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Rio Alto Water District

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May 12, 1997

Mr. Lester Snow, Executive Director
CAL-FED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Impact Analysis Workshop

Dear Mr. Snow:

I would like to follow-up my attendance at the recent CAL-FED Impact Analysis Workshop conducted on Tuesday, April 29, 1997. The comments that follow were made verbally during that workshop forum:

- (1) During Mr. Buer's discussion of the proposed groundwater conjunctive use program he indicated that existing records and data would be used to evaluate the potential impacts and resulting damages that will occur as a result of implementation of a groundwater conjunctive use program, and that there is no intent via the CAL-FED process to develop a pre-program base-line analysis or study of targeted groundwater supplies. If the groundwater conjunctive use program remains a component of the preferred alternative, and if the intent to develop impact data after implementing component projects remains, then we believe this will lead to a major failing within the CAL-FED process. Rio Alto Water District remains very concerned about the "not well understood Northern Sacramento Valley Groundwater supply" receiving minimal pre-program study efforts. Issues such as groundwater quantity, groundwater quality, land subsidence and the impacts on existing habitat and local economy must be evaluated prior to the adoption of conjunctive use as a program component. Pre-project baseline analysis of groundwater supplies along with analysis of projected impacts on local areas is essential. Pre-program/project studies cannot be

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replaced by post-program/project impact analysis. Damage to groundwater aquifers, in any manner, will be nearly impossible to correct after the fact, especially with "supply-demand" programs in place and operating. CAL-FED must be pro-active in protecting existing groundwater supplies in Northern California rather than reactive in the mitigation of the impacts that will occur.

- (2) A number of presentations by CAL-FED staff listed "common sense" as a tool that will be employed to insure that program impacts are minimal, however, in view of the recent unveiling of the DWR "Surplus Water Purchase" EIR, it appears that there is a serious lack of coordination between CAL-FED and one of its major players. We believe DWR's purchase/transfer plan when placed in tandem with the proposed CAL-FED conjunctive use proposal will create serious impacts for Northern Sacramento Valley groundwater supplies. We therefore request that CAL-FED's "Common Sense" criteria prevail and that a complete and thorough, project specific impact analysis, be completed prior to the adoption of any component of conjunctive use north of the Bay-Delta estuary.
- (3) Storage and conveyance facilities must be implemented prior to the adoption of any conjunctive use program aimed at groundwater supplies in the Northern Sacramento Valley. Additionally; any conjunctive use component proposed under the CAL-FED program should be voluntary, and as such, initiated and controlled by those local agencies and jurisdictions that will be directly impacted.

Rio Alto Water District greatly appreciates the opportunity to respond regarding your impact analysis process. We hope that our comments will be taken into consideration and we look forward to a continued involvement with the on-going CAL-FED process.

Sincerely,



Roger Sherrill, General Manager
Rio Alto Water District

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cc: Rio Alto Water District Board of Directors
Richard Golb, Executive Director, NCWA
Dan Keppen, Water Resources Engineer
Bill Richardson, U.C. Coop. Farm Advisor