

June 29, 1998

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Mr. Rick Breitenbach  
CALFED Bay/Delta Program  
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RE: CALFED- Bay/Delta Draft EIR/S

We note the following concerns over procedures and intent finding the information detail inadequate to respond at any other level.

1. The intent to use Adaptive Management: Adaptive Management subverts the spirit of an Environmental Impact Report. A trial and error action with little or no site specific research is unacceptable. If damage is "significant" (a term left undefined), Adaptive Management tries to find a mitigation measure (not stop action and go in another direction). Cumulative effects including damaging effects will be established as existing practices before consideration of new solution strategies is triggered.
2. Monitoring of impacts: In the document, Developing Strategic Plan for Ecosystem Restoration, you talk about the Scientific Review Recommendations of testable hypothesis, indicators, and phasing implementation. The same scientific approach must be made regarding Conjunctive Use to support out-of-basin water exports and water sales in evaluating impacts. Established indicators must be representative of the source area concerns developed by stakeholders within the areas providing the water. Characterizing those concerns as "externalities" is not acceptable.
3. Implementation Strategy: You imply that the public will be involved in decision-making. The public has been conspicuously absent due to the scope and frequency of meetings. Token "cattle call" meetings are not the meaningful input required for development of an undertaking this significant. The timeline is unrealistic if we conclude that there is a real attempt to engage the public in this process. The CALFED program will possibly spur changes in water rights laws, as well as, reallocate resources away from the land in a massive social engineering project under the guise of "economic efficiency".
4. "The public" has spoken clearly in the case of water transfers involving groundwater directly or indirectly for out-of-basin transfers. The Supplemental Water Purchase Program (SWPP), a six year feasibility study was rejected by the public. CALFED is presenting the same program buried within this document. All comments submitted to SWPP should be included and responded to in this document since the SWPP did not respond to its Draft EIR comments. Instead the SWPP proposal was abandoned only to show up in CALFED with even less consideration.

We look forward to your next steps in response to our concerns.

Cordially,

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