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July 1, 1998

Mr. Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, California 95814

Attention: Mr. Rick Breitenbach

Dear Mr. Snow:

Ag-Urban Comments on Draft Programmatic EIS/EIR for the CALFED Bay-Delta Program

The Agricultural and Urban Water Caucuses Technical Coordination Group (Ag-Urban Technical Group) has received and reviewed the Draft Programmatic EIS/EIR (Draft PEIS/EIR) for the CALFED Bay-Delta Program (Program). This letter represents the response of the Agricultural and Urban Water Caucuses Technical Group, affected stakeholders in this Program from agricultural, urban and rural areas throughout California, as required by the National Environmental Policy Act and the California Environmental Quality Act.

None of the comments contained within this letter are intended to address the policy issues associated with implementation of a CALFED program or indicate a policy direction from the members of the Agricultural and Urban Water Caucuses. Rather, these comments are intended to address the technical issues associated with complying with NEPA and CEQA and the strength of the associated analyses and evaluations included with the CALFED PEIS/EIR.

The accomplishments of the CALFED Program to date are extensive, but we recognize that considerable work remains to be completed in order to include sufficient detail and agreement in the Final PEIS/EIR and supporting documents to achieve general consensus and acceptance necessary for smooth approval and implementation of the preferred Program alternative. As such, we intend our comments on the Draft PEIS/EIR to be constructive and to provide recommendations for adjustments to be made in the evaluation and analyses in the Draft PEIS/EIR so that a preferred alternative can be identified in the Revised Draft and Final PEIS/EIRs that is technically defensible.

The initial comments of some interest groups have suggested that a "soft path," relying solely on increased water use efficiency, recycling and water transfers, could be applied by CALFED to solve Bay-Delta issues. The Ag-Urban Technical Group feels that CALFED has correctly identified appropriate elements for inclusion in a balanced solution to Bay-Delta water issues. The CALFED alternatives include an unprecedented level of innovative water use efficiency, recycling, and water transfer measures while recognizing the limitations of those measures in providing essential water quality and fisheries conditions, and avoiding redirected impacts. The Ag-Urban Technical Group questions whether the assured potential for water use efficiency and recycling measures are supported by the analyses done to date and is concerned that they may have been overestimated in some instances.

This letter raises concerns and provides recommendations regarding general issues we have with Draft PEIS/EIR. We strongly recommend incorporation of the following changes into the Revised Draft PEIS/EIR:

1. Improve integration of common and other Program components in the analysis of alternatives;
2. Include technical information sufficient to support issuance of regulatory findings and permits;
3. Develop and disclose an implementation plan for the preferred alternative that ensures balanced implementation in a phased manner through linkage of projects;
4. Include quantitative analysis of potential impacts in the Delta of moving transfer water at the levels identified for a preferred alternative;
5. Integrate significant concerns for levee failure into the evaluation of alternatives;
6. Include explicit linkages between alternative performance and potential source water quality parameter targets (bromide, TOC);
7. Revise assumptions and reanalyze fishery impacts, and revise the approach for adaptive management;
8. Expand the cumulative impact analysis to quantitatively address potential ramifications of the CVPIA Trinity River Flow Evaluation Study for the CALFED Program;
9. Revise the water use efficiency component of the CALFED Program to ensure that it will be based on a technically defensible, more complete and thorough analysis of data collected throughout the state of actual savings achieved from existing conservation programs; and
10. Include provisions to mitigate impacts to existing recreational resources within the Delta and consider development of enhanced recreational opportunities within the Delta consistent with the Ecosystem Restoration Plan (ERP) and the levee stabilization program.

Detailed comments that focus on specific discussions and/or analyses presented in the Draft PEIS/EIR and the technical appendices and supporting documents are included in an attachment to this letter.

**(1) Improve Integration of Components Within the Alternatives.**

The Draft PEIS/EIR addresses impacts in a qualitative manner at a very detailed level. For instance, each component of an alternative is evaluated for its effects on fisheries at different geographic locations within the delta and its watershed. While this aids understanding at a fine level, it is not possible to understand the overall effect of the alternative on a given resource. The Phase II Interim Report indicates that common components of the alternatives will function differently given interactions with other components of the same alternative. The fine focus of the impact analysis does not allow these interactions and differences to be seen. We expect that water quality program actions may have effects (positive and negative) on fisheries recovery, and that ERP actions may have consequences for water quality. For instance, various ERP actions could potentially increase total organic carbon (TOC) concentrations in the Delta. Actions taken within the Delta to provide improved conditions for a broad range of species within the Delta may impact fish population abundance in tributaries to the Delta. ERP wetlands could result in increased loading of toxic methyl mercury that could have consequences for aquatic resources and for human consumption of fish from the delta. We strongly recommend that the impact analyses presented in the Draft PEIS/EIR be revised to include evaluation of all of the components, their interactions with one another, and an overall analysis of the total alternative on each impacted resource as a whole. This will allow improved understanding of the effects of the alternatives and will help to ensure that regulatory findings needed for assurances can be made.

**(2) Technical Basis Sufficient for Issuance of Regulatory Findings and Permits.**

Ag-Urban Technical Group support for a preferred alternative will be predicated in part on provision of regulatory assurances in documents and agreements that accompany the Final PEIS/EIR. Critical regulatory assurances include Clean Water Act section 404 findings for the preferred alternative and *comprehensive* State and federal Endangered Species Act permits for preferred alternative system operations and for some initial projects. It is imperative that the Revised Draft PEIS/EIR provide sufficient technical detail to allow the following findings to be made. That is, the preferred Program alternative:

- Meets the specific requirements of section 404 of the Clean Water Act with respect to the alternatives analysis.
- Is not likely to jeopardize the continued existence, at the ecosystem level, of species within the Bay-Delta ecosystem and does not, at the ecosystem level, result in destruction or adverse modification of critical habitat, pursuant to ESA section 7.
- Will not appreciably reduce the likelihood of survival and recovery in the wild of species within the Bay-Delta ecosystem, and meets all other finding requirements for conservation plans pursuant to section 10 of the federal ESA.
- Meets the requirements of California Fish and Game Code sections 2081 (California ESA) and 2835 (Natural Community Conservation Planning Act) for incidental take and listed species (candidate, threatened, and endangered) permitting pursuant to NCCP.
- Meets recovery plan requirements of section 4 of the federal ESA including site-specific management actions, objective measurable criteria and estimates of time and funding necessary to achieve the recovery plan's goals.

We strongly recommend that the Revised Draft PEIS/EIR clearly disclose the full extent of the above-listed findings in these subject areas and fully explain the rationale that would support such findings utilizing technical analyses presented in the Revised Draft PEIS/EIR and its appendices. We are concerned with the statement on page 1-10 of the Draft PEIS/EIR that states, "In addition to the site-specific analysis, it is possible that further detailed system-wide analysis may be necessary during Phase III to determine the effects of projects with wide-reaching impacts." We are committed to working with CALFED to discuss the status of these regulatory issues, the approach CALFED and the regulators are taking to meet the regulatory requirements, and the opportunities for our regular involvement to assist with this work and to keep abreast of its status.

### **(3) Balanced Implementation Through Project Linkages.**

A basic tenet of the Ag-Urban stakeholders assurances discussion is that "we will all get better together." This theme point was also made in Proposition 204 which provides funding for the CALFED Program and amends the California Water Code. Section 78684.12 of the Water Code specifies that the PEIS/EIR will contain the "schedule of eligible projects" for funding and further specifies that this schedule is to "ensure that balanced solutions in all identified problem areas, including ecosystem restoration, water supply, water quality, and system integrity are achieved." This is a critical point for the Ag-Urban Technical Group that will need to be reflected in the Revised Draft PEIS/EIR as an even level of disclosure across all the objectives and as a specific outline for the implementation plan for the preferred alternative.

The implementation plan must link projects meeting the four basic objectives in a manner that ensures that all objectives achieve benefits on an incremental basis. It should include linkages, triggers, and conditions to be met before various decisions are made or actions are taken. We recommend inclusion of a specific outline of the implementation plan in the Revised Draft PEIS/EIR, and full discussion of the implementation plan in either the Final PEIS/EIR or in a separate supplemental EIS/EIR, as appropriate, in order to ensure that adequate disclosure and process is accomplished as required by NEPA and CEQA. We are preparing

suggestions regarding the implementation plan, and look forward to working with CALFED to provide substantial input to the development of the implementation plan.

In our review of the Draft PEIS/EIR, we find that the analysis of and disclosure for the ERP is more advanced than that presented for components that address the other objectives. Further, modeling assumptions utilized in the Draft PEIS/EIR analyses provide for full flow targets for the ERP, while there is only graduated implementation of water quality and supply actions. This suggests that the document may not provide for balanced implementation. We recommend that this be rectified in the Revised Draft PEIS/EIR so that implementation of the Program can be balanced and Proposition 204 funding can be readily expended at the appropriate time.

Our review of the CALFED Program also suggests that it may be very important to evaluate the need and opportunities for early strategic land purchases or purchase of option agreements for the ERP and other components of the preferred alternative. We recommend that the Revised Draft PEIS/EIR provide adequate disclosure in this regard so that early land acquisition can proceed as appropriate.

#### **(4) Quantitative Analysis of Potential Impacts in the Delta of Moving Transfer Water at the Levels Identified for a Preferred Alternative.**

Discussion of water transfers occurs in various locations in the main body of the Draft PEIS/EIR but makes only a general qualitative analysis of the potential impacts that transfers may have in the Delta and in the potential source and destination areas. In order for the Revised Draft PEIS/EIR to be meaningful with respect to moving transfers through the Delta, there must be a quantitative analysis of moving a range of water transfer quantities through the Delta consistent with the transfer capability of the preferred alternative. Without such an analysis, each transfer, whether it be a long-term transfer subject to additional environmental review or a short-term transfer exempt from CEQA, will be required to prepare a separate determination that there will be no unreasonable impacts on instream uses in the Delta even if all operations criteria and in-Delta water quality and flow objectives are being met.

Such a quantitative analysis needs to evaluate the potential impacts of moving an assumed quantity of water across the Delta in addition to the water that would normally be moved by the federal and state projects under the proposed operations criteria. Impacts at transfer sources and destinations would be assessed at the time specific water transfers are proposed. Alternatively, the Revised Draft PEIS/EIR would need to be clear that the analysis of the preferred alternative includes an assumed quantity of transfers and/or newly developed water and that there would be no additional impacts or unique operational requirements or mitigation imposed on transfers that fall within the assumed quantity.

Further, the Draft PEIS/EIR incorrectly identifies water transfer opportunities as a characteristic that does not vary greatly among alternatives. In the *Phase II Report, Distinguishing Characteristics, Water Transfer Opportunities*, page 106, all three alternatives are described as being essentially equal in performance under critically dry and above normal years primarily because they are based on limited flexibility in operating rules. This conclusion and the accompanying graph also ignore two very significant practical limitations on the use of excess physical capacity that are described both in that same section of the document and in more detail in *Supplement A: Water Transfers in Context of the CALFED Bay-Delta Program* located in the Water Use Efficiency Technical Appendix, page A-1. As described correctly in *Supplement A*, the current uncertain timing of and unreliable access to available capacity essentially preclude a long-term transfer market. As analyzed by CALFED, Alternatives 1 and 2 are similarly constrained, primarily because they both rely entirely on exports from the southern Delta using operating requirements as a key feature to protect fisheries. Alternative 3,

depending on configuration and sizing of facilities, may have the capability of providing more reliable access to export and conveyance capacity than can be achieved by Alternatives 1 and 2 depending on the ultimate operating requirements. Taking into consideration alternative operating rules, the distinct differences among the alternatives must be adequately described and evaluated in the Revised Draft PEIS/EIR.

**(5) Integrate Significant Concerns for Levee Failure into Evaluation of Alternatives.**

We are supportive of CALFED's proposed method for achieving system integrity. However, we are concerned that the levee system integrity program will not be sufficient to reduce risk of extended export outages to acceptable levels. The Draft PEIS/EIR indicates that the Delta levee system integrity program would improve long-term integrity of the levees, increase reliability of the levees, and improve emergency response capability. However, the document does not evaluate the degree to which these improvements will allow the alternatives to meet the Program objectives. Nor does the document provide clear criteria for determining which levees would be improved beyond Corps of Engineers' Public Law 84-99 levels. We request that these discussions be provided in the Revised Draft PEIS/EIR.

The Draft PEIS/EIR provides only a cursory discussion of faulting and historic seismicity that could affect the Delta levees. We request that the Revised Draft PEIS/EIR include an expanded discussion that includes a summary of expert opinion on the level of future seismic activity in this region. We are concerned that levels of seismic activity since the Delta was levied and farmed are not indicative of activity levels anticipated in the near future.

We are particularly concerned with the potential for widespread levee failure due to seismic shaking and subsequent liquefaction of soils both underlying the Delta and used in construction of the levees themselves. We are also concerned that future rise in sea level combined with continued loss of soil on the islands or El Nino-caused floods could eventually jeopardize long-term levee viability. The Delta levee system integrity program includes continuing seismic investigation by the California Department of Water Resources (DWR) and review by a board of seismic and geotechnical experts. Conclusions and recommendations from the DWR investigation and the expert board need to be disclosed in the Revised Draft PEIS/EIR so that seismic risk considerations can be adequately incorporated into the efforts to evaluate the performance of the alternatives and to identify the draft preferred alternative. The discussion of sea level rise found on page 2-15 of the Draft PEIS/EIR also needs to be expanded and incorporated into the effort to identify the draft preferred alternative.

Further, we are concerned with the effects of boating wakes on erosion of the levees. Proposed Program levee improvements need to be sufficient to withstand wakes, and on-going CALFED programs for maintenance of levees will need to repair damage associated with recreational activities and provide for reduced erosion potential by structural or nonstructural methods.

**(6) Include Explicit Linkages Between Alternative Performance and Potential Source Water Quality Parameter Targets.**

The Draft PEIS/EIR analysis is currently insufficient to adequately evaluate the ability of the alternatives to meet future needs for drinking water quality. The Phase II Interim Report ranks the performance of the alternatives as high, medium or low, but this does not give an assessment of the alternatives' ability to provide source water that can be cost effectively treated to meet future drinking water standards. We are greatly concerned with recent studies that link significant acute adverse health effects to short-term exposure to brominated disinfection byproducts because of the extraordinarily high source water bromide levels. As a result, this analysis must be substantially expanded in the Revised Draft PEIS/EIR since drinking water

quality will be a primary factor in determinations by urban stakeholders for support of a preferred alternative.

The CALFED water quality program developed a list of parameters and target levels, but the Draft PEIS/EIR does not reference this effort. Rather, the Draft PEIS/EIR indicates that CALFED will assemble a scientific panel to further address bromide target levels in Delta source water. We request that CALFED quickly assemble this panel, and that it initially focus on the health effects of brominated disinfection byproducts. This panel also needs to evaluate the scientific review and conclusions developed by the CUWA Expert Panel for bromide and TOC target levels. We also recommend that evaluation of each alternative's effectiveness at all drinking water intakes in the Delta be conducted and disclosed in the Revised Draft PEIS/EIR. It is important that this evaluation utilize data peaks associated with short-term averaging and the probability of their frequency rather than annual averages, since this will better reflect actual conditions faced by water suppliers.

While the above analyses are of primary importance to our determinations of support for a preferred alternative, we recognize the utility of an adaptive management approach to evaluating the effectiveness of water quality actions as they are implemented.

**(7) Revise Fisheries Evaluation and Adaptive Management Approaches.**

We are concerned that the Draft PEIS/EIR analysis of fisheries impacts is based on implicit assumptions that have not been reviewed by independently reviewed science. These assumptions are essentially hypotheses that have not been adequately tested. The strength and success of the ERP depends upon the validity of the assumptions on which the actions are based. The specific implicit assumptions with which we are concerned are:

1. Direct mortality at the export pumps, as measured as salvage, has been a major factor in the decline in abundance of several species of Bay-Delta fishes;
2. When fish are present in the southern Delta, the higher the rate of exports, the greater the salvage and therefore the greater the effect on adult abundance of the species being salvaged;
3. Given the current physical configuration, spawning populations and hydrodynamics of the Delta and upstream areas, higher survival rates of egg, larval and juvenile life history stages in the Delta directly translates into increased adult abundance;
4. Fish and their early life history stages, in the Delta, are swept along by net (that is tidally averaged) flows;
5. Delta net flows draw fish from their normal habitat or off of their normal migration routes and cause significant indirect mortality;
6. The ratio of Delta exports to Delta inflow is a good management tool to improve fish abundance;
7. Extended pulses of flow from the San Joaquin River coming into and through the Delta cause San Joaquin River origin fall-run chinook salmon smolts to move more rapidly across the Delta to a recapture location at Chipps Island;
8. The shorter the cross Delta transit time, the lower the mortality for San Joaquin River origin fall-run chinook salmon smolts;
9. The ratio of San Joaquin River inflow to the rate of Delta exports (ratio of Vernalis flow to exports) is a determinate, cause and effect variable affecting the survival of juvenile fall-run chinook salmon emigrating from that river system and affecting the magnitude of subsequent spawning escapement of San Joaquin River Basin fall-run chinook salmon;
10. Closing the Delta Cross Channel gates causes a dramatic reduction in the mortality of emigrating fall-run chinook salmon smolts by preventing their entry into the Central Delta (where they encounter unfavorable conditions and are more susceptible to being drawn towards or to the export pumps).

11. Flow that emulates natural conditions is assumed to improve survival during downstream movement of juvenile chinook salmon and steelhead and striped bass, sturgeon, and American shad eggs and larvae;
12. The major reservoirs have low nutrient levels and support modest phytoplankton production;
13. Artificial production of salmon and steelhead can lower the genetic integrity of natural populations. There are differences of opinion on this issue; and
14. Change in levee maintenance practices to allow development of natural riparian and shaded riverine aquatic communities would have small beneficial effects (to fish species) relative to the existing levee system.

We believe that these implicit assumptions obscure the extent of scientific uncertainty associated with analyses contained in the Draft PEIS/EIR and reify inadequate hypotheses. For example, we find that existing scientific data and discussions readily support hypotheses that significant salmon mortality results from passage of juveniles from natal streams to saltwater (which includes a component for entrainment at the export pumps), from survival in the ocean, as well as from possible effects from introduced species and sport and commercial fishing. Our concern is that CALFED's analyses do not identify the full range of mortality factors and do not integrate them into the analyses. We request that CALFED reconduct the fishery analyses utilizing a broader set of underlying assumptions and hypotheses that recognize the full range of factors and scientifically-based hypotheses affecting the behavior and survival of fishes. The uncertainty associated with our current understanding needs to be clearly identified. These revised fishery analyses need to be incorporated into the evaluations and conclusions presented in the Revised Draft PEIS/EIR. We strongly believe that this more comprehensive evaluation is necessary to ensure successful achievement of the ERP's goals for species recovery.

We are encouraged by the commitment for the Ecosystem Strategic Plan to develop a more appropriate Adaptive Management Plan. As presented in the Draft PEIS/EIR, the Adaptive Management Program for biological resources is an incremental approach, rather than the technically defensible use of adaptive management that incorporates hypothesis testing, learning objectives and managing scientific uncertainty. We strongly recommend that the Adaptive Management Program be revised and refined in the Revised Draft PEIS/EIR to comprehensively manage the scientific uncertainty inherent in our understanding of the Bay-Delta ecosystem.

The Draft PEIS/EIR does not appear to reflect other important programs that have and will continue to contribute substantial ecosystem improvements. The CVPIA needs to be incorporated into the No Action alternative, and Category III projects need to be acknowledged as part of the CALFED contribution to ecosystem improvements. The Revised Draft PEIS/EIR needs to be clear that the CALFED program is adding the needed increment to ecosystem restoration, and is not duplicating these other efforts. Mitigation and financial credit will need to be given by CALFED to those contributing to ecosystem restoration via these other efforts.

The Draft PEIS/EIR, with minor exceptions, largely ignores the environmental impacts of the alternatives on Eastside tributaries and fall-run chinook salmon. The only reference to Eastside tributary streams is where the Draft PEIS/EIR states that the screened diversion at Hood would result in straying of adult salmon into the Mokelumne River, which could affect the genetic integrity of the Mokelumne River populations. Eastside tributary fall-run chinook salmon need to be appropriately addressed in the Revised Draft PEIS/EIR. The Revised Draft PEIS/EIR needs to present an analysis of this impact on this species in this location that shows there is not a significant impact on this species. In addition, the survival of Eastside tributary origin salmon smolts migrating through the Delta needs to be separately evaluated for each of the alternatives and options. The Cosumnes, Mokelumne and Calaveras (and several other minor

tributaries) are and have always been tributary to the Delta. They are not and have never been tributaries of or to the Sacramento or the San Joaquin rivers.

The Draft PEIS/EIR does not present adequate technical documentation to substantiate numerous assumed, but unsupported, impact conclusions regarding upstream resources. The Draft PEIS/EIR appears to establish a process of meeting objectives in the Bay-Delta, in part by providing upstream flow from tributary river basins. In this sense, the Bay-Delta is given priority over the upstream basins. Instead of focusing narrowly on the Bay-Delta, the environmental analysis must look at the ecosystem as a whole, examine not only the Delta benefits of the action, but also any upstream and other impacts of the action. The solution to this piecemealing of analysis is to look comprehensively at proposed actions to fully evaluate their potential benefits and impacts, both upstream and in the Bay-Delta. We request that the Revised Draft PEIS/EIR address this issue.

**(8) Expand Cumulative Impact Analysis to Quantitatively Address Potential Effects of the CVPIA Trinity River Flow Evaluation Study on the CALFED Program.**

The Draft PEIS/EIR cumulative impacts discussion on page 9-6 recognizes the Trinity River Flow Evaluation Study required by section 3406(b)(23) of the CVPIA, but does not indicate the potential range of flow changes to the Sacramento River system that could result from implementation of recommendations for flow improvements on the Trinity River. We are concerned that the CALFED Program overestimates inflows to the Delta and, as a result, may underestimate the conflict between environmental and consumptive water needs. We recommend that the cumulative impacts analysis presented in the Revised Draft PEIS/EIR include a quantitative evaluation of the potential range of effects that this CVPIA program could have on the CALFED Program alternatives.

**(9) Revise the Water Use Efficiency Component.**

Water use efficiency is a necessary element of the CALFED solution. Urban water agencies have been implementing best management practices (BMPs) under a process conducted by the California Urban Water Conservation Council under the Memorandum of Understanding Regarding Urban Water Conservation in California. Agricultural water agencies have addressed improvement of water management under the Memorandum of Understanding Regarding Efficient Water Management Practices by Agricultural Water Suppliers in California.

However, we are concerned that the Draft PEIS/EIR and the Water Use Efficiency Component Technical Appendix introduce for the first time in these CALFED discussions the concept of numeric targets for water use efficiency. The Technical Appendix contains detailed estimates for both urban and agricultural water savings, broken down by region. Although not explicitly referenced as a "requirement", these targets could be construed as a possible determination of water efficiency progress. The Draft PEIS/EIR states on page 2-13 that "A high level of water use efficiency may also be assured through the concept of linked implementation. Widespread demonstration of efficient use by local water suppliers and irrigation districts could be a prerequisite to CALFED implementation of other program actions for water supply reliability." The BMP approach is to implement actions rather than targets. From our review of the CALFED water use efficiency program, it appears that the CALFED approach is inconsistent with the approach outlined in the BMPs.

We are concerned with how CALFED's volumetric target numbers were derived. It is critical that the CALFED conservation program be based on a technically defensible, more complete thorough analysis of actual results from conservation programs as collected over the past decade. Any estimates of numeric savings utilized in the development of a CALFED

program should be based on actual savings as achieved or demonstrated as feasible through existing conservation programs.

We have concerns with the feasibility of achieving the numerical values that CALFED has presented in the Draft PEIS/EIR for future levels of water use efficiency and recycling. The document creates the expectation that CALFED considers these levels practical and affordable. Absent disclosure of the methodology used to estimate the savings and recycling estimates, it is impossible to directly challenge them. However, in total they far exceed the sum considered practical by the agencies that would be expected to achieve them and are inconsistent with local resource plans.

Additional comments:

(1) CALFED can further encourage implementation of BMPs if it provides funding and technical assistance for implementation of BMPs that are not locally cost effective, but are effective on a statewide basis.

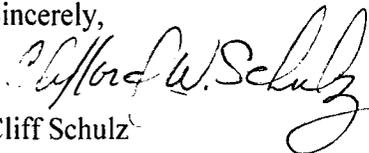
(2) CALFED can promote the streamlining of certification reporting if CALFED standardizes and consolidates certification requirements that it proposes with those already required such as those required by the Bureau of Reclamation pursuant to CVPIA and by the California Department of Water Resources pursuant to the Urban Water Management Planning Act. We recommend that CALFED explicitly accept CVPIA water conservation plans approved by the U.S. Bureau of Reclamation as equivalent to plans endorsed either by the Agricultural Water Management Council or the California Urban Water Conservation Council.

#### **(10) Mitigate Impacts and Enhance Recreational Opportunities within the Delta**

The California Department of Parks and Recreation estimates that recreation in the Delta accounts for over seven million visitor days annually, nearly double that of Yosemite National Park. This is a highly significant level of public usage of the Delta. In order to comply with the requirements of CEQA and NEPA, CALFED is urged to address in the Revised Draft PEIS/EIR mitigation of impacts and enhancement of recreational opportunities within the Delta in a manner that is compatible with the ERP and levee stability programs. Reductions in opportunities for high speed motorized boating in the Delta should be mitigated to the extent feasible. Enhancement of other recreational opportunities, such as wildlife viewing, non-motorized boating, hiking, bicycling and shoreline fishing, will build public support for the CALFED Program and ameliorate any unmitigable losses to specific types of activities. Alternatively, docks and marina facilities concentrate predator habitat and attract salmonid fry and smolts to these areas. An increase in these types of water-based recreational opportunities would not be compatible with the ERP goals and objectives.

We appreciate the opportunity to participate and provide input to the CALFED Program throughout its development. We continue to look to the CALFED Program as the best means of resolving issues and achieving benefits for all interests in the Bay-Delta and its watershed. We look forward to continuing our involvement in the Program to assist with identification and definition of the preferred alternative and development of supporting agreements.

Sincerely,



Cliff Schulz

For the Agricultural-Urban Water Caucuses  
Technical Coordination Group

Attachment