

California Sportfishing  
Protection Alliance



Friends of the  
Santa Clara River

**Southern California  
Watershed Alliance**



January 14, 2008

Ms. Delores Brown, Chief  
Office of Environmental Compliance  
California Department of Water Resources  
3251 S Street  
Sacramento, CA 95816

Via email: [delores@water.ca.gov](mailto:delores@water.ca.gov)

**RE: Comments on the Draft Environmental Impact Report for the Monterey Amendments to the State Water Project (including Kern Water Bank Transfer) and Associated Actions as Part of a Settlement Agreement - SCH#: 2003011118**

Dear Ms. Brown:

The undersigned organizations submit the following comments on the Draft Environmental Impact Report for the Monterey Plus (DEIR).

The proposed project in the DEIR would represent a major change to the State Water Project contracts which govern the operation of State Water Project (SWP). We urge DWR carefully to consider the implications for California's environment, citizens, and economy before finalizing a decision on the Monterey Amendments. Already, the interim implementation of the Monterey Amendments has contributed to significant environmental

degradation in the Bay Delta Estuary and reduced water reliability for residents in Southern California.

Since the interim implementation of the Monterey Amendments in 1996, the Bay Delta Estuary has fallen into a critical decline with several species, including the delta smelt, at historic low abundance. Increases in SWP pumping have been identified as a primary contributor to this decline. Such impacts were in part the result of the increased winter and the spring export of Article 21 and turnback pool. Provisions of the Monterey Amendments have in part facilitated these increased exports from the Bay Delta Estuary and the resulting environmental degradation.

In addition, elimination of Article 18 (b) (the permanent shortage provision) has perpetuated the reliance on paper water. By eliminating of Article 18(b), DWR would also be giving up a critical safety valve that allows SWP entitlements to be cut back in light of changing climate conditions and/or regulatory constraints imposed to restore the Bay Delta ecosystem. Elimination of the urban preference for SWP water delivery, contained in Article 18(b), has also contributed to reduced water reliability for millions of Californians.

DWR has many alternatives to the proposed Monterey Amendments. For instance, DWR could assist SWP contractors in aggressively implementing the 3.1 million acre feet of urban water conservation and the 1.4 million acre feet of recycled water potential identified in the California Water Plan. Such implementation would increase water reliability of SWP contractors while avoiding the environmental impacts associated with the Monterey Amendments.

We strongly urge DWR to reject the Monterey Amendments as proposed in the DEIR, and to adopt an alternative that can better serve California.

Sincerely,



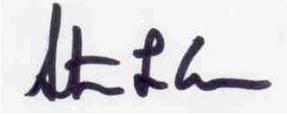
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David Nesmith, Facilitator  
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