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JUN 30 1998

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June 30, 1998

Re: the CALFED Bay-Delta Program EIS/EIR

Dear Mr. Rick Breitenbach:

Please consider the excellent comments of the Environmental Working Group and the Sierra Club.

The ERPP does not contain specific guarantees that the good things it talks about will be done. I hope the EIS/EIR contains guarantees.

**Please take care of the streams and their flood plains.** I am glad you recognize that we must help the forests high in the Sierra shelter the flood plains of the headwaters of our valley streams; this will slow spring run off and prevent erosion. Erosion increases the silt build up behind dams. Riverine wetlands will, under certain conditions, absorb excess nutrients from agricultural runoff and retain water that could contribute to flooding. Most of the areas that can recharge groundwater are located in flood plains. Flood plains that are not wetlands or recharge areas could be parks and farms. It is much cheaper to compensate farmers who own land in a floodplain every time they loose a crop to flooding than to build levees, dams and reservoirs.

Do not build any dams or on or off stream storage; they are expensive, degrade rivers and evaporate water. Delay them, and the peripheral canal (isolated conveyance facility to you) until we show the sum of all conservation measures fail, these include:

- Finding all possible recharge areas in California, and filling them with as much water as possible.
- Retiring the land that produces the least jobs, food and fiber per amount of water applied to the land. Usually this is the land that has the most sodium chloride and selenium salts.

- Urban water conservation including water meters on as many houses and apartments as possible.
- Agricultural water conservation including drip and other efficient irrigation methods and planting crops not easily grown in wetter parts of the USA.
- Water transfers, when they conserve water rather than promote urban sprawl

I do not think agencies around Bakersfield will implement efficiency measures as well as you seem to say on "Water Use Efficiency Component Technical Appendix page 2-2".

I do hope you will make a case for limiting urban expansion onto the land that produces the most jobs, food and fiber per amount of water applied to the land, rather than assume urban expansion will happen, as you seem to do on "Water Use Efficiency Component Technical Appendix page 4-5".

Thank you for the opportunity to comment,

Arthur Unger