



SIERRA
CLUB
FOUNDED 1892

California/Nevada/Hawai'i Field Office
827 Broadway, Suite 310, Oakland, CA 94607
TEL: [510] 622-0290 FAX: [510] 622-0278
www.california.sierraclub.org

October 31, 2002

Mr. Paul Marshall
California Department of Water Resources
Bay-Delta Office
1416 Ninth Street
PO Box 942836
Sacramento CA 94236-0001

Subject: Scoping Comments for South Delta Improvements Program (SDIP)

Dear Mr. Marshall:

The Sierra Club appreciates having the opportunity to submit comments on the SDIP on behalf of our nearly 200,000 members in California. We hope you will find our comments and recommendations helpful as you begin drafting the EIS/EIR. The Sierra Club, along with many other organizations concerned with the environment and fisheries, is concerned that implementation of the SDIP will do further harm to fisheries and water quality conditions in the San Francisco Bay-Delta and Central Valley Watershed. History has proven that engineering solutions in the Bay-Delta have had harmful and unanticipated consequences.

The Sierra Club believes that increased diversions are extremely likely to continue that harmful trend—especially given that fact that preliminary studies for operation of the SDIP, even under a modified Environmental Water Account, have shown that the overall entrainment of fish at the export pumps is expected to increase over both current and historic levels. A future EIS/EIR needs to adequately explain how increased pumping capacities will avoid ongoing or increased harm to risk species over time and how water quality standards in the Bay-Delta can be achieved if pumping capacities are increased.

It is true that the timing and volume of water exports can make a difference in the magnitude of environmental impacts. This widely-accepted and touted idea of increasing diversions when water flows are high, to allow for less diversion in periods when fish are particularly vulnerable holds promise, but it is difficult to guarantee that such operations aimed at minimizing environmental impacts will continue indefinitely.

While the EIS/EIR for the SDIP should include an alternative that would dedicate the additional export capacity to improving the timing of export operations to protect fisheries with no net increase in Delta exports, the Sierra Club is keenly aware of the fact that both legislative and administrative promises to operate and manage water projects in ways that benefit fisheries and the environment have regularly been broken in the past. At a minimum the Department of Water Resources and other agencies should work at developing language



SIERRA
CLUB
FOUNDED 1892

California/Nevada/Hawai'i Field Office
827 Broadway, Suite 310, Oakland, CA 94607
TEL: [510] 622-0290 FAX: [510] 622-0278
www.california.sierraclub.org

that can succeed in guaranteeing that environmental commitments within the preferred alternative will be honored over time.

Beyond the challenges of providing environmental assurances, a number of other storage and diversion project such as Los Vaqueros and Sites, emphasize the same style of operational plans that rely on diverting more water at less environmentally vital times. A cumulative study should be done to examine the overall net impacts on delta flows, fisheries and water quality of all of these projects combined.

Further, the idea of modifying the EWA to mitigate the impacts of increased diversions is problematic for the Sierra Club. First, the EWA is not effectively operating in its current form. CALFED should succeed in establishing a fully endowed, funded and effectively functioning EWA before changes or shifts are made to that program. A primary intent of the Sierra club is to ensure that the CALFED Environmental Water Account and Ecosystem Restoration Program, along with the Central Valley Project Improvement Act, do in fact result in ecological restoration with measurable and in-direct results and benefits. Simply providing water to make up for increased diversions is a status quo scenario that does not meet restoration objectives. Beyond simply slowing the rate at which aquatic ecosystems are lost we must turn back from the brink of extinction by restoring habitat, not simply mitigate greater loss of habitat.

To that end, before the Sierra Club can consider any increase in Delta diversions called for in the CALFED ROD, a number of management actions intended to provide environmental and fishery protections must be funded and implemented to maintain any sense of balanced implementation of the ROD. These include, but are not limited to, implementation of the CVPIA (b)(2) requirement of 800,000 acre-feet of flows for fisheries, a fully funded and endowed Environmental Water Account, and the increased stream flows needed to meet the targets of the Ecosystem Restoration Program.

Finally, the EIS/EIR should examine the long-term opportunity for a significant farmland retirement program as an alternative to increasing water exports from the Delta.

The Sierra Club appreciates having this opportunity to provide comments and recommendations as you go forward with your planned EIS/EIR. The South Delta Improvement Project certainly represents an important test of the CALFED program and the abilities of the participating agencies to move forward with implementing the ROD in a balanced manner. This is a powerful opportunity for the Department of Water Resources to show how it can be done, and we look forward to working with you as you progress.

Eric Wesselman

Regional Representative
Sierra Club