

Regional Council of Rural Counties

Comments on the CALFED
Programmatic Environmental Impact Report/Statement
Clearinghouse #96032083

June 29, 1998

Programmatic Environmental Impact Statement/Report -

Prior to providing specific, referenced comments on this report we would like to offer general comments so as to provide CALFED staff with an understanding of our concerns.

We recommend that the Draft Programmatic EIR/EIS be rewritten and reissued for additional, adequate (at least 90 days), public review. The effort should include clarification and improvement of present analysis deficiencies as well as additional information and completed CALFED program elements where necessary.

We believe, that in its present form, the proposed CALFED program would result in significant, adverse, unmitigated, impacts in the rural areas of origin and agricultural communities of California. These redirected impacts would be in gross violation of the CALFED solution principles as well indicating a lack of a sincere effort towards California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) compliance.

The at risk areas in the CALFED proposal are those in the Sacramento and San Joaquin valley that have been targeted for water transfers and acquisition. Additionally, the areas of origin, the source counties, are also in line to suffer CALFED impacts from water acquisitions while being excluded from even receiving a meaningful watershed restoration effort - due to the fatally flawed CALFED watershed program element.

The Census Bureau predicts that nearly 18 million more people will become Californians by the year 2025 - well within the CALFED planning framework. The CALFED program identified the need for millions of acre

feet of water to meet the program's goals. Yet the program's analysis of water supply alternatives is very limited and unlikely to produce adequate supplies to meet California's future needs. The discussion of new water storage in the Programmatic Draft EIS/EIR excludes new on stream storage facilities. RCRC is concerned that the program includes undue and unrealistic reliance on water transfers and reduced agricultural water use as new sources of water. That approach would result in an unacceptable negative impact to rural California communities and people. The CALFED program should instead consider a full range of storage alternatives, including development of new on stream facilities, in order to comply with NEPA, CEQA and the CALFED solution principles.

It is equally important for the program to determine whether the acquisition (or development) of new water supplies for Bay-Delta purposes will adversely affect the ability of the areas of origin to develop water supplies to meet their ultimate water needs. A number of RCRC member Counties are currently attempting to develop additional supplies to meet their own water needs.

Another aspect of the program which is of concern is the proposed definition of "water use efficiency." The Programmatic Draft EIS/EIR states (Water Use Efficiency Component Technical Appendix, pg. 2-1), "*Efficiency can also be defined in economic terms: deriving the greatest economic output from a given input such as a unit of water...Program actions that facilitate as water transfer market will likely result in improved economic efficiency.*"

RCRC will support voluntary, locally controlled water transfers, if they play a limited role in meeting California's water needs. Water agencies within RCRC's member counties have played an important role in providing transfer water on a temporary basis to help meet the state's supply needs during drought conditions. The areas of origin, the source areas, will oppose the notion that "efficiency" dictates the transfer of water from beneficial uses in the areas of origin to uses in export areas with water uses which are perceived by some as having a higher value. Once that concept of efficiency is accepted, there is concern that water transfers from source areas will be required rather than permissive.

CALFED's Programmatic Draft EIS/EIR states that the program's water transfers policy "...must also provide a means of ensuring that water transfers do not merely improve short-term water supply reliability at the expense of local communities or groundwater resources" (page 2-15). Yet, there is nothing in the proposed transfer policy that provides that assurance.

The CALFED proposal to increase the cost of agricultural water in the Sacramento Valley by as much as \$72/acre foot, in order to pay for conservation measures which would produce no real water savings, is simultaneously a demonstration of the lack of clear thinking that went into portions of the program, as well as a troubling disregard for demonstrable, water supply efforts.

We also note that much of the "solution area" is in essence an area to stage off-site mitigation for actions and impacts within the Delta and south of the Delta. The conversion of tens of thousands of acres of agricultural land into ecosystem management units, either directly or through onerous water pricing structures that simply force farmers out of business, will also result in unmitigated impacts targeting rural California.

We do not believe that property can be openly or covertly taken under the California Constitution (Article 1, section 18). Property may only be taken when just compensation is paid. We believe the CALFED plan will impose non-functional conservation measures and efficiency measures resulting in loss of economic use of agricultural land. The subsequent purchase of those lands as damaged goods - as a result of CALFED actions - would violate the premise of due process in receiving a fair market value for the land, *United States v. SWRCB* [1986] 182 Cal. App. 3d 82,101. See also *Los Osos Associates v. City of San Luis Obispo* [1994] 30 Cal. App. 4th 1670.

Many of the areas of origin, the source areas for the Delta, have been conducting responsible, managed growth programs, consistent with California land use planning law for decades. As a result of this, they have to date, not had to exercise full area of origin claims for additional water diversions upstream of the Delta. This responsible planning in one portion of the state, should be examined against the nearly unbridled growth in

other parts of the state.

CALFED proposes to advance, under the guise of efficiency, a program to reallocate surplus (currently unused) water from these source areas for use in other areas which CALFED perceives as having an (undefined) higher value. We do not accept the notion of surplus water, nor do we concede that water use in San Jose or Long Beach is a higher use than water used in Alturas or Groveland. It remains our assumption that all Californian's and their reasonable beneficial use of water are equal both in the eyes of the law and CALFED.

We find throughout the CALFED document that the mitigation measures are simply lacking, or so poorly defined as to be rendered meaningless. CALFED must commit the time and resources to proposing well thought out, functional, effective, mitigation measures for impacts which result from this program.

In CALFED's comparison of alternatives we were disappointed to find a rather off-handed explanation of regional impacts (economic). In section 8.6, for example, "*Additional negative regional economic impacts could result from costs of the Water Quality Programs...Costs are not yet available, so regional economic impacts cannot be quantified.*" The significance of the economic impacts cannot be accurately determined without quantifying the associated costs. However, it appears that the costs associated with this aspect of the Project have not been quantified because the nature and scope of the program have not been determined. The Project has not been adequately defined to a point upon which assessments, required by CEQA and NEPA, can be carried out. CALFED must conduct the necessary analysis of this point, including consistency with the CALFED principle of no redirected impacts, to achieve CEQA and NEPA compliance.

We are greatly disappointed to note that the Trinity River Watershed is excluded from the CALFED program for management but the Los Angeles River is included. This proposal is indefensible. The Trinity River is a regular and significant source of the Delta's fresh water, having contributed an average of 1,000,000 acre feet of water per year, for thirty four years to the Delta via diversions to the Sacramento River. It is thus an

indisputable part of the stream flow dependent Delta ecosystem and the Bay-Delta Watershed (the geographic area that drains into the San Francisco Bay). It is even excluded from the Study Area by CALFED.

This omission is both inconsistent with the factual diversion of water to the Delta as well as the language in Proposition 204, which designates the entire Trinity River Basin as a Delta tributary watershed. This Proposition was passed by the voters of California less than three years ago. In addition, the Bay Delta Advisory Council's Ecosystem Restoration Roundtable recommended on March 13th of this year, that the CALFED include the Trinity River Basin in the ERPP project area and associated Category III (CVPIA) Grant Program.

Problems in the Trinity River Basin cannot be effectively addressed through watershed restoration and management efforts, and other non-hydraulic measures if CALFED proposes no support for those opportunities. Absent these efforts, more hydraulic dependent actions will be likely, resulting in potential reductions in diversions to the Sacramento River of over 600,000 acre feet per year - with potential impacts to the Bay-Delta Ecosystem (see Central Valley Project Improvement Act, Section 3406[b][23] relating to the Trinity River Flow Decision).

CALFED must also recognize the reality of the inclusion of Cache Creek (within Lake County) as a CALFED tributary. The document is unclear on this matter, but clearly through flow patterns and legislative directive (Proposition 204) this stream should be included in the Delta Tributary system. The CALFED should clarify the status of salmon and steelhead migration up Cache Creek to Clear Lake with a historic point of reference.

We strongly disagree with a statewide definition of water conservation and efficiency. Furthermore, a definition of those terms linked to CALFED objectives is unacceptable.

We are curious how water users on the east side of the Sierra Nevada Mountain range would be able to prove they were not wasting water - if CALFED objectives are the only test of efficient use. CALFED must clarify what part of the programs apply to what parts of the state and which don't. The current language causes great apprehension.

No CALFED alternative is complete without an adequate assurances package. Assurances must be developed and put in place so that each segment of the public can be assured that actions promised as part of the overall program are actually executed. We wish to underscore the importance of the process of implementation of assurances as a component of adaptive management. Assurances, incorporated into an adaptive management program, are subject to abuse if the process of decision making, data collection/interpretation, and regular public reporting is inadequate. We therefore urge CALFED to place emphasis on the coming months, not on developing a specific preferred alternative, but rather on developing a process, for implementing CALFED - including any alternative.

Post CALFED governance will, due to the presence of adaptive management, and an uncertain regulatory environment, be one of the most important decisions made in this program. We urge that CALFED develop an entity to better manage the ecosystem portion of the program. Furthermore, other responsibilities of the program, should also be evaluated for incorporation into the new entity.

The new entity should not create one more layer of government - carrying on the tradition of isolation from the public and stakeholders. Rather, the new entity should be a true partnership between state and federal agencies, local agencies and communities, interest groups, and affected parties. It should have a long-term reliable funding source. The new entity should not be regulatory. The new entity should emphasize employing market-type incentives to achieve objectives. The new entity should work with local governments - rather than dictate mandates to them. The new entity should work with local conservation and watershed groups - rather than dictate standards and programs to them. The new entity should work with the public to better educate them. This new entity should be responsible for all funding available for the Bay-Delta program and further should provide for prioritizing projects.

The new entity, should contain (internally) a governance structure in which decisions (not advice) are made by a combination of federal, state and local government officials as well as members of special interest groups, conservation groups and the general public. This must be an open,

public, accountable governance structure with congressional and legislative oversight appropriate to responsibilities. This is in all probability a new form of governance unknown within this country. The scope of the problem before us is of the same caliber.

The source areas for water, the Counties of Origin, are currently afforded protections within the water code. Those protections are a component of past assurances, provided during other similar program development. CALFED must not, in the name of any competing water use, begin its "new" program by erasing past assurances. Unless CALFED begins by honoring past assurances all new assurances will be seen as illusory.

The CALFED program seems to emphasize water supply to export areas. CALFED should instead attempt to provide water supply reliability and new supplies for the environment, and people, across the entire solution area. CALFED must understand that many of the areas of origin, are themselves without an adequate, reliable, affordable, clean water supply. They must meet their needs before they would willingly commit more water to solutions elsewhere in the state.

In this same area, we do not believe that conservation, water transfers and recycling will achieve the water supply needs of much of the state. With a projected population growth of over eighteen million people during the next twenty-five years state CALFED must recognize that not all of those people will be within the Bay-Delta or Delta export areas.

Our membership are strong advocates for local control of groundwater resources and to a great extent surface water resources. RCRC does not advocate nor does it support the creation of new regional or statewide entities (or the assignment of responsibility to an existing entity) to have regulatory or environmental authority over water transfers. We insist that CALFED recognize the desire of most of California's groundwater source areas to control their own groundwater resources, and that their authority is in law. This point was upheld by the California Supreme Court in the Tehama vs. Baldwin decision.

CALFED's Watershed Management Common Program Element is incomplete. The program's draft watershed strategy is best described as a strategy to

prepare a watershed strategy. We are encouraged that CALFED has proposed appointing a Bay Delta Advisory Council (BDAC) Workgroup. However, the Watershed Program has the lowest funding level of any CALFED program. In addition, there are not adequate agency staff detailed to this program from the U.S. Forest Service with expertise in Watershed Management or Fire Ecology. BLM has no staff detailed. These are the two agencies which manage the lands of most of the upper watersheds. The lack of interest and commitment from the Department of Interior and Agriculture on this key component of a CALFED solution is inexcusable. Both in this record, and in other venues, we will call for meaningful involvement from those agencies and cooperation from CALFED.

CALFED has failed to make the simple connection between upper watershed health and a healthy tributary system to the Delta. A relationship of connectivity between upper watersheds and downstream aquatic life forms, that is easily grasped by most scientists is somehow "lost" on CALFED's team of scientists. We will continue to urge CALFED to include a functional - not illusory - upper watershed component in its program. To do this will however take additional time, given the complexity of the issues and the late date of the formation of a BDAC workgroup. We therefore will work with CALFED to develop a realistic schedule and work plan to accomplish this task. In the interim, we wish to underscore the need for CALFED to recognize the glaring deficiencies in the existing watershed program and to work on a plan to correct them.

We strongly recommend the incorporation of the following changes into the Revised PDEIS/DEIR:

- We believe that CALFED's management approach towards ecosystem restoration is flawed. Although CALFED has clearly identified a list of "key species" that will be managed for, the program has failed to identify what the most important stressors of those species are. Without that critical information Ecosystem Restoration Program Plan actions will be the biological equivalent of shooting in the dark - with very expensive bullets.
- Improve the integration of common program elements in the analysis of alternatives. The PDEIS/DEIR addresses impacts in a

qualitative manner at a very detailed level. For instance, each component of an alternative is evaluated for its effects on fisheries at different geographic locations within the delta watershed. It is not possible however, to understand the overall effect of the alternative on a given resource. Since each common program will function somewhat differently depending upon the selected alternative the analysis should allow a "program level" comparison.

- Include a technical basis as a provision of regulatory assurances. It is very important that the Revised PDEIS/DEIR provide sufficient technical detail to allow findings to be made regarding section 404 of the Clean Water Act, jeopardy to continued existence of species pursuant to section 7 of the Endangered Species Act. The project will not appreciably reduce the likelihood of survival and recovery of species with the Bay-Delta ecosystem pursuant to section 10 of the Endangered Species Act. The document should meet the requirements of the C.D.F.& G. code Sections 2081 (Cal. ESA) and 2835 (Natural Community Conservation Planning Act) for incidental take and listed species permitting pursuant to NCCP. The recovery plan must meet the requirements of Section 4 of the Endangered Species Act including site specific management actions, objectives measurable criteria and estimates of time and funding necessary to achieve the recovery plan's goals.
- Include quantitative analysis of potential impacts in the Delta of moving water at the levels identified for a specific preferred alternative. Water transfers are discussed in various locations throughout the documents. However, there is only a general qualitative analysis of the potential impacts that transfers have in the Delta and in the potential source and destination areas. In order for the Revised PDEIS/DEIR to be meaningful with respect to moving water transfers through the Delta, there must be a quantitative analysis of moving a range of water transfers through the Delta. The analysis should also be indexed against the transfer capability of the preferred alternative. Impacts at transfer sources and destinations should be examined at the programmatic level.

- Expand the cumulative impact analysis to quantitatively address the potential outcomes of the CVPIA Trinity River Flow Evaluation Study for the CALFED program. The document recognizes the Trinity River Flow Evaluation Study (as required by section 3406(b)(23) of the CVPIA), but does not indicate the potential range of flow changes to the Sacramento system that could result from implementation of recommendations for flow improvements on the Trinity River. We believe that CALFED has overestimated the possible flows to the Delta, and as a result may underestimate the conflict between consumptive and environmental water needs. We believe that a cumulative impact analysis must be presented in the Revised PDEIS/DEIR and that it include a quantitative evaluation of the potential range of effects that the CVPIA program as referenced could have on the CALFED program.
- Identification of specific triggers and triggering mechanisms that will be used to guide staged decision making and staged implementation measures. These triggers should be identified as to type, range of action likely and the relationship between the existing CALFED objectives and the alternatives of the “triggered” actions. All triggered actions would of course have to be consistent with the existing CALFED solution Principles.
- The CALFED program does not make clear who beneficiaries of the program are and who the payee’s are of the program. There must be a clear identification of the benefits the CALFED program and the proposed methodology for quantifying and allocating those benefits, for the record. Likewise, linkage between beneficiaries and payees must be made very clear in the Revised PDEIS/DEIR if the document is to have any relevance. Also the relationship between payees and benefits from a regional perspective must be clarified.
- The CALFED program should recognize that its Ecosystem Restoration Program Plan essentially converts much of California into off-site mitigation for impacts as a result of actions in the Delta and export areas. Such an action, should be clarified in the record from a regional perspective when assigning impacts and requiring mitigation measures.

- New storage should be identified for surface and groundwater sites. Storage should include above, in and below delta areas. Surface storage should generally be a higher priority than groundwater. New storage should provide the broadest spectrum of benefits including local water supplies, local environmental benefits as well as Delta benefits and export water benefits. No form of surface storage should be dismissed at this stage in the planning.
- CALFED's Ecosystem Restoration Program Plan identifies numerous areas for the creation of meander belts. CALFED must recognize, within its planning process, that "hard" spots such as bridges, culverts, diversions and pumping plants should be identified and planned for accordingly on a site-by-site basis. The program has the potential for significant redirected impacts to local communities, local agricultural operations and human safety due to flooding. CALFED should utilize an outreach element of its planning program to avoid such conflicts where at all possible. This should be addressed in the Revised Programmatic EIS/EIR.
- Artificial streams should not be considered as "perennial" streams for the purposes of ecosystem actions. The very concept of "restoring" something that was never a natural stream is not sound logic or science. Irrigation ditches, water delivery ditches and flood overflow ditches are not actual streams. Actions along these water conveyance structures should be dealt with by local agencies, with local public input and expertise.
- The CALFED ERPP will purchase surface water from current users to release in streams. The reduction in surface water usage will result in reductions in groundwater recharge that will affect groundwater levels, quality and storage. These impacts are not described in the DEIS/DEIR. They should be adequately discussed and mitigation measures identified in the Revised PDEIS/DEIR.
- The program seems to place far too much emphasis on export water supplies and not enough emphasis on system-wide supplies. The level of detail in the report is supportive of our conclusion on this

matter. In keeping with the CALFED principle of no redirected impacts, the redirected impacts as a result of water use efficiency programs and water reallocation programs for the environment must be eliminated or fully mitigated in a manner acceptable to those impacted. The Revised Programmatic EIS/EIR must include such mitigation.

- Water use efficiency standards should be applied to all water uses including environmental use. Simply because an amount of water is being used to achieve a CALFED objective does not equate to efficient use of the resource. CALFED could waste water as easily as any other entity.

Our specific comments on the PDEIS/PDEIR main volume are as follows:

1. Page 1-7. Water supply reliability. The goal is framed as “...*for water supply reliability ...to reduce the mismatch between Bay-Delta water supplies and current and projected beneficial uses dependent upon the Bay-Delta system.*” We urge that CALFED examine the premise from the perspective that to achieve this goal water resources from the “solution” area are being called on. Therefore, CALFED should also work towards reducing the mismatch between Bay-Delta water requirements and the requirements of source areas tributary to the Delta.
2. Page 1-13. Next Steps. We point out that the scientific/peer review conducted by CALFED thus far has not included adequate expertise on those resources to be impacted in the solution areas. CALFED must broaden its scientific/peer review panels if it is sincerely interested in a balanced view of the Bay-Delta Ecosystem. This must include expertise on watershed management, fire ecology and resource economics.
3. Page 2-1. CALFED programs and solution areas. We disagree with the CALFED contention that in order for there to be a problem in the Delta Ecosystem it must manifest itself in conditions in the Delta. Not all life forms dependent upon the Delta spend their entire life within the statutory delta. Therefore, there can be significant influences on

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those species and on the water resources they depend upon, in areas outside the statutory delta. Indicators for "Delta" problems may in fact be first present in the solution area not the problem area - as defined by CALFED.

4. Page 2-2. Sacramento Region. We strongly disagree with CALFED's decision to not take actions in the Trinity River watershed as a study or actions area. To a great extent the Sacramento flows into the Delta will be dependent upon the Trinity Flow decision (CVPIA[b][23]). Thus, upper watershed restoration actions taken in the Trinity could supplement and perhaps reduce total amount of flows on the Trinity - thus benefiting the Delta. By isolating the Trinity from CALFED actions, the CALFED is exposing the program to a level of uncertainty and risk which is unnecessary. We recommend that in the Revised PDEIS/DEIR the Trinity watershed is included in the CALFED solution area. A do nothing plan will have predictable results and not result in improvements in the Trinity, or other Bay-Delta watersheds.
5. Page 2-3. We disagree with CALFED's "dissection" of local County boundaries by only identifying specific water districts for inclusion in the CALFED study area and leaving out the remainder of the local jurisdiction. This is inconsistent with local comprehensive land use planning which is required by California law. These districts are not isolated entities unto themselves, but rather are economic and governmental sub-units of local Counties and larger regions. We find such distinctions and the adoption of such artificial boundaries somewhat incongruous in that CALFED proposes statewide water use efficiency standards which don't even recognize the boundaries of the Delta ecosystem. The Revised PDEIS/DEIR must reconcile these internal conflicting CALFED policies in a satisfactory manner.
6. Page 2-6. We are unclear as to the status of the Vernalis Adaptive Management Plan as a "long-term" proposal. The only environmental documentation for this project is a negative declaration for a one year program. Not a multiple year program as described.
7. Page 2-8. Water Storage and Conveyance. We wish to point out that there may be opportunities for additional on-stream storage sites in

the source areas, tributary to the Delta, which could help off-set downstream Delta water demands in source areas. These projects, although relatively small <100,000 af, do hold a potential solution to part of the CALFED challenges. Abandoning them at this point may result in additional impacts to source areas.

8. Page 2-15. Water Transfers. Terms like "...open and active..." are unclear and leave much to (mis)interpretation by the reader. CALFED should use more concise language.
9. Page 2-16. The CALFED Watershed Management Program Element is incomplete, understaffed, underfunded, unfocused and far behind the development of other program elements. It continues to operate with just one staff person and the lowest program budget of any CALFED Common Program Element. We believe that the staffing and budgetary problems, combined with lack of commitment from the CALFED policy group have resulted in this portion of the program being severely inhibited. CALFED must revamp the program and completely revise the focus prior to the Revised PDEIS/DEIR release.
10. Page 2-35. Implementation Strategy. CVPIA, USBR. We are unclear under what provisions CALFED assumes that the program objective of improving water reliability should be used to "...offset..." agricultural water impacts due to the dedication of 800,000 acre feet of water. There are existing watershed of origin water rights filings, which have not been settled, in areas of origin, which under D-1422 (SWRCB) should have priority over many water claims downstream, contract, environment, or otherwise.
11. Page 2-37. Vernalis Adaptive Management Plan (VAMP). It is our understanding that the VAMP is currently only covered by a negative declaration for compliance with CEQA. Therefore, the use of words such as "will" are better replaced by "could" inasmuch as long-term CEQA compliance has not been achieved. This is in recognition of the San Joaquin River Group Authority, the USBR and the USFWS participation in a joint EIS/EIR - in the near future.

12. Chapter 5.2. Land Use Changes. CALFED claims that "*Water use Efficiency (WUE) measures are not expected to directly impact current land uses therefore, no estimates of land changes relative to this program are presented.*" We do not believe that this is so. It has been our first hand experience that land use and water use/availability and price are inextricably linked. The successful implementation of the WUE will invariably result in changes in land use. Changes most likely under the current CALFED proposal are significant reductions in irrigated agricultural lands and irrigated urban landscapes raising the issue of uncompensated takings. This should be included in the revised Programmatic DEIS/DEIR.
13. Page 6.1.54. Coordinated Watershed Management. We do not believe that the CALFED conclusions regarding reforestation are valid. For example, stand composition and basal mass are critical factors that affect evapotranspiration. In point of fact, coniferous stands with dense, unthinned under story are the primary cause of increased transpiration - not open stands of large, mature conifers. Thinning of small stems in coniferous forests both reduces transpiration and lowers forest fire hazards.
14. Page 6.1-69. Alternative 3. We note the potential water supply benefits of this alternative. Our comments are directed not just at this specific instance, but rather throughout the report, it is unclear if the "new" water is in fact a reallocation of water which would otherwise have been used in source areas. Please clarify.
15. Page 6.1-73. Coordinated Watershed Management. See comments on 6.1 - 54 (above).
16. Page 6.2-4. Groundwater use. CALFED's allegation that "*Also, cities and counties may adopt ordinances giving them authority to manage groundwater, although this has not occurred.*" is incorrect. Numerous counties have adopted groundwater management ordinances which place strict conditions on the export of groundwater. Partially in response to the CALFED program, the Department of Water Resources Supplemental Water Purchase Program and the CVPIA water acquisition program, even more groundwater ordinances are in

various stages of preparation now.

17. Page 6.2-9. Existing conditions. CALFED's conclusion that groundwater is not "widely" used in the upper watershed due to the availability of surface water is incorrect. There are many regions in the upper watersheds where an adequate surface water supply is not available and therefore municipal and industrial customers pump from groundwater located in fractures of the underlying granite. Groundwater in the upper watersheds can contain dangerously high concentrations of metals, and other contaminants such as lime and arsenic which require expensive treatment of water supplies. Nonetheless, for much of the upper watershed area this is the only available water supply.
18. Page 6.2-19. We agree that upper watershed activities may result in increased dependence on groundwater. However, we do not believe that such use will result in increased overdraft of the groundwater in the Sacramento River Region. We question both the conclusion and whatever data may have been used to reach this conclusion.
19. Page 7.1-18. This section does not appear to recognize the impacts that past in stream storage facilities have had on key species in the Delta. CALFED's ERPP and the environmental analysis fail to clearly bring this issue to the forefront for policy level discussion.
20. Page 7.2-8. Coordinated Watershed Management. We do not believe that CALFED has accurately portrayed the potential benefits to local areas in upper watersheds through a successfully managed and implemented fuels thinning program as a component of watershed restoration. The role of pre-settlement, non-intense wildfires as a method to keep forest fuel loads down, has been displaced by aggressive fire fighting programs. As a result, fuel loads are not "historic" but rather unnaturally high due to decades of forest/fuels management practices which failed to recognize this facet of forest health. CALFED is also apparently failing to recognize the same close link between forest health, wildfires and healthy watersheds. We urge CALFED to seek out U.S. Forest Service, Bureau of Land Management and California Dept. of Forestry Fire Ecologists and

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watershed managers to assist in the proper development of this program.

21. Section 8.1.5.6, Mitigation Strategies. CALFED states, "*Strategies for minimizing the social/employment impacts as a result of agricultural land conversion include: continuing the flow of property tax revenues to the local communities...*" Please note that the proper wording should be "*restoring and supplementing the flow of property tax revenues...*"
22. Page 8.2-55. Environmental Consequences: Utilities and Public Services. We believe that CALFED should recognize that additional pumping of federal projects (CVP) may result in higher electricity costs to CVP power customers as well as reduced capacity for those customers. CALFED should recognize the difference between Reclamations Preference customers and its First Preference Customers with regards to power resources. The latter are specifically recognized in the enabling legislation for the construction of New Melones (1962 Flood Control Act) and the Trinity Division (1955 Trinity Act). The specific counties are Tuolumne, Calaveras and Trinity.
23. Page 8.6-3. Water Quality, Water Use Efficiency and Water Transfers. We do not agree with CALFED that these programs would have beneficial effects for most regions. Actually, water costs associated with these programs could result in water rates increasing by as much as 600% in some areas. The effect on agricultural communities would be significant and adverse. Any benefits from those actions would be likewise transferred to downstream parties - again with no reinvestment back into the source area watersheds. This would indeed be adding insult to injury.
24. Section 8.8. Public Health and Environmental Hazards Summary, page 8.8-1, eighth paragraph. "*The Water Quality Program would have potential beneficial impacts as decreasing mosquito populations reduce the potential for disease transmission...*" We disagree. Actually, the proposed Water Quality Program (WQP) would result in the construction of settling basins and other structures that would be

designed to maintain a pool of stagnant water. Many of these structures would, by definition, be in parking lots and other areas in relatively close proximity to populated areas. The stagnant water detained within the structures would be mixed with high concentrations of organic material - an ideal environment for breeding mosquitoes.

25. Section 8.8.2.6. Mitigation Strategies. The proposed mitigations are either contrary to the proposed WQP, or internally contradictory. The referenced section proposes to use pesticides and to reduce the amount of standing water during construction, both of which directly contradict the proposed WQP. It also proposes "*...limiting construction to cool weather periods, when mosquito production is at its lowest; and limiting construction to periods of low precipitation.*" Cool and dry weather is unusual in much of the Sacramento River Region. Such conditions are unpredictable and usually only occur for a few days or weeks at a time. This time period would be too short to complete any sizable construction projects - unless a multiple year time frame were used.
26. Section 8.5.1.3. Affected Environment/Existing Conditions, Sacramento Region (pg 8.8-7). CALFED accurately reflects the already serious mosquito-related problems in the Sacramento River Region, but fails to disclose the significant adverse impacts that would result from the WQP and to a lesser extent, the Ecosystem Restoration Program. As explained in the document, "*...the Sacramento River Region has a relatively high rate of encephalitis among the regions in the study area...*" and "*...historically the Sacramento River Region has had the highest rate of malaria of any of the regions under investigation.*" These are serious public health problems that will be significantly worsened by the proposed project.

Programmatic EIS/EIR, Executive Summary -

1. Page 8, The CALFED Program claims to be addressing problems which occur in or are closely linked to the Suisun Bay/Suisun Marsh and Delta area (Problem Scope). The CALFED believes that "*...at least part*

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of the problem occurs within the Day-Delta or is directly associated with conditions in the Delta." We believe that too narrow an adherence to this principle will have the effect of CALFED overlooking or ignoring problems whose origins are both in and out of the Delta. For example, the population problems of the various salmon runs are at least in part related to the presence of the export pumps in the south delta. However, they are also in part related to the loss of ninety percent of their original spawning and rearing habitat in the solution areas. We urge CALFED to examine the ecosystem problems in the entire solution area, not just the Suisun Bay/Marsh area.

2. Page 10, we note that of the items listed on this page all contain positive statements for action - except watershed management. The statement for that program - encouragement. Is the equivalent of agency cheerleading. If CALFED intends on carrying out watershed management programs it will require actions not "encouragement." CALFED should change the language to reflect real proposed actions with plans, staff and direction to carry them out.
3. Page 21, the predicted impacts for lost power benefits to areas which are First Preference Power Customers fails to recognize past assurances to Trinity County (1955 Trinity Act) and Calaveras and Tuolumne County (1962 Flood Control Act). The above referenced enabling legislation, contained specific recognition of these areas (in which project facilities were sited) as First Preference Power Customers which not reflected in the CALFED analysis.

Phase II Interim Report -

1. Page 5, perhaps prophetically, the CALFED Vision fails to even mention conditions in the solution area. We assume that like the treatment of the solution area ecosystem this is just another CALFED oversight. If it is not, if in fact CALFED has no "vision" for the environment of the solution area, we stand ready to assist you in creating one. Alternately, if there is no "vision" for the environment

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of the solution area due to a conscious CALFED decision, we would like that decision and the logic supporting it, to be available in print. We also note that the "vision" for a California in the year 2030 does not include any new surface storage, but instead relies solely on conservation and transfers. This may be a "vision" for some but for rural northern California, such a program is more analogous to a nightmare. Meeting all of California's growth demands with no new storage would result in disastrous impacts to agriculture, source areas and rural communities. A CALFED vision with no storage component is not a vision, as much as it is a group of agencies walking into the future with their eyes closed to reality. We insist that CALFED restate its vision to avoid the unstated but implicit significant redirected impacts to rural California.

2. Page 22, we note, continuing our concerns in item #1 above, that CALFED indicates with regards to water transfers that, "*Local economies can be affected if farmers fallow land and transfer the water. Both the buyer and the seller may benefit, but third parties may be seriously affected.*" We believe that the impacts on third parties will be significant and certain.

Under "Water Storage Interrelationships" on the same page CALFED characterizes new surface storage as "...*controversial*...". We would like to point out that such clearly biased editorializing in an environmental impact analysis, legally required to be unbiased, is wholly inappropriate. To be as constructive as is possible given these two passages, we would urge that CALFED accept the fact that both transfers and new storage are potentially controversial and reflect that recognition in the revised environmental document. For that matter CALFED's complete abandonment of upper watershed actions is in our opinion, controversial.

3. Page 40, Agricultural Land Conversion in the Delta - We do not believe, that even at the programmatic level, it is appropriate to propose offsetting very real agricultural production losses by "*...investigating concepts of supporting efforts...*" From a policy perspective alone it is disconcerting to note that the CALFED work focused on agricultural land retirement and land fallowing, is far in

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advance of any tangible methods to mitigate for such impacts. Such policy discussions - and alternatives - must be discussed in the Programmatic level environmental analysis - not just later on a case by case basis. If we are to ever know the cumulative impacts of this program we must analyze it at the programmatic level.

4. Page 42, Effects on Hydro Generation. Please note that the Counties of Trinity, Tuolumne and Calaveras are all First Preference Power Customers under Reclamation law. These customers are not simply preference power customers, but were specifically accorded special status in the 1955 Trinity Act and the 1962 Flood Control Act. Please reflect that status and its implications in your analysis of power impacts.
5. Page 51, We concur with your finding that flow augmentation necessary to provide up to 500,000 acre feet of in stream flows solely from water transfers (willing sellers) is at a scale unprecedented. We believe that at that level, in the absence of other more acceptable methods of developing environmental water supplies, there would be significant, unmitigated adverse impacts to much of the solution area and its local economies. Additionally, it is likely that local opposition to transfers would "harden" under the described conditions. Therefore, achieving that level of transfers would require rather draconian measures by an agency with regulatory authority. That would of course raise a host of new issues - and adversaries.
6. Page 55, It is our understanding that "Net Water Savings" as identified in the table would be used to meet "unmet needs." That is accommodate currently existing unmet needs - throughout the Bay-Delta Ecosystem. This is not necessarily the same thing as "...*reallocation to other water supply uses.*" CALFED must clarify if water use efficiency measures are to be carried out locally (for local benefits) or carried out locally for benefits in other geographic regions. The ability to impose such water sanctions successfully will in great part depend upon the resulting local benefits. This also has implications as to the identification of beneficiaries of CALFED actions and who will pay.

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7. Page 58, we note that the Water Transfers Framework Policy does not recognize the opportunity for ecosystem reinvestment, specifically watershed reinvestment, as a component of a water transfers program. We believe that this failure with further emphasis on creating an *"...open and active..."* transfers marketplace, indicates a fundamental failure of CALFED to recognize the realities of natural resource management economics in the solution area. The transfer of water is a transfer of wealth away from the watershed which "sourced" the water. The transfer of that water absent reinvestment then places the burden of watershed restoration and management on the backs of others - while at least one group receives benefits.

8. Page 58/59, It is not our belief that the creation of a *"...open and active water transfers market will improve the economic efficiency of water use..."* as a stand alone concept. This hypothesis will only be tested successfully against a backdrop of adequate source area assurances - which do not currently exist. We do not believe that the proper place to carry out *"...public review of transfers so they are properly regulated..."* is in a clearinghouse. We are adamant that CALFED leave local control of transfers in place, and establish a data bank type clearinghouse.

9. Page 60. We note that the CALFED watershed strategy as currently proposed is fatally flawed. It inappropriately divides the watersheds into an ecological "caste system" in which lower watersheds are given one priority for actions and the upper watersheds are given a lower priority. This is done simply because there are in some cases dams on the rivers. This is stark and revealing evidence of the inadequacy of the CALFED Watershed Strategy and its underlying failure to comprehend and address the issue head on. We (once again) refer the CALFED staff to the Sierra Nevada Ecosystem Project Report on file in their offices with special reference to the discussion of watershed health and reinvestment. We believe that the current CALFED strategy would result in the creation of new institutional barriers to watershed reinvestment in upper watersheds, which could only be remedied by removal of the

physical barrier that creates the institutional barrier to reinvestment, as described by CALFED.

10. Page 61, we agree with the identified Watershed Management Issues and Concerns listed. We urge that CALFED move beyond recognition of these issues and concerns and redesign the Watershed Program to more adequately address these issues.
11. Page 66-68, Upstream Surface Storage, In Delta Surface Storage and South of Delta Off-Aqueduct Storage. We urge recognition by CALFED that all of these storage proposals, being made by a consortium of Federal and State agencies, would be subject to the County of Origin and Watershed of Origin Statutes. These new storage facilities would not be given a priority of water ahead of the source areas. We also note that the proposed Auburn Dam is not in the current list of proposed projects and would request that CALFED clarify this decision and the source of the information leading up to the decision. We would offer the observation that unlike the CALFED water use efficiency programs the Auburn dam could provide water for the Delta and therefore should be given equal consideration under NEPA and CEQA.
12. Page 123, Water Supply Opportunities. We urge CALFED to recognize the upstream needs of the source areas in the Solution Area in planning on how to allocate water supply benefits. We understand the convenience of using export users as the family of beneficiaries for crude feasibility studies, however, we wish to note for the record that this should not be carried on much longer as the model for analysis.
13. Page 149, Assurances. We believe that the CALFED Assurances "package" will be the single most important program component. It is likely, given the level of public distrust of the CALFED program in the solution area, that short of a well crafted, well understood, and clearly acceptable assurance package, there will be little support and much opposition to any CALFED solution - regardless of environmental or economic potential benefits.

14. Page 152. We note that the final EIS/EIR is to be released in later 1998. It is our understanding that this is incorrect and instead a revised draft environmental document will be recirculated in late 1998/early 1999. The final document would then follow sometime in 1999. Please clarify.

Financial Package. The currently crafted financial package does not address long-term economic institutional problems throughout the solution area. The recognition of ecosystem reinvestment "fire walls" that subordinate the upper water shed is a very real obstacle to achieving overall ecosystem health. Failure to address this issue, and simply moving on to allocating costs for the current proposal is far too narrow a scope of analysis for adequate NEPA/CEQA compliance.

Developing a Strategic Plan for Ecosystem Restoration -

1. Page 2. The stated purpose of the CALFED Strategic Plan is "...to clearly articulate an integrated planning and scientific framework by which to successfully implement and evaluate restoration of the large and complex Bay-Delta Ecosystem." In this we agree with CALFED. The plan should indeed address the entire Bay-Delta Ecosystem and not just the "problem area" or any artificial construct of a portion of the Ecosystem. CALFED should expand, rather than limit its vision on this point. Since CALFED has taken the time to quote Sir Winston Churchill on planning ("A plan is nothing; planning is everything.") we would like to offer another of Sir Winston's quotes to our comments.

"Do not let spacious plans for a new world divert your energies from saving what is left of the old."

2. Page 6, Ecosystem Science Program. We continue to urge that CALFED does not seem to recognize the need for expertise in the disciplines of Watershed Management, or Coniferous Forest Management. We (continue - evidently with little effect) urge CALFED to incorporate these disciplines into the Tier One scientific panel.
3. Page 6, Ecosystem Science Program. We also note that CALFED has evidently ignored our calls for a natural resource economist with

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knowledge throughout spectrum of issues of the solution area, to be incorporated to the CALFED program. We therefore, once again and for the record, point out that this specific portion of the Programmatic analysis is inadequate and it must be rectified in the final environmental document.

Implementing Strategy -

1. Page 3, Implementation Assurances, the Common Program Elements should be included as items which must be assured. Please add to the list and indicate appropriate tools, management structures and assurance alternatives.
2. Page 4, Program Elements - please include Common Program Elements to this list as well.
3. Page 11, Contingency Plan - this should include a caveat that the process is an open public process with significant, meaningful, participation from the stakeholder community.
4. Page 14, Financing - There does not seem to be a discussion of the financing of the Common Program Elements. That should be more advanced than the other programs, given that the Common Elements will be carried out regardless of the selected alternative.
5. Page 15, Benefits-based allocation - The fifth paragraph indicates that there is "*...not general agreement over what role any particular water diversion, or water diversions in general, may have played in degrading the ecosystem relative to many other factors...*" We urge the authors to review the Sierra Nevada Ecosystem Project Report (on file at the CALFED offices) regarding the impacts of stream diversion on watersheds.
6. Page 18, Delta Watershed Fees - We believe that an adequate level of analysis of this issue must be conducted prior to making any decision regarding a "watershed fee." Such analysis should include data from sources such as the Sierra Nevada Ecosystem Project Report. In

addition, the services of a Natural Resource Economist should be utilized in this task. This same premise should apply to general funding for ERPP actions.

CALFED Phase II, Storage and Conveyance Refinement Process
Overview -

1. In reviewing this document it is not clear if the new water rights which would be acquired for CALFED storage projects would be consistent with existing California water law. For example, inasmuch as the "new" storage would be carried out by Federal and State agencies we presume that any water rights for said storage would be subject to the Area of Origin and Watershed of Origin statutes. Please make this point clear and include it in your "Refinement Process."
2. Due to the critical importance of the storage component to the potential for impacts resulting from other portions of the CALFED program (for example, a CALFED solution which simply relied on water transfers and conservation vs. one with new storage could have dramatically different impacts on rural agricultural communities) we urge that the decision making process be an open and public proceeding with regular reports to the Bay Delta Advisory Commission with opportunities for public input. We also note that Auburn Dam is not in the current list of proposed projects and would request that CALFED clarify this decision and the source of the information leading up to the decision.

Water Quality Program -

1. Page vii. We reject your conclusions on the Sacramento River Region that the Trinity River Watershed is not truly "connected" to the Bay-Delta System. Flows from the Trinity watershed are indeed diverted by a pipeline to the Sacramento, and the amount and quality of those waters flowing into the Sacramento will have direct affects on water quality (and quantity - which affects temperature and therefore is a component of water quality) in the Delta and its ecosystem. It is

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certainly as much a part of the system as the Los Angeles Basin which is also only connected to the Bay-Delta by a large ditch. We find CALFED's logic in making the Trinity not part of the Delta system and the Los Angeles river part of the Delta system to be tragically flawed. Please correct this incorrect portrayal of reality in your next draft of this document.

2. Page 2-11. Agricultural Water Use Efficiency Actions. We believe that these measures may actually concentrate the pollutants in drain water and will result in adverse impacts at receptors utilizing water discharges.
3. Page 2-16 Coordinated Watershed Management Program. This program should provide funding and technical resources to watershed efforts in the upper and lower watersheds in the Sacramento and San Joaquin Watersheds. See also our earlier comments on this program.
4. Page 22. Action 4 (reduction of sediments in water) is apparently not linked at all to wildfire. Wildfire is a major producer of sediments due to significantly increased erosion in the winter immediately following the fire. We urge that the CALFED take appropriate steps to recognize this linkage here and throughout the CALFED environmental documentation. Additionally, we would request that CALFED staff someone to the Parameter Assessment Team (PAT) who is a fire ecologist. We recommend staff with the United States Department of Agriculture (Forest Service), the Bureau of Land Management and the California Department of Forestry. This should be done in a timely manner so as to avoid ongoing sins of omission on this subject.
5. Page 25, Water Management. CALFED's recognition that it may have to acquire "*dilution water*" from "*willing sellers*" should be linked to a working knowledge of the factors which affect the quality of the water the sellers own. Inasmuch as many of the willing sellers are expected to be in upper watershed reservoirs we suggest CALFED make the overdue linkage referenced above between wildfire and watershed health as it relates to reservoir water quality.

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6. Page 26, Water Management. We agree that water management of dams to include reservoir reoperation should be evaluated as a water quality action. However, bear in mind that one means for areas of origin expect to obtain necessary supplies is through reoperation of existing small hydroelectric facilities in the upper watersheds. Therefore, improvements for water quality downstream should not compromise water supplies upstream.

7. Page 49, Introduction. We take note that "...this large group of technical experts, representatives from stakeholder groups, and staff of the CALFED agencies have played and will continue to play a major role in defining and evaluating program components to better achieve increases in beneficial uses." We also note that there is not one staff person assigned with any expertise in forest fire ecology, or watershed management. We would therefore (continue) to urge that CALFED include scientific expertise from this critical component of the ecosystem of the Delta. This should be done immediately if there is any hope of incorporating their input into the CALFED program.

8. We wish to note that the interrelationship between the Water Use Efficiency Program and that of the Water Quality program should be improved. For example, reductions in agricultural applications of water (as an efficiency matter) may result in increased concentrations of the pollutants in drain water and result in adverse impacts at locations receiving the drain water discharges. If forced water use efficiencies result in agricultural land not meeting discharge standards (so as to benefit other users elsewhere in the system) this will be a redirected impact and an inappropriate action in light of the CALFED solution Principle of no redirected impact.

Water Use Efficiency Component -

1. Page 1-4. We agree with your understanding and distinction between applied water reductions and real water savings. However, we disagree that applied water reductions always would provide for water quality improvement. Due to potential concentrations of

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pollutants in agricultural runoff, water quality could decrease due to applied water reductions.

2. General comment. We urge CALFED to adopt a definition of "water user" that has universal application throughout the various CALFED documents. It is confusing to the reader to attempt to imagine the implications of programs without this key definition in place.
3. Page 2-1. We strongly disagree with the CALFED definition of water use efficiency ("*...efficient water use is characterized by the implementation of local water management actions that increase the achievement of CALFED goals and objectives.*"). CALFED needs to recognize that there is no necessary relationship between effective water use efficiency measures and CALFED objectives. Water use efficiency actions should be measured in their ability to wisely use water for the benefit of all parties and all segments of the ecosystem and export area.
4. Page 2-2. We object that in the design of the program CALFED has discounted reservoir operation, upper watershed management and in stream flow standards as water use efficiency programs. Reservoir operations are very important components to water use efficiency from the standpoint of time-value of water, as well as availability for stored water to be transferred. Upper watershed management actions related to water use efficiency are reflected in the language of the Organic Act of 1897 which identified water production as one of the primary purposes for the formation of our national forest systems. This issue had previously been communicated to CALFED in our letter of November of 1997 regarding the CALFED watershed program.
5. Page 2-6. General Assurances. We wish to note that CALFED indicates that efficient use "*...should be met by every water supplier in California, regardless of the suppliers desire to receive CALFED benefits.*" We believe that this will be politically difficult to implement statewide and that CALFED will open themselves for justifiable criticism. Water use efficiency measures should be treated under the same standards as watershed actions and must be directly

linked to problems in the Delta. Areas unconnected to the Delta should not be required to participate in CALFED water use efficiency programs.

6. Page 2-7. Please clarify the definition of "...*local and regional water suppliers...*" as that relates to being eligible to receive any additional water. Also please explain in detail the phrase, "*They may be asked to meet water measurement and pricing criteria.*" These are significant issues which must be clarified.
7. Page 2-7. New Water. We do not believe that your description regarding "...*new or expanded water supplies...*" would be applicable to areas of origin. The Bay-Delta Accord did not change those statutes. We would also note that the areas of origin, either singly or collectively, did not participate in, or execute, the Bay-Delta Accord.
8. Page 7-13. We believe that one of the main obstacles to obtaining a functional, flexible, water marketplace is the current lack of adequate data on local groundwater basins. We urge that CALFED recognize that the often fragmented institutional boundaries of local districts do not allow for comprehensive basin wide groundwater monitoring and modeling. Neither do these boundaries encourage the development of County wide or basin wide, comprehensive planning. Funding is a major obstacle to this need and should be addressed through CALFED and recognized in proposed CALFED programs. For example, funding should be made available to assist local Counties and districts in gathering adequate data, imposing a monitoring program for ground-water resources and development of a groundwater model which could assist in predicting long-term yield of the basin. Without adequate information and a model capable of predicting extraction and export levels, there should be no expectation of a "suddenly" free water transfers market place for ground-water resources. Without adequate information and a model capable of predicting extraction and export levels, there could be no adequate analysis of impacts from water transfers. To develop this information funding being made available to local agencies and carried out by local Counties and districts.

9. Page 7-14/15. We agree with the CALFED's work group's conclusion that "*Research and development, as necessary, to establish credible and adequate baseline information on groundwater monitoring programs, before, during and after specific water transfer projects.*" We urge CALFED to vest that charge with local agencies and not with a state, federal or "new" institution. We believe that local agency planning, working cooperatively can produce the necessary information and programs on a basin wide basis without the need for any regional governance.
10. Page 7-16. We agree with the concept of a "*clearinghouse*" for the storage and evaluation of data gathered regarding local resources. However, we must make it very clear to CALFED that we do not support the concept the creation of a regional or statewide entity to administer anything but a data bank, which could also provide technical assistance to local entities. It should not have regulatory authority, nor should it act as the Lead Agency for environmental analysis, in compliance with the California Environmental Quality Act.

Ecosystem Restoration Program Plan (Vol. I) -

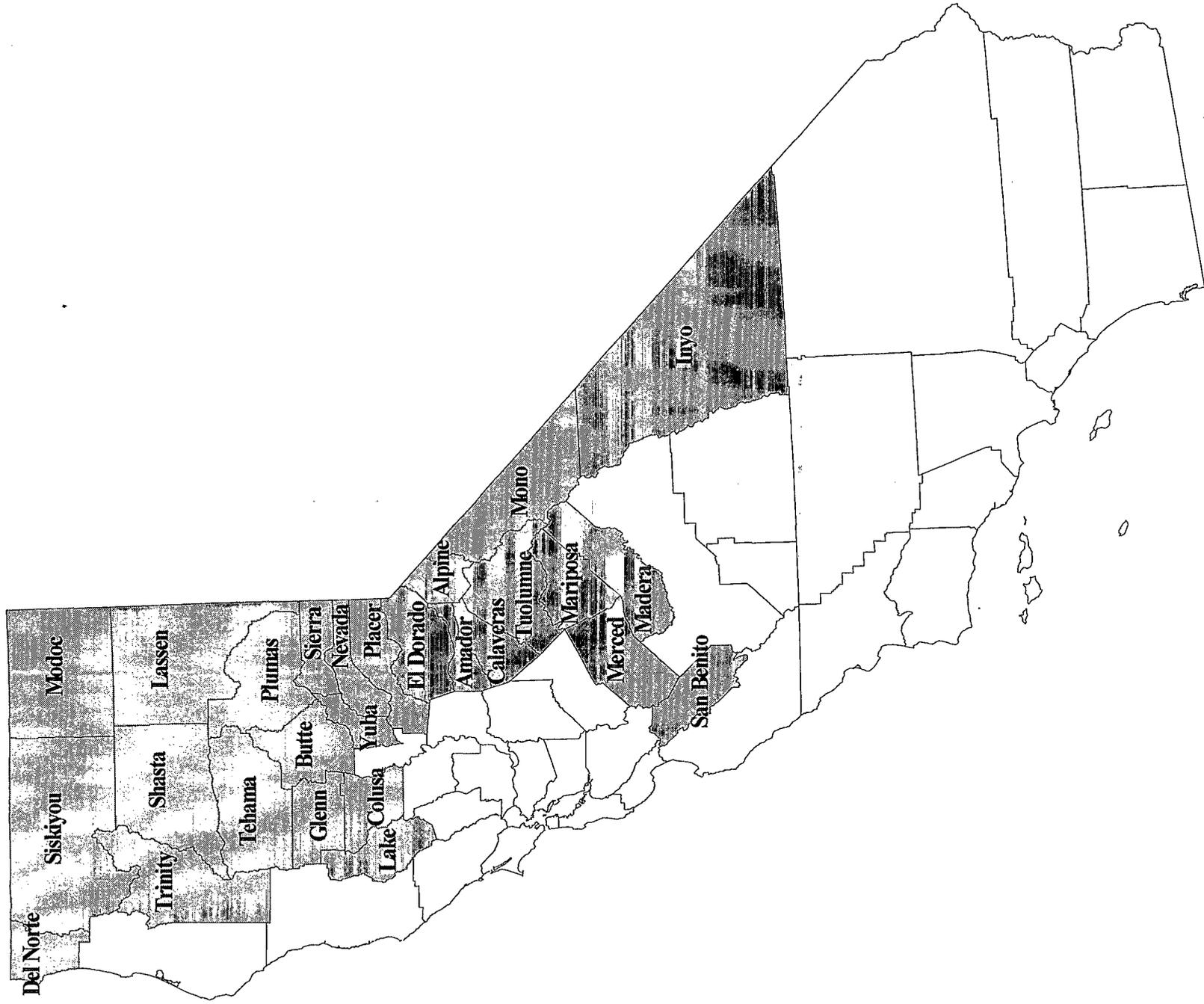
1. Page 288. The first paragraph under Stressor Description states that, "*1.53 million tons of aggregate were mined in Tehama and Shasta Counties in 1992.*" The context of this statement implies that this aggregate was all removed from rivers and streams. This statement is misleading in that more than half of the aggregate mined in Shasta County in 1992 came from quarries, and therefore, was not alluvial sand or gravel. it is also a point of record that in 1992 there was only one in-stream mining operation in Shasta County.
2. Page 289. The first full paragraph in the second column states: "*Typical extraction rates exceed the average annual yield of gravel from upstream areas.*" It is not clear what source of information was used to determine these "typical" extraction rates. While it may be true that historically extraction rates have exceeded yields, most conditional use permits for in-stream mining issued in California in the last ten to fifteen years do not permit extraction rates to exceed

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annual yield. Review of aggregate resource management plans from Counties such as Sonoma, Yolo and Lake, would show that such stream degradation is not permitted. In other counties, which do not have specific in-stream mining policies, mitigations required under CEQA would prevent stream bed degradation.

END

Regional Council of Rural Counties



RCRC COUNTIES	POPULATION¹	LAND AREA² (acres)	AGRICULTURE- Value of Production³ (millions)
<i>Alpine</i>	1,180	472,740	N/A
<i>Amador</i>	33,750	379,240	16.0
<i>Butte</i>	199,100	1,049,340	260.3
<i>Calaveras</i>	36,500	652,920	16.5
<i>Colusa</i>	18,300	736,500	304.9
<i>Del Norte</i>	28,250	645,050	19.2
<i>Eldorado</i>	142,200	1,095,350	14.9
<i>Glenn</i>	26,800	841,530	237.0
<i>Inyo</i>	18,350	6,522,930	9.0
<i>Lake</i>	54,800	805,420	41.8
<i>Lassen</i>	34,450	2,916,790	47.2
<i>Madera</i>	111,600	1,368,590	598.6
<i>Mariposa</i>	16,000	928,780	16.2
<i>Merced</i>	61,400	1,234,490	1,220.2
<i>Modoc</i>	10,150	2,524,390	64.3
<i>Mono</i>	10,400	1,948,470	13.4
<i>Nevada</i>	86,600	612,900	5.7
<i>Placer</i>	209,700	898,820	48.3
<i>Plumas</i>	20,350	1,634,540	14.6
<i>San Benito</i>	44,350	889,050	160.5
<i>Shasta</i>	162,700	2,422,820	46.3
<i>Sierra</i>	3,360	610,200	5.1
<i>Siskiyou</i>	44,400	4,023,850	120.8
<i>Tehama</i>	54,800	1,888,670	96.7
<i>Trinity</i>	13,400	2,034,470	1.5
<i>Tuolumne</i>	52,100	1,430,820	13.6
<i>Yuba</i>	60,500	403,490	120.8
Total	1,555,490	40,972,160	3,513.4
Percent of California	4.77	41.04	14.06

¹ -1997, Official State Population Estimate, Department of Finance, Demographic Research

² -Department of Water Resources, Statewide Planning Branch

³ -1995, California Department of Food & Agriculture, Agricultural Statistics Service

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