

Organization

Comment on Process

1996

Northern California Power Agency (NCPA)

Mission statement must integrate its assessment and decisions with other environmental restoration and enhancement activities.

Delta Wetlands

The basic DW project should be included in the list of reasonable foreseeable projects. Foreseeable projects are extremely consistent with the principals of the CALFED process. They should be strongly encouraged by Calfed team.

Delta Wetlands

Core actions seem to fit into categories, first there are fundamental actions, such as demand management, conversation and reclamation, that are universally accepted but will require ongoing efforts for the foreseeable future. Second there are more specific actions that can be quickly accomplished and should be encouraged immediately.

Department of Water Resources (DWR)

Depending on mix of preferred alt you may need FERC license, permits for construction sites, reclamation plan, encroachment permit, coordination with ports of sacramento and stockton, involvement of public utilities company. State Department of Parks and Recreation has jurisdiction over Suisun Marsh. Bay Conversation and Development Commission has some jurisdiction over suisun Marsh.

County of Yolo

Alt 3,14,and 15 should be retained for more analysis and not "narrowed out"
Extension of TC canal need lot of consideration.

Too much focus on the delta and the core actions. Core actions are not clearly defined. Basic lack of understanding on the part of staff and participants of the Sacramento River Hydrology and how the operations(of reservoir) or modified operations does and can impact the various beneficial uses. North of Delta thats where storage should be created. Water south of delta has no value north of the Delta and less value for the delta. Alt14 offers almost unlimited options for the exchange with most of the Sacramento Valley major users.

California Urban Water Agencies

"The objective to reduce the uncertainty of Bay-Delta system water supplies to meet short and long term needs" could be interpreted such that a reduced but more certain water supply from the Bay Delta system would satisfy this objective.
We believe that a comprehensive ecosystem restoration program is critical to a successful alt and are concerned that the wide variety of approaches and levels of implementation which appears in the twenty alt connote that there is a great deal more known about what sets of actions should be undertaken and what biological benefits will result than is justified by the current scientific understanding of the system's problem and results of restoration actions.
In general Core Actions defined in the workshop lack specificity.
We believe that each alt should contain a comprehensive ecosystem restoration program as noted in Stakeholder submittal and that alt do not need to vary in degree on this component.

Calfed Workshop

Alt are not internally balanced against conflict resolution& CALFED principles.
System reoperations alternatives do not supply sufficient water supply benefits. Without supply improvement benefits there will be financial support for other improvements.

Department of Fish and Game (DFG)

The draft essentially limits discussions of the subject to proposing review of export/ inflow during triennial reviews. Neither the scope nor the setting is appropriate. While operating standards will obviously be subject to review in accordance with the law, the alternative report should focus on the goal of the program concerning operating standards.

Min flow standards need to be considered not only for Delta outflow but also for key locations within the delta.

Subsidence management should be included in more alternatives than 6 and 16.

In addition to having a set of core actions for early implementation that there be a set of actions to all alternatives.

Include all or most actions of secondary importance to the program in common actions.

Linkage to the Anadromous Fish Restoration Program:

Opportunities should be sought for describing the linkage between the two programs.

As the program stands now very little will be done for the San Joaquin system. We need to seek more balanced approach.

Another concept which may have potential is greater development of local water supplies from the delta.

US Bureau of Reclamation

As written, CALFED sounds like a vague, amorphous entity. At least, the background should say who is in CALFED relates to these agencies. Planning Process: It is not clear what the 3-Phase process is. It sounds like each of the 3-phases identify problem, identify solutions, and help devise a plan.

It is not clear what are the two tiers of the two tiered scope. Perhaps say "The first tier is"; "The second tier is ..."

Purpose and Needs: You should say that the comprehensive plan would be implemented, by some or all of the agencies which comprise CALFED, in a number of specific actions. This is referenced in several sections, but what seems to be missing is a concise description of the entire process from planning to implementation, not just the planning process. Maybe you will say that in the alternatives section

Consulting Economist

There is a strong concern about the absence of objective measures and costs to permit assessing the relative merits of the alts.

I have found that color coding of descriptive attributes (e.g., Basic, moderate and extensive) among categories of activity in a matrix helps to spot patterns and relationships. It is very helpful to have the notional idea of the general cost of an activity as a basis of ranking the alts.

Red Bluff Fisheries Forum

There is apparent lack of concern in the workshop 5 information packet of a basic fact of migratory fish flows through the delta to the ocean.

Northern California Power Agency (NCPA)

1) There is need for a process/ structure to coordinate actions and funding between the various restoration and enhancement activities affecting Central valley resources.

2) need for the development and articulate of strategic subobjectives.

3) need for specificity of the actions continues to exist.

4) must continue to attempt to estimate fishery population benefits of proposed actions.

Department of Water Resources (DWR)

If facilities are implemented concurrently with environmental restoration, the facility may generate a revenue stream to fund a portion of the restoration actions.

Also it is difficult to visualize a project which guarantees its construction, slated for the last stage of implementation will be actually funded and constructed. History suggests that it is extremely difficult to provide all the necessary components for implementation of public work over extended period of time. Support, funding, authorization, up to date technical information and permits must all exist simultaneously.

DWR water demand projections show that California will suffer significant harm if we wait for another decade.

Environmental Water Caucus

CALFED should adopt a two tiered approach to formulating and adopting restoration targets during phase 1. Tier 1 would consist of near term, higher- resolution targets designed to restore natural process(including both physical habitat and flow) to the extent necessary to meet recovery criteria for estuary-dependent species of concern. Tier 2 consists of a large scale, lower-resolution vision of long term restoration designed to provide guidance for the development of 1)community-level and ecosystem-level targets during phase 2 review and through the long term adaptive management process and 2) implementation mechanisms and funding streams adequate to support future restoration on a large scale.

Department of Fish and Game (DFG)

Tier 1 EIR/EIS should provide specific documentation sufficient to begin implementation of some site specific actions. Table 4-2 contains lots of errors,data be presented for all months, add ag types of data for upland/ag lands, add reference to DWR's recently developed methodology to assess service area impact.

Department of Fish and Game (DFG)

Criteria 3 should include reference to a Notice of Determination on a final EIR or negative declaration. Criteria 5 would presumably result in eliminating a number of actions from the no-action.

State Water Resources Control Board (SWRCB)

Under CEQA, the No Action alt is not always the same as the baseline.

Law Office

Appears to be a lack of common understanding among interested parties on the scope of area of origin protection. Development of Bay Delta alt should not proceed without regard for the legal protections provided to the counties to the counties of origin.

Shasta County Water Agency

Water supplies allocations were cut back in area of origin during recent droughts. We are concerned that environmental demands for water in delta will worsen the situation for usin shasta. We feel that this issue be properly addressed in environmental issues. Long term solution sought by CALFED program would encourage entrepreneurs to come to shasta and install facilities and export groundwater and other local supplies.

Department of Parks and Recreation

Add these to solution principles like NewProject work to have minimal env impact. There be efficiency improvement and alt be cost effective as opposed to affordable. Alt A,B satisfy mission and should recieve further consideration. Alt H give it more consideration. Alt E should be considered, without any modifications. Include reduced demand in every alt. Delete some portion of text from alt J,I,B,C,D

Department of Fish and Game (DFG)

Premise is that modification to the CVPIA document and technical report will be sufficient. More substantial interagency discussion should occur to verify this approach. Shortcoming in the CVPIA PEIS should be identified and corrected, certain actions are not likely to be addressed adequately in the CVPIA PEIS. Drawbacks to close link to the CVPIA programmatic approach include not being able to move quickly to implementation of the basic component of the Bay-Delta prgram's adopted alt. Risk is that actions will run into further opposition and resolve will diminish. We will lose focus on the issue that need to be addressed and the momentum. Premature to judge the extent CVPIA PEIS technical appendices will need to be modified.

Department of Fish and Game (DFG)

Role of No Action: Isn't clear how the results of the supplement or sensitivity analyses will be used if there is controversy about including or excluding an action from no action alt.
Scoping Criteria: Some categories may lend themselves to be screened by these criteria. Criteria 3 should include Notice of Determination on a final EIR or Negative Declaration as well as completed FONSI. Criteria 5 result in eliminating number of actions from the no-action alt that would expected to be implemented at some level even in absence of proceeding with any other alt in PEIR/EIS.
Possible phasing of Analyses: we are not aware of such phased analysis being conducted.
Time Frame: Some definations of actions categories seem problematic. Defination of policies could be misleading since it implies that they are policies that need to be adjusted before no action alt can be analyzed. Changes should be considered to appendix A

California Urban Water Agencies

CUWA's agencies strongly believe that an objective of the CALFED program should be to provide a water source of sufficiently quality to assure that future public health standards for drinking water can be met. This issue needs more attention. CALFED need to be augmented with a national level expert on drinking water quality, source control, and safe drinking water Act from EPA

San Diego County Water Authority

Each alternative must satisfy Water Supply Reliability, Water Quality, Ecosystem Protection, Demand Side Management, Costs. Future obligations of the urban agencies to conserve water should be clearly defined in the alt. As member of CUWA we encourage you to consider CUWA's positions regarding a preferred alternative.

California Striped Bas Association

Bay Delta does not adopt goal of CVPIA of doubling anadrmous fish. Strped bass should be given equal treatment in Bay Delta program as it is in CVPIA. There is no clear indication for implementation of changes in pumping restrictions. We support demand management.

Serious focus on environmental improvements but little vision as to long term water needs. Any comprehensive water supply plan?Need more focus on water supply. Focus on core elements. Explain relation between CVPIA/PEIS & this process. Need assurance that water supply will increase. Demand management-What is real agenda. Individual comments about strong and weak points on alt's are on file.

California Urban Water Agencies

Identifications of the issues to be studied and resolved regarding final alt. final alt should include refined E,C version stating with delta habitat&channel improvements, added storage and adding isolated conveyance. Sizes of these need to be determined by public. Individual comments about strong and weak points on alt's are on file.

Organize workshop in sierras on issue of watershed management and forest health as for fire danger. Consider upstream watershed improvements in order to deliver quality water. Include upstream solution to solve downstream problems. Individual comments about strong and weak points on alt's are on file.

Consulting Engineer

Industrilized ag seems to be a minus quality, as far as ecosystem health is considered. Need some information about tide fluctuations and distance below MSL, health of San Francisco Bay, and size of areas involved. Individual comments about strong and weak points on alt's are on file.

County of Orange

Address water supply issues. How delta environment enhance while balancing needs of contracted water deliveries. Evalaute each alt for participation by all diverters of Delta water. Existing levee maintenance, upstream versus downstream diverters of water. Analysis of levee maintenance, costruction of an isolated conveyance facility. Local programs which reduce reliance on delta exports should be addressed. Impoundment operations on San Joaquin river should be evaluated for upstream water shed management to improve water quality. Water export should be evaluated as to water quality to meet public health drinking water requirements. Alt should be evaluated for meeting sound principles of DM for all users. Timeframes for program implementation.

BDAC

Need more comprehensive evaluation of each alt before we can choose among them. First sort them out as to basic approach. Examine each potential component to determine whether it should be common to all alt or to none. Third step examine each component and each alt after assessing following consideration.

Environmental Benefit

Water Supply

Water Quality

Costs

Assurances of preservation of Delta.

Adequacy of Technical Analyses of proposals.

Relative balance among all and assurance of "Shelf Life" as population growth etc.

Western United Dairymen

We seriously object to large amount of land retirement in DM category. We see no modelling analysis attached to various alt. Very imp to acknowledge water that was allocated temporarily to environment in Bay-Delta Accord and should not be considered in Baseline of no-action alt. Modified alt that would size a through and/or around delta facility that would transport only water for municipal and safety uses. This suggestion will in no way fulfill historic demand and contracts. Ag insists that CALFED-Bay Delta result to restore to ag the water supply that was diverted fro environmental purposes. Calfed include Site Reservoir project in the next phase of alt review.

Western Growers Association

Must focus on individual components that make up each alt and assess implications of each and everyone. preferred alt must include protection pf water rights, mean to convey water to meet water needs, be financially feasible. Water rights and area of origin must be respected. We believe in means to move water from north to south of delta in a manner which ensures reliable supply. Final financing solution must include combination of federal, general obligation bonds etc. We do not view extensive habitat protection as an alt in itself. Reliance in name of DM is not acceptable. We support CORE actions.