

CDFA Comments on the draft Phase II Report:

pg. iii and pg 1, first paragraph on each page - The Bay-Delta supplies drinking water for two-thirds of California's citizens and irrigation water for **over 7 million acres of the most highly productive agricultural land in the world.**

pg iv, last paragraph - We can take advantage of this time value of water to **hold it on-stream or** divert water to offstream and groundwater storage...

pg 1, second paragraph - define what "the system" is. Also, in the second sentence, we suggest that the term water management be replaced with water supply and water supply reliability, which is more descriptive and was previously used.

pg 4 - In the vision statement, the first paragraph talks about restoring natural stream flows, while the second paragraph talks about providing environmental flows in drier times. This implies augmenting natural flows during drier times, not depending on natural flows.

pg 5 - The time/value of water must be discussed in the context of within each water year as well as between water years. Within each year, the concept is to reduce fish entrainment impacts by shifting times of diversion.

pg 16, second paragraph - delete "such as farmworkers" from the second-to-last sentence.

pg 16, Water Storage - also discuss pros and cons of groundwater storage in first paragraph. Second paragraph - define off-aqueduct storage; the lay person won't immediately know what this is.

pg 17, Delta Conveyance, second paragraph, last sentence - define what is meant by environmental harm.

pg 18, Ecosystem Restoration - There is no discussion of exotic species issues. There needs to be.

pg 19, Economic and Financial Aspects - Reference Prop. 204 language that eco. benefits from new water supplies are a public benefit.

pg 19, Putting it all Together - first bullet, add **But less water may be available to users downstream and soil quality may degrade if adequate movement of salts through the soil is not maintained.**

pg 24, the concept of carryover of water using onstream storage should be mentioned; the time/value concept within an individual water year (reducing entrainment and adverse flow impacts) should be discussed.

pg 25, pg 30, pg 34 and many other places where storage and/or energy is discussed - energy impacts (positive and negative) are very different between off-stream, conjunctive use and on-stream configurations. This needs to be discussed where appropriate.

pg 25 and pg 26 - An on-stream storage example should also be charted or discussed in some detail.

pg 36 first paragraph, last sentence - Watershed management coordination is a large long-term program to encourage **upper watershed water supply management**, habitat enhancement...

pg 36, third paragraph, last sentence - ...provide greater operational certainty and Program balance **and reduce potential redirected impacts**.

pg 37, bullet continued from pg 36 - ...agricultural and urban settings **and for environmental purposes** which is essential...

pg 37 Levee System Issues and Concerns - levee setbacks vs agricultural land conversion; government land acquisition vs private land ownership.

pg 40 Water Quality Program Issues and Concerns - extent and impact of toxicity of unknown origin in the Bay-Delta system; need to establish link between presence of toxicants and biological impacts.

pg 42 Ecosystem Restoration Program, first paragraph, last sentence - ...20 to 30 years ~~it will take to restore ecological health~~ implementation period.

pg 42 ERP - There is no discussion of exotic species. There needs to be.

pg 42 ERP Issues and Concerns - need for conceptual models and validation of those models; agricultural land and water impacts/mitigation; government land acquisition vs private land ownership; information needs to accurately evaluate stressors.

pg 44 ERP Facts and Figures - Second bullet is an issue; 70% of the aquatic biota in the system is exotic; may convert 150k acres to 200k acres of agricultural land and associated water supply to ecosystem uses;

pg 45 WUE Program - Issues and Concerns - Land retirement is not a demand management tool and is not apart of the CALFED Program; Agricultural water reuse limits the amount of "new" water that may be realized through agricultural conservation measures.

pg 49 Watershed Management - first sentence - ...improve environmental conditions **and resource management** throughout a watershed.

pg 51, Storage - There is an apparent bias throughout the document towards off-stream surface storage that should be removed. An example: First paragraph, third sentence - reword - By ~~cautiously diverting water into storage~~ **judiciously storing water** during times of high flow...

Issues and Concerns - Amount; Type; location; cost/who pays; public acceptance; water rights (NorCAL vs SoCAL)

pg 52, 72 and other places - remove the range of storage. In some places it is up to 4.75 MAF; others it's 4.95 MAF; others, it's 6 MAF. Some believe these upper limits are artificial, and would not accommodate a "full blown" Shasta with or without other projects.

pg 53, Millerton - Are there potential flood control benefits that would be derived from this projects? If so, they should be mentioned.

pg 57, Conveyance, Issues and Concerns - cost/who pays; assurances; public acceptance.

pg 68, fourth bullet - This should not be a bullet, but should be a side-bar, or separate paragraph.

pg 75 - 89 - Alternatives: Two issues: 1) ERP does change somewhat with each alternative, yet this may not be adequately described in the draft EIR/EIS. Again, this emphasizes the need for maps in the EIR/EIS. 2) As a member of the IDT, Steve Shaffer consistently brought up the issue of enlarging Shasta by 10 MAF and considering other onstream storage such as enlarging Millerton. The upper range of storage should be eliminated throughout this document. Also, as listed here, the upper range is 6.5 MAF, again different from that cited in other places in the document.

pg 85 - Discuss briefly why a 10,000 +/- 2,000 cfs facility was selected. Also mention that 2,000 cfs for transfer capacity and 2,000 cfs for in-delta water supply (mitigation) may also be a factor in sizing.

pg 87 - third paragraph - 15,000 cfs is 65% of 23,000 cfs. 12,000 cfs is 52% of 23,000 cfs.

pg 94, Land Use Changes - After the third sentence add **But most most is agricultural land in private ownership.**

pg 113, Issues to be Addressed - Agricultural Land Impacts: This is an important issue that is in the side-bar, but not discussed in the chapter. It should be discussed, with programmatic policy.