



**CALFED
BAY-DELTA
PROGRAM**

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June 24, 1997

Karna E. Harrigfeld
Neumiller & Beardslee
509 West Weber Avenue
Stockton, CA 95203-3166

Dear Ms. Harrigfeld:

Thank you for your May 27, 1997 letter outlining your concerns regarding CALFED's Storage and Conveyance Refinement Process. Your comments focused on two areas: 1) the Draft Storage and Conveyance Component Inventories, and 2) assumptions used in the DWRSIM Planning Simulation Model for the CALFED Benchmark Study.

Regarding the Draft Storage and Conveyance Component Inventories, you expressed your view that Farmington Reservoir would have less extensive environmental impacts than typical on-stream reservoirs. You were concerned that under the CALFED priority ranking of storage options, which rates off-stream reservoirs higher than on-stream reservoirs, Farmington would receive an undue low priority. I recognize your concern and wish to emphasize that this priority ranking system serves only as a useful shorthand. While it is generally true that off-stream storage options offer opportunities for reducing environmental impacts, particularly to riverine and aquatic resources, the CALFED screening process will consider each storage component on its individual merits.

You also pointed out that references to South San Joaquin Irrigation District in the Folsom South Canal Area groundwater storage component description should actually be references to Central San Joaquin Water Conservation District. This correction will be made to the component description in the inventory.

You provided a number of comments on assumptions used in the DWRSIM Planning Simulation Model for the CALFED Benchmark Study. Most of these concerns relate to assumptions for Stanislaus River operations. These assumptions were taken from earlier simulation studies conducted by the Department of Water Resources for the State Water Resources Control Board (SWRCB). While I understand your concern and position regarding these issues, CALFED has chosen to follow the guidance provided by the SWRCB in establishing assumptions for this Benchmark Study, pending development of compelling

CALFED Agencies

California

The Resources Agency
Department of Fish and Game
Department of Water Resources
California Environmental Protection Agency
State Water Resources Control Board

Federal

Environmental Protection Agency
Department of the Interior
Fish and Wildlife Service
Bureau of Reclamation
Department of Commerce
National Marine Fisheries Service

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contrary evidence. This approach will provide a high level of compatibility between previous SWRCB simulation studies and CALFED simulation studies.

Please note that the additional June through September instream flow requirements for the Stanislaus River listed in the modeling assumption package are used as a surrogate for the dissolved oxygen water quality requirement at Ripon. This assumption is a simplification for modeling purposes and is necessary because DWRSIM does not directly account for water quality. Additionally, the Central Valley Project (CVP) Demand Assumptions listed in Section IX of the modeling assumption package refer only to CVP demands considered as Delta exports. The CVP contractual water rights of Stockton East Water District and Central San Joaquin Water Conservation District are also included in the simulation studies.

Thank you again for your comments. If you have any further general questions or comments, please call me at (916) 657-6628. If you have any additional questions or comments regarding modeling assumptions, please call Mark Cowin of my staff at (916) 653-2986.

Sincerely,

Stein M. Buer, Assistant Director
CALFED Bay-Delta Program