

Mr. Steve Yaeger
June 6, 1997
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Alternatives Appendices

Appendix A- Ecosystem Restoration Targets- Delta and Bay ecological zones:

Specific Comments:

Delta

Page 1-3 Stream flow: The document should describe whether the totality of potential flow needs been reviewed and agreement reached that the needs listed have the highest priority. The appendix should indicate whether the summary section of the main report which references 300,000 to 500,000 acre feet annually of "increased critical-period flows" is consistent with the amounts listed here. The document should also distinguish between using certain amounts of storage available for ecosystem purposes to meet these flows as contrasted with the traditional concept of establishing minimum standards. The minimum flows on these pages seem consistent with minimum standards rather than storage. The approach should be internal consistent within these document.

Page 2 Target 3, Action 1: The specific operational criterion which would accomplish the stated purpose of "limiting water diversions from the Delta for up to 10 days" should be described.

Page 3 Target 5: The correct definition of QWEST should be used. The species targeted with this condition should be briefly described.

Page 3 and 4 Delta Channel Hydraulics: The targets and actions appear to remain deficient in restoring downstream flow and other needed hydrodynamic conditions. The feasibility of actions 3 and 4 should be described and Action 5 should be clarified, particularly since, as it's worded now, it may conflict with the target.

Page 3 and 4 Delta Channel Hydraulics: We strongly recommend that the targets for this process be modified to include the following:

Target 1: Modify internal Delta hydrodynamics in all months so that flows, as measured in selected Delta sloughs and rivers at fixed indicator sites are within ten percent of the Delta hydrodynamic conditions that existed under a mid-1960s level of water supply development.

Target 2: Modify internal Delta hydrodynamics in the months of April through June so that flows, as measured in selected Delta sloughs and rivers are within ten percent of the Delta hydrodynamic conditions that existed under an early-1950s level of water supply development and export.

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Appendix B- Water Quality Program

General Comment:

Overall this program seems like a reasonably comprehensive proposal. Note its format seems quite different than that of the Ecosystem Plan. Most of its specific strength comes from Performance Measures rather than from Objectives and Targets. Many of the Performance Measures are specific, but others are too general. e. g. Those that simply say something like "reduce some pollutant effect" need to be quantified.

Specific Comments:

Page 4 Turbidity: This section is written from the perspective of a drinking water supply objective. There is some reason to believe that one of the things that has gone wrong environmentally is that the Delta has become too clear from an aquatic ecosystem perspective. Thus this section may be in conflict with ecosystem restoration objectives. That issue needs to be recognized and addressed.

Page 5: At least upon quick reading the action related to oxygen, copper, and mercury seems to overlap with earlier sections on the same substances.

Page 6: Salinity in South Delta: The document should provide some documentation whether or not the stated methods actually reduce salinity loads entering the South Delta as stated in performance measures. I. e. some could decrease concentrations but not loads.

Page 9 Water Management: Again, the issues of dilution of salinity and whether this is an appropriate measure to reduce loads needs to be clarified.

Appendix C

Specific Comment:

Page 9 New Water: The appendix should clarify that the use of new water for environmental beneficial uses does not require "carrying out appropriate water management measures or implementing cost-effective efficiency measures.