

M e m o r a n d u m

Date : **OCT -1 1997**

To : Lester Snow, Executive Director
CALFED Bay-Delta Program

From : Department of Water Resources

Subject: CALFED Common Programs

As you requested at the last CALFED Management Team meeting, the following discusses the significant concerns expressed by the Department of Water Resources' staff regarding the CALFED Common Programs.

Ecosystem Restoration Program Plan

Our gravest concern relates to the draft of Volume II, Ecological Zone Visions, and is that supporting information is not provided or does not reflect current understanding of some of the processes and needs of key aquatic species. The wrong assumptions on processes and species needs leads to implementation objectives, targets and programmatic actions that may not achieve the desired ecosystem objectives. Significant effort will be required to improve the scientific validity of Volume II.

Additionally, the limitations and costs of adaptive management need to be more fully explained in Volume III to provide all CALFED participants with a good understanding of the magnitude of the effort and financial commitment that will be required.

The Department will provide extensive comments on the public drafts of Volumes I and II, and the administrative draft of Volume III to your office by October 14. I have attached a preliminary set of comments prepared by our Environmental Services Office.

Water Quality Program - Draft Component Report

As in the ERPP, our general concern is that supporting information is not provided or does not reflect current understanding of some of the processes. I have attached a list of technical comments on this program prepared by our Water Quality Assessment Branch.

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Water Use Efficiency Program

The California Urban Water Conservation Council is currently identified as the entity to certify that best management practices are being implemented per the Memorandum of Understanding Regarding Urban Water Conservation. The Council would need substantial technical support to fulfill this function.

System Integrity Program

The beneficial reuse of dredged material has been made part of the ERPP program and eliminated from the System Integrity Program. While aspects of dredged material reuse are appropriate for inclusion in the ERPP, other aspects are appropriate for inclusion in the System Integrity Program. Beneficial reuse of dredged material for maintaining and improving Delta levees should remain a component of the System Integrity Program.

I anticipate we will address these along with the concerns of other CALFED agencies in the near future. If you wish to discuss them personally, please call me at 653-6055. Contact persons for specific common programs are Randy Brown, at 227-7531, for the ERPP; Phil Wendt, at 327-1660, for the Water Quality Program; Curt Schmutte, at 227-7567, for the System Integrity Program; and Ed Craddock, at 327-1655, for the Water Use Efficiency Program.



Robert G. Potter
Chief Deputy Director

Attachments