

PROGRAM TEAM COMMITMENTS TO ALTERNATIVE REVISIONS (Based on PCT Comments)

GENERAL COMMENTS:

DFG:

Comment: DFG offers another alternative for consideration in the Dual Conveyance category.

Response: DFG's suggested alternative and operating criteria represent a great deal of thoughtful work and are very much appreciated. We will study this proposal further to determine whether and how to include it or its component parts (including the proposed operating criteria) as we carry alternatives forward.

Comment: Upgrading existing screens is dramatically different from new screens at the CCF intake, need more detailed descriptions of impacts of these different approaches in the alternative descriptions.

Response: References to screening in the south Delta were not intended to be site specific at this stage but only to indicate that south Delta diversions would be screened. Refined descriptions will be included in the revised alternative descriptions.

Comment: p4, Common Programs, geographic scope. Should be more clear that the program only looking at problems linked to the Delta and Suisun Bay, as agreed to by BDAC.

Response: We agree. It is important to us that the issue is clear. It will be clarified.

Comment: Language protecting upper Sacramento River water quality from impacts (e.g. temperature and turbidity) associated with receiving reservoir discharged water should be included. [Suggest water exchange program with the T&C Canal could accomplish this.]

Response: Reference will be made to the need to assure the temperature of the Sacramento River is not adversely affected in a significant way as a result of operating any new off-stream storage projects. It is not clear, however, how discharges from off-stream facilities would be expected to add turbidity. Typically, the effect of impoundment is to settle suspended solids, resulting in increased water clarity. The suggested water exchange will be reviewed as a possible means of avoiding or mitigating potentially negative temperature effects.

USFWS:

Comment: Summary Common Programs, p10, San Joaquin Basin. Bromide not an issue in Grasslands as suggested here.

Response: Noted, will review.

Comment: Redundancy of descriptions makes differentiation difficult.

Response: A summary matrix, tables or charts will be provided in future documents to highlight major differences in alternative configurations.

Comment: Each alternative description needs statement of modified conveyance goal.

Response: More explanation will be provided in the introductory paragraphs.

Bureau of Reclamation:

Comment: Suggest Appendix explaining rationale and technical bracketing parameters of alternatives.

Response: Noted.

Comment: More discussion of water quality standards, possibility of modifications to D 95-6, and of State Board process.

Response: A more detailed discussion of water quality standards being used, and possible future modifications will be included in the Affected Environment section of the water quality appendix of the programmatic EIR/EIS.

Comment: Some alternative configurations in document received past evaluations, their inclusion may be useful.

Response: Noted, will review for appropriateness of inclusion.

Comment: Descriptions are redundant. Summary table showing specific differences would help identify issues.

Response: A summary matrix, tables or charts will be provided in future documents to highlight major differences in alternative configurations.

SPECIFIC COMMENTS ON ALTERNATIVE DESCRIPTIONS

Alternative 1

DFG:

ALT 1B:

Response: Will refine the description to include one fish screen complex as recommended by the Fish Facilities Team.

ALT 1C:

Response: Will refine the description to include one fish screen complex as recommended by the Fish Facilities Team.

BuRec:

General Response:

Detailed review of the alternative drawings and writeups is very helpful. A number of errors and omissions were noted which we will endeavor to correct during the narrowing and refinement process.

Comment: Operational velocities for CCF may conflict with fish screens. Need additional research.

Response: Noted.

Comment: More detailed explanation of water movement into off aqueduct storage would be useful.

Response: Noted.

Comment: p4, 3rd bullet, treatment actions. Unclear what is meant by "reducing pollutants in water diverted from the Delta" and for what purpose. [Ditto p4 of Alts 2/3.]

Response: Noted.

Comment: p7, suggest refinement of bullets to: [bul-1] "New fish screens at the Skinner Fish Facility and the Tracy Fish Collection Facility; or [bul-2] Construct an intertie/interconnection between the Tracy Pumping Plant and the Clifton Court Forebay with a new fish screen at the inlet to Clifton Court Forebay." [Ditto pp7,13,16,19 Alt 2, pp6,16,19,21,25,28 Alt 3.]

Response: Noted.

Alternative 2

General Response:

With regard to Alts 2a through 3I, recommendations will be considered in the alternatives narrowing and refinement process. This applies to proposed operating criteria as well.

Comment: p15, last bullet. Unclear if existing facilities affected by setback levees to be replaced or relocated, e.g. Los Vaqueros pumping plant and fish screen structure on Old River. [Ditto p19, Alt2 and p24, Alt 3.]

Response: Noted.

Comment: Alternative 2E description, 2nd sentence. Explain in more detail “the additional conveyance” and eliminating the 10,000 cfs intake.

Response: Noted.

Comment: p17, next to last bullet. Unclear how water will enter this system from Sacramento River (Cross Channel, Mokelumne etc.), and what operational criteria will be used (e.g. Cross Channel closure).

Response: Noted.

Comment: p18, 2nd/3rd bullets. Reference to weir intake and inflatable rubber dam not reflected on figure/map.

Response: Noted.

ERPP:

DFG:

DELTA

Comment: pp3-4, Delta Channel Hydraulics. Targets and actions still seem deficient to restore downstream flow and other needed hydrodynamic conditions. Feasibility of actions 3 and 4 should be described and action 5 clarified.

Response: We will clarify.

USFWS:

Comment: Should note that actions will not affect species and habitats equally, with some localized adverse impacts. Programmatic level of detail makes assessment of impacts to endangered species and their critical habitats difficult, but needs to be done to the extent possible before selection of preferred alternative.

Response: We acknowledge your concerns and they will be addressed in the programmatic and site specific environmental analyses.

Comment: In-kind mitigation should be included in common program to address its own impacts: species, habitat & wetlands.

Response: Mitigation for impacts will be included at programmatic level of analysis. Likely implementation of mitigation will be incorporated into the Ecosystem Restoration Program as an adjunct.

USEPA:

[NOTE: *These are only comments on Appendix A. Intensive review to occur with release of ERPP Volumes I-III.*]

Comment: Need more scientific support for flow prescriptions intended to affect channel morphology. If further study necessary for particular streams, state so.

Response: We agree and are seeking out the information.

Comment: Need to establish ERPP implementation priorities, while considering positive and negative linkages to other program components to assist refinement of alternatives.

Response: Volume III of the ERPP will include concepts for prioritization and phasing implementation.

BuRec:

Comment: Include San Pablo, SF, and Suisun rather than just "Bay". Replace "hub" with "critical component", as former may be offensive to some.

Response: Noted.

Comment: Apparent reliance on water transfers to achieve restoration actions may be unrealistic. Helpful to include list of generally accepted potential sources of water and inclusion of examples of past transfers.

Response: Water transfers are but one of several means to obtain environmental water outside the regulatory process. Other suggestion noted.

Water Quality Program:

DFG:

Comment: Overall, reasonably comprehensive though format quite different from ERPP. General performance measures need to be described with more specificity.

Response: Effort will be made to provide more specific Performance Measures, realizing that further prefeasibility evaluations will be required in some cases to enable quantification.

Comment: Watershed section should explain processes and contribution to Delta restoration.

Response: The watershed section will be revised to include additional information on CALFED's watershed role and how watershed activities can contribute to restoration of the Delta.

Comment: P4, turbidity. Section written from drinking water quality perspective. Perhaps Delta too "clear" for aquatic ecosystem support. Consequently, section may conflict with ecosystem restoration objectives. Issue needs to be recognized and addressed.

Response: The ecological aspects of turbidity will be discussed in the document. However, while Delta water has evidently increased in clarity, it has not been demonstrated that the effect of this change will in all cases be a reduction of biological productivity. Arguably, increased water clarity should result in higher primary production, up to some limit. Secondly, because of the probable influence of exotic filter feeding organisms on the availability of planktonic food, there appears to be some doubt that reduced productivity is, in fact, a result of increased clarity. Perhaps increased clarity may be an effect, rather than a cause. We propose to incorporate a discussion along these lines.

Comment: P5. Actions related to oxygen, copper and mercury seem to overlap with earlier sections.

Response: The document will be examined to determine whether redundancy exists and can be eliminated.

Comment: P6, salinity in south Delta. Provide documentation whether stated methods actually reduced salinity loads (as opposed to concentrations).

Response: The document will be revised to clarify whether the stated methods will reduce salinity loads, as compared to concentrations.

USFWS:

Comment: P2, mine drainage, mercury. Specifically identify methods in watersheds to promote methylation (anaerobics).

Response: The document will be altered to mention identification of activities that may promote methylation of mercury.

Comment: P3, urban/industrial runoff. Cross-reference actions directed at particular parameter.

Response: The document will be amended to cross reference related actions.

Comment: P4, wastewater/industrial discharges. Consider expansion of boat discharge actions upstream.

Response: Discharges from boats in upstream reservoirs are generally much better controlled than is the case for boats in the Delta. The document will be amended to indicate that as part of the boat discharge control program, control programs on reservoirs will be evaluated and augmented as needed. It will also be indicated that priority will be given to the Delta.

Comment: P5, ag drainage. What about oxygen depletion from nutrient loading? Also, sediment loading.

Response: We will evaluate nutrient and sediment loading for inclusion under agricultural drainage; sediment loading due to farming and logging will also be evaluated.

Comment: P6, ag drainage, selenium. Other success indicators are decrease in concentrations in biota, achieve Basin Plan and EPA objectives in San Joaquin River.

Response: These indicators will be shown.

Comment: P6, ag drainage, salinity in South delta. Dilution is no solution. Conflicts with WUE. Should only be considered for possible emergency response to spills or uncontrollable discharges. Important distinction.

Response: The document will be amended, however, to make note of the ecosystem stakeholders' perspective that dilution actions should be utilized only in emergency circumstances.

USEPA:

Comment: Need to identify areas where incomplete or unavailable information to move ahead with addressing various issues. Also, explain methods considered but rejected and why (e.g. land retirement for salinity control).

Response: The report, when completed, will contain this information to the extent practicable.

Comment: P3, pesticides chlorpyrifos & diazinon. Indicators of success should cite DFG criteria.

Response: DFG criteria will be cited.

Comment: P4, sediment loading/turbidity. Should have agricultural component, not just urban/industrial.

Response: We will evaluate whether sediment loading and turbidity should be included as an agricultural component.

Comment: P5, selenium. "western Delta" should be area upstream of Chipps Island and not include Suisun Bay. Refinery release probably affect Suisun but not western Delta. Tissue concentrations should refer to species occurring in the Bay-Delta.

Response: Recommendations accepted.

Comment: P6, ag drainage/salinity. Reverse osmosis does not seem viable. Explain how constructed wetlands remove salts. Changing timing of discharges will reduce concentration but not load which is target.

Response: [1] We agree reverse osmosis does not appear to be a viable, cost effective solution at this time. This methodology was recommended through our public participation process in realization that new technological developments have occurred that have reduced the cost of this method of treatment, and the expectation that further improvements could be possible in the future. [2] The document will be amended to avoid creating the impression that constructed wetlands are expected to remove salts. [3] We agree changing timing of flows will affect only concentrations, not loads. This will be stated.

Comment: P6, salinity/South Delta. Explain special conditions in South Delta problem assessment as compared to other locales in Delta.

Response: Salinity problems peculiar to the South Delta will be more fully described.

Comment: P7, carbofuran. DFG criteria can be cited as "indicator of success."

Response: DFG criteria will be cited:

Comment: P8, TOC and other problems. Problems need to be clarified, methods rewritten (e.g. bromides are not discharges).

Response: The report will be amended to indicate bromides are not discharges and other portions rewritten for clarity as required.

BuRec:

Comment: Method to reduce toxic effects is WUE, need better clarification of actions/practices linkages between WQ & WUE.

Response: The water quality technical report will incorporate a discussion of the potential linkages between the water use efficiency and water quality programs, and will include positive as well as negative effects. Theoretical examples will be cited.

Comment: Should include description of IEP role in CALFED Comprehensive Monitoring, Assessment, and Research Program.

Response: The Interagency Ecological Program is charged with performing ecologically related water quality monitoring in the Bay-Delta. The Comprehensive Monitoring, Assessment, and Research Program will include a sizeable component of ecological monitoring to be conducted through the IEP, and will include other components as well, probably including other entities and citizen involvement. The document will be expanded to include a discussion of this concept.

Comment: Performance targets on p11 are defined as load reductions, should include other methods described in Appendix B.

Response: The methods and targets in Appendix B will be incorporated into the performance targets as appropriate.

Comment: Need clarification as to why WQ programs and actions don't change from Alt 1 to Alt 2, with only minor modifications in Alt 3. Provide more detailed descriptions of differences within each alternative.

Response: By definition, the Common Program is intended to remain virtually the same irrespective of which alternative is ultimately selected. We will create a matrix that compares and contrasts the water quality program actions for the various alternatives, then evaluate whether the matrix significantly improves understanding of the program and should be included in the document.

Comment: Performance measures not necessarily consistent with specified actions, e.g. reducing amount of toxicity may not reduce effects of certain toxins.

Response: Performance measures will be examined for consistency with the actions. The example cited in the comment is unclear, though. Because a toxicity bioassay is a direct measurement of toxic effect, is not a reduction of toxicity equivalent to a reduction of the effect?

Comment: Action to reduce mercury should achieve USEPA 304(a) guidelines, and include amount of reduction in mercury concentration.

Response: 304(a) guidelines will be examined for their applicability. A question to be answered is whether it will be feasible to realistically quantify the reduction of mercury without considerable further study.

Comment: Phrase "unknown toxicity" needs more explanation.

Response: "Unknown Toxicity" has been used to refer to observed toxicity that has not been traced to any particular toxic agent. This terminology is confusing and needs to be improved. Perhaps "toxicity due to unknown causes" would be better. We will work on it.

Comment: Suggest removing increase in juvenile anadromous fish as a performance measure for reduction of sediment loading and turbidity.

Response: We agree that it is not likely that changes in anadromous fish production will be directly linked to changes in sediment loading and turbidity. Direct measurements of sediment loading and turbidity can be made and should be the primary means of determining the effectiveness of control actions. Perhaps, however, it is a good idea to look at fish production as a collective measure of the effectiveness of all actions affecting the fish. We will consider modifying the language accordingly.

Comment: Treatment/removal of selenium still experimental, perhaps premature to list as method to reduce its toxic effects.

Response: The document will be revised to indicate treatment methodologies are experimental.

Comment: Nutrient loading section would benefit from more detailed description of success indicator, i.e. achievement of Basin Plan Objectives.

Response: The document will be modified to include a more detailed explanation of the indicator of success (attainment of Basin Plan Objectives).

Comment: Proposal of timed release of pollutant discharges raises question of need and viability of drainage water storage facilities.

Response: We agree that, if timed release actions would require surface storage facilities, the problem discussed in the above comment would pertain. Our approach will be to include this caveat in the document.

Comment: p9, P2, mine drainage. Should include copper, cadmium & zinc, not just mercury.

Response: The document will be modified to include a discussion along the lines that actions upstream of the Delta to reduce copper, cadmium, and zinc introductions will result in benefit to the Delta.

Water Use Efficiency

USEPA:

Comment: Need specific agency commitments in personnel and funding for implementing technical, planning and funding assistance promised as part of the WUE program. Also need baseline of current commitments.

Response: CALFED agencies will be expected to fund technical and planning assistance programs as they have in the past, but at increased levels. Stakeholders have raised this as an assurance issue. CALFED will need to make a firm, assurable commitment to adequate long-term funding to these staff efforts. A draft implementation plan and description of CALFED agency actions will be developed.

Levee System Integrity:

DFG:

Comment: This isn't a program yet, only a list of proposed actions. Need more detail. Agree there needs to be coordination with ecosystem program. Glaring weakness in omission of linkage between subsidence control program and ecosystem program.

Response: We are currently working on putting together a comprehensive Delta Levee System Integrity Common Program description to more clearly describe the actions for that program.

BuRec:

Comment: Since levee improvements goal is to reach PL84-99, should include detailed description of that standard.

Response: The Base Level Protection Plan of the Delta Levee System Integrity Common Program will achieve a minimum federal flood control project levee design criteria for project and non-project levees in the Delta. Staff is currently working with the US Army Corps of Engineers to identify draft criteria. A detailed description will be developed based on review by the agencies and interested stakeholders.

Comment: 100 million cubic yards may be too low an estimate to meet PL84-99.

Response: CALFED Bay-Delta Program staff will be developing material and cost estimates to improve project and non-project levees to the desired federal flood control project levee design criteria. This information will be provided for review as soon as it is available.

Comment: Should define who will be responsible for O&M and liability of new/improved levees.

Response: As part of the Delta Levee Base Level Protection Plan of the Delta Levee System Integrity Common Program, guidelines for participation including maintenance requirements, and State, federal and local cost-sharing will be defined.

Other Comments (not specific to the Alternatives Package)

BuRec:

Comment: CVPIA PEIS Power Affected Environment analysis not enough for CALFED, at least add SWP power impacts.

Response: The impact analysis will include the SWP.

Comment: DWRSIM is limited as a tool for assessing power impacts: doesn't estimate available capacity or peak use needs, doesn't estimate transmission losses, doesn't include all CVP pumping plants -- impacts results.

Response: Impact analysis will include some qualitative descriptions where modeling results are not available.

Comment: Need definitive strategy for analysis of groundwater storage.

Response: Comment noted, such strategy under development.

Comment: Important that technical teams understand each others' work.

Response: "Team 6" has not had meetings. We assumed that review of draft documents after July 1 would be the most efficient means to understanding "Team 6" input.

OPERATION ASSUMPTIONS FOR EXISTING CONDITIONS MODELING

General Response: All comments noted.

USFWS:

Winter Run BO: Add closure of cross channel gates Feb 1 B April 30.
CVPIA: Upstream provisions should be preliminary not hard & fast guidance.
CVPIA: Add Delta AFRP actions since represent upstream AFRP actions.
CVPIA: Add upstream AFRP actions on Stanislaus.
CVPIA: Delta Smelt BO provisions absent altogether, should be added.

SPECIFIC EDITORIAL COMMENTS:

DFG:

ERPP Bay Section

Comment: P2, unscreened diversions. Change “managed agricultural lands” to “managed wetlands”.

Response: We agree.

Comment: P5, strike “the size of” from action regarding vernal pools.

Response: Thank you.

USFWS:

Comment: Summary Common Programs, p3, P4, L5. Substitute “innumerable” with “complex”.

Response: Will consider.

Comment: Summary Common Programs, p11, L1. Insert “excessive” between “specifically” and “selenium”.

Response: Will consider.

USEPA:

Comment: Summary Common Programs, p13, P2. Change “The greatest current challenge...” to “One of the challenges in...”

Response: Suggestion noted.

Water Quality Watershed Management Section

Comment: p18. To be consistent with Purpose and Need statement; after “water system service area,” need to have read “San Pablo Bay, San Francisco Bay, and portions of. . .”

Response: Will consider.

WQ Common Program Appendix

Comment: pp7-8 wastewater discharge/ammonia. Belongs in “wastewater and industrial discharges” section starting on p4.

Response: The discussion will be moved to the wastewater and industrial discharges section.

Comment: p12. 2P under “coordinated Watershed Approach”. Delete “State Water Resources Control Board’s” from “Sacramento River Watershed Program.” Change “the Sacramento River Toxic Parameter Control Program” to “Toxic Pollutant Control Program”.

Response: These changes will be made.

BuRec:

Comment: Move four program goals and program mission ahead of summary of common programs.

Response: Noted.

WQ Common Program Description

Comment: p11. Change statement “to address potential toxicity to water and sediment” to “to address the potential toxicity of contaminated water and sediment.”

Response: Suggestion accepted.

ERPP

Comment: Delta zone, p4, water temp target. Should read between 60F and 65F.

Response: Thank you, correction will be made.