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July 1, 1998

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

Attention: Rick Breitenbach

**Subject: COMMENTS ON DRAFT PROGRAMMATIC EIS / EIR**

Dear Mr. Snow:

Thank you for the opportunity to provide written comments on the CALFED Bay-Delta Program Programmatic EIS / EIR on behalf of the Association of California Water Agencies (ACWA) and its more than 440 public agency members who collectively manage and deliver 90 percent of the state's urban and agricultural water. Over 30 million Californians rely on ACWA members to provide a safe and reliable supply of water to their homes, schools, businesses and farms.

ACWA supports the goals of the CALFED Bay-Delta Program to improve ecosystem health, water supply reliability and water quality. It is essential that CALFED adhere to its solution principles as it identifies the best course of action to accomplish its goals. Though CALFED has exerted tremendous effort to date, the draft programmatic EIS / EIR does not present a program that meets the objectives of its solution principles.

Based on a recent joint statement by Governor Wilson and Secretary of Interior Bruce Babbitt, we understand that CALFED plans to prepare and distribute this fall for public comment a revised draft programmatic EIS / EIR that will identify a draft preferred alternative. ACWA strongly recommends that this second draft document be extensively revised in order to respond to the unmet needs in the Delta, particularly those needs such as fisheries protection and improvement in source water quality, which are essential to CALFED's success and California's future.

As you may know, ACWA has been an active participant in the joint effort by Agricultural and Urban Water Caucuses that is investing a great deal of time and resources to provide CALFED with substantive technical and policy input to its process and draft programmatic EIS / EIR. These groups, which include agricultural, urban, rural and in-delta water users, have developed several recommendations relating to water quality, water supply improvement and reliability and ecosystem restoration, with the goal of an integrated, balanced package of solutions that allows the environment, agricultural, rural and urban communities to get better together. The following comments reflect many of the policy views shared by Agricultural and Urban caucuses. Additionally, these Ag-

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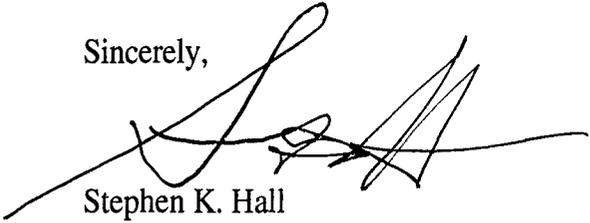
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Urban groups have submitted technical comments on CALFED's draft EIS / EIR. ACWA concurs with those comments and believes CALFED must address them in the draft preferred alternative document.

The balance of comments contained herein are broken down into those areas which ACWA believes must be more fully addressed in the draft preferred alternative and the interim plan which will be contained in the revised draft document that CALFED is now developing.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hall', with a long horizontal flourish extending to the right.

Stephen K. Hall  
Executive Director