

ENDANGERED HABITATS LEAGUE

Dedicated to the Protection of Coastal Sage Scrub and Other Threatened Ecosystems

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June 27, 1998

Lester Snow
CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

RE: CALFED Draft EIS/EIR

Dear Mr. Snow:

The Endangered Habitats League (EHL) is an organization of Southern California conservation groups and individuals dedicated to ecosystem protection, improved land use planning, and collaborative conflict resolution. The opportunity to participate in this vital process is appreciated.

Please consider the following comments:

1. Water conservation measures are insufficient.

The document seriously underestimates the potential for water efficiency measures. The capacity and willingness of the populace and businesses to conserve water has simply not been recognized. What is missing from the plan are the full range of steps necessary to capitalize on the potential for water conservation, efficiency, and reuse.

There is under-utilization of reclamation and efficiency on agricultural lands, as well. It makes sense to retire lands which have drainage or salinity problems, and to reduce subsidies to low value crops.

In both urban and agricultural areas, water pricing which incentivizes conservation is needed. Furthermore, a whole range of efficiency measures, such as low-flow fixtures, should be mandatory. Water metering must become universal.

In addition to increasing reclamation capacity, funding would be well-spent in investing in the infrastructure necessary to bring reclaimed water to points where it can be used. Currently, much reclaimed water passes unused down the concrete LA River simply because it cannot be transferred to end-use points.

2. Structural measures are given unwarranted precedence.

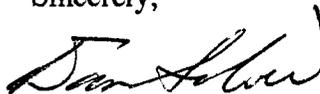
There is far too much emphasis on expensive structural measures, such as dams and diversions. Structural measures must always be a second priority to conservation. A case in point is the \$3.8 billion to enlarge Shasta Dam.

3. Habitat restoration is crucial.

The restoration objectives for Central Valley streams and rivers are generally supported. The goal of CALFED must be true restoration far above and beyond minimal Endangered Species Act requirements.

Thank you for considering our comments.

Sincerely,



Dan Silver,
Coordinator

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