

July 1, 1998



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

Dear Lester:

Re: Comments on CALFED Draft EIS/R

The entire CALFED staff, as well as the volunteers who have contributed to the process, is to be congratulated for their tremendous efforts. The Draft Programmatic EIS/R is a very important step in what hopefully will be a permanent and productive process. We have some general comments and a few comments that focus on our particular interests relating to in-Delta storage opportunities.

Since the release of the Draft Programmatic EIS/R, there has been valuable new information brought to bear on virtually every subject matter addressed in the draft. Failure to recognize some of the important forward steps taken would result in generating comments that are of little real value. Consequently, we attempted to keep the current efforts in mind when we composed these comments.

The short- and long-term durability of the CALFED process will be maintained and enhanced if there is a continued, and even increased, effort to involve members of the public in this ongoing process. The process should be interactive. Issues and ideas need to be discussed and questions need to be answered, not just noted.

There should be a significant effort put forth to identify how new water projects might perform in the way of yield and water cost. The new staged approach to the CALFED process presented to BDAC on June 16, 1998 suggested that the high capital cost water storage and conveyance elements of the process can wait until a later date for analysis. We feel that nothing could be further from the truth. If the environmental restoration elements of the project begin, and only at a later date it is discovered that new water is going to be too costly to be of interest to water users, then there is likely to be a whole new direction for the CALFED process. CALFED cannot afford such an event. In addition, it appears from witnessing the level of work completed to date and from the general knowledge of what modeling capabilities are available, CALFED can more accurately and precisely appraise the various water producing and conveyance elements under consideration. Such an analysis is vitally important to the successful accomplishment of the CALFED process and need not be delayed.

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We understand that as of mid-June 1998, CALFED was moving toward a staged approach with an initial effort to address some of the program objectives using an in-Delta and through-Delta approach. We support that effort but seek clarification as to how CALFED is treating in-Delta storage. We are particularly interested in seeing that the process fairly evaluates in-Delta storage as a possible component of any solution.

The evaluation of in-Delta storage seems to be lost or at least partially lost in the *Phase II Interim Report*. Although in-Delta storage is mentioned in the text of every alternative, it is not shown on the maps for Alternates 1, 2 and 3. The graph on page 65 of the report titled *Water Supply Benefits of Surface Storage* should include a line for the relationship of in-Delta storage capacity versus water supply benefits. A CALFED storage and conveyance refinement team report dated September 24, 1996, deals with this subject and the report showed that in-Delta storage had significant promise on a stand-alone basis and in conjunction with other storage schemes. That work is not brought forward even though the early work shows in-Delta storage to be a very attractive component which we believe can produce water for at or below \$300 per AF.

The last paragraph on page 67 of the EIS/R discusses certain possible negative aspects of in-Delta storage. We welcome the opportunity to meet with members of your staff to discuss the concerns raised regarding in-Delta storage so that a more balanced view of in-Delta storage advantages and disadvantages may be presented in the next analysis.

We appreciate the continued opportunity to participate in the CALFED process.

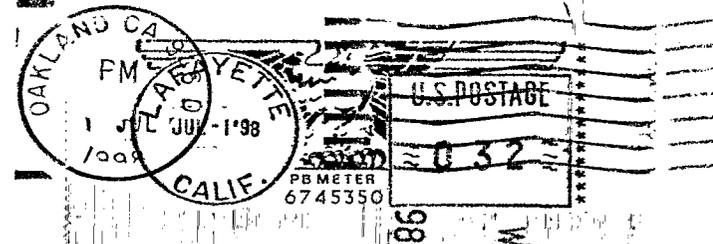
Sincerely,

John L. Winther
President

JLW:kf



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