

TURLOCK IRRIGATION DISTRICT

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January 6, 1997

Mr. Dick Daniel
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: CALFED Bay-Delta Program Ecosystem Restoration Program Plan—
Implementation Objectives and Targets

Dear Mr. Daniel:

The Turlock Irrigation District staff has reviewed the various Program materials relating to the above document. TID's back-to-basics comment is that by attempting to set objectives and targets for the upstream areas, CALFED has expanded the Problem Area to include the upstream portion of the Solution Area and such an expansion is not within CALFED's mandate.

CALFED has four primary Program objectives, including

to improve and increase aquatic and terrestrial habitats and improve ecological functions in the Bay-Delta to support sustainable populations of diverse and valuable plant and animal species [the "Ecosystem Quality" objective].

A primary Ecosystem Quality objective is to

Improve and increase aquatic habitats so they can support the sustainable production and survival of native and other desirable estuarine and anadromous fish in the estuary.

CALFED's geographic scope of the Problem Area is defined as the legal Delta, Suisun Bay, and Suisun Marsh. CALFED's geographic scope of the Solution Area is much larger area because as CALFED states it may be more economical or ecologically preferable to perform off-site mitigation actions. CALFED's Phase I Final Report (September 1996) states:

[S]almon population problems are linked to the Bay-Delta due to high mortality rates during salmon migrations. While one solution would be to reduce mortality during salmon migration through the Bay-Delta, it might be less expensive or ecologically preferable to promote greater salmon production upstream.

Setting Ecosystem Quality objectives and targets for the Problem Area is appropriate. If it is determined that Problem Area objectives cannot be economically or



ecologically met with in-Delta solutions, then off-site actions need to be considered. However, by setting goals and targets for fish and wildlife in the upstream tributaries in the name of Delta "ecosystem restoration", CALFED has expanded the Problem Area to include the upstream portion of the Solution Area.* This is not within CALFED's mandate. CALFED is suppose to fix the broken Delta. Other existing programs, such as CVPIA/AFRP, San Joaquin River Management Program, FERC-mandated actions, are directed at addressing problems in the upstream areas. While the upstream aspects of these other programs should be coordinated with the CALFED program, CALFED does not have the authority or a mandate to supersede or to dictate actions to these other programs or the affected water agencies.

The link that upstream actions have with the CALFED program is to serve as off-site mitigation for the adverse fish impacts which occur within the in-Delta Problem Area. Identifying off-site actions does not require independently setting Ecosystem Quality objectives and targets for off-site areas. The issue is whether an off-site/upstream action is more economical or makes better sense than an in-Delta target or action in obtaining the desired in-Delta objective.

As quoted in the above CALFED example, salmon juveniles are subject to high mortality rates migrating through the Delta. One action to reduce this mortality would be to further reduce export pumping during San Joaquin salmon smolt migration. In lieu of further export pumping curtailments, a suite of possible off-site actions could be implemented. The CALFED question would then be whether the suite of actions would result in greater production of San Joaquin fall-run chinook salmon sufficient to offset the in-Delta mortality in a more economic manner with comparable ecological benefits and with greater supply reliability for the Export interests.

CALFED needs to first establish objectives, targets, and actions for the Delta; then evaluate potential off-site/upstream actions against the in-Delta actions to determine what suite of actions appear to be the most economical, most beneficial for the Delta ecosystem, etc.

The main effort of CALFED with regards to the San Joaquin Basin should be to assist and work with the San Joaquin Tributary Association and San Joaquin River Group agencies in implementing off-site mitigation measures in the tributaries. To that end, we appreciate the initial efforts of Cindy Darling of the CALFED staff to get San Joaquin Basin fish habitat projects into the CALFED funding pipeline.

Very truly yours,

PAUL D. ELIAS
General Manager

* In contrast to the upstream areas, it does not appear that CALFED has proposed any objectives or targets for the Southern California water system service area of the Solution Area.