

# NID Nevada Irrigation District

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IN REPLYING REFER  
 TO FILE NO.

6-3-C

July 13, 1994

Bay/Delta Section  
 Division of Water Rights  
 Water Resources Control Board  
 State of California  
 P. O. Box 2000  
 Sacramento, CA 95812-2000

Dear Honorable Members of the Water Resources Control Board:

The Nevada Irrigation District would like to comment on key issues Nos. 1, 2 and 3 during the course of this workshop.

Key issues 1 & 2 -

What fish and wildlife standards should the SWRCB evaluate as alternatives in this review?

How should the economic and social effects of alternative standards be determined?

The Nevada Irrigation District is not technically qualified nor is it financially able to perform a study thorough enough to analyze the conditions in the Delta and make a fully informed suggestion.

There have been numerous scientific and cultural studies made on the conditions within the estuary, most being inconclusive or significantly different in results, that they cancel out any real basis for making a determination as to how best to solve the dilemma in the Delta.

The District would hope that a cooperative and coordinated study of the needs of the Delta be reached by all concerned parties. It will certainly require "give and take" from all parties as a necessary means of maintaining the economic health of California.

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Funds available through the Central Valley Project Improvement Act could/should be made available to perform this study, and a course of implementation over a period of several years while monitoring programs analyze the interim actions to meet the interim standards.

3. Should the SWRCB request the CVP and SWP to implement portions of the draft standards prior to adoption of a water rights decision?

We feel that not only should the Central Valley Project and State Water Project implement portions of the draft standard prior to the adoption of a water rights decision, the District's position is that all major water quality objectives should be met by the junior water rights projects to the District's. It is our intent to fully protest and defend our senior pre- and post- water rights.

Decision 1485 requires these projects to implement protective measures for water quality, and there should be no question in the Board's decision to now fully protect the Estuary based on water allocations from the CVP and SWP.

The District will further comment on the economic and social effect of alternative standards once they are determined. At this time, we can only refer to our comments submitted to the Board on February 12, 1993, when protests were made concerning Decision 1630.

Sincerely yours,

NEVADA IRRIGATION DISTRICT

  
By R. Paul Williams, President  
Board of Directors