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Subject: Isolated Facility Operating Criteria

Rick, Gary and Patrick

I have concern about the operating criteria listed in the October 29 draft. I suggested a set of criteria thinking they were fairly far towards the environmental end. Several modifications were made during the group discussion which moved the criteria considerably further towards the environmental end. While a certain part of me says great, I am concerned that the criteria are so far towards one side as to make the alternative very unattractive to the water supply interests. Three specific points are:

1. I am not sure of the full implications of basing diversions from the south Delta plus the isolated facility on the existing E/I ratios, but some initial calculations indicate that it is much more restrictive than my proposal to base south Delta exports on an E/I ratio with "I" being only San Joaquin flow. I believe that the ratio with the present export system often results in exports taking the full San Joaquin flow, so my proposal seems to provide substantially greater protection than presently provided.

2. Requiring that minimum flows below the isolated facility intake prevent flow reversals at all times, rather than from October through June when young salmon are present presumably will cost a great deal of water, which I find difficult to justify. Actually, considering that some portion of the time when young salmon are present the numbers are very few and sometimes are predominantly yearlings and that the screen criteria are designed to protect salmon smolts, even requiring no flow reversals during the entire time that salmon are present is quite conservative.

3. I suspect that modeling the 36 day curtailment as the whole month of May rather than as I proposed may considerably increase the water cost.

The above changes would provide more balance of environmental and exporter water interests. Beyond that, however, reasonable balance of interests, as CALFED intends to do, requires that we consider measures to provide better protection of Delta interests. Requiring minimum exports from the south Delta, perhaps with the exception of the most critical fish periods, might be a reasonable compromise. I am convinced that it at least ought to be evaluated. Clearly it would maintain a common Delta pool at least operationally. While I do not expect that it would satisfy Delta farm interests, perhaps it and overland deliveries to farmers to the extent that proves feasible would be perceived as fair by many interests.

In any event, I think IDT should rethink the operating criteria before

making the operations study.

Pete Chadwick