

SOUTH DELTA WATER AGENCY

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APR 15 1998

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April 11, 1998

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

Dear Rick:

We are writing to supplement our previous comments on the CALFED DEIS.

1) On 7.1-11 it is stated that the "Ecosystem Restoration Program actions would reestablish natural short-term flow events". It does not say from what current beneficial uses this increased water demand would be taken in this overcommitted San Joaquin watershed. It also does not say to what degree it may be feasible to accomplish this, and what degree of ecological benefit is anticipated.

2) Table 5.2 lists most of the proposed conversions of farm land to ecosystem storage and conveyance benefits. There is no analysis of the consequent reduction in food production, or the water needed to replace that food production elsewhere, or the effect on levee maintenance assessments, etc. There is also no analysis of the increase in water consumption by the new wetlands as compared to existing agriculture on those lands, or from what other use this increased water demand would be taken) Throughout the DEIS there appears to be a tendency to assess feasibility and impacts based on present populations of humans and exotic species. The analyses should clearly address the conflicts that will result when these populations reach the level that can be expected at the end of the 30 year planning period.

Sincerely,



Alex Hildebrand

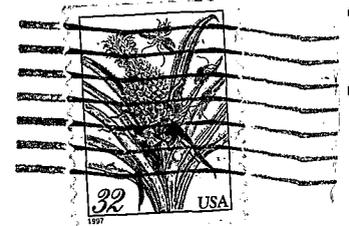
cc John Herrick
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WATER RESOURCES
SACRAMENTO

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Comment

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