



SAVE THE AMERICAN RIVER ASSOCIATION, INC.

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January 31, 2006

FEB 07 2006

00127

Mr. Paul A. Marshall
CA Department of Water Resources
Bay-Delta Office
1416 Ninth Street
Sacramento, CA 95814

Dear Mr. Marshall:

Subject: Draft Environmental Impact Report / Environmental Impact Statement
(EIR/EIS – October 2005) for the South Delta Improvement Program.

Save the American River Association (SARA) is a grass roots organization, established in 1961 to promote the protection, conservation and restoration of the lands, waters and fish and wildlife resources of the Lower American River. SARA's concern extends to riparian and aquatic ecosystems that are required to conserve, protect and restore our native fish resources such as Chinook salmon and steelhead and other native fish and wildlife. This concern extends to resources, uses and values downstream into the Sacramento-San Joaquin Delta and San Francisco Bay protected by the public trust doctrine.

SARA is writing to make you aware of its comments and concerns regarding the actions proposed in the Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS – October 2005) for the South Delta Improvements Program (SDIP).

The fish and other aquatic resources of California and the habitat upon which they all depend are a Public Trust, held by the State on behalf of its people. SARA is concerned about the future of the Delta, its resources and ecosystem. SARA believes that impacts to the Delta resources and ecosystem will have impacts extending upstream to the operation of the CVP and SWP facilities. The SDIP is another attempt by the State Water Project and the Federal Central Valley Project to pump / divert additional water from the already severely compromised Sacramento – San Joaquin Delta- Bay Estuary.

The various South Delta modifications including dredging, barrier construction, and channel alignment will eventually lead to increased pumping of more Northern California water for export south of the Delta. The SDIP will only worsen the Delta Ecosystem Pelagic Organism Decline. This SDIP is really a single purpose project for exporting more Northern California water from the already severely compromised Delta-Bay Estuary.

The measures proposed by the SDIP will benefit special interests such as Westlands Water District. Some of this additional water when applied to saline-seleniferous soils will, in turn, lead to more leaching of selenium and other salts from the soils on the Westside of the San Joaquin Valley. This in turn will contaminate groundwater and surface water, including waters of managed wetlands and the Delta. Some of this selenium will be taken up via the food chain, by fish and wildlife of the San Joaquin River and the Southern Delta.

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SARA believes that to export additional Northern California water which could further exacerbate the irrigation / selenium drainage / groundwater, surface water, fish and wildlife contamination conditions on the Westside of the San Joaquin Valley is poor and illogical thinking as well as a waste and the unreasonable use of the State's waters.

SARA requests the following actions before any more water is exported from the Delta:

- That the Lower American River ecosystem and associated native fish species (Chinook salmon and steelhead resources) be assured long-term and high level of renewability through actions by the State Water Resources Control Board.
- Reduce pumping rates and water exports to those that existed during 1998 to 2002 when Delta Smelt appeared to be on the road to recovery.
- Increase ecosystem restoration measures.
- Improve water quality of all Delta inflows.
- Ensure that the ecosystem of the Bay-Delta, including its fish resources and other aquatic life are restored to a high level and self-sustaining populations, before there is any consideration exporting more Delta water (its lifeblood) from the Bay-Delta.

SARA believes that the California's Water Plan demonstrates that our water needs can be met for several more decades through conservation, reclamation, efficiency, and conjunctive use. The Sacramento – San Joaquin Delta – Bay Estuary is a treasure appreciated by all Californians. Therefore the long-term sustainability of the Delta's many Public Trust assets must be protected before more water is exported from the Delta even with the SDIP in place.

Please incorporate these comments into the record of the SDIP. Also please advise SARA of the SDIP's selected actions to be implemented.

Sincerely,



Alan D. Wade, President
Save the American River Association, Inc.



Felix Smith, Director
Save the American River Association, Inc.

Cc: Interested parties
Water Forum