

FRIENDS OF FOLSOM PARKWAYS

100 Baldwin Lake Circle
Folsom, Ca 95630
Sara Myers, President

JUN 26 1998

01155

(916) 988-8298

Fax (916) 988-8479

CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, Ca 95814
Attn: Mr. Rick Breitenbach

June 24, 1998

Re: Draft Programmatic EIS/EIR

Dear Sir:

This document places a heavy emphasis on water transfers; however, the water transfer solution doesn't address how California will meet its future water needs and lacks specificity about the range of water needed. The population of California is growing. Your analysis is deficient unless you identify where the water is coming from and what the impact will be on the area where it is obtained. The EIS/EIR doesn't show how many acre-feet of water will be needed to implement your solutions. Again, your analysis is unclear and ambiguous.

CALFED has an unrealistic role for the water transfer. With fifty million people added to California you need more water storage projects. The EIS/EIR downplays this aspect. We believe your scenario will trigger a bidding war because there isn't enough water to go around. The issue of area of origin will come into play and the courts will be called upon to referee. The two big water projects, being junior water right holders, will probably lose if tributary streams have to give up water to meet Delta water quality standards. However, if we didn't have the two big projects (CVP and SWP) exporting water south and pumping in the Delta we wouldn't have the problem of Delta water quality. To demand that tributary streams contribute to make the Delta whole is false logic if the impact of water exports is not recognized.

The ecosystem restoration plan is unrealistic and irresponsible. You are proposing to take ephemeral streams and turn them into full-time streams in this scenario to make more habitat. However, this is another plan based on voluntary water transfers. Where is the water coming from? Again, no answers are given, and another serious deficiency in your document. Assume Calfed creates a salmon fishery where one doesn't exist. Once created, the salmon fishery must be kept alive. What happens when the money runs out? How will the water be purchased? If Calfed takes the water from a local district in some sort of condemnation process, this will probably lead to more litigation. And the slice of the water pie gets smaller and smaller. The ecosystem restoration plan means more costs and fewer benefits.

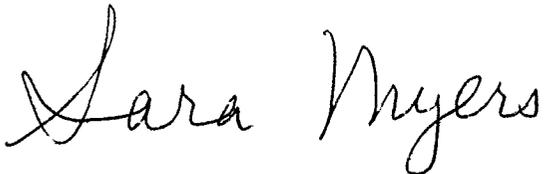
The Calfed reliance on water transfers will affect Folsom. In a critically dry year, Folsom has promised (in the Water Forum) to get off the American River and use another source of supply at a certain point. That is, Folsom will not take its full water right entitlement to allow more streamflow for fish and habitat during the dry spell. That means Folsom has to go elsewhere--either purchase ground water or surface water from another source. However, if

Folsom has to compete for a water transfer in the Calfed scenario, it will mean a bidding water because others will want water during a drought. The Calfed reliance on water transfers will aggravate the situation immensely. More storage must be provided in your solution and less reliance on water transfers.

The land fallowing solution you propose creates an economic disaster in the Sacramento Valley. Small towns will be hit hard; school bonds and municipal bonds for infrastructure would be affected. When people realize what you're proposing, they will be outraged. The third party impacts of land fallowing will be enormous. In Section 8.1 you offer mitigation strategies which are half-baked. Who is going to pay for the cost of continuing the flow of property tax revenues to the local counties? No figures are given on the cost of the mitigation strategies, but I believe the amount would be staggering and politically unacceptable. Are fish more important than people? It appears to be the case in your EIS/EIR.

Conservation is another solution to the problem; however, conservation doesn't produce much water. There is little that agriculture can do to conserve. Fifty percent of a plant is water. Also, the two big water projects don't reward the farmer for conservation. For example, in the Sacramento Valley, when a farmer pipes or lines an irrigation canal to prevent ditch loss, he does not get the benefit of the water saved. The big projects want the benefit for downstream use to fulfill their own obligations. There is no incentive to conserve. Your solution doesn't offer any to the farmer either.

Sincerely,

A handwritten signature in cursive script that reads "Sara Myers". The signature is written in black ink and is positioned above the typed name and title.

Sara Myers, President
Friends of Folsom Parkways



Ms Sara Myers
100 Baldwin Lake Cir
Folsom CA 95630-1514



CalFed Bay-Delta Program
1416 Ninth Street, Suite 155
Sacramento,

att: Rick Breitenbach

Ca 95814

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