

Summary of Written Comments Received On the Draft Programmatic EIS/EIR

The Program has received more than 500 comment letters about the Draft Programmatic EIS/EIR as of **May 27, 1998**.

Extension of Public Review Period

Approximately 50 of the 500 comment letters we have received were focused on extension of the public review period. Since CALFED has extended the review period until July 1, 1998, and committed to distribute a revised draft Programmatic EIS/EIR, the length of the comment period should become less of an issue and allow those commenting to focus on the content of the draft environmental document.

Water Use Efficiency

Many comment letters from members of the general public have criticized the Program's water use efficiency program as being insufficient. Many letters have suggested that CALFED incorporate specific water conservation measures--such as tiered pricing, installation of water meters, horizontal-axis washing machines, and drought-tolerant landscaping--within the water use efficiency program in order to strengthen it. Also, several letters recommend additional water reclamation and recycling research, and educational programs and outreach to encourage use of new reclamation and conservation techniques.

Alternatives

A San Joaquin Valley county supervisor recommends that CALFED choose an alternative that contains the "best elements" of each of the three CALFED alternatives. Another letter recommends phasing the Program and implementing Alternative 1 first, assessing its effect, and moving on to additional features of Alternative 2 if Alternative 1 proves to be inadequate. If the combined features of Alternatives 1 and 2 were inadequate to meet CALFED goals upon further evaluation, features of Alternative 3 would be implemented.

Many postcards and letters have come in from environmental groups and members of the public expressing support for an "environmentally friendly" alternative focused on 1) restoration and protection of watersheds and groundwater basins, 2) maximization of water conservation and efficient use of water through economic incentives, and 3) restoration of habitats of the Bay-Delta ecosystem.

One member of the public recommends constructing a salinity control barrier in the Carquinez Strait. Another member of the public suggests that CALFED is proposing unsuccessful, old approaches to fixing the Bay-Delta system, and that CALFED should "go back to the drawing board" to formulate a conservation-oriented alternative. Yet another letter recommends building more desalination facilities in Southern California to reduce the demand on Northern California water supplies.

Insufficiency of Environmental Documentation

One letter from a member of the public suggests that the Draft PEIS/EIR fails to adequately address environmental issues and that it underestimates the funds necessary to rehabilitate the Bay-Delta ecosystem. He also suggests that the document does not adequately represent the cost of the full Bay-Delta solution since it does not account for mitigation costs.

Another letter from a member of the public indicated that the environmental document does not evaluate an adequate range of alternatives.

A separate letter from a BDAC member similarly complains that the Draft fails to provide the cost-benefit analyses necessary to assess if Program actions will achieve their objectives cost-effectively. He also questions many of the policy and modeling assumptions that underlie the impact analysis, and he criticizes the Draft for failing to explain many of its assertions regarding impacts. He also suggests that the Draft does not adequately account for the impacts of actions associated with the Ecosystem Restoration Plan. He also argues that Alternative 2 was not optimized before undergoing impact analysis.

Conveyance/Alternative 3

Several letters from the general public have expressed opposition to the isolated conveyance facility that is part of Alternative 3, citing its cost, its potential impact upon Delta water quality, its potential impact upon fisheries, and its capacity for siphoning large volumes of water from the northern part of the state.

Several letters from the public described support for Alternative 3, referring to the expectation that additional storage and conveyance facilities will provide more flexibility in water operations to meet agricultural, urban and environmental water needs.

Storage

A few letters from members of the general public have expressed general opposition to new dams, suggesting that the state should live within its existing developed water supply by implementing water conservation measures.

Other letters have expressed strong support for additional storage. One letter favored developing dam sites south of the Delta rather than raising Shasta Dam. Two letters from south Delta residents expressed concern over the siltation that new south of Delta dams would cause by mentioning the siltation induced by existing temporary dams. Two letters expressed support for developing storage sites in the northern portion of the state.

Alternative Water Supply Projects

One letter criticizes the Draft for not exploring land retirement as a nonstructural means for augmenting the state's water supply. Another letter suggests exploring desalinization as an alternative water supply strategy.

Growth-Inducing Impacts

Several letters from the general public have expressed concern about increasing the state's water supply owing to the urban development that it spawns. They argue for managing growth so that it conforms to the state's existing water supply.

Costs

A number of letters from the general public expressed reservations about the anticipated large cost of the Bay-Delta solution and the cost to the next generation.

Levees/Flood Control

A letter from a congressional representative criticized the Program for not adequately addressing flood issues. The use of setback levees would eliminate productive farmland, thereby reducing the jobs and the economic output of source counties. Levee maintenance must be coupled with additional storage in the northern part of the state to provide effective flood control.

Watershed Management

A congressional representative argues that the Program must expand the restoration of upper watersheds to increase water quality, supply, and timing benefits. A representative of the timber industry recommends the Program place more emphasis on upper watershed management.

Several letters from environmental groups and members of the public oppose upper watershed forest management if fire management involves increased logging.

Contra Costa Water District is concerned about water quality degradation in the Bay-Delta watershed and would like the watershed management and water quality programs to address projected increases in urban and industrial wastewater discharge and agricultural drainage (i.e., watershed pollution load limits with a market mechanism to permit the exchange of pollution credits).

Water Rights

Sacramento Valley landowners and the Lassen County Farm Bureau want to make sure that CALFED actions don't jeopardize landowner water rights and area-of-origin protections.

Water Quality

Several letters from the general public have indicated the importance of improving water quality by managing and reducing urban and agricultural pollution sources. Several members of the public emphasized the need for clean drinking water.

Assurances/Implementation

One letter from a major stakeholder group expressed concern that the Program has made limited progress on the legal assurances necessary to implement the Bay-Delta solution.

Agricultural Economics

A San Joaquin Valley county supervisor noted that the adverse effects of agricultural land conversion to habitat on the local economy would be significant in the San Joaquin Valley, where unemployment rates are relatively high. In addition, he indicated that the cumulative impact of the conversion of agricultural land to urban uses and conversion of agricultural land to habitat would make protection of productive farmland even more difficult. Finally, the supervisor opposes any water transfers outside county boundaries.

Economic Analysis

Several members of the public have requested more detailed economic analyses of the potential impacts of the Program on both urban and rural communities/economies throughout the state.

Exotic/Invasive Species Management

One member of the public expressed concern that noxious weeds are a major threat to the ecosystem and water transport systems, and CALFED has not given weed management and education adequate attention in the environmental document.

Mitigation Strategies

Another letter questioned the adequacy of mitigation strategies to offset the adverse social/employment impacts resulting from conversion of agricultural land. Questions were raised about the source of funding to offset potential lost property tax revenues and to compensate local governments for increased demand for services required by displacement of workers, and the feasibility of training farmers/farm workers to become skilled high-tech workers.