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JUN 30 1998

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June 28, 1998

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

Attn. Mr. Rick Breitenbach

Re: Bay-Delta Program Rev. Draft EIS/EIR

Dear Mr. Breitenbach:

**My Comments for entry into the formal record the Rev. Draft Programmatic EIS/EIR and Statement are as follows:**

A. CalFed should put forth and select a new "**Smart Alternative**" based on conservation and restoration to provide reliable, high quality water for California's people and wildlife. The "**Smart Alternative**" should:

- Ensure strong conservation programs and economic incentives to use our water more efficiently;
- Maximize water efficiency before even considering costly new dams and reservoirs or a Peripheral Canal;
- Restore and protect our watersheds and groundwater basins;
- Restore California's fish, birds, wetlands, rivers, delta and bays.

B. The EIS/EIR does not provide an alternative to its costly Delta **flood control** element. A **Delta Levee Alternative** should be established to include complete consideration of at least the following:

- The difficulty, and probably the impossibility, of ever constructing levees that could permanently prevent Delta flooding due to the **continued rapid subsidence** of the Delta Islands and the expected increases in ocean surface elevations;
- The **massive costs** of probably futile attempts at Delta flood control;
- The probable government and citizen water users need to bare most of the expense of flood control, as the total costs will **likely far exceed the value of the privately owned land**;
- The fact that much of the Delta is in foreign ownership, with the greatly enhanced value resulting from publicly funded flood control constituting an **unjust enrichment to non-citizen owners**;

- If adopted, the proposed Peripheral Canal will bypass the Delta, will therefore **reduce the need for Delta levees** to prevent island inundation and the resulting salt water flows into the lower portions of the Delta;
- The fact that **adequate flows** into the Delta, and thence through the Bay to the ocean, all of which are necessary to preserve the ecosystem, will have the additional benefit of providing adequate **salt water control** without additional Delta levee work;

C. The project should consider the environmental and economic impacts of additional water transport, which will be made possible by means of new dams and other **water storage, diversion, and transport facilities:**

- The impact of **growth enhancement in areas receiving the water** is not adequately considered. Usually new water leads to new development of desert and other lands otherwise unsuitable for development. This type of development is often at great environmental expense.
- Every drop of water removed from the Sacramento and San Joaquin Rivers and their tributaries **reduces the historic and natural flows** into and through the Bay-Delta. **Dams do not create new water**, they merely permit removal of water from the natural system. Additional scientific consideration needs to be given to the amount of **Bay-Delta degradation** which will result for each amount of water being considered for extraction and export;
- Consideration should have been given to whether **Water conservation**, if properly practiced on a priority basis, would reduce the need for additional water storage;
- Instead of **subsidizing the cost of water** to urban and farmland users by the public, consideration should be given to requiring the users to pay the true cost of water as a means of water conservation;
- Urban sprawl should not be encouraged. Consideration should be given to the **impacts of urban sprawl** resulting from the ready availability of additional water.
- Although the EIS/EIR is not site specific, consideration should be given to the direct and cumulative impact of the program on the **degraded condition of fish and wildlife in the state as a whole.**
- It appears that the Programmatic EIS/EIR should have given full consideration to the past, present and future direct and cumulative impact of **dams and other water storage facilities** on the states fish and wildlife.

D. CalFed recommendations for **23 New or Enlarged Dams & Canals** will not "restore the Bay-Delta, but will be extremely detrimental:

- Any alternatives that require construction of new or enlarged dams and canals, including the Peripheral Canal and an enlarged Shasta dam, should not be adopted. The past detriments to the state's fisheries, to its wildlife, and to its general environment have been severe. In seeking a method to carry out the preservation of the Bay-Delta, the very actions that have caused the problems should not be repeated. Flow problems in the Bay-Delta cannot be improved by adding more dams and canals.

E. The effect of **catastrophic fires** in the watershed on water supply have not been adequately considered. Scientific studies should be conducted to determine whether aggressive action is required to prevent forest fires.

- The studies should include examples of massive fires, such as the **Yellowstone Fire** of a few years ago. As it turns out, the fires may have not been detrimental, but may have, in fact, rejuvenated the forest.

F. Scientific studies are required to determine whether the following are **causes of, and remedies for, catastrophic wild fires**:

- **Forest clear cutting.** If so, consideration should be given to the environmental and economic impacts of stopping clear cutting in the future. Clear cutting for fire prevention zones, appears to also have all the detriments of past clear cutting. There should be no recommendation until the completion of in depth scientific studies with full public participation.
- Inadequate appropriated funds to remove small under story trees and brush without the removal of large fire resistant trees. For clearing to be economical, it is necessary to include substantial amounts of merchantable timber in the proposal. This leads to unnecessary logging. Studies should determine whether **adequate funds to remove "only" the small under story trees** should be recommended by Cal-Fed.
- **The destruction of ancient forests.** Scientific studies should be conducted to determine the environmental and economic impacts of stopping the destruction of ancient forests.
- **Excessive logging.** Excessive logging in the past has probably resulted in the present problems. An increase in logging will not remove the threat of wildfires in the forests. Plans such as that proposed by the Quincy Library Group will greatly increase the amount of logging and habitat destruction. The plan appears to be using a future defective practice to remedy past defective practices. The impacts of the QLG plan should be extensively studied; should be limited to small scale test areas; and should include considerable public participation before any positive or negative recommendation will be warranted..
- **Past fire suppression activities.** Here again, examples such as the Yellowstone Fire should be considered.

G. The Cal-Fed program should transfer its emphasis on water transportation to the protection of the Bay-Delta ecosystem. **Priority** for the benefit of the environment should be given to the following:

- Restoration of adequate **stream flows and water temperature** below existing dams and in all the river tributaries;
- Preservation of the ability of streams to **meander** and the preservation of **riparian** vegetation/riverine habitat;
- Preservation and enhancement of all threatened, sensitive and **endangered species**.

Yours truly

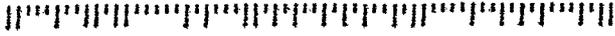
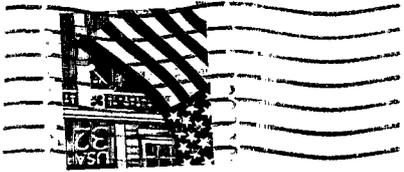
  
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