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# SAN DIEGO AUDUBON SOCIETY

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Executive Director Lester Snow  
CALFED Bay/Delta Program  
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**SUBJECT: COMMENTS ON CALFED DRAFT PROGRAMMATIC EIR/EIS**

The San Diego Chapter of the National Audubon Society is acutely aware that a reliable supply of fresh water is essential for the quality of life and economic vitality of the residents of Southern California. We also appreciate that the subject document does address, to some extent, Bay Delta water quality, habitat issues, and the importance of water conservation for meeting water needs. However, we feel that the document and thereby the program is far too weak on each of the latter issues and puts far too much emphasis and investment into a somewhat dated, short sighted, and very expensive civil-engineering-oriented approach with somewhat vague and uncertain protection for water quality, wetlands, and wildlife.

We appreciated the two local hearings on CALFED in the San Diego area, and the encouragement for participation by the public. We urge that the strong water conservation and habitat conservation message of many of the participants be taken seriously.

## INVESTMENT IN CONSERVATION

We live in a highly developed world in which our personal, commercial, and governmental investments have produced amazing capability to move earth and pour concrete. We also have heavily invested computational and communication capabilities and modern materials. However, our use of water shows relatively little progress for the past 2000 years or so except that we have longer aqueducts and effective pumps to free us from the limitations of gravity flow. Unfortunately, these improvements have been a severe liability for our wildlife.

It really is time for our civilization to use some of our technological skills to seriously seek "order of magnitude" conservation improvements of our most valuable resource, fresh water. Our economy is based on using more and more water for more and more people. This model will not project very far into the future before it crashes. When it does, Southern Californians will bear the brunt of this crash. Spending many billions of dollars to propagate this "greater aqueduct" plan to facilitate short term prosperity instead of investing in viable long term solutions is irresponsible and perilous. CALFED needs to direct substantial technology and engineering investments on conservation, reclamation, and planning so that it will address our real future water needs while



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substantially reducing our tragic impacts on the natural environment on which we ultimately depend.

The range of solutions that must be considered are obvious. Priorities for investment should be based on conservation effectiveness, not short term politics. Some candidate measures are:

- sell water per-unit for exactly what it costs, where it is delivered,
- eliminate subsidies for water operation and infrastructure (true prices will promote conservation),
- provide disincentives or buy-out opportunities for activities that use large amounts of water for little economic value (such as irrigating cotton and alfalfa crops in a desert)
- include the cost of thoroughly minimizing and remediating all environmental impacts of water diversion in the per-unit cost of water,
- require meters for all users,
- invest substantially in a broad technology base for water conservation,
- invest in a technology base for reuse, reclamation, repurification, etc.,
- actively promote a culture of water conservation using media and education (native, low-water use landscaping, prohibitions against hosing off hard surfaces, emphasis on drip irrigation, etc.),
- actively promote agriculture policies that would inherently conserve water,
- promote land use policies that would inherently conserve water,
- promote industrial and commercial policies that would inherently conserve water,
- substantially reduce evaporation and seepage water losses in transportation, active storage, and emergency storage, and
- improve management and protection of local watersheds and ground-water resources to reduce the need for importation (especially in Southern California).

#### HABITAT CONSERVATION

We urge CALFED to offset much of the habitat damage that water extraction and waterway reoperation has already done in the past in the Delta and Bay Area. We also urge that habitat quality and quantity standards be specifically included in CALFED. We can clearly see how many acre feet of water each option will extract, from the presentations, but the wildlife benefits are much fuzzier and more ambiguous. Many of the birds that breed in the Delta migrate to or through our region in the colder months. These are natural resources of international importance. Their protection in CALFED should be clear, irrevocable, and above short term political manipulation.

It is obvious that water taken from the Delta impacts habitat there. Similarly the urban and agricultural runoff caused by cavalier use of that water in our region has a negative impact on our canyons, creeks, and seasonal wetlands. The high volumes of year-round runoff displace our drought tolerant native plant species and result in loss of habitat value for native wildlife and invasions of non-indigenous species. CALFED offers no analysis or remedies for these Southern California impacts.

## WATER SUPPLY FOR WILDLIFE

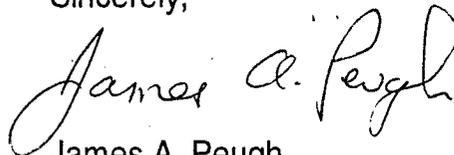
As with HABITAT CONSERVATION above, the water supplies needed for wildlife must be absolutely secured. During dry years there will be tough political conflicts for water for economic use. Our State and Federal agencies and policies have not been impressive in the defense of water essential for Delta wildlife so far. CALFED must provide ground rules that guarantee that wildlife will be protected in the face of political and economic pressure.

## WATER QUALITY

It is inappropriate that agricultural and urban water users are allowed to use publicly provided water, then pollute public water resources with the runoff after they have contaminated it. Such users should lose access to that water or pay enough more for water to completely offset their negative impacts on water and wildlife. This would be a reasonable application of market principles and would be fair to the specific user and to the public. Some uses may prove to be unprofitable under this "true cost" policy and result in failures. But the public should not and can not afford to suffer the impacts of counterproductive water uses.

We also urge that ample water flows be allocated to adequately manage salinity in the Delta, and that those allocations also be secure enough to overcome political and economic pressure in dry years. We urge that policies and enforcement be included in CALFED that will reliably result in substantial water quality improvement.

Sincerely,



James A. Peugh  
Coastal and Wetlands Conservation Chair

cc:

Vice President Albert Gore  
Senator Barbara Boxer  
Senator Dianne Feinstein  
Governor Pete Wilson

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