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CALAVERAS-TUOLUMNE CATTLEMEN'S ASSOCIATION
Nancy Whittle, President
P.O. Box 38
Altaville, CA 95221-0038

June 23, 1998

CalFed Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Comments on draft programmatic EIS/EIR

The members of our organization have a number of concerns with the CalFed proposals.

There is a great deal of apprehension and uncertainty concerning the Ecosystem Restoration and Watershed Management components and their effect on land use and management in the upper watersheds. The ERRP could become the most intrusive restoration program in the world. One of the stated CalFed objectives is to "improve riparian habitat". We have concerns as to where and how much "improvement" is actually needed and what the proposed solutions are. As livestock producers we are concerned about potential impacts to grazing. CalFed must defer to existing non-point source pollution control programs already in place. The State Water Resources Control Board has adopted the non-point three-tier approach for protection of water quality, and has entered into MAA's with BLM and the Forest Service to address non-point source issues in the upper watersheds. CalFed must recognize and encourage these efforts and not overlay another whole program over an existing one.

There is no firm commitment in the plan that as an area of origin we will be able to retain our water rights. These rights must be upheld regardless of how much water we are using at the present time. The rural mountain counties need assistance from CalFed to build additional impoundment facilities and a binding assurance that all the water we have a right to as counties of origin will be held in reserve and be available for our use in meeting the demands of our rapidly growing population. Protection of the area of origin and our water rights must be upheld by any CalFed proposal. The CalFed proposals are lacking this commitment.

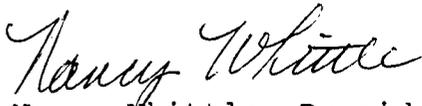
To make the system work, CalFed needs to assure us that there will be a reliable long-term water supply that treats the needs of all users fairly. To accomplish this, CalFed needs to make a firm commitment to expanded storage facilities and they haven't done

that. Conservation alone won't provide enough water to meet the needs of the environment, agricultural needs, and the needs of our increasing population. The most important form of conservation is to be able to save excess water in wet years by collecting it in reservoirs to be used in drought years.

The CalFed proposals rely too heavily on farmland conversion and retirement to accomplish their goals. Depending on the proposal, anywhere from 250,000 to 1,000,000 acres could be lost from agricultural production. No one benefits from this solution.

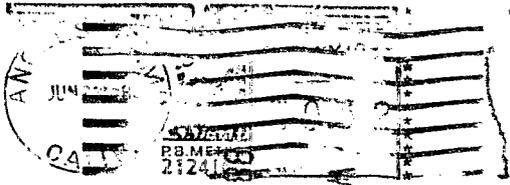
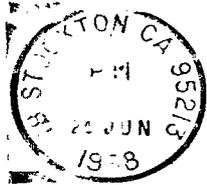
The CalFed plan must make a firm commitment to expanded water storage or the plan will fail. Without this commitment, and due to the other concerns mentioned our Association cannot support the Plan.

Sincerely,



Nancy Whittle, President
Calaveras-Tuolumne Cattlemen's Association

C-TCA
Box 38
Ottaville, CA
95231



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WATER RESOURCES
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Cal Fed Bay Delta Program
1416 Ninth Street Ho 1155



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