

98-401

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 Date: Mon, 30 Nov 98 10:47:38 -0800  
 Subject: CALFED Phase II report draft  
 TO: potter@water.ca.gov  
 CC: clcreel@water.ca.gov, kkelly@water.ca.gov

NOTED  
 NOV 30 1998  
 RGP

Bob--

Here are my comments on the Phase II report. I am using a computer at METs office. I will call after I send it. Don't bother to respond to this address because I won't be able to respond. I will be in Palm Springs tomorrow (at the groundwater workshop). Will probably see you at ACWA. This is a vacation day for me... yes, I am vying for sainthood.

Phase II Draft Report-- comments.

page 39. text reads "One of the primary goals of the CALFED Program is to reconstruct all Delta levees to a particular standard. CALFED has tentatively selected the U.S. Army Corps of Engineers PL 84-99 standard." "all" is too encompassing, needs to be more qualified.

page 40. Format of bullets and box under heading "Overall benefits..." is confusing. Recommend it be reformatted.  
 IMPORTANT COMMENT: Recommend text on subsidence be deleted. I think this issue has been resolved by including research and monitoring in CMARP.

page 43. under "Selenium", text reads "Impacts of selenium will be further reduced by real-time management of selenium laden agricultural drain water released to the San Joaquin River to minimize concentration in the river when selenium discharges occur." Is it understood that this management objective is the right one for the environment? It may be possible that another way of managing the selenium concentrations will benefit the environment more. I don't think much investigation on selenium management on the San Joaquin River has been done. I recommend the text be modified to reflect the uncertainty.

page 44. An editorial comment. The paragraph beginning "Storage can help timing..." doesn't fit in the discussion. Recommend it be deleted.

page 45. editorial comment. Near the bottom of the page, the sentence beginning "This approach allows revision..." insert an "of" after "design".

page 47. First full paragraph has CALFED policy statement regarding agricultural lands. Bob may want to read this over.

page 48. Table has two errors. The numbers for Urban Recycling for the No-Action should be 967 and 798. Also, an explanation of "Irrecoverable Loss Savings" should be included.

page 51. First bullet links water use efficiency with reduced demands for Delta exports and reduced fish entrainment. This conflicts with the explanation regarding the export values included in the model runs analyzing the CALFED alternatives. We have explained that the water use efficiency efforts do not significantly reduce the exports because of the use of groundwater in the San Joaquin River/Tulare Lake basin. I recommend this bullet be deleted or explained in much more detail. The explanation should emphasize the increased operational flexibility (timing of diversions) on a yearly basis (as opposed to model studies).

pages 60, 71, 90. FYI, RGP. "Bundles" is described as we understood it to be originally defined.

page 63. IMPORTANT COMMENT. CALFED's basic as stated here is good. Be wary of any suggested changes. (Same comment for the figure on page 66.)

page 70. What is the "Bay-Delta Act"? Also, I haven't seen any of the attachments to this report. Attachment D should be reviewed for text regarding ISDP.

page 73. editorial comment. re: item #4 "following evaluation and abatement mercury work" should probably read "following mercury evaluation and abatement work".

Under item #4. "Delta" item 2...ISDP has done some of this work already. Recommend time frame change from 3-7 to 1-7 years.

page 81. Intro text under "Storage" is redundant and doesn't appear to apply to ground water. Recommend that text states issue relates to surface storage and the links and conditions only really apply to it. This comment also applies to the discussion of storage beginning on page 58.

page 82. IMPORTANT COMMENT. This is the South Delta discussion. Under South Delta Improvement, text should be added that describes the actual situation/status of ISDP DEIR/S and the next steps DWR, DFG, FWS, NMFS, and COE plan to take, also reference the possibility of completing the ISDP ROD by the end of 1999. (I can work on this text at ACWA if necessary.)

Also, under item #2, the italicized text should be removed. Many of the proposed actions have potential negative impacts but these impacts are not flagged. The treatment of negative impacts is uneven and detracts from the report. This comment also applies to the italicized text on

pages 83 and 84.

page 85. First paragraph under "Assurances and Institutional arrangements". change text to read "Items identified to date are listed below. State 1 components will be refined by the BDAC Assurances Workgroup." Text on 89-90 is better.

page 87. "Water Operations" should be included in the Stage 1 discussion (Section 5.2). It shouldn't be its own section because I don't think the action will continue past Stage 1. This comment also applies to the "Long-term Implementation" section on page 103 (delete "water operation rules".)

page 95 Comment #1. FYI--This text proposes to credit funds on ecosystem-related actions taken after the Bay-Delta Accord. Efforts taken prior to the Accord are to be part of the "no-action" baseline. An exception may be the CVPIA Restoration Fund.  
Comment #2 Text links the financial baseline with a mitigation baseline, they both start on 12/15/94. This is similar to the decision we reached regarding the Four Pumps Agreement that the Accord mitigated for all past impacts.

page 106. Define NCCP.

Page 109. editorial comments on first paragraph-- The first sentence needs to be fixed. Delete "to be addressed" in the third sentence. Correct spelling of "alterations" in last sentence.

Hope this is helpful!

See you soon--

KK

P.S. It is a girl. Cassaundra Maxine Wages. 9 pounds, 22 inches, everyone is doing very well.