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Lester Snow
Executive Director
CalFed Bay/Delta Program
1416 Ninth Street
Suite 1155
Sacramento, CA 95814

Dear Executive Director Snow,

Please enter these comments into the formal record for your Draft Programmatic Environmental Impact Report and Statement.

I sent comments in June of '98 and received a reply in August thanking me for my letter; however I was not notified of the release of the Revised Draft Programmatic EIS/EIR. I happened to read in the local paper that there was a local hearing recently, and I did attend, though, due to the large attendance and time constraints, I did not comment there. The information I obtained at that hearing was not specific enough to tell me whether or not the concerns I had written of previously had been addressed; but did provide an internet website. The Adobe Acrobat Reader format used to show your documents on the internet is painfully slow to download and does not facilitate easy online reading. I think your public outreach efforts leave a lot to be desired.

After spending several hours reading the environmental documentation on the internet, however, I have been somewhat reassured; but I wish to here reiterate my previous comments and add a few new observations.

My main concern is protection of our National Forests. Regarding the list of Watershed Stewardship activities that can contribute to achieving each of the four objectives of CalFed (those being Ecosystem Quality, Water Quality, Water Supply Reliability, and Levee & Channel Integrity) they sound pretty good. Using the listed activities as a guideline should ensure that no ill-advised `forest health' projects are funded through CalFed.

I do not have easy access to the Revised Draft, but the first Draft Programmatic EIS/EIR identified catastrophic wildfire as having the greatest potential to accelerate runoff and endorsed the Quincy Library Group's Community Stability Proposal of a massive network of shaded linear fuelbreaks or DFPZs. I hope you have reconsidered that endorsement.

The Forest Service's own analysis and Record of Decision on the Herger Feinstein Quincy Library Group FEIS states that the DFPZs would not work as well as Area Fuel Treatments in reducing wildfire risk or protecting wildlife habitat. Furthermore, increasing logging in upper watersheds will not provide more water for downstream uses without dramatic negative effects.

Please refer to the report by Rhodes and Purser, Thinning for Increased Water Yield in the Sierra Nevada: Free Lunch or Pie in the Sky?,

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available from the Pacific Rivers Council at P.O. Box 6185 Albany, CA 94706, 510/548-3887 phone, or 510/548-3776 fax.

From an extensive review of the scientific literature, that report concludes: " In summary, if thinning were conducted on a scale significant enough to increase annual yield, it would be accompanied by increases in flooding, erosion, permanent loss of soil storage, loss of forest productivity, reduced water quality, and increased frequency of local extinction of sensitive aquatic species. This would be unacceptable from an economic, environmental, social, and even legal viewpoint. And still, a desired effect of increased summer streamflow (baseflow) would likely not be realized except possibly as a transient effect, while the negative effects are likely to persist for far longer."

Quincy-style logging would not meet the four main objectives of the CalFed Watershed Program Plan, nor would it be likely to significantly reduce the risk to forests from wildfire.

Another concern I have is the support voiced by the agricultural community for increased storage. I was glad to hear that CalFed is not now proposing any new or expanded dams. You must realize the inherent contradiction between trying to maximize both water supply reliability and flood protection from the same dams, and that with 1400 major dams in California, it is dams and diversions which have proven to be the most damaging to the bay/ delta ecosystem.

I am also concerned about the effects that proposed off-stream storage could have on the Sacramento River's endangered salmon and steelhead. Guaranteed fresh water flows for healthy rivers, bays, and fisheries should precede any diversions for off-stream storage projects such as the Sites/ Colusa project.

CalFed should also provide firm guarantees of more fresh water flows for our rivers, bays, and fisheries before diverting more water into canals and encouraging more farmland conversion of marginal and selenium-laden tracts.

CalFed should improve water quality for people and wildlife by preventing pollution at its source.

CalFed should maximize conservation efficiency and appropriate groundwater storage before even considering new surface storage facilities.

Sincerely,

Stephen Sayre

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