delta ecosystem improvements. I appreciate recent CalFed efforts to address this issue, but more needs to be done and implemented quicker. Congress needs to require a consolidation of duplicate and similar programs and the elimination of parallel management structures.

CalFed Reauthorization

There is much debate as to whether and/or how the current federal authorization should be extended. While common sense (with an eye to the congressional calendar) tells us that the best chance for success would be for a consensus to emerge from California and that a simple "no change" extension of the authority for one year be provided.

However, nothing related to California water is that simple. Many people believe that a requirement that a balanced approach to expenditures, with benefits going to both the human and fishery sectors of the ecosystem, must be established statutorily because of the failure of the CalFed agencies to embrace this goal to date. At the same time, everyone is looking to the federal/state negotiations on the CalFed Record of Decision for a guarantee that CalFed will proceed in a balanced manner.

My view is that the fate of the CalFed reauthorization will be determined directly by the results of the CalFed negotiations currently going on behind closed doors. If a bold, creative and achievable agreement is reached which has clear benefits for all interests and brings containment to the regulatory excesses the water users are now suffering under, then a simple extension of the existing authority may be prudent. Prudent, in that successful negotiations will require that a major piece of authorizing legislation be drafted and introduced in the next Congress. Our collective time and energy would best be invested in that effort.

If, however, the negotiations result in a "lowest common denominator" Record of Decision, which strives to offend no one, puts off critical decisions and fails to radically change the unbalanced "ecosystem only" approach of CalFed to date, then the authority should not be extended and little or no money should be appropriated for the CalFed ecosystem program in Fiscal Year 2001.

CalFed and the San Joaquin River

As I noted earlier, the Friant Water Users Authority in cooperation with a number of environmental groups, including the Natural Resources Defense Council and the Pacific Coast Federation of Fisherman's Associations, is deeply involved in developing alternative means of restoring the environmental values of the upper mainstem of the San Joaquin River in ways that do not adversely impact the water supply or cost of water to Friant water users.

Again, as noted earlier, CalFed has played a significant role in recognizing the potential of this effort by funding a pilot project in the summer of 1999 that led to a stay in the longstanding litigation. This was very much appreciated by all of the parties to the litigation.

It is anticipated that this fledgling effort will grow into being a major program of CalFed, or at least involve most of the CalFed agencies. It will need significant new investment by the state and federal government in the next few years to support the studies that are currently in the process of going out for contractor proposal and in the development of pilot projects that test our theories of what river restoration may require and how to make water available for restoration purposes. Beyond these early years, implementation of a program of river restoration and water development/acquisition will be very expensive and will need the active support of CalFed and/or many of the CalFed agencies. The integration of this potential program of San Joaquin River restoration with CalFed solutions for such things as increased south Delta inflow and improved water quality for Delta export interests raises some very interesting possibilities. The Friant Water Users Authority hopes to see the ongoing support for San Joaquin River restoration and the potential integration of this effort into the CalFed solution provided for in the CalFed Record of Decision.

Closing

In closing, let me extend my appreciation for the invitation to appear before the Subcommittee today. We are all waiting for the display of decisions being cast as part of the ongoing federal and state negotiations and hope that they provide a balanced array of programs and projects that return some stability to the water user community while laying out scientifically based actions to be taken in improving the ecosystem. Thank you.

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