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6/26/98

Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Comments to programmatic EIS/EIR

Dear Mr. Snow,

As the chair of the Environmental Committee for the San Francisco Bay Chapter of the Surfrider Foundation, your probably wondering what stake Surfers have in the Bay/Delta. I hope I can clarify this and describe why the CALFED Bay-Delta Program (the Program) has, at this time, failed to adequately address important environmental and economic solutions.

Everything that flows out the Bay/Delta ends up in the Pacific Ocean. In addition, much of the fresh water that is diverted for local or non-local uses will end up polluted and then discharged into the ocean. For some reason there is no mention of any effects of the Program to the Ocean. There are huge amounts of pollution, both visible and not, that flow out the Bay/Delta from the entire Sacramento and San Joaquin river and Bay area regions from many controllable sources. There are also some that think the Oceans can be used to dilute these and other pollution problems. In this International Year of the Oceans, we must not overlook the long term effects of pollution to our ocean environment. Since the Program will have 'some' control over almost all of the water-borne pollution that goes to the Pacific Ocean from California, the Program must asses total mass pollutant loadings to the ocean and the positive effects of conservation and pollution reduction through the elimination of practices that are not mutually beneficial to all stakeholders. This includes visible trash as well. We have collected thousands of plastic buck-shot casings along ocean beach this past year—obviously from Delta duck hunters. How much more trash will we continue to pick up along Ocean Beach that drifted from the delta?

An issue immediately facing surfers at Ocean Beach in San Francisco is the loss of sand from the southern end of the beach. Erosion occurring there is taking away critical endangered species habitat and also threatens a main roadway and the Southwest Oceanside Treatment Plant. There are plans to build a sea wall that will directly effect two world-class surf areas ('Sloat St', & '2nd Parking Lot'). What is the historical sediment loads for the Pacific at the Golden Gate? I

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imagine that during the rainy season large pulses of sediment were seasonally replenishing the beaches with sand. All the small dams in the delta and river systems settle the sediments. How are the current sediment loads different, and what can be done to change the sediment transport through the Bay/Delta to a more natural state?

The potential for water conservation seems to be the greatest oversight of the Program. Water conservation increases water supply reliability, improves water quality for all interests, and increases flows for wildlife. All inefficient uses of water must be identified and discouraged by market fairness. Water subsidies should be phased out and eventually eliminated. CALFED must consider in much more detail how this will be done.

How is it that the Water Quality Technical Group has chemical manufacturers as a major stakeholder? How can a “. . . comprehensive plan to restore ecosystem health and improve water management for beneficial uses. . .” be composed of a non-beneficiary that profits from the production of toxic petrochemicals and synthetic compounds that pollute our people and our environment? Corporations or individuals have no legal or moral right to profit from a business that pollutes our people and our environment. We are just now realizing the true cost of past environmental damage caused by our non-sustainable business practices which puts the profit of companies and shareholders above the needs of the environment. This must end! The chemical manufacturers group should not be included in the Water Quality Technical Group which reviews and comments on all products at the highest level—to the Expert panel. The chemical manufacturers group should only have input as the rest of the public! How come I never heard a word from them during any of the public hearings I attended? Is it because their input and influence is ‘behind-the-scene’? I demand an answer to this issue!

What is the connection between downstream water quality and upstream water use? How do changes of water consumption and water conservation programs effect downstream water quality parameters in terms of mass loadings and pollutant concentrations? What are the total pollutant loadings out of the Golden Gate into the Pacific Ocean from sources indicated in the geographic scope of the Program? What are the additional pollutant loads that will end up in the ocean from water that is exported? No alternatives specifically address issues of new decentralized technologies available for pollution control of both supply and runoff water quality. It has been shown that these decentralized techniques are cheaper and more effective in controlling pollution. How will CALFED ensure that ‘best’ available technology (per CWA) be used for all levels of pollution from the Program?

Money should be used for programs to develop and implement innovative farming practices that are sustainable to the environment and to the farmers. It seems that the small family farms are the ones caught in the middle. They should be encouraged through funding and grants to develop sustainable farming practices and to grow crops that use less water and have higher values. Organic sustainable farming practices should get the most training and funding since they cost the environment the least. Just as non-sustainable toxic farming practices that do not conserve water and use pesticides and chemical fertilizers should pay the most due to their damage to the environment. Even in southern California, water interests should be required to conserve in every possible way. Yes—the consumers will pay at the market place, but in a fair way, unlike now where we all pay for the past mis-use of our resources due to subsidies where only the rich and powerful truly benefit.

In Seattle, the cost to restore the Chinook salmon runs will be in the \$billions, if it's even possible to restore them. CALFED will also be spending huge amounts to restore past damage from subsidized water conveyances and poor water quality decisions. The question is not who will pay for environmental damage, but how and when. The true cost of resources must be identified up front and the costs must be paid up-front by the 'users'. How much is the true cost of water (all current and future environmental costs must be included) if it is taken from its natural course? As resource users continue to pay lower than actual costs, then damage the environment will continue and the costs of those resources will be much greater because we will be paying those costs in the future. We must find a way to stop borrowing from the future and pay the true costs of resources. It will then force changes away from destruction and promote conservation through the market.

Enforcement of existing regulations regarding dry and wet weather runoff from urban, residential, industrial and agricultural areas needs to be expanded to the fullest extent of the Clean Water Act (CWA). All entities that are not in compliance with the CWA should be required to pay the costs associated with their non-compliance and be forced to re-imburse any CALFED projects which 'help' them to comply. How will CALFED ensure this and put 'teeth' in enforcement of CWA and the Coastal Zone Management Act? How will CALFED enforce other environmental laws that are being violated as well?

San Francisco Chapter Surfrider Foundation has been working with other groups to ensure that a Cross-town Transport Tunnel under the City would never be built. We were able to convince the City of San Francisco that ocean disposal is not a good solution to wastewater discharges or any other possible discharges the

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tunnel could be used for. At the time, many Central Valley interests were hopeful that this tunnel could be used for their salt-laden wastewater instead of the 'San Louis Drain'. Of course we had to find out indirectly, the city did not disclose this possible use of the tunnel in the EIS/EIR even though they were aware, and in fact they were working with those Central Valley interests for a plan to discharge their toxic wastewater to the ocean. I worry that exportation of wastewater could be considered as a viable option for any discharges that are currently impacting to the Bay/Delta, especially now that Steve Ritchie is coming to work for the Program. Twice, the San Francisco Board of Supervisors have made resolutions that asked for alternatives to the Crosstown Transport Tunnel since the original draft EIR for the tunnel project was withdrawn (it was really bad). These resolutions asked for a comprehensive investigation and study of alternative wastewater treatment designs including decentralized and cluster treatment systems. In addition, a Technical Review Committee (TRC) composed of the top experts in the field has found that there are many potential and feasible alternative technologies which can be used in a wide variety of ways in San Francisco to solve wastewater problems. Steve Ritchie was the person responsible for carrying out a complete investigation and study of alternative wastewater treatment, but he has not and will not. He is now leaving the City for CALFED. He also once worked at the Water Quality Control Board, which has stated that exportation of wastewater could be considered as a viable option for reducing the impacts of pollution. This is bogus. Large centralized treatment facilities cost more and are less effective than alternative decentralized treatment. When will we get a clue?

The agencies that are suppose to protect California's environment and resources have not been doing their job. If they were, the Bay/Delta would not be in its current situation, nor would the many other polluted streams, rivers, groundwaters, lands, etc... How will this program change the course to a more sustainable one. I wish I could be more optimistic, but money and greed seem to be too great an obstacle overcome, even by a well intentioned program as this is.

Thanks for the time and effort.

Sincerely


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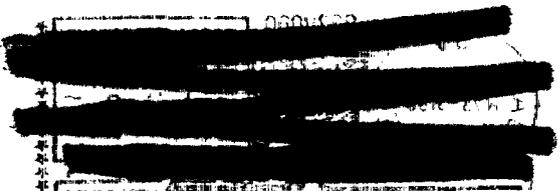
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