



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street  
San Francisco, CA 94105-3901

MEMORANDUM

SUBJECT: Agency Review of Bay-Delta Problem Summaries  
FROM: EPA - Bay/Delta Section  
DATE: August 22, 1995  
TO: Steve Yaeger, Program Deputy Director  
CALFED Bay-Delta Program

OPTIONAL FORM 88 (7-90)

FAX TRANSMITTAL

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GENERAL SERVICES ADMINISTRATION  
NSN 7540-01-317-7368 5089-101

# Comments on Geographic Scope

EPA comments on the CALFED document *Draft Discussion Paper: Geographic Scope*, dated August 14, 1995, follow:

1) We would suggest including the text marked with double underline below:

"The Delta as one piece of an interconnected water/biological/economic system. Many things, from water and water quality constituents, to fish and birds, to economic goods and services, move across the boundaries of the Delta, . . . Examples of Delta inputs and outputs . . .

2) We would like to see San Pablo Bay included in the definition of the Delta, or, text recognizing the downstream impacts of possible Delta solutions, including a discussion of pulse flows.

3) EPA recommends adding the following double underlined text on page 2:

". . . beneficial use of water. Additionally, the program is focused upon those aspects which have changed in status, according to historical records."

# Comments on Problem Summaries

General EPA comments on the CALFED document *Draft Problem Summaries*, dated August 15, 1995, follow:

- 1) EPA recommends that the distinction between Tidal and Brackish marshes be made clearer.
- 2) EPA recommends including declines in San Pablo Bay Pacific Herring as a problem.
- 3) EPA recommends including "reduction in pulse flows flowing through the Delta" as a problem in the Delta.

Specific EPA comments on the CALFED document *Draft Problem Summaries*, dated August 15, 1995, follow:

## Delta Water Quality

move A.1.a to A.3.a

EPA questions the use of "increased" in A.1.\*, EPA believes carbon has not increased.

EPA questions the assumption that things have changed over time in A.1.b

EPA believes that turbidity has generally decreased, not increased.

EPA recommends changing "pesticide" to "insecticide and other toxic residues" in A.2.a and D.2.a

EPA would like text to show an appreciation of distinction between wet and dry year problems in A.3.\*

EPA recommends changing thrust of text to identify market failures as the problem, not regulatory responses to market failures, in A.4.c and B.4.a

EPA recommends changing "The" to "During" in A.3.c

EPA information indicates that "increased" should be changed to "generally decreased" in B.1.\*

EPA recommends adding double underlined text ". . . for particular industrial uses or the use of less desirable alternative intakes . . ." in C.2.a

EPA recommends adding "TOC decline" in E.1.a

EPA questions "Increased" in E.1.b, suspended solids have generally decreased

*Done* Delta Ecosystem Quality

EPA recommends under the heading "Important Aquatic Habitats . . .", need to develop list of species of interest.

EPA recommends deleting "estuarine" in A.1.b and A.1.c

EPA recommends adding Tule Perch, Splittail and Copepods to A.3.\*

EPA recommends replacing "Reduction . . ." with "Movement into deeper channels . . ." in A.4

EPA recommends changing text to read ". . . Suisun Bay reduces the bay's . . ." in A.4.a

EPA recommends changing text to read "Reduced and Altered Transport Flows . . ." in A.5

EPA recommends replacing "production" with "abundance" in A.5.\*, A.7.\*, etc.

EPA recommends replacing "Lack" with "Reduced" and deleting "desirable" in A.7

EPA seeks clarification of "Organic Nutrient Inputs" in A.7.f. Does this refer to TOC?

EPA recommends changing text to read "Reduction and Seasonal Shift of Freshwater Inflow to Estuary . . . during critical spring/summer periods." in A.7.h

EPA recommends eliminating lists of example species in A.7, etc., because they are too exclusive. However, if lists are kept, then striped bass should be added to the lists of example species.

EPA recommends deleting "desirable" in A.7.\*

*Case* EPA recommends including "local channel sedimentation and lack of tidal prism" as a problem under B.1.\*

EPA recommends changing list of species to "Suisun song sparrow, Suisun slough thistle, Snowy Egret" in B.1

EPA recommends changing text to read "Altered Vegetation Composition and Stature . . ." in B.1.a

EPA recommends changing text to read "Reduced Areal Extent and Patchiness of brackish tidal marsh limits native wildlife populations and genetic exchange." in B.1.b

EPA recommends changing text to read "Inappropriate Salinity Levels and Soil and Water Acidity reduce forage . . . native species in managed wetlands." in B.1.c

↙ EPA recommends inserting B.1.e as follows: "Lack of Brackish water Wetlands that do not require intensive management limits long-term sustainability."

EPA recommends deleting B.2.d.

EPA recommends changing text to read "Fragmentation or riparian . . ." in B.3.b

EPA recommends changing text to read ". . . (e.g. freshwater and brackish marsh) . . ." in B.5.c

EPA recommends changing text to read ". . . sustainability of some wintering . . ." in B.5.d

*clear* EPA recommends inserting B.5.e as follows: "Levees reduce riparian vegetation, aquatic habitat and tidal prism."

## Water Supply

EPA recommends adding the following problems:

C. Inefficient water pricing has exacerbated both short- and long-term water supply problems.

1. Scarce water resources have not been efficiently priced at the marginal cost of supply to various end-users.

2. The marginal cost of supply historically has not included full project costs, including capital costs.

D. Institutional constraints have prevented the growth of private, market-oriented mechanisms (futures markets, options markets, etc.) that might be used to cope with uncertainty and risk in water supply.

1. The relative merits of using market-oriented methods of managing uncertainty and risk have not been fully examined.

E. Increasing the flexibility of timing of Bay-Delta system water supply is costly.

1. The benefits of increasing the flexibility of water supply timing have not been weighed against the costs.

F. Decreasing the uncertainty / increasing the reliability of Bay-Delta system water supplies is costly.

1. The benefits of decreasing the uncertainty of / increasing the reliability of water supply should be weighed against the costs.

## Some Final Observations

CALFED needs to begin a list of potential impacts outside the Delta resulting from proposed Delta solutions, even if these impacts will not be addressed by CALFED.

The determination of whether a given stationary level of a Delta quality indicator (biological or hydrological) is "adequate" or is "a problem" depends on the definition of the base case.