CalFed Draft Programmatic EIS/EIR
General Comments

Family Water Alliance (FWA) would like to submit the following general comments on the Programmatic EIS/EIR.

Introduction:

The goal of CalFed, to solve the water supply and water quality problems facing the Bay-Delta is indeed a noble goal. The professed solution principles, affordable, implementable and **equitable** solutions, with no significant redirected impacts would lead the lay person to believe that the interest of all Californians will be protected though this process. Further reading, however, reveals that northern California interests, in particular rural and agricultural interest are not being protected. In fact CalFed has succumbed to the myth that reduction of agricultural use is the fastest, easiest, and therefore the best method of freeing up water supplies in California. The redirected impacts of this plan onto the backs of agricultural areas promise to devastate the economies of small rural communities that provide this state with the (billions?) of dollars in revenues from the production of food. The current direction of CalFed violates the very principle that CalFed have charged themselves with, that of finding equitable solutions that create no redirected impacts. These principles must be at the foundation of any proposed CalFed solution.

In general, Family Water Alliance finds that the CalFed solution imitates previous top-down approaches. While CalFed maintains that it is locally driven, the CalFed EIS/EIR documents do not reflect that philosophy. Statements such as, "legislative and regulatory mechanisms will be triggered," and a call for investigation of existing water rights by the State Water Resources Control Board for waste and unreasonable use violations, clearly define the intent of this agency driven process.

At the very least, CalFed needs to clearly define terms, and not allow for the subjective interpretation of different interests to convolute the process in long-term litigation proceedings costing the taxpayers both in diverted revenues, and the loss of valuable time.

Ecosystem Restoration:

The ecosystem restoration plan is a far reaching, and often haphazard approach to restoration. The plan covers approximately two thirds of the state, and recommends actions such as in-stream temperature limits and flows, increased wetlands restoration, and creating salmon runs in streams that have traditionally never been salmon bearing streams.

The plan also suggests that the Sacramento River be allowed to meander, levies be used as habitat, and agricultural ground be fallowed to accommodate the new habitat plans. Both rural and urban areas in the Sacramento Valley have recently felt the sting of seasonal floods. These impacts are felt just as deeply in rural areas, as they are in urban areas. Each farmer that had to face the clean up of large debris from field after field, or attempt to counter the effects of erosion caused by swift moving flood water can attest to the viability of plan that allows the Sacramento River to meander, and levies that have weakened by the hands-off habitat preservation approach to levee maintenance.

Water Efficiency:

The Water Efficiency component cites the California Constitution, reinforcing the concept that anything other than *reasonable use* of water is strictly prohibited by California law. It does not, however, define reasonable use. This term is subjective in nature. The reasonable use of water in northern California could be, and often is considered to be unreasonable by citizens in urban areas of the state.

The plan calls for current agricultural efficiency levels to be increased to 85% by the year 2020. An increase of 12%. What the plan ignores is that farmers already realize that water conservation is in their best interest--lower water bills equal a higher bottom line. Armed with this knowledge, farmers have actively sought to improve yields while lowering their consumption of water. Recent years have shown improved irrigation technics, yet it is equally as important to maintain viable soil. A certain amount of water flow over the land is required to reduce salt and other undesirable minerals from building up, rendering the land useless.

While the Water Efficiency component focuses on the economic value of water transferred to other uses within the state, it completely ignores the economic value of the cheap, reliable, and safe food source that is provided by Sacramento Valley farmers. With thousands of acres of agricultural ground currently targeted for fallowing it is difficult to foretell the total impact of higher food prices on every Californian's pocketbook.

Water Transfers, Water Conveyance, and Water Storage:

Family Water Alliance acknowledges that water transfers can create mutually beneficial impacts when implemented on a voluntary basis under controlled circumstances. The CalFed EIS/EIR relies heavily on water transfers to implement its components. In order to facilitate these transfers CalFed promotes the use of conjunctive use plans, and seems to ignore the known environmental damage that is caused by heavy reliance on groundwater. The ecological damage of subsidence, and degraded water quality in aquifers that have been over drafted is one of the few known certainties in groundwater hydrology, yet CalFed continues to hitch their wagon to this component over the protests of northern California citizens. It is imperative that CalFed clearly defined caps on any proposed conjunctive use plan.

Any water conveyance component must be directly connected to construction of additional storage. Although storage is mentioned throughout the documents, it is apparent that the emphasis is on water conveyance rather than additional water storage. Experts have predicted California's population growth over the next thirty years will be equivalent to the population New York State. CalFed has stated that the creation of additional water supplies does not fall within its mission. FWA feels that this stance is short-sighted, and a huge disservice to the citizen's of California both now, and in the future. CalFed currently enjoys the cooperative participation of 15 agencies, and the backing of both state and federal governments. This is the ideal situation to work towards long-term solutions, rather than once again taking out the box of band-aids, and randomly applying first-aid. Long-term solutions will require a re-evaluation of

environmental priorities. We feel confident that with CalFed's cooperative approach to finding solutions to the water inequities in California it is possible to make additional water supplies for California a reality.

Conclusion:

In conclusion Family Water Alliance has grave concerns about CalFed's Draft EIS/EIR. Any final documentation must include clearly defined terms, words such as *reasonable use, cooperative management,* or *species richness* must be clarified in a sufficient manner to ward off future mis-interpretations of intent.

The general assurances must include adherence to private property protections as guaranteed by state and federal constitutions. Water rights and Area of Origin protections must be honored. During the last few years numerous county governments have gone to a great deal of trouble and expense to develop AB 3030 plan, consequently it is essential that CalFed respect local governments and local ordinances.

The stated principles that form the basis of the CalFed program are equitable solutions with **no significant redirected impacts.** The EIS/EIR as written places a significant burden on agriculture and small rural communities dependent on the agricultural economy. These impacts cannot be justified as insignificant by assuming that they will be easily absorbed on a regional basis. Small rural communities all over northern California are struggling to stay economically viable. The cultural practices that have provided the open space in northern California are in jeopardy as added water costs threaten to price ariculture out of existence.