

California Native Plant Society

Sacramento Valley Chapter
1940 Markham Way, Sacramento, CA 95818-3019

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June 30, 1998

The CALFED Bay-Delta Program
Attention: Rick Breitenbach
1416 Ninth Street, Suite 1155
Sacramento, CA 95815

Subject: Comments on the CALFED Draft PEIS/PEIR, State Clearinghouse #96032083

Dear Mr. Breitenbach:

The California Native Plant Society (CNPS) is a non-profit organization dedicated to preservation of California's native flora. Among other activities, CNPS is well known for its expertise in rare and endangered plant species and plant communities. The CNPS Sacramento Valley Chapter represents CNPS members in five counties in the Bay-Delta and Sacramento Valley area.

We have serious concerns about the CALFED Draft Programmatic Environmental Impact Statement/Environmental Impact Report (Draft). These concerns have to do not only with project effects on native plant species and the range and treatment of alternatives presented, but also with the adequacy of the information and analysis presented in the document relative to requirements under the National Environmental Policy Act (NEPA) and CEQA.

The Draft is excessively vague. Little concrete or quantitative information is given on any of the proposed alternatives, such as maps of potential dam and reservoir locations, lists of special-status plant species likely to be affected by the various alternatives, or acreages of habitat impacts. The Draft repeatedly emphasizes positive effects of various actions, including mitigation and restoration, but ignores negative effects. We find the Draft, including technical appendices, to be largely useless for purposes of evaluating the relative effects of the proposed alternatives on native plant resources under NEPA and CEQA. The fact that CALFED calls itself a Program must not be used to neglect disclosure of key data and analyses that would allow the legally mandated assessment of impacts, under the cloak of a "Programmatic" EIS/EIR. Nor can the argument be made that there are too many alternatives to analyze, since the various sub-alternatives (1A, B, C, etc.) are merely different mixtures from a rather limited set of possible facilities and projects. For this reason we applaud CALFED's stated intent to issue a revised draft. We request that CALFED provide much more detailed, substantive data, maps, and analyses in the revised Draft, and further request that it be re-issued as a draft EIS/EIR--not as a programmatic document.



Dedicated to the preservation of California native flora



The range of alternatives considered in the document is too limited. The Draft begins with the assumption that more water storage and diversion is needed, and proceeds from this point. The Draft fails to adequately analyze whether the desired benefits can be achieved without additional dams and diversions. Further, NEPA and other environmental laws require first an emphasis on avoidance of impacts, secondarily minimization of impacts, and as a last resort mitigation of impacts. The Draft alternatives largely ignore avoidance and minimization and proceed directly to mitigation. The Draft is unrealistically optimistic that most impacts are mitigable. Certain unmitigable impacts, such as the flooding of unique species populations or large areas of valuable habitat, are inadequately discussed in the Draft.

Markedly absent is an aggressive water conservation alternative (see below). Studies by the Pacific Institute and recently the Natural Resources Defense Council contradict the assumption that we need more water from our already over-allocated rivers and streams. We request that a major new alternative be added to the CALFED analysis that attempts to promote water-related benefits, while maintaining or reducing diversions, through a set of state-of-the-art water conservation initiatives. Water conservation is worth a closer look because it is low cost--low infrastructure cost, low environmental cost, reduced water costs for users--and low impact. CNPS is interested in water conservation because it would minimize the impacts of future human water use on native plants and their habitats.

A vague and lowest common denominator water use efficiency (WUE) program--the same under all alternatives--is proposed in the Draft. Opportunities for substantial water savings in agriculture, by far the largest water use sector in California, are substantially under-realized by the WUE program: only 160 thousand acre-feet per year (Table 2-2). A reduction in total agricultural water use of 10%, roughly 4 million acre-feet annually, through practical, existing methods, appears thoroughly realistic and achievable, even conservative. This would result in net water savings and in freeing up allocated water for transfers and other uses. The proposed WUE program is little discussed under the section on environmental impacts to vegetation and wildlife, and what discussion is present covers only adverse impacts (section 7.2). Ignored are the potentially avoided impacts to vegetation and wildlife that would flow from water conservation and the lack of need for new storage and diversion facilities and their construction. Is this because the magnitude of potential water savings has been so severely understated in the Draft? Is it because reductions in water use are "lost" to "paper" allocations that are not really needed or used? CALFED must more explicitly and thoroughly address the implications and potential for reduction or retirement of such paper allocations. Impacts that could be avoided due to increased water conservation should be addressed in the final document based on more realistic estimates of the amount of water that could be saved, especially in the agricultural sector.

Substantial portions of the WUE Component technical appendix suffer from inaccuracies and confused analysis due to inappropriate treatment of irrigation efficiency. Efficiency is widely conceived of as a ratio of beneficial use, or output, to total application, or input, but the theoretical concept is less easy to put into practice. Irrigation efficiencies even today are traditionally calculated in such a way that they include non-productive evaporation from soil and crop surfaces as part of the output or "beneficial" part of the equation ("crop evapotranspiration", "ETAW"), and the Draft is no exception. The reasons for this are probably historical and pragmatic, since non-transpirational evaporative losses are hard to quantify and were formerly hard to control.

However, use of this traditional but flawed measure in the Draft's analysis obscures the potential to achieve substantial applied water reductions in the agricultural sector. We request that CALFED affirm that it does not consider non-productive evaporation to be a beneficial use of water, and suggest that CALFED drop its use of traditional irrigation efficiency measures that treat non-productive evaporation as a beneficial use (enter the numerator of the ratio). Instead, the Draft should concentrate on amounts of water used and opportunities for reductions in these amounts.

Retirement of lands that contribute disproportionately to selenium contamination of wetlands or that are currently used to produce low-value, water-intensive crops should also be explicitly included in the WUE plan. Examples from Arizona might be informative.

Finally, the discussions of cumulative impacts and growth-inducing impacts in the draft document are completely inadequate. The Draft's assertion that a water supply project in a water-limited region, such as this one, will not result in significant impacts to natural habitats due to facilitation of urban and agricultural expansion, is counter to both reason and experience. We request that these sections be corrected and provided with meaningful analysis and projected impacts.

Due to time constraints and the size of the CALFED Draft Programmatic Environmental Impact Statement/Environmental Impact Report, we regret that we have only reviewed limited portions of the document, and have been forced to focus our comments on negative aspects. It is clear that many of the alternatives would also have some positive effects, which we look forward to having further opportunity to review. We look forward to working with you on a revised draft EIS/EIR document in the future.

Yours truly,



Eva S. Butler
Chapter Vice President

CC: David Chipping, Vice President for Conservation, CNPS



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