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August 9, 2000

Mary Nichols, Secretary
The Resources Agency of California
Suite 1311, Resources Building
1416 Ninth Street
Sacramento, CA 95814

David Hayes, Deputy Secretary
U.S. Department of Interior
1849 C Street NW Room 5113
Washington D.C. 20240

Steve Ritchie, Acting Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, CA 95814

Dear Ms. Nichols, Mr. Hayes, and Mr. Ritchie:

I am writing to comment regarding CALFED's proposed 30 day comment period on its Final Programmatic EIS/EIR, and on the proposed early adoption of a Record of Decision. As you know I am an environmentally sensitive farmer, a San Joaquin County Farm Bureau Director, and a member of BDAC.

We should not pretend that there can be meaningful public review and comment on a six thousand page document in the proposed 30 day review period. It can not be assumed that the public already knows what is in the document. CALFED became a "closed door" process last May. The public does not know what changes have been made from previous documents and where any such changes may be buried in the new document.

Furthermore, there will be a cloud over the future of CALFED if a Record of Decision is adopted without first holding public meetings in which CALFED clarifies its intent in respect to important issues wherein CALFED appears to be vague or ambiguous, or even misleading. It is unlikely that these clarifications can be found in the PEIS/EIR or that they will be resolved by later piecemeal, site specific EIR/EIS's. For example,

- What are CALFED's intentions regarding improvement of its through-Delta conveyance plan? The plan was developed without participation by in-Delta interests and in disregard of the plan's inadequacies and

in-Delta impacts. Will the plan be improved by measures such as proposed by BDAC and Delta interests and urged by the Ag Caucus?

- What does CALFED mean when it speaks of "water supply reliability"? "Reliability" apparently does not mean "adequacy" as the public is allowed to believe. It also can't mean a predictable degree of inadequacy unless CALFED follows BDAC's recommendation regarding CALFED's intent, process, and basis for evaluating the likely water supply shortage. Will CALFED's plan lead to colossal water shortage during the life of the plan?
- What are CALFED's intentions regarding the development of new water supply? CALFED has hoodwinked the public by talking only of "storage" and letting the public believe that new storage is equivalent to new supply. Some of CALFED's storage proposals may produce very little new supply. They may also consume so much power that they can not be justified and will not be built.
- CALFED apparently now proposes that the government displace local control of groundwater management. Is the public expected to believe that there is some governmental magic by which it can thereby stop the unsustainable long term overdraft of groundwater without either replacing the overdraft with new surface water supply or reducing the agricultural water supply?

I urge that the review period be substantially extended. It is important also that the ROD not be adopted until public meetings are held and unambiguous written documents are provided to clarify CALFED's intent regarding issues such as the above, and regarding the impact that CALFED's plan will have on the production of agricultural products, and on rural communities, and on the environmental benefits provided by agriculture.

Sincerely,


Alex Hildebrand

cc Governor Gray Davis
Senator Diane Feinstein
Congressman Richard Pombo
Congressman Gary Condit
State Senator Patrick Johnston
State Senator Richard Montieth
Assemblyman Michael Machado
Assemblyman Dennis Cardoza
San Joaquin County Board of Supervisors