

**CALFED BAY-DELTA PROGRAM  
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT/  
ENVIRONMENTAL IMPACT REPORT**

Good evening. I'm Patrick Minturn, Shasta County Water Agency.

The document explains the benefits to the rest of the state that would result from the common elements and each of the three conveyance alternatives. However, it is vague in quantifying the impacts upon Shasta County, and in quantifying how some of these impacts will benefit others downstream.

Water supply benefits south of the Delta have been quantified. Water supply impacts north of the Delta have not been quantified, beyond saying that they will be adverse unless additional storage is provided. These impacts should be quantified and mitigated with additional storage, or by giving preference to the Areas of Origin.

The proposed Water Quality program would impose significant burdens upon northstate residents. The program would impose numerical limits on stormwater runoff, force expanded erosion control measures, and generally tighten up on the enforcement of all potential sources of contaminants in the watershed. But the document fails to quantify the downstream benefits that would be derived from many of these measures. Also, the downstream beneficiaries would not pay for whatever unquantified benefits they might receive; we would.

There is no question that there are water quality problems in the Delta from Bromides and Organics. The Bromides come from seawater and Organics come from within the Delta. Water quality coming down the Sacramento River is excellent. And yet the CALFED program would impose substantial water quality restrictions upstream of the Delta. This is like trying to improve the quality of sewage effluent by improving the quality of the water supply.

Costs of the Water Quality Program in the upstream areas have not been quantified, but they would be substantial. Sedimentation basins and other facilities to treat runoff from each parking lot would add up. There is the cost, but there are also the impacts to land use, and the potential for adverse impacts from the facilities themselves. Pools of water detained in urban areas pose threats to safety and to public health. The facilities would make ideal mosquito habitat, which the program proposes to mitigate with pesticides. But part of the same program is to restrict pesticide use!

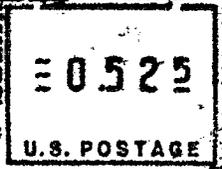
The non-point source element of this program needs to be justified, defined and analyzed before it is carried forward. If the benefits of the program are found to be trivial, it should be discontinued. If the program proves its worth, then its adverse impacts in the northstate should be mitigated, and it should be financed on a "beneficiaries pay" basis, along with the rest of the CALFED program.

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