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March 2, 1998

Lester Snow and BDAC Members
CALFED Bay-Delta Program
1416 9th St., Suite 1155
Sacramento, CA 95814

MAR 06 1998

Dear Lester and Fellow BDAC Members;

Thank you for the Staff's February 23 partial response to my December letters. The response provided useful technical and cost information on the isolated canal, which it acknowledged to be based on the Peripheral Canal. It did not provide the operating plan for through Delta versus isolated conveyance, or state how that plan would be assured. Stein also indicated that seepage from the canal would be handled in part by compensation rather than prevention. This would add to the loss of productive land. Might control of shallow groundwater levels be lost over a large area? What environmental and other disruptions will occur during installation of the syphons under streams and rivers?

The Facility Description for the canal references a Facility Description for an "Improved" Through Delta Facility. We should see that document. Do the improvements include using the South Fork of the Mokelumne instead of the North Fork? Do they include measures to control the flow of water and fish through Georgianna Slough? What other facility and operational improvements have been made?

Before the BDAC can provide informed advice regarding the choice between alternatives 2 and 3 it will need other information including but not limited to the following:

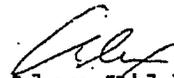
- 1) A cost/benefit and risk analysis of the difference between an optimized alternative 2 and alternative 3 in dollars; water supply and water quality for different interests; estimated quantified benefits to specific fish species and their resident or migratory routes; third party impacts; and the implementation time and interim benefits involved. Also some consideration of the probability of public support.
- 2) To the extent that the choice is based on alleged advantages to public health there should be a much more balanced assessment than that presented to BDAC by urban water purveyors at our last meeting. The EPA did not appear to concur in the presentation. The presentation did not address the potential for adequately meeting concerns by revising alternative 2. It also did not consider the alternative of treating

less of the urban water supply to potable levels, with due regard to the fact that only a very small fraction of that supply is consumed.

The February 23 letter again emphasized the Staff's reliance on substantial reallocations of water involving exports from watersheds and changes in purpose of use; that is, primarily reallocation away from agriculture. Yet it again fails to consider whether these substantial reallocations can realistically occur while "protecting against significant negative third party or environmental impacts," and consistent with "no redirected impacts" and "getting better together."

I again urge that the BDAC first be provided with adequate, unbiased information, and that its advice then be sought and clearly provided regarding the choice of alternative. The BDAC was presumably appointed to fulfill that function. Its members have devoted a great deal of time and effort toward that end. It would be a mockery of the BDAC to circumvent the role it expected to fulfill.

Sincerely,


Alex Hildebrand