

From: becky@calbotany.com
Sent: Monday, September 27, 2010 9:34 PM
To: ILRP Comments
Subject: ILRP comments
Attachments: EIR_comment_letter.pdf

Ms. Smith,
Attached are the comments of the Sacramento Amador Water Quality Alliance. We are a subwatershed within the Sacramento Valley Water Quality Coalition.

Thank you.
Becky Waegell
Coordinator
Sacramento Amador Water Quality Alliance.

September 23, 2010

ILRP Comments
Ms. Megan Smith
ICF International
630 K Street, Suite 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the
Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

As the coordinator for the Sacramento Amador Water Quality Alliance I would like to provide the following comments on the Draft Programmatic Environmental Impact Report (PEIR) for the Long Term Irrigated Lands Regulatory Program (LTILRP).

The PEIR does not analyze the preferred alternative. Given that the preferred alternative appears to have been developed by taking portions of the five alternatives it is difficult to assess the actual impact that the program might have. This concerns me given the broad range of economic impacts of the 5 alternatives. Why wasn't the preferred alternative analyzed as part of the PEIR document?


The PEIR indicates that habitat loss from the implementation of management practices would be significant, but implementation of BIO-MM-2 would reduce this impact to less than significant. Who would be responsible for paying for the cost of mitigation? Was this included in the economic analysis and if not, why not?

The Economic Analysis indicates that field crops, grain, hay, irrigated pasture and rice will suffer the greatest losses of acreage due to implementation of the LTILRP. These particular types of irrigated cropland have significant habitat benefits for a number of bird species including State-listed Swainson's hawk and Greater Sandhill crane and numerous migratory waterfowl covered under the Migratory Bird Treaty Act. Loss of agricultural lands was not analyzed in Chapter 5: Environmental Impacts and Mitigation Measures. Why was this impact not analyzed?

The Staff Report identifies extensive water quality monitoring and protection programs already in place. Additional monitoring seems redundant and unnecessary. We would encourage the Board to utilize existing data and only require additional monitoring when all other data sources have been reviewed and data gaps clearly identified.

We encourage the adoption of Alternative 2 as the most cost effective means of achieving improved water quality. We also support the views of the Sacramento Valley Water Quality Coalition, and Somach, Simmons and Dunn.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rebecca Waegell". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Rebecca Waegell

Coordinator

Sacramento Amador Water Quality Alliance