

FAX 916/654-9780

TO: Judy Kelly
FROM: Palma Risler
RE: Comments on 1/23/96 Alternatives Package

Here are some more comments on the 1/23 package. Bruce Herbold, Bruce Macler, Susan and Carolyn all have looked over the document in detail. Others have looked over the summaries. Hopefully our comments at the meetings were also helpful. Thanks --- *Palma*

Water Quality - generic

It is important to be clear that "water quality" is not an end in itself but has real benefits. It would be helpful, not only for public debate but technical review to divide up the discussion of "water quality" into it's component parts - agricultural, drinking water (human health) and ecological quality. I would like to know which pollutants, problems and locations are targeted for improvement.

For example on abandoned mines - are we talking about Iron Mountain Mine - which is a Superfund site? Coast Range abandoned mines with mercury runoff? Recognize that most of the large mining sites (Iron Mountain, Penn mine) have been under regulatory attention for some time. So what exactly is being proposed? I am assuming that further controlling mine drainage addresses an ecological problem NOT a human health one - but this was not explicit.

Another example is "agricultural drainage". Sometimes I thought it referenced salts and selenium on the San Joaquin. In this case, is our main concern San Joaquin Salmon migration? Delta agricultural TDS problems? Other times (especially when source reduction was mentioned) I thought you were talking about diazinon in the delta. Again I am assuming that with agricultural drainage the main concerns were not human health. But it was not clear.

In addition, there is a significant range of opinions on the amount of ecological risk that these contaminants are having. Therefore, if you don't realize it already we should talk and further characterize the debate.

Water Quality - human health

As we discussed at the PCT meeting, I am going to get Macler and others together for a drinking water quality discussion. Others did not readily agree with his assessment that bromate/bromide is the majority of the problem.

In addition, export drinking water quality is often referenced as improving but we couldn't figure out if this included CCWD (who has the largest problem) or just Tracy and Banks people. It would be helpful at this stage to be clearer on how

"facilities" improve drinking water quality for all current diversion points (or if they do.)

Habitat issues

- o Use of multiple hatcheries for fall run on San Joaquin is inconsistent with modern management of wild stocks and is not recommended in any other restoration document (native fishes recovery plan, AFRP).
- o The use of a bypass of the 'Mouth' of Old River, in place of a barrier, to facilitate salmon passage is unlikely to have the anticipated results as described at the recent meeting. The flow split at the head of Old River is predominantly determined by the difference in elevation to the north and west. Irrespective of channel configuration, water at Vernalis will tend to continue to go downhill toward the pumps. We believe that further discussion may lead to a configuration that could work.
- o Construction of a barrier at the delta cross channel is proposed in several alternatives. Is something other than the present system of radial gates intended?
- o Marking of salmon is presented in almost all alternatives as a tool for managing ocean harvest rates. The AFRP does not make this recommendation largely because studies in the northwest indicate that mortality rates are unacceptably high among the unmarked (or illegally sized) salmon. Thus there are grounds for concern that this method of management would likely lead to (or maintain) disastrously high side catches of wild stocks.
- o Alt #1 proposes that changes in export patterns will achieve moderate increases in delta outflow. The mechanism for such a result is unclear.
- o Alt #2 (and others) propose to reduce fish entrainment at the export facilities through implementation of a real-time monitoring program on salvage. Such a program is already in place with samples taken every two hours. Is some other action intended?
- o Along with the cooperative approach method in the Core actions suggested at the PCT meeting, please add two other elements that greatly facilitate further restoration actions. 1) Take steps to assure that adjacent landowners are not adversely affected if and when endangered species inhabit restored lands; and 2) Provide sufficient O&M money and staff to assure that trespass and illegal dumping are controlled.
- o Questions arise as to the sustainability of the deepening the San Joaquin channel. Would this be a constant dredging project or a self-sustaining project?
- o In Alt 15 the restoration actions on the San Joaquin should be described

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together rather than in different places. This would give the reader a better understanding of the "habitat philosophy" in each alternative. This same suggestion holds for other alternatives.

- o There should be more alternatives which include long-term staged features. For example: alternatives which allow and encourage natural processes for marsh development in the delta over a long term frame. This should include demonstration projects. One possibility might be a continuing program of successively moving levees back and berm development, plus operating water flow into and through the delta to maximize sediment input and trapping in these restoration areas.
- o The San Joaquin alternatives are too limited if the objective is to provide much increased survival of salmon rearing in the SJ tributaries, passing through the delta or restore native fish populations. Without more natural flow levels, a restored channel is unlikely to last and will have to be constantly maintained. One or more alternatives providing consistently higher flows to the SJ tributaries. Offsets for hydropower, transfers, conjunctive use, storage south of the delta and the possibilities need to be explored within this process and not dismissed apriori.

Water Supply Issues

It was unclear what was being proposed besides the physical and institutional solutions. This section needs to link the timing and quantity of flows projected in each alternative. The ecosystem habitat section makes an attempt to quantify these, but they are missing from the water supply reliability sections.

Performance measures

After working through the package we would note how important performance measures will be in better defining the program. Are we most interested in different approach to the same level of performance or different levels of performance? Thus far a characterization of different levels of performance seems appealing. However, without the performance measures it is difficult to even provide a "wild idea" test to this set of alternatives. Note that #13 seems to be generally in this category. On the issue of water supply reliability, it was unclear what level of water supply reliability was projected by any new facility or diversion point. Were new supplies anticipated? What was the baseline reliability? Do alternatives #4 and #19 provide the minimal objectives of the CALFED process?

Core Actions

The concept of Core Actions is still unclear to us. We have several levels of questions, but our main comment is to carefully rethink this analytic mechanism

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because it hasn't been clear thus far. Questions you might need to clarify include:

- What is the baseline compared to core actions?
- If core actions are in every alternative then wouldn't 1000 acres in Suisun Bay be a core action and others in the minimum habitat description?
- In the Core action list, many ongoing programs are described (levees, water conservation, source control) that are currently funded. Is this a continuation of a program which may be losing funding? A new level of funding? Clarity on these questions will also help in determining and moving along Category III and CVPIA-match projects.

Present the core actions (IF they are really actions in all alternatives) in each alternative however briefly. After reading and discussing the document several times, we believe it would be worth the extra language.

Water Quality Standards

As discussed at the ERT and PCT meetings, we believe that proposing changes in standards will only confuse the discussion of the costs and benefits of alternatives. Keeping the accord as a baseline and measuring improved ecological protection or water supply reliability seems less confusing. After implementation, changes in water quality standards or take limits can be revisited or as a subsequent step in implementing the selected alternative. However not as part of the planning phase.

Presentation

We have had several ideas for presentation improvements.

- The matrix developed for the PCT meeting was helpful. Including something like this in the public version will be useful.
- Grouping actions by geographic area would also help. This will make it easier to evaluate the sum total of actions.
- Another presentation method would be to group alternatives by level of effort. It would be useful to arrange them so that the alternatives which generally achieve the same level are identified and grouped. This will assist the public in comparing apples to apples. Several of us were concerned that without some caveats it may be misconstrued that each of the alternatives provides a similar level of protection or reliability.
- Another change to increase ease of review would be to highlight changes to an action which appears in multiple alternatives (e.g. 1000, 2000 & 5000 acres in Suisun or over 250 v 100 cfs). This problem will be less acute once there are less than 20 but right now several of developed our own summary sheets in order to keep things straight.

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We also have some suggestions regarding the "themes" of alternatives at least at the "low" of effort. It may be helpful to make these themes more explicit, although there seems to be opportunity to improve each one. We hope to use the next phase of the process for refining the alternatives and making them more distinctive.

- Alt #1 & #2 represent similar efforts to reduce diversions from the existing facilities at times when aquatic resources are believed to be most sensitive. The principal actions in each are not incompatible. A single alternative representing a comprehensive effort of implementing this approach would yield a much more viable alternative than either of the two presented.

- Alt #4 & #5 represent an approach that relies on maximum benefits to all users by improving aquatic habitats and restricting export impacts while retaining the present configuration.

- Alt #7 and #17 appear to represent various efforts at meeting the objectives by emphasizing flood control efforts and various water management tools.

- Alt #19 and #20 are minor variations on a theme of toxic reduction and management.

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