

CITY OF FOLSOM

Administration/Engineering
50 Natoma Street
Folsom, California 95630



Public Works Department
R.H. Blaser, Director

February 29, 1996

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

RECEIVED

MAR 05 1996

WATER SUPPLY IMPROVEMENTS

**SUBJECT: FOLSOM SOUTH CANAL CONNECTION PROJECT
NOTICE OF PREPARATION**

Dear Ms. Morrison:

Thank you for providing the City of Folsom an opportunity to comment on the Notice of Preparation for the Folsom South Canal Connection Project Environmental Impact Report. We have reviewed your Initial Study and offer the following comments:

1. The use of a project EIR presumes that a program EIR had been prepared, certified, and included a legally-adequate analysis of the program-level impacts of the proposed project. A project EIR can then focus on the "footprint impacts" of the project, such as pipeline routing, etc. The Updated Water Supply Management Program EIR, which was prepared in 1993 and is referred to in the NOP as the program EIR upon which the project EIR will rely, did not include an adequate project description, or program-level analysis of alternatives to, and cumulative impacts from, the Folsom South Canal Connection Project. Therefore, the project EIR must contain an analysis of project alternatives and cumulative impacts that satisfies the requirements of CEQA.
2. Even assuming that the WSMP EIR adequately analyzed the Folsom South Canal Connection Project on a program-level, there have been numerous factors that have significantly changed the conditions that existed at the time of preparation of the WSMP EIR. Under section 15162 of the CEQA Guidelines, these substantial changes that have occurred with respect to the circumstances under which the proposed project was analyzed in the WSMP EIR would require extensive additional evaluation to satisfy the requirements of CEQA.
3. The City of Folsom is very concerned with the impacts on the Lower American River and the impact on those who divert from the River. Folsom has excellent water rights for up to 27,000 acre-feet of water and would not want to limit our ability to enjoy this water right to its fullest.

g5304ld

Public Works (916) 355-7272 / Fax (916) 351-0525

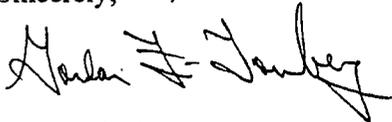
C - 0 8 4 9 5 2

C-084952

4. Water in the American River is limited, especially in the dry years. Thus, additional diversions may have an impact on other water diverters who would need to restrict their diversions in order to provide adequate flows for recreation and fish. This impact and the effects of increased diversions on the fall-run chinook salmon and steelhead in the Lower American River needs further consideration.
5. The Sacramento Area Water Forum is working with regional stakeholders towards a solution for the American River that will provide a reliable water supply and preserve the Lower American River. The EIR should address the impacts of this project on the Water Forum's objectives.

Thank you for the opportunity to provide these comments. Please continue to include the City of Folsom on the mailing list for additional information on this project and the proposed project EIR. If you have any questions or need additional information, please feel free to call me at (916) 355-7370.

Sincerely,



Gordon F. Tornberg
Water Engineer

GFT:dso

c: Paul M. Bartkiewicz

g5304ld