



SAVE THE AMERICAN RIVER ASSOCIATION, INC.
P.O. BOX 277638 - SACRAMENTO, CA 95827-7638 - (916) 387-1763

February 21, 1996

Ms. Maria Morrison, Project Engineer
East Bay Municipal Utility District
375 Eleventh Street
Oakland, CA 94607-4240

RECEIVED

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WATER SUPPLY IMPROVEMENTS

Dear Ms. Morrison:

Subject: Notice of Preparation and notice of Scoping Meetings for the Folsom South Canal (FSC) connection project Environmental Impact Report (EIR), dated January 25, 1996.

These are Save the American River Association's (SARA) comments in response to subject notice.

SARA is an organization of concerned citizens established in 1961 to promote the protection, conservation, restoration and enhancement of the lands, waters, natural resources and other interests of the American River Parkway and the Lower American River.

The Lower American River and the American River Parkway are resources of incalculable value to residents of Sacramento County and the greater Sacramento area. State and Federal policies and laws, including the State and Federal Wild and Scenic Rivers Acts and the public trust doctrine, support the view that these resources associated uses and values, should be afforded the greatest level of protection and that beneficial uses of the water of the American River should be maximized. A cornerstone of SARA's concern is the protection, restoration and enhancement of the anadromous fish resources (chinook salmon and steel head trout) of the Lower American River.

SARA opposes any and all efforts by entities to divert water from the Lower American River, or from points above the Lower American River, for use outside of counties, watersheds and areas of origin as defined under California law. SARA believes that all such diversions of American River water be taken from locations below the confluence with the Sacramento River.

SARA was a part of the Environmental Defense Fund, et al v. East Bay Municipal Utility District, Alameda Superior Court No. 425,955, May 25, 1990. SARA has embraced the physical solution, the so-called Hodge Flows, as the new minimum environmental standard for protecting public trust interests of the Lower American River.

SARA does not accept the premise that diversions from the Lower American River are necessarily acceptable at times when flow levels set forth in the Hodge decision are instantaneously met. The Hodge Flows are minimum target flows which cannot be met at all times and that flow-related in stream conditions must be translated into actual operational criteria that will meet the Hodge Flow standard.

SARA encourages the EBMUD to investigate as a part of the alternative actions for meeting future water needs, (1) the enlargement of Pardee Dam and Reservoir and the flow releases needed to meet the flow regimen of the Lower Mokelumne River Fisheries Management Plan of the California Department of Fish and Game, November 1991, and (2) that any diversion of American River water be taken from a location or locations below its confluence with the Sacramento River such as via a Freeport diversion or at its own Bixler facility.

Thank you for the opportunity to provide these comments.

Sincerely,

Frank F. Cirill

Frank F. Cirill, President
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wgd

cc: DeCuir and Somach
Attn: Stuart Somach

Department of Fish and Game
Attn: Jim White

Committee to Save the Mokelumne River
Attn: Bill Jennings

Friends of the River
Attn: Ron Stork

Congressman Vic Fazio
Congressman Robert Matsui

SARA Board of Directors