

JUN 18 1998

June 16, 1998
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530/926-4624

01235

CALFED Bay-Delta Program Comment-Draft EIS/EIR
1416 Ninth St., Suite 1155
Sacramento, CA 95814
Attention: Rick Breitenbach

Dear Sirs:

The EIS/EIR development process is a good effort and is the right process to address the water issue in California; however, the draft documents are legally insufficient and inadequate in addressing significant parts of this issue:

1. Section 9, "Cumulative Impacts", and Section 10, "Other CEQA/NEPA Topics" do not adequately analyse cumulative impacts to date or the impacts of sending more water south. With more water supply, population increases will likely occur to use up that supply. There will be additional adverse impact to the Delta especially during low flow periods and during drought periods. Ultimately population pressure will always severely pressure water supply and the ecological health of the Delta to the point where there will be no solutions. This CALFED effort seems aimed at finding only short-term solutions and ignores the increasing problem long-term of growth inducing impacts and the irreversible and irretrievable commitment of resources. It appears that all three alternatives proposed increase the significant adverse impacts that are already occurring.

2. More detail on feasibility and requirements for implementation needs to be addressed in Phase II rather than in Phase III regarding the following elements in order to choose an alternative:

A. Water rights: What basic water rights will the state/counties/individuals have in the future?

B. Storage: What specific amount of storage, including off-channel and groundwater, is actually available and at what cost?

C. Assurances: More detail is needed. A draft outline of necessary assurances is needed.

D. Probability of successful mitigations: What is the probability of success of each mitigation or group of mitigations on the adverse impact being mitigated?

E. User funding/public funding: A better idea of public costs and user fee levels is necessary.

F. Endangered Species recovery: What are the probabilities for recovery of each species?

G. Water efficiencies: What numerical objectives will be set? What specific process will be used to assure these objectives?

H. Adequate model validation and confidence: How do the

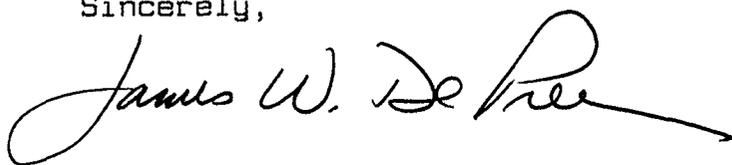
citizens of California know that each of the alternatives will accomplish their projected objectives?

I. Range of Alternatives: Is there another alternative that will recover and maintain species dependent on the Delta ecosystem, remove all other adverse impact, and still export water south of the watershed?

3. Impact analysis needs additional detail to give more confidence that the results of actions under each of the alternatives will be attained.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "James W. De Pree". The signature is written in black ink and is positioned above the typed name.

James W. De Pree

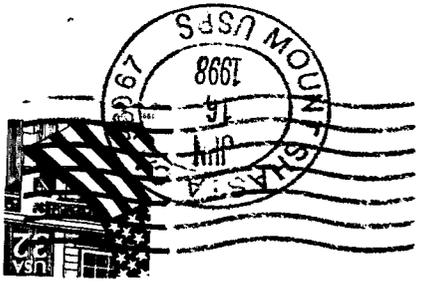
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