



Department of Energy
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, California 95630-4710

October 22, 1997

Mr. Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Comments on Ecosystem Restoration Program Plan (ERPP)

Dear Mr. Snow:

In addition to being a Federal Agency member of the CALFED policy team, Western Area Power Administration (Western) is a stakeholder in the Bay-Delta Program (Program) decision-making process. Under Federal law, Western has the responsibility to market Federal hydropower resources generated by the Central Valley Project (CVP). Because the amount and economic value of hydropower generated from CVP could be reduced by Program decisions, Western has reviewed the ERPP for potential adverse effects on hydropower generation.

Western supports the ecosystem restoration goals of the ERPP, but would like assurance that actions taken to benefit the ecosystem do not result in redirected impacts on hydropower or create other indirect impacts, including human health impacts, indirect biological impacts, and impacts to other natural resources.

Implementing actions contained in the ERPP could cause curtailment of CVP hydropower generation or generating capability, or reduction in power resources for sale as a result of making changes in river operations and from increases in pumping to move water around the system to benefit fish and wildlife and their associated habitat. To meet existing and anticipated electrical loads in California, curtailment of CVP power resources as a result of ERPP actions would have to be made up with other generation, either by building new generating facilities, or operating existing thermal facilities at higher capacities. Constructing new generating facilities would have land use impacts and potential biological impacts from site preparation and operation and maintenance of the new facilities. Wind generation, as an alternative to hydro generation, affects birds (collisions with turbine blades) and small animals (operational noises), as well as affecting surrounding land uses (objectionable noise, visual impacts). Thermal generation produces greenhouse gasses and air pollution which indirectly affects humans, plants, and wildlife, and, depending on type, can consume petroleum-based natural resources.

Western observed the Scientific Review Panel review sessions for the ERPP held the week of October 6-9 in Sacramento. Western agrees with many of the recommendations of the Panel

including the stated need for developing a conceptual model to better describe ecosystem component interrelationships, and for a better description of benefits to be realized from ecosystem improvements. When other resources and CVP project purposes are at risk in a tradeoff relationship, a trial and error approach is not sufficient. There must be a valid scientific basis for taking actions intended to benefit the ecosystems, with ecosystem improvements, and there must be some predictable certainty that the sought-after benefits will result from the actions taken.

Western expects that the adverse effects that might result from actions taken to implement the ERPP will be adequately described and analyzed in the Program's environmental impact report/environmental impact statement (EIR/EIS), or in project-specific environmental documents to be tiered from it. However, in our letter to you of October 7, we expressed concern over the shortcomings of the hydroelectric power impact analysis method described in the draft report Affected Environment and Environmental Impacts for Power Production Economics (review draft dated September 1997). Unless the CVP and the State Water Project (SWP) are analyzed separately, it will be impossible to evaluate the hydropower impacts of any Bay-Delta Program actions including implementation of the ERPP.

Western also has a number of specific concerns related to the ERPP that are listed in the attachment.

We appreciate this opportunity to express our concerns.

Sincerely,



Earl D. Nelson
Environmental Planning Coordinator

Enclosure

cc:

Mr. Dick Daniel, CALFED Bay Delta Program
Ms. Mary Schoonover, CALFED Bay Delta Program
Ms. Sharon Gross, CALFED Bay Delta Program
Mr. Zach McReynolds, CALFED Bay Delta Program

bcc:

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A3400 (Mr. Bill Karsell)/A3400 (Mr. Gary Burton)/A3400 (Mr. John Bridges)