

OPTIONAL FORM 99 (7-90)

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TO: Rick Breitenbach, CALFED

FROM: Carolyn Yale, EPA, 415-744-1580

SUBJECT: Comments on the draft Purpose and Need statement

DATE: February 7, 1996

I have the following suggestions. As I'm sure you are aware, we at EPA consider this a "work in progress" and will have more to offer during later refinements of the Purpose/Need.

INTRODUCTION: Add bullet

> Water diversions from the Delta and uses supported by these diversions

PURPOSE AND NEED

Paragraph #1:

This paragraph (beginning, "The interrelationship...") seems out of place, in fact adds little. If you choose to retain anything from this paragraph, consider rephrasing to emphasize that, *recognizing the complex interrelationships between ecosystem health,* water supply reliability, and water quality, the Program seeks actions which will provide balanced and complementary improvements in these areas.*

- * Ecosystem "health" needs to be defined (not necessarily in the P/N statement).
- * Water supply reliability needs definition, too.

Paragraph #2:

You may run into the objection which distinguishes between developing a program, and actually doing something "on the ground." I actually liked some features of the earlier version, now discarded (1st paragraph under Purpose, draft of Jan. 16, 1996). Consider replacing the first sentence with: "The overall purpose of the CALFED Bay-Delta Long-Term Program is to develop a comprehensive plan for ecosystem restoration and improved water management in the Bay-Delta system." (NOTE: "Water management" can be interpreted to include water quality, supply and flood protection. If you believe that needs clarification, do so.)

Change the specific purpose statement which relates to "water

supply reliability" to the following:

c) "reduce the mismatch between Bay-Delta water supplies and current and projected beneficial uses ~~dependent on~~ of the Bay-Delta system"

NOTE: There is a problem with the phrase "uses dependent on the B/D system" as it relates to M&I and agriculture users who currently or prospectively (as in contract "entitlements" which have yet to be realized) look to B/D supplies. The wording suggests that these users would continue to depend on the B/D system, exclusive of other options. However, for many of these users the question regarding B/D supplies is to what extent it will be feasible (from an IRP perspective-- cost, reliability, other measures) to take B/D water, compared with other options.

By contrast, the B/D ecosystem is truly dependent on B/D water supplies. A driving purpose of the Program, as it relates to B/D resources, is to identify ways of supporting sustainable, diverse fish and wildlife populations (addressing the full complement of "habitat," including flows); for other users, such as M&I and ag, water supply strategies which depend on the B/D must be consistent with-- and preferably fully complementary/synergistic with-- ecosystem restoration.]

Paragraph 3: Recommended changes

"The decline of fish, wildlife, and plant species dependent on the Bay-Delta system for all or part of their life cycle ~~results in~~ is evidence of considerable conflicts among beneficial uses of the Bay-Delta...."

~~Conversely~~ The decline.... has led in turn to....

Also, the third paragraph doesn't even touch upon the fact that ways in which water is diverted can increase beneficial use conflicts (deficient fish screening is the simplest example). (The factors cited relate to timing/quantity only. Is this omission intentional? Consider adding information.)

Paragraph 4 (on water quality): this paragraph doesn't really say anything about need for actions addressing water quality, except to suggest that quality should be taken into account when addressing other measures (ecosystem, water supply reliability). Does this omission (references to quality problems caused by mine drainage, agricultural drainage, urban runoff, for example) reflect a deliberate intent to write these issues out of the scope of the action?

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