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23443 S. Hays Road
Manteca, CA 95337
February 1, 1998

Lester Snow and BDAC Members
CALFED Bay-Delta Program
1416 9th St., Suite 1155
Sacramento, CA 95814

Dear Lester and Fellow BDAC Members;

The presentations and discussions at the January 29 BDAC meeting indicated that Alternatives 2 and 3 have not been optimized and scrutinized prior to making comparisons between them, and that the comparisons between them are not being made in a defensible manner. This undermines the credibility of the process.

1) The bar chart comparing overall fish benefits from Alternative 3 versus Alternative 2 was not quantified. However, it conveyed a visual impression that 3 would protect a much larger percentage of fish than Alternative 2. Discussion revealed that the alleged benefit applied only to a minority of the total fish population, that there had been no examination and quantification of benefits to specific categories of fish. Furthermore, the visual impression was not based on first considering the ongoing optimization of fish protection during through Delta operations. These optimizations include seasonal management of Vernalis flows, seasonal variations in export rates, monitoring of locational fish abundance, and operational management of south Delta barriers (refer to 1/30/98 Hildebrand/Loudermilk memo). This then created doubts about similar graphs on other issues.

2) There was a major presentation of the benefit to urban water treatment if they got Sacramento water through an isolated canal. There was then no opportunity for BDAC examination of the issue. The portrayed benefit in respect to bromides and TOC was based on an Alternative 2 that was not first optimized in this regard, such as by guiding the cross-Delta flow down the south fork of the Mokelumne and along the east side of the Delta as was previously proposed. It was also not clear whether the analysis recognized that bromides in the San Joaquin River would decline from present levels under Alternative 2. (Refer to my August 24 letter). Agriculture is expected to make huge expenditures to improve its application efficiency, but urbans feel free to use potable water to flush toilets and water gardens.

3) We still have no explanation of why the South Delta salinity analyses portray salinities that are substantially lower than have occurred historically.

4) There has been no response to my December 14 letter and previous oral requests for information on the proposed canal regarding capital and O and M costs, acreage of displaced agriculture, acreage of displaced habitat, seepage control, impairment of major flood flows, the proposed operating plan under varying conditions, etc.

5) It is generally acknowledged that "assurances" are both most necessary and most difficult for Alternative 3, and that there are no reliable assurances. Yet it is apparently still expected that a preferred alternative will be selected before the difference in assurability between 2 and 3 is clearly evaluated and discussed.

6) There has not yet been any acknowledgement of legal issues such as those presented by Mr. Nomellini.

On related matters I look forward to the responses and discussions requested in my December 14 fax and my December 21 letter.

CALFED's mission is very important and is also very difficult. However, our technical analyses must be technically sound. Political and single interest preferences may influence final decisions, but they should not warp the objectivity and scope of analyses.

Sincerely,

Alex Hildebrand

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