

State of California
Memorandum

To : Mr. Steve Yaeger
Deputy Director
CALFED Bay-Delta Program

Date June 6, 1997

From : Department of Fish and Game

Subject : Phase II Alternatives Descriptions and Alternatives Appendices

The Department of Fish and Game has reviewed the subject documents and offers the following comments to assist the CALFED Bay-Delta Program in its efforts to define a reasonable range of alternatives to be carried forward for analysis in the Programmatic EIR/EIS. Our comments are provided separately below for each of the documents.

Alternatives Descriptions

General Comments

Following are key points regarding this document:

- We found it difficult at times being able to tell what the common programs really are or what they are composed of. This is particularly true of the Levee System Integrity Program.
- A clearer link needs to be made between subsidence reversal and the ERPP.
- The alternatives to screening in the south Delta are described vaguely as ranging from upgrading existing screens at their current site or new screens at the intake to Clifton Court Forebay. These represent such dramatically different alternatives that additional emphasis is needed to describe the significance of these two approaches in the alternative descriptions.
- The Department believes that there is a desirable alternative configuration for a Dual Delta Conveyance that has benefits and impacts that, we believe, cannot be adequately characterized with the currently described alternatives and ranges of isolated conveyance. Below we offer a description of that alternative and recommend that it be considered as an additional alternative.
- The discussion of Geographic Scope on page 4 of the Common Program does not make it clear that the program will consider only problems linked to the Delta and Suisun Bay. That definition was carefully worked out among stakeholders and

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additional criterion(a) may be needed below Chico Landing. It appears that the former will occur, but the latter may not. Our concern about criteria below Chico Landing arises from the expected use of floodways and set-back levees as part of the creation of "150,000 acres" of new habitat. High flows will be needed in these areas to "preserve the river's natural fluvial geomorphology process." It may be that the flow necessary above Chico Landing before diversion to off stream storage may be adequate to protect organisms and habitat below there.

- There is a disturbing statement in the general description of alternatives 2 and 3 that it "would allow full physical pumping capacity." Does this mean there would be no limits on exports as presently exist under the Accord?
- The likelihood that alternatives will obtain supplemental water from "willing sellers" only in order to provide much in the way of environmental restoration through increased stream flows should be disclosed.

Alternatives Review

A review of the alternatives is attached as an addendum to this comment memorandum.

Recommended Alternative Configuration

Since the Department remains concerned that a full range of alternatives are not being carried forward for analysis, we recommend the following:

- A 10,000 cfs isolated facility and a separate screened intake at Hood
- Divide the screen facility into a multiple bay system with three bays
- A turnout of between 2,000 to 3,000 cfs into the Mokelumne River near New Hope Tract from the isolated facility to be used as specified in the attached operating criteria.
- Keep the Cross Channel Gates closed except, perhaps, during the peak periods of recreational boating.
- A facility that allows the intake of water at lower export rates (e.g. 2,000 cfs) from Italian Slough through a screened facility to the State Water Project export facilities.