



## PARADISE IRRIGATION DISTRICT

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September 29, 2008

Mr. Phil Isenburg, Chair  
Delta Vision Blue Ribbon Task Force  
State of California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Subject: Delta Vision Strategic Plan

Dear Mr. Isenburg:

As a part of the Delta watershed, the Paradise Irrigation District (PID) has a vested interest in the solutions to the problems the Delta has experienced. The Strategic Plan contains positive elements necessary to protect the Delta's ecosystem and water supply reliability for citizens statewide. The following comments address serious concerns the PID has with the direction of certain aspects of the Strategic Plan.

Public Trust Doctrine We are opposed to the proposal to use the Public Trust Doctrine to circumvent the current water rights system and Area of Origin Rights. The Central Valley Project and the State Water Project have played a key role in creating the problems in the Delta today. When those two projects were created, they worked to secure adequate water rights under the current water rights system. Any solution to the problems should come from working within this same system.

Districts north of the Delta have invested local money in projects to serve their consumers, including significant efforts to secure and maintain their water rights. Those efforts and funds should not be discarded, through the Public Trust Doctrine, for the benefit of consumers south of the Delta.

The Delta Strategic Plan supports the concept of regional self-sufficiency as the best avenue to achieve sustainability of statewide water demands. With this in mind, the consumers using the State Water Project and the Central Valley Project and the Delta Vision Blue Ribbon Task Force should be charged with creating solutions to obtaining water supplies during plentiful years that will carry them through dry years. They should not simply rely upon water purveyors north of the Delta to supply them with water through the Public Trust Doctrine.

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Governance and Finance The PID opposes any type of governance structure that would be granted authority to affect areas outside the Delta. The support for regional self sufficiency stated in the plan does not align with the establishment of a new authority that could use the Public Trust Doctrine to take water from agencies that have worked for self sufficiency by investing in infrastructure and securing water rights for their consumers. The governance authority should be restricted to consumers and agencies that use the State Water Project and Central Valley Project.

The Paradise Irrigation District opposes any plan designed to fix the Delta Problems at the expense of Northern California residents. We encourage the Task Force to seek solutions in support of regional self sufficiency while working within the existing water rights system that we have been governed by for many years.

Please feel free to contact George Barber, Paradise Irrigation District Manager, to answer any questions you may have regarding our comments.

Sincerely,

Paradise Irrigation District



Kenneth G. Hunt, President of the Board

cc: Rick Keene, Assembly District 3  
Sam Aanestad, Senator District 4  
Wally Herger, US Representative District 2  
Barbara Boxer, US Senator  
Dianne Feinstein, US Senator