

State of California
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Memorandum

To : Mr. Steve Yaeger
Deputy Director
CALFED Bay-Delta Program

Date : June 6, 1997

From : Department of Fish and Game

Subject : Phase II Alternatives Descriptions and Alternatives Appendices

The Department of Fish and Game has reviewed the subject documents and offers the following comments to assist the CALFED Bay-Delta Program in its efforts to define a reasonable range of alternatives to be carried forward for analysis in the Programmatic EIR/EIS. Our comments are provided separately below for each of the documents.

Alternatives Descriptions

General Comments

Following are key points regarding this document:

- We found it difficult at times being able to tell what the common programs really are or what they are composed of. This is particularly true of the Levee System Integrity Program.
- A clearer link needs to be made between subsidence reversal and the ERPP.
- The alternatives to screening in the south Delta are described vaguely as ranging from upgrading existing screens at their current site or new screens at the intake to Clifton Court Forebay. These represent such dramatically different alternatives that additional emphasis is needed to describe the significance of these two approaches in the alternative descriptions.
- The Department believes that there is a desirable alternative configuration for a Dual Delta Conveyance that has benefits and impacts that, we believe, cannot be adequately characterized with the currently described alternatives and ranges of isolated conveyance. Below we offer a description of that alternative and recommend that it be considered as an additional alternative.
- The discussion of Geographic Scope on page 4 of the Common Program does not make it clear that the program will consider only problems linked to the Delta and Suisun Bay. That definition was carefully worked out among stakeholders and

Mr. Steve Yaeger
 June 6, 1997
 Page Three

additional criterion(a) may be needed below Chico Landing. It appears that the former will occur, but the latter may not. Our concern about criteria below Chico Landing arises from the expected use of floodways and set-back levees as part of the creation of "150,000 acres" of new habitat. High flows will be needed in these areas to "preserve the river's natural fluvial geomorphology process." It may be that the flow necessary above Chico Landing before diversion to off stream storage may be adequate to protect organisms and habitat below there.

- There is a disturbing statement in the general description of alternatives 2 and 3 that it "would allow full physical pumping capacity." Does this mean there would be no limits on exports as presently exist under the Accord?
- The likelihood that alternatives will obtain supplemental water from "willing sellers" only in order to provide much in the way of environmental restoration through increased stream flows should be disclosed.

Alternatives Review

A review of the alternatives is attached as an addendum to this comment memorandum.

Recommended Alternative Configuration

Since the Department remains concerned that a full range of alternatives are not being carried forward for analysis, we recommend the following:

- A 10,000 cfs isolated facility and a separate screened intake at Hood
- Divide the screen facility into a multiple bay system with three bays
- A turnout of between 2,000 to 3,000 cfs into the Mokelumne River near New Hope Tract from the isolated facility to be used as specified in the attached operating criteria.
- Keep the Cross Channel Gates closed except, perhaps, during the peak periods of recreational boating.
- A facility that allows the intake of water at lower export rates (e.g. 2,000 cfs) from Italian Slough through a screened facility to the State Water Project export facilities.

Mr. Steve Yaeger
June 6, 1997
Page Five

Alternatives Appendices

Appendix A- Ecosystem Restoration Targets- Delta and Bay ecological zones:

Specific Comments:

Delta

Page 1-3 Stream flow: The document should describe whether the totality of potential flow needs been reviewed and agreement reached that the needs listed have the highest priority. The appendix should indicate whether the summary section of the main report which references 300,000 to 500,000 acre feet annually of "increased critical-period flows" is consistent with the amounts listed here. The document should also distinguish between using certain amounts of storage available for ecosystem purposes to meet these flows as contrasted with the traditional concept of establishing minimum standards. The minimum flows on these pages seem consistent with minimum standards rather than storage. The approach should be internal consistent within these document.

Page 2 Target 3, Action 1: The specific operational criterion which would accomplish the stated purpose of "limiting water diversions from the Delta for up to 10 days" should be described.

Page 3 Target 5: The correct definition of QWEST should be used. The species targeted with this condition should be briefly described.

Page 3 and 4 Delta Channel Hydraulics: The targets and actions appear to remain deficient in restoring downstream flow and other needed hydrodynamic conditions. The feasibility of actions 3 and 4 should be described and Action 5 should be clarified, particularly since, as it's worded now, it may conflict with the target.

Page 3 and 4 Delta Channel Hydraulics: We strongly recommend that the targets for this process be modified to include the following:

Target 1: Modify internal Delta hydrodynamics in all months so that flows, as measured in selected Delta sloughs and rivers at fixed indicator sites are within ten percent of the Delta hydrodynamic conditions that existed under a mid-1960s level of water supply development.

Target 2: Modify internal Delta hydrodynamics in the months of April through June so that flows, as measured in selected Delta sloughs and rivers are within ten percent of the Delta hydrodynamic conditions that existed under an early-1950s level of water supply development and export.

Mr. Steve Yaeger
June 6, 1997
Page Seven

Appendix B- Water Quality Program

General Comment:

Overall this program seems like a reasonably comprehensive proposal. Note its format seems quite different than that of the Ecosystem Plan. Most of its specific strength comes from Performance Measures rather than from Objectives and Targets. Many of the Performance Measures are specific, but others are too general. e. g. Those that simply say something like "reduce some pollutant effect" need to be quantified.

Specific Comments:

Page 4 Turbidity: This section is written from the perspective of a drinking water supply objective. There is some reason to believe that one of the things that has gone wrong environmentally is that the Delta has become too clear from an aquatic ecosystem perspective. Thus this section may be in conflict with ecosystem restoration objectives. That issue needs to be recognized and addressed.

Page 5: At least upon quick reading the action related to oxygen, copper, and mercury seems to overlap with earlier sections on the same substances.

Page 6: Salinity in South Delta: The document should provide some documentation whether or not the stated methods actually reduce salinity loads entering the South Delta as stated in performance measures. I. e. some could decrease concentrations but not loads.

Page 9 Water Management: Again, the issues of dilution of salinity and whether this is an appropriate measure to reduce loads needs to be clarified.

Appendix C

Specific Comment:

Page 9 New Water: The appendix should clarify that the use of new water for environmental beneficial uses does not require "carrying out appropriate water management measures or implementing cost-effective efficiency measures.