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June 25, 1998

JUN 29 1998

Mr. Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA

RE: COMMENTS ON DRAFT PROGRAMMATIC EIS/EIR

Dear Mr. Snow:

GENERAL COMMENT AND REQUEST

The major comment and concern relates to the apparent assumption that the area identified by Cal-Fed as the Sacramento River Region is to be used as an underground storage facility, and that the area will be over-pumped with an excess amount of water transferred to other regions within California.

Moreover, in discussions with local residents, there is a strong concern (and ever fear) that there has been inadequate attention by Cal-Fed to the protection of groundwater within the Sacramento River Region and inadequate attention to the need to mitigate the adverse impacts resulting from the groundwater depletion which is expected to occur within the Sacramento River Region.

This is a concern shared by both agricultural and domestic users who are totally dependent upon pumps. For example, in Butte County alone there are an estimated 1,400 households who are dependent upon pumps for domestic use. And, many of these users well remember the drought years when it was difficult to obtain an adequate supply of water.

In addition, it is noted that many of the grants associated with the Cal-Fed process are for general environmental protection and advocacy, but do not address the legal and institutional changes which will apparently be necessary to protect groundwater within the Sacramento River Region.

Therefore, it is hoped that the Final EIS/EIR will more fully respond to groundwater issues within the Sacramento River Region, and more specifically: 1) the extent of those mitigation measures which would be necessary for full mitigation; and, 2) an identification of the legal and institutional changes which are either recommended or assumed to be made.

SPECIFIC COMMENTS AND QUESTIONS

1. What are the current names, titles, and addresses of the individuals who will select and sign-off on the preferred alternative.?

2. Will the preferred alternative be selected by vote, and if so the results of the vote be available to the public?
2. What are the current names, titles, and addresses of the individuals who serve on the "Bay-Delta Advisory Council" which is a "...34-member federally chartered citizens' advisory committee...". (Phase II Interim Report, March, 1998, page 8)
3. The Executive Summary, page 5, identifies six "Solution Principles". Two of the principles are "Reduce Conflicts in the System" and "Have No Significant Redirected Impacts". It appears that each of the three major alternatives which were evaluated significantly rely upon groundwater pumping in the Sacramento Valley Region and subsequently expanded water transfer programs. Where can the evaluation be found which considers additional groundwater pumping and expanded water transfer programs in relation to each of the "Solution Principles"? Moreover, where can the evaluation be found which evaluates the "Solution Principles" against other alternatives, such as expanded storage facilities?
4. Which of the three alternatives is likely to result in the least potential damage due to the depletion of groundwater in Butte and Glenn Counties?
5. Did the financial costs associated with the three alternatives consider any compensation to agricultural and domestic well owners due to the need to sink wells deeper and also consume additional energy to recover an equivalent amount of water?
6. Did the environmental analysis consider the adverse impacts due to additional energy needed to sink deeper wells and pump from a deeper depth? If so, where is this evaluated in the programmatic EIS/EIR?
7. What institutional framework is proposed by Cal-Fed to "Reduce Conflicts in the System" (the first "Solution Principle") between agricultural users who are dependent upon groundwater and agricultural (or urban) users who are able to utilize surface water and who wish to pump water during dry years so that the water can be transferred and sold?
8. The Phase II, Interim Report, page 15, identifies several "Fundamental Program Concepts" including that of "assurances". It is stated that "The preferred program alternative will need to include a set of actions and mechanisms to assure that the Program will be implemented and operated as agreed." Given this statement by Cal-Fed, it is hoped that the Final EIS/EIR will provide a set of "assurances" so that northern California who are dependent upon groundwater for agricultural and urban uses will have a reasonable expectation that groundwater will be protected.
9. It appears that Cal-Fed made assumptions about environmental and urban-related needs, but it is not clear what assumptions were made to meet California's food needs

(as distinct from projected agricultural production) around the year 2015. Is this true?

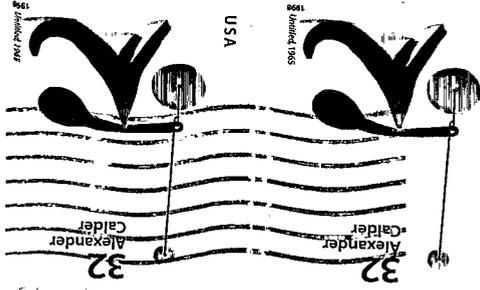
Thank you for the opportunity to comment. I look forward to receiving the Cal-Feds response to the many comments which will be provided.

Cordially,



Greg Steel
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Chico, CA 95928
Phone/Fax (530) 3452-3191

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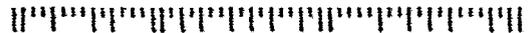
MR CENTER SMOY EX. DIRECTOR

CALIFED BAY-DELTA PROGRAM

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