

DRAFT (for PCT ad hoc meeting 6/12/1997)  
Highlights of EPA comments:  
CALFED Alternatives Descriptions Phase II and Technical Appendices

General -- Integrated Alternatives 1-3

Areas of the Bay which have been recognized as part of potential Program solutions in the purpose and need statement are not represented in the alternatives-- that is, we lack actions or policies associated with these areas.

The text needs to clarify whether 'operational policies' are being represented as a range, or in terms of one set of reasonable policies. [For example, Introduction, page 2, refers to a 'range of reasonable operational policies and strategies,' whereas the alternatives contain a single set of policies applicable (as appropriate) to the features of each alternative.] It is also unclear whether there may be program-level decisions on operational policies.

Several of the storage/conveyance sub-alternatives appear to be based on differences which are site/design-specific rather than programmatic in nature. Notably, some sub-alternatives are distinguished by isolated conveyance which is either a pipeline or an open channel. If there are no significant operational and program-level impact differences, these could be combined.

The basis for attributing to some alternatives (for example, 2E and 3H) habitat benefits exceeding the ERPP is not clear.

The Alternatives document/Appendices suggest certain conditions which would be prerequisites for an agency to be eligible for Program benefits (for example, the 'general assurances' discussed in the water use efficiency appendix, page 8). This concept is very important and merits far more detail.

ERPP (we will defer most detailed comments on ERPP pending completion of the three-volume Plan)

All alternatives, but particularly those without significant storage and conveyance features, will require some level of environmental water acquisition or other environmental flow protection. Implementation mechanisms for acquiring or protecting environmental water need to be identified. NEPA requires examination of a full range of reasonable options. It appears that regulatory means of securing environmental water have been discounted; if this is the case, stronger justification is warranted.

Substantially more discussion is needed on transfers to obtain environmental water.

Water Quality

We need to understand the problem assessments underlying the prescribed actions. Is this information included in a fuller text for the Common Program? Is there (or will there be) an amplified Water Quality Program document?

Some actions are vague (for example, 'unknown toxicity'). Other actions have been restricted in scope (for example, land retirement). The Program needs to explain where there are circumstances of incomplete, unavailable information which preclude more definitive action at this time-- investigations, etc., needed in the near term. The Program element should also explain which methods have been considered but rejected for various reasons (for example, land retirement for salinity control).

Page 2, mine drainage: Explain where mine drainage presents a problem for the ecosystem and/or human health. Be specific regarding the reaches of rivers, streams affected. Has the water quality component assessment been checked against the ERPP with respect to toxic contaminants?

P. 3 Toxicity from pesticides chlorpyrifos and diazinon: indicators of success should cite DFG criteria.

P. 3 oxygen depletion problem to which the action refers is limited to a specific area on the San Joaquin, at the Port of Stockton turning basin, during the fall (low flow period on the River). We are not aware of other areas with this problem, making it less a program issue than a very specific one. Further, the source of the problem is related to discharge from a particular plant, so source control may be an option.

P. 4 The Program element should include an agricultural component relating to sediment loading, turbidity. (The current text refers only to urban and industrial sources.)

P. 4 Wastewater and industrial discharges: The problem of impact of domestic wastes and pathogens is largely associated with contact via recreational use. It is not truly a problem for drinking water, since treatment addresses these contaminants. Rewrite the action statement and indicators to emphasize the recreation use. There are hot spots within the delta where the recreation impact is pronounced, and these should receive priority attention.

P. 5 Action to reduce the toxic impacts of selenium: The "western Delta" should refer to the area upstream of Chipps Island, and should not include Suisun Bay. Refinery releases probably do affect Suisun, but not the western Delta.

P. 6, referring to the action to reduce agricultural drainage toxic effects of selenium:

Methods should add developing and implementing a TMDL; incorporating the provisions of the Grasslands Bypass Use agreement; adopting and implementing a waste discharge requirement.

Indicators should refer to reduced selenium loads. We were uncertain of the intended distinction between the "performance measure" and the "indicator of success," which appears to be another performance measure. Tissue concentrations should refer to Bay-Delta species.

Methods should, we believe, include land retirement or at least explain that this method was considered but rejected for specified reasons.

Emphasize management for in-valley solutions in the methods list.

P. 6, action relating to reducing salinity in the South Delta. The separate entry here should be deleted, as it refers to dilution actions, rerouting pollution, and structural options which are included in certain of the 17 storage/conveyance alternatives. These measures are inappropriate for the water quality common element. To the extent that salinity in the South Delta is a problem, it should be noted in the action immediately preceding. Source control methods are appropriate in the common element, but not the methods associated in this action (such as tide gates).

P. 7, action on toxic effects of carbofuran, etc. in the delta and tributaries. There are DFG criteria which can be cited in "indicators of success."

P. 8, water treatment, action relating to improved quality of treated drinking water. There needs to be further thinking on appropriate actions. We cannot agree that the "incentives" listed under "methods" are appropriate.

P. 8, TOC and other problems. Clarify the problems and rewrite the methods. Bromides, for example, are not discharges. Relocating the water supply intakes may not be the appropriate response.

### Water Use Efficiency

We suggest including a demand management discussion in each of the final alternatives considered in the DEIR/EIS. This should include a range for water saved through demand management for each alternative.

More work is still needed in the approach to agricultural water use efficiency-- for instance, on MOU certification and water measurement.

There should be more information on the water conservation plans required by the Bureau of Reclamation pursuant to RRA and CVPIA.

For all the technical, planning and funding assistance elements, CALFED needs to begin a process to get specific agency commitments in personnel and funding.

The Appendix C (page 4) states that "the cost of new storage and conveyance projects will help

set the marginal cost of new supplies for many water suppliers.” The discussion should cover how an increase in marginal cost will affect the actual price of water. The link between marginal cost and price should be discussed with respect to ‘new’ CALFED water.

Appendix C (page 4) also suggests that costs of providing water for ecosystem restoration may be ‘reflected’ in the price of water to agencies and consumers. This could be a premise of water pricing for the CALFED Program.

In emphasizing local implementation, the Common Program discussion on water use efficiency (e.g., p. 13) ignores important roles of regional, state and federal entities (notably, CALFED). CALFED has a role in promoting actions which may not be cost-effective from local users’ perspective but which are ‘in the general interest.’