

To: Dick Daniel

From: Cindy Darling

ERPP Comments

I only had time to review Volume 1. My comments are divided into sensitivity issues and general technical and readability issues.

Sensitivity Issues

The major "sensitivity" issue is the use of the flow recommendations for many of the tributaries to the delta. In many cases, these are flow recommendations from DFG or USFWS that were subsequently incorporated into the AFRP working paper referenced as USFWS (1995). And we know how fondly some of the ag and urban users remember that document. Given all the work that Interior has done to settle controversy over the AFRP working paper flows (stopping just short of having Dale Hall burn the document before a large audience), this issue should be thoroughly discussed with the Management Team before dredging the controversy back up.

Another sensitive issue is the ubiquitous recommendation for watershed conservancies like those operating in the Sacramento Valley. Some of the conservancies, because of their strong interest in protecting private property rights, have alienated members of the environmental community. Also, if we are encouraging locals to organize to solve resource problems, we should allow them the ability to use whatever mechanism they feel is appropriate. I'd suggest language that recommends that "Restoration of the ???? River would be improved through organized local habitat restoration efforts using Resource Conservation Districts, watershed conservancies, Coordinated Resource Management Plans or other grass roots organizations."

On p. 29 and 30 of Vol 1, demand management is defined as land retirement. I think some folks on BDAC are going to have some thoughts on this.

On p. 30 of Vol 1, it calls for the elimination of any temporary or permanent barrier in the Delta. I think Potter will have some thoughts on this.

Figure 7 of Vol 1 for Suisun and San Francisco bay only includes the North Bay even though the vision description discusses South and Central bays.

On p. 109 of Vol 1, where we talk about restoration of saline marsh in Suisun, we may want to emphasize that we do not intend to replace seasonal freshwater marsh with saline but rather will focus on restoring areas that are not currently wetlands. Also, in the second column, second paragraph, it says that existing habitat is of low quality. We should clarify which habitat we are talking about so Lee Lehman and his duck people don't think their marsh is being portrayed as low quality.

On p. 305 of Vol 1, ERPP recommends restoring salmon in Putah Creek. Although it has been

some time since I was involved in the Putah Creek Council litigation, I had not heard Peter Moyle or others advocate this. Unless there has been discussions already, Solano ID is likely to be very sensitive to this concept. They are likely to question the political and biological feasibility.

On p. 336, given the years of rancor over flows in the Mokelumne, EBMUD is likely to be very sensitive that the document only refers to DFG and USFWS streamflow recommendations and doesn't reference the EBMUD recommendations. EBMUD has long and loudly argued that the DFG recommendations are not feasible because they dry up the reservoirs. I left the negotiations before they got into the EBMUD operations model to see if this claim was valid but we may want to check on this.

Readability, organization, and general technical comments: Vol 1

The table of contents needs to be moved up in the document and needs subheadings. The Delta vision is over a hundred pages long and it kind of hard to find sections.

In the Introduction, add this sentence at the end to give the reader some sense of what comes next..."This document describes actions at the programmatic level for analysis in the DEIR/EIS. Subsequent to the certification of the programmatic EIR/EIS, project specific actions will be developed through the adaptive management process and evaluated in site specific environmental documentation."

Each of the visions is written with a slightly different outline. A standard outline should be developed with a consistent numbering system. Right now, it is hard to find equivalent sections in the restoration plan sections for the different visions. The numbering system could then be used to expand the table of contents so people can find a specific section quickly. This will also help dealing with comments because they could then reference a specific section by number so even if the page numbers change, you can find what they are referring to.

Different visions also use different page formats. Some have one column and some have two. I liked the two column pages.

Add the graphics to the Executive Summary that show the step down relationship of the goals, objectives, etc.

My preference would be to have the maps in with each section rather than at the end.

I like the health ratings but you may want to have a short paragraph explaining what had to be wrong to get A's, B's, C's, D's and F's.

The small graphics with the historic monthly average flows should indicate what time period is "historic" and how a dry and normal year are defined.

On page 1 and in many of the other vision statements, there is a recommendation for a comprehensive resource management plan to achieve the vision. Is this the adaptive management

planning process? When I first read this, my first reaction was that the ERPP was the comprehensive plan. My recommendation would be to change this to a recommendation to “select project level actions through an adaptive management planning process”.

Need to clarify what the bullets on page 1 and 2 are (targets, visions, indicators) and what the consequences are if they aren't met.

P. 3, 2nd para, add “and urban runoff” to “ag waste”.

P. 4, 4th para, the document has “high” and “adequate” quality water being diverted from the delta. Are these defined the same?

P. 13. Prospect is actually east of the Deep Water Ship Channel so is outside the bypass so should be moved to the 3rd vision paragraph, not the first.

P. 21, last para The first sentence references urban development along Highway 4 in the Central and West Delta combined with habitat development. This reference should be clarified or deleted. We don't need another Discovery Bay or Mountain House development.

P. 25. I like the levels for ag lands but to avoid confusion and hot buttons, I'd add “Some ag lands provide significant habitat. These values can be protected and improved through several strategies. These strategies have been separated into three levels with level being minor changes to existing practices and level 3 being extensive changes that can be made to improve the value of the habitat.

P 30 Do we want to move X2 or increase the number of days X2 is at certain locations? I thought it was the latter not the former.

P. 32 real time monitoring, change “species of concern” to “vulnerable life stages of desirable species” and add salmon smolts in addition to fry.

P. 30 The recommendations regarding the existing diversion facilities are a great place to show how the restoration actions could change with different alternatives. For example, if there is continued diversion from the delta, it may make sense to abandon Rock Slough intake, upgrade Clifton Court and Tracy and maintain the new state-of-the-art CCWD Old River intake to give some flexibility in diversion locations. However, if the diversions were moved upstream of the delta, it may make sense to allow for all four diversion points to be consolidated.

p. 35 This section could really use some numbering and indenting.

P. 25 to 33 Water quality program linkages need to be identified so the reader can understand what water quality issues are important to the Delta vision. There are targets and implementation objectives for water quality but they aren't referenced in the vision.

Also, what about preventative programs designed to keep new species from being introduced?

There are targets but they aren't incorporated into the vision.

P. 106 and p. 30 both discuss the PG&E intakes but p. 30 says reduce or eliminate diversion in Feb to July and p. 106 says continue diversion in a manner to minimize impacts on eggs. These sound generally the same. Are they?

P. 110, 3rd paragraph, second sentence is incomplete.

P. 110 North Bay could use a table like Table 1 on p. 32 showing acreages for each unit.

P. 158 This section refers to the value of the flow and sediment from Cottonwood Creek. Are any reservoir sites on Cottonwood being considered? Should we describe how the importance of this creek relates to any proposed development on it?

P. 412 In the upper watersheds, one of the biggest stressors that has the closest link to erosion and general stream health is the extensive development for water supply and hydroelectric power. Peaking operations have destabilized some stream channels through erosion and loss of riparian vegetation. In other areas, diversion dams have disrupted sediment transport processes and sluicing of the small impoundments has resulted in slugs of sediment being deposited in channels during low flow periods where it is difficult to re-mobilize. In other watersheds, inter-basin transfers have decreased flows in one watershed and increased flows in another. And in a lot of areas, water flows through penstocks rather than in rivers.

Shouldn't the vision focus on restoring riparian and aquatic habitats because this is the closest linkage to the health of the delta because of water quality and other aquatic benefits?

P. 166, last para refers to Table 1 as summarizing targets when it actually summarizes health ratings.

P. 292 Need to add reference to the work of the Water Forum and Interior to develop and implement an improved flow pattern under CVPIA.

P. 296. AFRP flows may have changed based on the modeling work of the Water Forum showing how to balance carryover storage and flow needs. Might want to check this with Marty.

P. 297 Add Lower American River Task Force who are looking at flood control and riparian issues related to channel capacity and bank protection.

P 299 Target 1, Action 1 add "and balances carryover storage with these flow objectives to provide adequate water temperatures".

P. 301 Flow Rationale- oops it says flow provides habitat for spring rather than fall run.

P. 296 Improved gravel spawning habitat says gravel can only be added from sources in the flood plain because of channel capacity issues, and p. 302 Target 1 has adding 6 to 10,000 tons. Given

the land use limitations because of the parkway and the wild and scenic river status, you might want to flag this as an implementation issue.

P. 302 add a programmatic action to increase carryover storage to provide additional cold water in the fall.

p. 315 add Yolo Basin Foundation.

P. 333 add the concept of setback levees along the Cosumnes.