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June 26, 1998

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

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

Dear Mr. Breitenbach:

Western Canal Water District (WCWD) appreciates the opportunity to provide written comments on the 1998 CALFED Bay-Delta Draft Programmatic EIR/EIS. This massive document was not easy to review and WCWD thanks you for extending the comment period. We can only hope that the final programmatic EIR/EIS is less vague and cumbersome.

While incorporating the six core programs into one preferred alternative seems a noble idea, it appears that the agricultural community and Northern California will shoulder the burden. In turn, urban and environmental interests will reap huge benefits at the expense of agriculture. WCWD feels that these significant redirected impacts are unacceptable without clearly defined and meaningful mitigation measures, which are sadly absent from the document.

WCWD supports the concept and goals of CALFED, specifically the six core programs. However, we feel that new water storage should be a priority inclusion in CALFED's mission statement as well.

Water Storage

WCWD cannot support any final EIR/EIS that does not contain provisions for storage both north and south of the Delta. With projected population increases there will be a critical need for new water supplies. Interim measures such as water transfers and conservation cannot be relied upon to provide reliable permanent supply. CALFED must not just study but actually construct storage facilities. Whether on-stream or off-stream, storage projects provide numerous benefits to California. New water supply, flood protection, recreation and water supply reliability are just a few of the attributes of reservoirs. WCWD has spent about \$15,000 per year repairing flood damage from the Sacramento River in the last four years. Highway 162 near Butte City was closed for 26 days this winter due to flooding. WCWD insists that CALFED include a time line for construction of storage facilities and be placed on a priority basis in the final EIR/EIS.

Water Transfers

WCWD has engaged in water transfers in the past (1991, 1992, 1994 Drought Water Bank) and would participate in future water transfer programs while encouraging new water storage projects. Water transfers may help the state meet demands for the short term, but long term transfers may have serious local impacts such as aquifer overdraft, water quality degradation and harm to the environment. Water transfers will not achieve local public acceptance without a commitment to new storage.

Water Code section 1011 provides for and encourages the creation and transfer of conserved water. WCWD's goal is to operate at the most efficient level possible. The Department of Water Resources should recognize all conserved water (which is owned by WCWD pursuant to WC 1011) as a value to the state and pay WCWD for this water. Without payment or credit, there is little incentive to make capital improvements necessary to expand conservation efforts. CALFED must support the transfer of conserved water in the final EIR/EIS.

Meander Belts

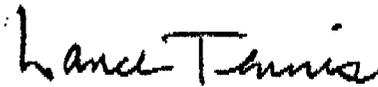
WCWD is strongly opposed to this back to nature concept. Taking several thousand acres of prime agricultural land out of production will put some of our landowners out of business. These meander zones could threaten existing infrastructure within our district. WCWD recently completed the Gary N. Brown Siphon at a cost of approximately \$10,000,000. This project which was a joint funding effort of WCWD, California Urban Water Agencies, U.S. Department of Interior and CALFED Category III Program, helped restore over 25 miles of Butte Creek to unimpeded flow. A meander belt near this area could render the siphon useless. CALFED needs to more carefully consider the negative consequences of the meander zone concept on productive land and/or infrastructures. The significant redirected impacts to WCWD are unacceptable.

Watershed Management

Watershed management strategy should include all landowners and local districts. Without input by those who will be impacted, there can be no consensus on a plan. WCWD supports watershed management strategy that will include all stakeholders. Watershed management strategy should not include accumulation of woody debris in creeks and rivers if it threatens the integrity of bridges, levees and other structures. Several bridges in or near our district were damaged in 1997 and 1998 by woody debris that became dislodged by flood waters.

It is WCWD's sincerest wish that these comments submitted will help the CALFED Bay-Delta program achieve a solid, logical and workable solution to the Bay-Delta without redirecting significant negative impacts to agriculture. WCWD realizes that we must all work together to accomplish the goals at hand. We believe that the only feasible answer to California's long term water problems is building additional storage facilities. If this option is eliminated from the list of solutions, then the result will most certainly be a multiple choice of inadequate answers.

Sincerely,



Lance Tennis, President
Board of Directors, WCWD