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JUN 29 1998

Rosalie G. Cartwright
3986 Ord Ferry Rd.
Chico, CA 95928
June 26, 1998

CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

Re: Comments on 1998 CALFED Bay-Delta Draft Programmatic EIS/EIR

Ladies and Gentlemen:

As a Butte County almond farmer totally dependent upon wells and groundwater for my farm and home, I am concerned that our water supply and the economy and environment of Northern California will be at risk by conjunctive use and out of basin transfers. This groundwater dependency includes the thousands of farmers in this part of California, probably the majority. Agriculture drives the economy of Butte County and impacts to Agriculture are far-reaching into the economy of the community.

It's impossible to discuss all of my concerns in this EIR because none of the alternatives address them. I am very worried about third party impacts and the fact that CALFED has avoided coming to grips with any assurances for third parties in the Report and also in the work groups. A majority of the participants are very disinterested in any consideration of third parties. Even though this is a programmatic EIR, it translates to specific issues which affect Butte County and many areas of California in the same way.

Water Transfers

All impact risks must be studied in detail before transfers are considered; i.e. subsidence, contamination, reduced water availability for native vegetation and terrestrial habitat, water availability in both deep and shallow wells, and financial impacts to rural communities.

Transfers augment the notion that there is an abundance of water, thereby expanding tree and vine plantings to non-prime areas in the San Joaquin Valley and elsewhere (to get water supply established). They also encourage urban development in water-deficient areas. This establishes "critical need", thereby insuring the supply of water in "lean years". This will escalate risks to the regions rather than stabilize water supplies for reliability. Groundwater users must not subsidize growth in other areas. Water transfers should only be crisis based by some objective standard.

Water transferred will be interpreted that the water is unnecessary and surplus and be lost to the area of origin.

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Subsidence

A very real risk of transfers and over-extraction is subsidence. It is irreversible and costly. Who will pay for the damaged roads, bridges, pipelines, wells, foundations, other structures, and later flooding. We in Butte County and the San Joaquin Valley are at risk. Review the Mendota area problem for an example.

Water Rights

Correlative water rights which entitle each overlying landowner to a fair and just portion of a commonpool must be a part of the water rights included by CALFED. Baselines must be established to protect these rights.

The "no-injury" must be adhered to. Transfers which would injure another legal user are prohibited, but these rules are not always followed as in the instance of the Cherokee Strip farmers and Western Canal in 1994.

If people want to sell their surface water and take it out of the region, they should not be allowed to pump replacement water. Their surface water has been an established part of the groundwater recharge for over 70 years in Butte County. The correction of double dipping should be a part of the CALFED process. Exporting water hurts the area of origin whose water integrity should be protected.

Storage and New Water

A through-Delta facility seems to be the centerpiece of the CALFED Program. However, this is putting the cart before the horse. Storage must come first. There needs to be more water in California. The major way to get it is by building off-stream reservoirs to capture new water. Otherwise all of the Program will be a reshuffling, taking away from one area and giving it to another by transfers which are not new water.

Desalination must be considered as a water source. When costs of third party impacts, economic and social service costs are considered, desalination is an alternative. The technology is here. Costs are realistic. Other nations use it.

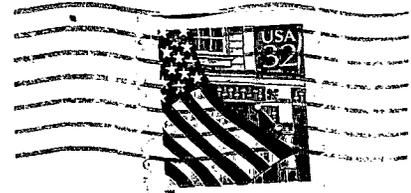
Surface storage is of paramount importance and it is possible in several sites in California. It must be started immediately, because we are already behind. We cannot wait 20 years.

Sincerely,

Rosalie G. Cartwright



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