

June 29, 1998

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Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth St. Suite 1155
Sacramento, CA 95814

Dear Rick:

I am a recreational enthusiast and advocate of the South Delta region for nearly thirty years. As such, I have been involved in the public processes of the South Delta Water Management Program of June 1990 and the Interim South Delta Program of July 1996. The alternatives presented in the CALFED Bay-Delta Program Programmatic EIS/EIR initial draft include components that were in the earlier project proposals. Therefore, along with my comments to the CALFED Draft, I'm enclosing copies of my previous comments for review and incorporation into the CALFED response. Since ongoing problems remain unaddressed or unsolved, my concerns remain pertinent and applicable to the CALFED process. The concept of 'adaptive management' prevalent in the CALFED ERPP, must first be applied to the consequences of thirty five plus years of CVP and SWP operations. CALFED's creditability in the counties of the Delta region depends on it.

I met with Dave Samson and two of his associates from the CALFED Storage and Conveyance team on May 21st and together we toured several South Delta channels viewing the basis of my comments. Then, along with Steve Roberts of DWR, we viewed the site of the proposed CCF northern intake and discussed additional concerns. I've also attended several meetings of the In-Channel Islands Workgroup in the past eighteen months and continued to solicit agency sponsorship for restoration projects on islands in the South Delta region. I welcome any assistance in this effort.

I stand by my assertions at the CALFED public hearing in San Jose on May 18th that Recreation has not been sufficiently addressed by CALFED. After the hearing, Mr. Richard Izmirian introduced himself as a recreation representative to the BDAC. His card indicated he was an officer of the 'Federation of Fly Fishers'. I asked if he boated or fished in the Delta, and he replied 'no'. The other recreation representative on the BDAC is also from a fisherman's association. Fishing represents less than 20% of Delta recreation according to Sacramento-San Joaquin Delta Recreation Survey August 1997. This recent study by the California Department of Parks and Recreation is not listed in the bibliography in the CALFED Draft EIS/EIR. No previous recreation survey is referenced. What is the basis for 8.3.2.7 on page 8.3-31 of the Draft that 'No potentially significant unavoidable impacts were identified.'?

The existing impacts of current CVP/SWP operations are well documented. With 15% of Delta inflow from the San Joaquin

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and 85% from the Sacramento basin, any increase in diversion at the Forebay will only cause additional impacts on the limited flows of the San Joaquin. A screened diversion in the vicinity of Hood may provide a viable alternative. However, shouldn't public and agency acceptance of a suitable 'assurances' package for operation be in place before the alternative is selected?

I support the CVP/SWP inter-tie and believe the CVP intake should be used only during high flows. I support additional storage outside the Delta. The risks of in-Delta storage far outweigh the amount gained. I support raising Friant Dam and making the diversions much more prohibitively expensive to help the San Joaquin recover. I support the new concepts of involving Los Vaqueros in the system, a previously missed opportunity with the Contra Costa Water District. I support the development of the means and technologies to capture excess runoff and re-charge the underground storage and aquifers. The Auburn Dam? Well, perhaps in time.

I've made myself available to agency people in the past and will continue to do so when asked with the goal of improving conditions in the Delta.

Additional comments and questions regarding the CALFED Bay-Delta Program Programmatic EIS/EIR are attached.

Respectfully,



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