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SIERRA CLUB

Delta Group of the San Francisco Bay Chapter
2412 Cambridge Dr., Antioch, Ca. 94509 Tele 510-754-8801

June 29, 1998

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

Atten: Rick Breitenbach

RE: COMMENTS FOR REVISED DRAFT PROGRAMMATIC

EIS/EIR FOR CALFED BAY-DELTA PROGRAM

Dear Mr. Breitenbach:

Please include the following written comments from the Delta Group of the San Francisco Chapter of the Sierra Club.

Very Truly Yours,

A handwritten signature in cursive script, appearing to read "Timothy P. Donahue".

Timothy P. Donahue

Chair, Delta Group of the San Francisco Chapter of the Sierra Club

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C-013741

Water to Restore the Environment

- Water for the environment is water that remains within, restores, and sustains streams, rivers and wetlands and flows out the delta and San Francisco Bay. This water is not "lost to the ocean"-- freshwater flows are critical for healthy drinking water and habitats
- Building or expanding more dams and reservoirs is *not* good for the environment
- CalFed should include a program to purchase water rights for the environment and reduce water demands on this system that has already overcommitted its water resources
- Restoring the environment is good for water supply. For example, wetlands act as natural sponges, slowly recharging water basins below ground. California has destroyed more wetlands (91%) than any other state in the nation. Wetlands restoration is good for the environment, water supply and water quality

Conservation Works

- CalFed's draft documents do not reflect the full potential for water conservation to meet California's water needs.
- Conservation can be less expensive and does not harm the environment
- Water conservation can increase water supply reliability at a lower cost, improve water quality for people, and increase freshwater flows for wildlife.
- In the 1980's, we avoided building nuclear reactors by investing in energy conservation. We can do the same with water conservation to avoid new costly, damaging dams and reservoirs.
- In many parts of the state, low value crops that use a lot of water are still grown. CalFed should explore ways to reduce subsidies or other pricing mechanisms to discourage production of these crops
- Innovations in efficient irrigation systems could and should be more widespread than they currently are
- Some urban areas do not even meter their water, and we have only begun to tap the potential for efficient home fixtures, reducing water use for landscaping, and water recycling

New Surface Storage (Building or expanding dams and reservoirs)

- California needs a more reliable supply of water, not more water
- Our state has the largest and most complex plumbing system in the world. With the staggeringly inefficient use of water in many parts of California, there is no evidence that we need major new water supplies which will harm our environment.
- CalFed should maximize groundwater storage before even considering new surface storage
- CalFed should maximize environmentally friendly ways to capture and store water, such as restoring meadows, wetlands and forests.
- "New" water does not exist--water must either be taken from the environment or reclaimed from existing uses
- If CalFed develops any additional water supplies, that water should be considered at best as partial mitigation for current water diversions for urban, agricultural and industrial uses.

Restore Water Quality

- CalFed's plan needs to do more to restore wetlands, forests, and riverbanks which enable nature to filter out pollution, making rivers healthier for people and wildlife
- CalFed's program should restore the quality of our groundwater basins. This is an important source of water that we should not lose to pollution and contamination with toxics
- Our rivers currently suffer excess runoff from farms, especially manure with disease-causing bacteria, dumping of organic wastes from industries, logging operations, & abandoned mines
- Curbing excess runoff can help reduce the organic matter in our waterways (organic matter may lead to human health problems in drinking water treated with chlorine); reduce the amount of pesticides and other known carcinogens in our streams and rivers; eliminate the silt and mud that currently clog our rivers, harming fish and other wildlife
- To improve drinking water quality, CalFed needs to assess and reduce salinity and bromide levels from agricultural drainage (particularly those returning to San Luis Reservoir)

Water Transfers

- Properly-regulated water transfers can play an important role in meeting the water needs of California's people and wildlife
- CalFed must ensure that transfers
 - ⇒ do not cause or exacerbate unsustainable depletion of groundwater. California's groundwater resources should be separately regulated and properly managed
 - ⇒ do not have detrimental impacts on rural communities
 - ⇒ do not result in increased demands on the Bay/Delta ecosystem or its watershed
 - ⇒ can be used to help repair damage to the ecosystem

The Peripheral Canal

- Until CalFed has analyzed how water conservation can improve the freshwater flows through the delta, we cannot evaluate a peripheral canal. Improved flows have the potential to improve water quality and help fish avoid death at the pumps which send water south.
- We have grave concerns that a Peripheral Canal could be used to dramatically increase water diversions from the estuary, thus further damaging fish and wildlife.
- CalFed has proposed no guarantees to assure that such a facility would not be used to degrade the environment further.
- it is unclear that the Peripheral Canal is the best way to improve water quality. CalFed must consider that we can protect public health with alternative water treatment which is available and affordable.
- CalFed must reduce levels of bromide (which the peripheral canal is meant to reduce) in drinking water from agricultural runoff.
- CalFed must acknowledge that the "technical advantages" it is assigning to a peripheral canal depend on many unanswered questions and assumptions, including: how well fish screens work, the way water flows through rivers, streams, and the delta, how water agencies mix water delivered to their customers, and others.

Cost/Taxpayer dollars

- We support using taxpayer dollars along with dollars from the users (through fees based on use) to help restore the Bay/Delta and its watershed
- We do not support using taxpayer dollars to expand or build new dams, reservoirs, or canals. The interests that would benefit from these new structures should pay for them in full
- Conservation and efficiency measures (broadly defined to include true cost pricing, comprehensive groundwater management, reclamation, re-use, retiring marginal agricultural lands, storing water in groundwater "banks," and others) are often less expensive options for saving water and improving the reliability of the supply, and we should spend our money on making sure we have done all we can in this department

Stop Irrigating Agricultural lands that poison our water

- CalFed's solution should include a program to stop irrigating lands that poison our water
- Marginal lands that produce runoff with toxins for people and wildlife should no longer be irrigated
- A program to pay willing sellers to stop irrigating that land would be a good use of taxpayer money
- Water that is currently used to irrigate those lands should instead be used to restore the environment or improve water supply reliability for other water users
- Programs to stop the urbanization of prime agricultural lands should also be a part of CalFed's plan, to ensure a strong agricultural economy and long-term floodplain protection

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