

State of California

# Memorandum

APR 12 1996

Date : April 12, 1996

To : Mr. Lester Snow  
Executive Director  
CALFED Bay-Delta Program

From : Department of Fish and Game

Subject : Draft Affected Environment and Existing Conditions Work Plan

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We have reviewed the subject work plans and have the following comments:

### GENERAL COMMENTS

The primary thrust of these papers is to describe the close linkage between the preparation of the Bay-Delta Program PEIS/EIR and the CVPIA PEIS. The premise is that modification to the CVPIA document and technical reports will be sufficient, in most cases, to satisfy the environmental documentation requirements for the Bay-Delta Program. Before the decision is made to default to this approach more substantial interagency discussion should occur to verify whether this approach is the best approach and not just the most expedient. For instance, any shortcoming in the CVPIA PEIS should be identified and corrected before they are repeated. The specificity of certain actions scheduled for implementation, especially those that are in the Bay-Delta and fundamental to each alternative, and should be covered in detail in the Bay-Delta Program document are not likely to be addressed adequately in the CVPIA PEIS.

Potential drawbacks to establishing a close link to the CVPIA programmatic approach include not being able to move quickly to implementation of the basic components of the Bay-Delta Program's adopted alternative. The risk is that the more significant actions that will drive restoration of the Estuary will run into future opposition, that the level of resolve will diminish, and that we will lose focus on the issues that need to be addressed and the momentum for implementation. Other programmatic approaches have faced the similar challenges.

It is premature for us to judge to what extent CVPIA PEIS technical appendices will need to be modified. Considering the different focus and the broader and more ambitious goals of the Bay-Delta Program for restoring the Estuary, it is probable that much of what is in the CVPIA PEIS will need to be modified.

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### SPECIFIC COMMENTS

**Table 1:** This table should be modified as follows:

**Physical Resources:**

Soil salinity is likely to be affected in the Bay-Delta system.

Surface water quality will likely be affected in the Bay-Delta system.

Aquatic Ecology/Fisheries - It isn't clear why this subsection is located under the Biological Resources category.

There will likely be changes to anadromous fish populations in the rivers flowing through the Bay-Delta system. If the intent of this delineation is to not include rivers as part of the Bay-Delta, this comment would not apply.

**Aquatic Ecology/Fisheries; Delta and Bay:**

There are a number of specific issues related to this resource topic that are not included in this table and should be. The more glaring omissions are physical and hydrodynamic habitat for fish.

**Social Resources:**

M and I land use could change in the Bay-Delta system. Furthermore, land uses associated with recreation facilities, such as marinas, etc., could change. M and I, Commercial Fishing, and Regional income and employment related economic changes are likely to occur in the Bay-Delta system. For instance, commercial ventures for crayfish could be affected. Income in the Bay-Delta is likely to be significantly affected by some alternatives. Power use effects in the Bay-Delta could also be anticipated, depending in the alternative chosen.

**Page 2-2:** The paper states that the Bay-Delta Program proposes to use the historic periods in the CVPIA PEIS for the Bay-Delta Program's PEIS/EIR. More detail regarding the specifics of the historic periods used in the CVPIA PEIS is needed before the acceptability of this approach can be judged.

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- Page 2-3, Study Area Criteria:** It isn't possible to judge whether the affected environment section from the CVPIA PEIS will be adequate to address the range of areas that could be impacted. For example, new areas that could be impacted by construction of new reservoir storage north or south of the Delta will be additions to the affected environment section. The last line suggests that the criteria at the top of page 2-3 will be revisited. It isn't clear that the criterion should change, just that it should be applied again after alternative development.
- Section 3, Page 3-1, Surface Water:** The quality of inflows into the Delta, especially from the San Joaquin River needs to be included. The presence and operation of barriers also needs to be addressed.
- Page 3-3, Paragraph 2:** The emphasis, even though, expanded for non-flow restoration categories, nevertheless, needs to continue to emphasize flow and hydrodynamic conditions in the Delta.
- Page 3-3, Paragraph 3:** Commercial fishing for crayfish needs to be recognized. Recreational hunting should be added to the analysis.
- Table A-1:** Reference to IESP should be changed to IEP. Key greater sandhill crane and waterfowl areas and general plan urban limit lines are available in an ARC INFO format from DFG's Bay-Delta and Special Water Projects Diversion. The contact is Alan Kilgore.

This concludes our comments. If you or your staff have any questions or need for clarification, please contact Mr. Frank Wernette of DFG's Bay-Delta and Special Water Projects Division at CALNET 8/423-7800.

*Frank Wernette for*

Pete Chadwick  
DFG/CALFED Bay-Delta Program Liaison

cc: Mr. Frank Wernette, BDD