

To: Steve Yeager,
CALFED Bay-Delta Program

From: Penny Howard, Chief
Division of Environmental Affairs

Subject: Significant Areas of Concern in CALFED Documents

Bureau of Reclamation staff has reviewed the "Phase II Alternative Descriptions" document, and its technical appendices. We have categorized our review comments into three general areas: (1) lack of specificity concerning common programs and descriptions of alternatives (2) need for a description of rationale used to formulate the alternatives and (3) adequacy of analytical tools. We view the deficiencies in the above categories as sufficient to potentially jeopardize the future funding of this program and to potentially deem the programmatic document as legally deficient under NEPA regulations. We have summarized our comments below:

Lack of Specificity

Although, the documents include an evaluation and comparison of the "Alternative Solution Concepts," the lack of detail associated with the concepts does not allow the decision maker to determine the extent and degree of potential system-wide impacts common to the alternatives as required by both NEPA and CEQA regulations, nor does it allow for a comparative analysis of the alternatives as required by Federal Policy and Guidelines. We recognize that this is a programmatic document, however, the environmental impact analysis must be provided in sufficient detail to make informed judgements about options and alternative decisions. Several specific examples of this concern include:

* Alternative 1/ Water Use Efficiency. As currently described Alternative 1 does not include enough detail to be a viable alternative. There appears to be a heavier reliance on water use efficiency in Alternative 1 as compared to Alternatives 2 and Alternatives 3. However, there is no difference in the description of actions for achieving water use efficiency improvements.

* Water Quality Common Program. Suggest CALFED consider water quality and flow conditions that are not founded on Decision 95-6. Variations in Delta configurations and operational approaches may in fact, negate or alter the need for specific water quality standards. There appears to be a need to describe the overall strategy or vision for the Delta and how water quality parameters will ultimately be incorporated into this strategy or vision.

Plan Formulation Criteria

Our second general area of concern is the need for a description of the plan formulation process or rationale used. The process of selecting options to create alternatives must be clearly portrayed in the document. The process of using analytical tools, expert judgment, and public input to measure the performance of options or alternatives in a number of categories, including technical performance and effectiveness, cost, and flexibility is absent in this document. The methodology and evaluation criteria will provide the information, or performance measures, needed to compare and eventually select options or alternatives. Detailed evaluation criteria should be provided.

Analytical Tools

Our final area of concern involves the need to display the limitation of analytical tools. The documents must note the source of available data, the data limitations, the assumptions used in the analysis, and the confidence level of the impact determinations. The choice of models and the characterization of the results must be generally acceptable to the resource community as well as the interested public. A specific example of this concern can be found in the Water Quality Common Program where there is significant scientific uncertainty with the list of indicators of success that may or may not monitor the action(s) being taken. We remain concerned about the validation of the model results and hope to continue working with CALFED staff to resolve this issue. Of primary importance to Reclamation is the potential for analytical tools to skew the water quality impacts and power costs for Reclamation customers.

We apologize for any confusion our detailed comments have caused you in your efforts to understand each agencies significant concerns. Reclamation review and comments have stemmed from the need to meet contractual commitments, and improve operational flexibility and environmental conditions.