

98-A17

MEMORANDUM



Pete Wilson
Governor

FEB 25 1998

TO: Lester Snow
Executive Director
CALFED
Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

FROM: Walt Pettit
Executive Director
EXECUTIVE OFFICE

DATE: FEBRUARY 25 1998

SUBJECT: COMMENTS ON AGENCY REVIEW DRAFT OF CALFED PHASE II
INTERIM REPORT

Thank you for the opportunity to comment on the draft report. The following comments are organized by page number in the draft report.

1. [Page 14] The sentence in the "Water Quality" section regarding source water quality should be rephrased to state: "The Program's strategy to achieve the water quality objective is to improve water quality by reducing or eliminating parameters that degrade water quality at its source."
2. [Page 15] The last sentence of this page claims possible beneficial impacts of water transfers across the Delta. There can also be substantial negative impacts associated with the export of water related to these transfers. The sentence should be modified to provide this balanced perspective or deleted.
3. [Page 18] The first sentence in the "Water Quality Improvements" section should be rephrased to state: "Program actions to improve water quality focus on source control: improve the quality of water that flows through the Bay-Delta system by addressing water quality concerns at their source."
4. [Page 18] The "Watershed Coordination" section should focus on water quality and habitat benefits, not on possible increases in watershed yield.

CALIFORNIA

State Water
Resources
Control Board

901 P Street
Sacramento, CA
95814
Mail Code G-8
(916) 657-1873
FAX (916) 657-1485

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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

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5. [Page 27] The figure is confusing; more explanation is appropriate.
6. [Page 30] The first sentence in the "Area of Origin/Water Rights" misstates these laws as a priority of water use rather than a protection of water rights. These laws do not guarantee a water supply only the priority to obtain rights to water senior to out of basin uses. The section should be revised to state: "Area of origin statutes protect the rights to water in watersheds where the water originates from uses outside these watersheds.
7. [Page 37] An issue with the levee system protection plan is that water quality problems could occur with the relocation of dredged material and its use in levee construction and for other uses (i.e., marsh rehabilitation). Dredged material reuse criteria need to be developed (e.g., through the LTMS) to facilitate implementation of the actions listed in the plan.
8. [Page 40] The Water Quality Program identifies significant water quality actions that need to be implemented to address water quality concerns. Substantial effort will be required to scope out the specific details on how to implement the general actions. A principal concern regarding the program is that there may not be adequate resources to scope out the general actions and to implement specific action plan elements. Current resource levels are inadequate to address the significant water quality issues included in the Water Quality Program.
9. [Page 43] A programmatic action under the ecosystem restoration program is "Evaluate and reduce adverse effects of contaminants." This action is more appropriately included in the water quality program.
10. [Page 69] It should be pointed out that the mortality of eggs at the screens at Hood could be partially avoided by short-term pumping curtailments during egg passage.
11. [Page 69] It is not clear why upstream flow requirements on the Sacramento River and the Vernalis flow requirement on the San Joaquin River place significant constraints on the availability of exports from a diversion point at Stockton.
12. In the sensitivity analysis, the existing X2 requirement was changed to a less restrictive X3 requirement with the same locations and time periods as the X2 requirement. This method of deriving a less restrictive isohaline standard is not consistent with the logic associated with the existing isohaline standard. The X2 standard is based on the number of days that the 2 ppt isohaline is downstream of specified locations at a particular "level of development", defined in the existing

standard as the level of development in the year 1971. A less restrictive isohaline standard could be derived using this logic by either (1) moving the compliance locations upstream and calculating the new number of days at the same level of development, (2) changing the standard to an X3 isohaline and calculating a new number of days at the same level of development, or (3) changing the level of development to a more recent date and calculating a new number of days. The actual method selected by CALFED results in a different level of development at each of the compliance points. This comment is not meant to suggest that new studies be conducted at this late date. The comment is provided only for information purposes. If other parties raise this concern in the future, CALFED staff should be aware of the issue.

13. [Page 88] The operating criteria should identify the size of the isolated facility assumed in the modeling.
14. [Page 92] The total costs of the alternatives should be broken into the conveyance and the storage components. The costs cited in the report for the alternatives are similar because they are dominated by the storage component.
15. [Page 95] The brackish water habitat section states that X2 locations are similar for all alternatives. The X2 locations are established by the standards in dry conditions and the natural hydrology in wet periods, not by the Delta configuration. Therefore, the text should state which standards are used to determine the X2 location for each of the alternatives. The plots indicate that existing standards were used for all of the alternatives.
16. [Page 97] There should probably be a negative symbol around locations 2 and 3 on the map for Alternative 3. (Salinity is also misspelled on this map.)
17. [Page 103] The plot titled Antioch looks like the net flows in the western San Joaquin River. This location is usually referred to as Jersey Point. The year(s) these plots represent should be identified.
18. [Page 107] The plots indicate that exports under Alternative 3 with existing standards are lower than exports for the other alternatives with existing standards. The reduced exports under Alternative 3 are not caused by either existing standards or the configuration of the alternative; rather, they are caused by a "new standard" incorporated in the modeling that prohibits diversions from the southern Delta, beyond specified minimum levels, until the isolated facility is filled. This "new standard", in conjunction with the Rio Vista flow standard has a substantial water

FEBRUARY 25 1998

cost. If the "new standard" is deleted, the export levels under existing standards for all of the alternatives would be the same. The cause of the reduced export levels for Alternative 3 should be identified.

19. [Pages 132-135] This part of the report talks about permitting measures needed to implement the program. In addition to Clean Water Act section 404 permits and endangered species authorizations, implementation may require water right permits or changes in water right permits and may require discharge permits under either Clean Water Act section 402 or under the California Porter-Cologne Act.

If you have any questions, please contact Thomas Howard at (916) 657-1873.