CALFED
BAY-DELTA
PROGRAM

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September 16, 1999

The Honorable George Miller
United States House of Representatives
2205 Rayburn House Office Building
Washington, DC 20515

Dear Representative Miller:

This is in response to your letter of August 26, 1999, regarding a potential Hood-Mokelumne River diversion facility as discussed in the CALFED June 1999 Draft Environmental Impact Statement/Environment Impact Report Revised Phase II Report.

Your letter raises a number of important program questions and issues as well as some very detailed technical questions. I believe it is essential to clearly address the program questions so there is no misunderstanding as to what was intended by CALFED. I will soon forward more detailed responses to your technical questions.

Comparisons of a Hood-Mokelumne River diversion to an isolated facility or a Peripheral Canal are probably inevitable. It is from that perspective that I want to reiterate CALFED and the CALFED agencies' intent - that the isolated facility is not part of the draft Preferred Program Alternative. And as such, it will not be covered by the CEQA findings or NEPA Record of Decision. Any reconsideration of an isolated facility would require additional programmatic environmental review, such as a supplemental programmatic EIS/EIR. Moreover, I wish to assure you that neither the CALFED Program nor the CALFED agencies believe that an isolated facility could be or should be covertly boot-strapped into being in a piecemeal fashion.

The primary reason for possible consideration of a Hood-Mokelumne River diversion is to compensate for the drinking water quality impacts of increasing the closures of the Delta Cross Channel. The Delta Cross Channel, shown on the attached maps, was constructed by the U.S. Bureau of Reclamation as part of the Central Valley Project in 1951. The purpose of the Delta Cross Channel is to provide a direct hydraulic connection between the CVP water supply (Sacramento River) and the export facilities in the south Delta and in so doing, to provide for higher quality water in the Delta and at the CVP export pumps. The Cross Channel is equipped with gates to regulate flow from the Sacramento River depending on pumping patterns at the export facilities and flow conditions in the Sacramento River. The design flow through the Delta Cross Channel when open is approximately 3,500 cubic feet

per second. It has been recognized for some time that operation of the Delta Cross Channel is a significant contributor to salmon mortality. Based on field studies with tagged fish, out-migrating salmon that are diverted through the Delta Cross Channel into the central Delta are estimated to experience a three-fold increase in mortality. Over the past ten years, and particularly since listing of salmon as an endangered species and passage of the Central Valley Project Improvement Act, increasing restrictions have been placed on operation of the Delta Cross Channel. These restrictions are intended to reduce overall salmon and striped bass mortality. Over the years, consideration has been given to screening the Cross Channel, but this approach has been rejected due to site characteristics.

When CALFED chose a through-Delta conveyance strategy as part of its draft Preferred Program Alternative, a specific effort was undertaken to develop more fishery protection measures and habitat strategies for a through-Delta approach. As a result of that effort, CALFED identified additional Cross Channel operational constraints - specifically, more closures of the Channel. One of the by-products of the increased closure of the Delta Cross Channel is a reduction of water quality in central and south Delta. Modeling of the CALFED proposed actions revealed increases in total dissolved solids and in total bromides. This degradation of water quality prompted a reconsideration by CALFED agencies of a Hood-Mokelumne diversion as a screened replacement for the Delta Cross Channel to mitigate impacts on water quality. Hood is the proposed diversion site because it provides a good balance of physical features, which would tend to minimize effects on delta smelt migration, diversion of sediment from the river, tidal influences on fish screen effectiveness, while providing topographic and geologic conditions that would allow a diversion structure to be constructed near sea level, on mineral soils, and through mostly agricultural lands. One earlier concept was to divert water from the Sacramento River into Snodgrass Slough, which flows into the Mokelumne River. However, due to habitat values of Snodgrass Slough, a subsequent proposal would construct a channel from Hood to the Mokelumne River in the vicinity of Snodgrass Slough and the Cross Channel. (Please see attached maps.) This is roughly the alignment that would be used for an isolated facility.

Serious fishery concerns exist about a Hood-Mokelumne diversion, even as a contingent action. These concerns center on possible disruption to fish migration patterns. Although a screened diversion on the Sacramento River would keep out-migrating salmon in the Sacramento River, flows from the Sacramento into the Mokelumne system may attract adult returning salmon to the downstream side of the screens. This "back-of-the-screen" phenomenon could result in stranding or potential increased mortality associated with a fish passage structure. More broadly, the concern exists that the negative fisheries impacts associated with the Hood-Mokelumne diversion may actually be greater than the positive benefits associated with the Cross Channel closure that produced the water quality degradation. As a result, we have structured the potential Hood-Mokelumne diversion as a contingent action to be considered only after three separate assessments are completed: first, a thorough assessment of cross channel operation strategies (see page 130, item #1 of the June 1999 Revised Phase II Report); second, a thorough evaluation of the viability of a Hood-Mokelumne diversion evaluation; and third, resolution of the fisheries impact concerns.

The other issues raised in your letter, both in the text and detailed questions, tend to center on changes in text between the December Progress Report and the June draft document. We intended the changes in the June draft to increase the detail of both the contingency action and the conditions that would have to be met in order for the Hood-Mokelumne diversion to be considered. We did not intend any change in fundamental approach. In retrospect, neither the December report nor June draft are as clear as they could be on this topic. If this contingent action remains in the final preferred program alternative, a substantial re-write will be appropriate. Whether this contingent action will be included in the final Preferred Program Alternative will be the subject of further consideration based on comments received and concerns raised.

A brief description of the two documents on this matter will illustrate our efforts to provide increased detail. The December progress report and the June draft both call for evaluation and finalization of a Delta cross channel operation strategy as a first step. In both descriptions, this action could end consideration to the Hood-Mokelumne diversion by finding Cross Channel operational strategies that do not raise concerns about water quality degradation.

In both documents, the contingent step is the evaluation of a Hood-Mokelumne diversion. The December report called specifically for evaluation of a 2,000 cfs diversion (see page 89, #9). In the June draft, the scope of the diversion analysis was changed to include a range of diversion amounts up to 4,000 cfs. This change was made for two primary reasons. First, virtually none of the CALFED analysis at the programmatic level is structured around a single point. Rather, our analysis is structured around a range of options. Second, use of a range allows us to evaluate a complete replacement of the Delta Cross Channel. As a secondary issue, we considered the general phenomenon that the larger the diversion, the greater the fisheries concern in terms of potential stranding behind the screen. Even without a high level of analysis, doubts exist that any diversion larger than 4,000 cfs could be considered because of fishery impacts. Fishery agencies remain concerned that even approaching 4,000 cfs may result in insurmountable fisheries issues.

The December progress report called for implementation of projects resulting from the studies (page 90, #11). The June draft called for a pilot project phase to further test feasibility prior to production facilities.

The June 1999 draft added the phrase "achieving drinking water quality goals" in the North Delta Conveyance description. We intended this phrase to mean continuous improvement in source water quality, rather than achieving long-term public health protection targets of 50 ppb bromide and 3 ppm total organic carbon for source water quality or their equivalent. We added this phrase to indicate that drinking water quality issues related to closures of the Delta Cross Channel would be the sole water quality issues that would be considered in deliberations on a Hood-Mokelumne diversion.

As mentioned above, I will soon forward a response to your technical questions. I hope this information is helpful and more clearly sets forth the purpose and contingent nature of CALFED deliberations on a Hood-Mokelumne diversion.

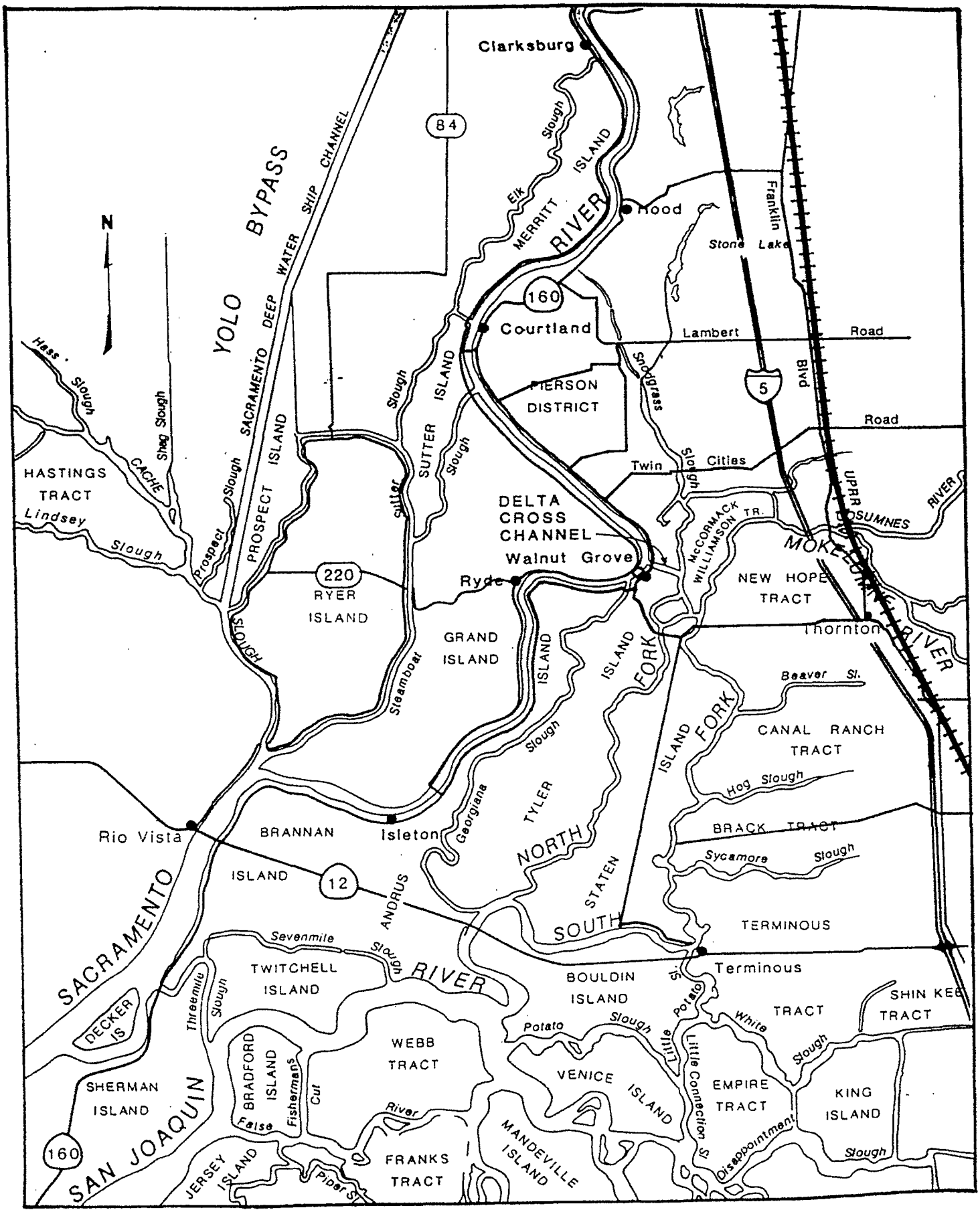
Please call me at (916) 657-2666 if you wish to discuss this matter in more detail.

Sincerely,

Lester A. Snow
Executive Director

Enclosure

cc: Honorable Bruce Babbitt
Honorable Patricia Beneke
Honorable Mary Nichols
Honorable Thomas Hannigan
Honorable Carol Browner
Felicia Marcus


Clarksburg
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YOLO BYPASS
DEEP WATER SHIP CHANNEL
SACRAMENTO
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Elk Slough
MERRITT ISLAND
RIVER
Hood
Franklin Blvd
Stone Lake
160
Courtland
Lambert Road
Snodgrass Slough
PIERSON DISTRICT
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Twin Cities
Hass Slough
Shag Slough
CACHE Slough
HASTINGS TRACT
Lindsey Slough
Prospect Slough
PROSPECT ISLAND
Sutter Slough
SUTTER ISLAND
DELTA CROSS CHANNEL
Walnut Grove
McCORMACK WILLIAMSON TR.
UPRR
MOKELUMNE RIVER
NEW HOPE TRACT
220
RYER ISLAND
Ryde
SLOUGH
GRAND ISLAND
Steamboat
ISLAND
FORK
Thornton
Beaver Sl.
CANAL RANCH TRACT
Hog Slough
Georgiana Slough
TYLER ISLAND
NORTH FORK
BRACK TRACT
Sycamore Slough
Rio Vista
BRANNAN ISLAND
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12
ANDRUS
STATEN ISLAND
SOUTH FORK
TERMINOUS
Sevenmile Slough
TWITCHELL ISLAND
RIVER
BOULDIN ISLAND
Terminous
Threemile Slough
DECKER IS
Potato Slough
Little Potato Sl.
White Slough
SHIN KEE TRACT
WEBB TRACT
VENICE ISLAND
Little Connection Sl.
EMPIRE TRACT
KING ISLAND
SHERMAN ISLAND
BRADFORD ISLAND
False River
Fishermans Cut
MANDEVILLE ISLAND
Disappointment Slough
160
SAN JOAQUIN
JERSEY ISLAND
Piper Sl.
FRANKS TRACT

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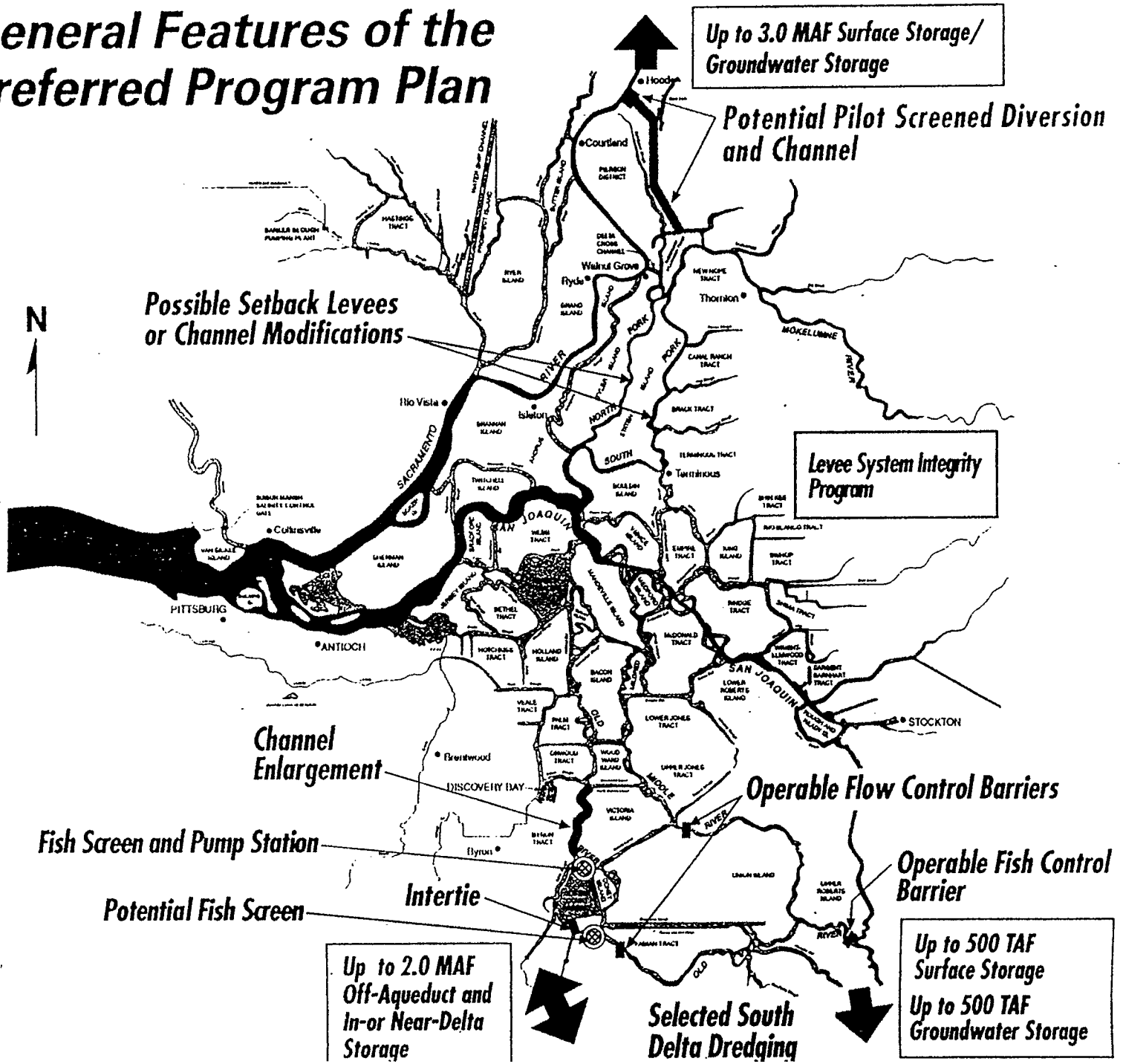
General Features of the Preferred Program Plan



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