



CALFED  
BAY-DELTA  
PROGRAM

# Public Comment

01172  
JUN 26 1998

Date 6/23/98

The CALFED Bay-Delta Program welcomes your participation. Please use the space below for your written comments (attach additional sheets if necessary).

Comments:

Please see attached

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Name: Russell van Loben Sels  
 Organization: Amistad Ranches  
Esperanza Enterprises  
 Address: Reclamation District 744  
P.O. Box C  
Courtland, CA. 95615  
 Phone: (916) 775-1941 Fax: same

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PROGRAM  
1416 Ninth St., #1155  
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(916) 657-2666  
(800) 700-5752  
<http://calfed.ca.gov>

*Russell van Loben Sels*

The Cal Fed program is not consistent with 4 of the 6 solution principles.

### **1. Reduce Conflicts in the System**

One of the major conflicts is left unresolved....there is not enough developed water for the beneficial use of all water users. The "water wars" will continue if more water is not stored in the north and delivered to the south and the common program elements Water Use Efficiency and Water Transfers will be the weapons used in this conflict to redistribute water. New on stream storage is absolutely essential to provide:

- a. flood control for the north
- b. new water for the south
- c. environmentally sensitive and flexible stream flows

### **2. Be Equitable**

Because the Cal Fed program relies heavily on redistribution of water in order to meet the present and future needs of the state, as water is redistributed from agricultural uses to urban uses, economic activity will be curtailed in the rural communities whose economies are based on agricultural production. In addition, in the Delta up to 50% of the agricultural economy will be eliminated by conversion of farm land to habitat, levees, conveyance facilities and storage options. These negative impacts are not equitable.

### **4. Be Durable**

Unless the water supply is sufficient to adequately provide for all beneficial uses, the program will eventually fail. The program in its present state relies too heavily on water created by the Water Use Efficiency and Water Transfer elements. The future water needs of the state need to be provided for by creating "new water" in order for Cal Fed to be durable.

## 5. Be Implementable

The Draft EIS does not address negative impacts with meaningful mitigation. Menus of conceptual mitigation strategies do not provide for realistic assessment and or mitigation of adverse impacts. The document should address specific negative impacts with specific mitigating actions and in the case where no meaningful mitigation will result in reduction of negative impacts such as the cumulative socio-economic impacts of land conversion in the Delta, the program should be changed so that the adverse impacts are eliminated or greatly reduced. Conceptual mitigation is not meaningful and a concept is not implementable.

## 6. Have No Significant Redirected Impacts

The program as described in the draft documents does not meet this requirement for the following reasons:

a. In the Delta, there will be between 135,000 and 199,500 acres converted from agricultural uses to other uses. This will have significant negative redirected impacts on all of the citizens, businesses, and communities of the Delta. This magnitude of conversion will have devastating socio-economic impacts.

b. Rather than plan for increased water demand of the future by developing sufficient water supplies, the plan relies heavily on water transfer and conservation. The resultant shortages will perpetuate conflicts between water users and result in shifts of water from agricultural production to urban uses, resulting in significant negative redirected impacts in those communities where land retirement occurs and economic activity is curtailed.

c. It has been estimated that between 250,000 and 914,000 acres of prime agricultural land may be converted to other uses. This will have severe negative redirected impacts in the rural communities and counties which rely on agricultural production to generate economic activity.

Cal Fed needs to acknowledge that the program does not meet its solution principles and make changes such as:

- a. Provide enough on stream and off stream storage of water to create sufficient water supplies to meet the future environmental, agricultural and urban water needs of the entire state.
- b. Remove from the program conversion of agricultural land for habitat and other environmental purposes.
- c. Agree to subject the program to local land use planning ordinances and restrictions where the program will result in changes in land uses.

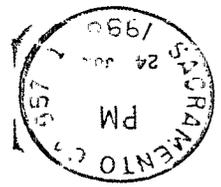
Cal Fed will only succeed if it is fair to all. In its present form it is very unfair to the agricultural community generally and to the Delta specifically. The program as proposed is not consistent with the solution principles, especially number 6, and will result in significant negative redirected impacts to all areas where agricultural land is retired and/or converted to other uses.

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CAL FED Bay Delta  
1416 North St., # 1155  
Sacramento, CA. 95814

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AMISTAD-RANCHES  
P.O. Box C  
Courtland, CA 95615



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