

CALFED Phase II Interim Report  
 DWR's Environmental Service Office  
 Comments on the Feb 16, 1998 Draft

*Comments from Steve  
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 Services Office.*

### General Comments

Its delta smelt, not Delta smelt.

The discussion of the X2 and brackish water habitat in the western Delta and Suisun Bay on page 95 seems incorrect and should be revised before distributing the report to the public. See the specific comments on the problem and how it could be resolved. (below)

Most of the other comments are of a more editorial nature. However, since they all point out things that could be real problems for some readers, they should be corrected if at all possible before the report goes public.

### Specific Comments and Suggestions

Page 4 - The vision statement seems unreasonably optimistic and is setting up expectations that are unlikely to ~~be~~ me. It seems a bit like false advertising to me.

At the minimum, I suggest deleting the fourth sentence of the first paragraph. The program isn't going to restore "natural streamflows" and we don't have any evidence that if we did that it would do much, if anything, to reduce the "adverse effects of undesirable species in the aquatic environment". If it isn't deleted, the sentence should at least be changed to replace "natural streamflows" with "improved streamflows".

Statements are also made regarding (1) the use of setback levees, bypasses and easements to provide greater flood protection; (2) the benefits this protection would provide to ag lands; and (3) the restoration of shallow water habitat. Somewhere it seems that we should be more forthcoming about the fact that a significant portion of that flood protection and shallow water habitat is going to be at the expense of ag lands. Alternatively, we could delete "and loss of agricultural resources"

from the fifth sentence of paragraph two. Then at least we would be softening the claims to (overall or localized??) ag benefits.

Page 69, para 3. - Delete "resident species" from the first bullet. Change the last line of the second bullet to "additional mortality for some species of fish screened from the south Delta". Conclude the first sentence of the third bullet with "stock" or "population" or "some of these species". Many of the species occur in both the Sacramento and the San Joaquin. A south Delta diversion would have a less direct effect on Sacramento Chinook salmon than the Hood diversion but it would have a greater effect on San Joaquin Chinook.

Page 69, para 4. - I think the last sentence would cause less confusion if it were changed to "Flow requirements on the upper Sacramento River". "Upstream flow requirements" sounds too much like reverse flow.

Page 70, para 1. - Change the last sentence to "Such flow disruptions may cause damage." This will better reflect the scientific uncertainty that about the issue that is reflected elsewhere in the report.

Page 70, para 6. Delete "The inadequacy of the current facilities to prevent" from the first sentence. I think that would get across the intended meaning without implying that there are screens that could prevent all fish entrainment.

Page 73, para 1. - The fact that we also operate to DFG's Biological Opinions should also be mentioned here.

Page 95. - The first sentence mentions the importance of maintaining brackish water habitat in the western Delta and Suisun Bay and then proceeds to compare how the alternatives <sup>alter</sup> such habitat by looking at the change in the location of X2. It seems to imply that the further X2 is downstream the better the brackish water habitat. I don't think this is correct, or at least it depends on how brackish water habitat is defined.

The X2 standard is designed to keep western Delta and Suisun Bay waters fresher than they have been. It seems that an alternative that moved X2 further upstream would therefore increase brackish water habitat and harm species such as the clapper rail that depend on it. The easiest way to deal with this problem might be to keep the discussion to the

relationship of X2 and the abundance of some fishes and drop the references to brackish water habitat. Note that the X2 standard was developed for fishes and its effects on birds and mammals wasn't looked at very carefully.

Page 95, para 2. - Start the second sentence with "The outflow that determines the location of X2 also affects both the downstream". It's flow that transports not X2 .

Page 118, para 2. - At the minimum change the fifth sentence to "mortalities can exceed 90% even for adults." It's my understanding that DFG did some experiments a couple of years ago and found that salvaged adult smelt actually survived pretty well and certainly had a much lower mortality than 90% during the winter months when the adults are most likely to be found at the facilities. Consideration should be given to using shad or another fish for which we have better data at the facilities than smelt or citing DFG's smelt data rather than the smelt aqua culture data.