

**REVIEW COMMENTS**  
**CALFED Alternatives Package and Technical Appendices**  
**U.S. Bureau of Reclamation**  
**September 25, 1997**

The comments are categorized as follows, significant issues of concern, general comments, specific comments on alternative descriptions, common programs, water transfers, operation assumptions for existing conditions modeling, in accordance with the CALFED Memorandum dated, August 12, 1997, Response to General Comments. In addition, attached comments are provided on the specific draft technical reports.

**SIGNIFICANT ISSUES OF CONCERN**

- **Viability of Alternative 1**

There continues to be a concern that Alternative 1 is not a viable alternative as required under NEPA regulations.

- **Plan Formulation**

- **Model Validation**

Reclamation believes that validating models is an essential in determining the appropriate use of models in the CALFED process. We appreciate CALFED's support and participation in this effort and look forward to working with you to satisfactorily complete validating the analytical tools.

- **Power Analysis**

Reclamation does not believe that combining SWP and CVP projects in the analysis will identify the effects to the CVP on-peak generation and project-use load requirements.

## GENERAL COMMENTS

1. Many of the responses to comments simply stated that the comment was noted. Although for some of the comments this may be an appropriate response, there are other comments in which it would be beneficial to provide the specific actions taken in noting the comment, for instance has text been changed to address the comment, additional data collected or is work progressing on the subject in question.
2. A previous comment stated that it was unclear what level of uncertainties will exist for analytical assumptions of EIR/EIS analysis. The response stated that uncertainties will be discussed where possible. Please describe and/or define what is meant by "where possible." Reclamation believes that it is critical to put assumptions into perspective.

## ALTERNATIVE DESCRIPTIONS

### General

1. We believe the Interagency Development Team (IDT) efforts will become an imperative part the CALFED program and we look forward to the IDT working to integrate the common programs with the storage and conveyance alternatives. We wish to reiterate the importance of providing a complete discussion of the uncertainties whenever they occur in the analysis.
2. We disagree with the assumption that there is no value in separating the qualitative from quantitative information. CALFED documents should describe quantitative information, the source of that information, and qualitative information. It is important for the reader to understand what information was used in making decisions.
3. All (Published) References used should be cited and listed in the EIR/EIS and technical reports.
4. To the extent that it is known, future agency activities should be identified (e.g., authority and estimated level of activity) to allow for agency planning and budgeting.
5. We fully support the development and implementation of a long-term scientific review process and believe it is an integral part of the alternative development process and CALFED program. We continue to believe that such a process will help to guide adaptive management decisions, resolve conflicts and address scientific uncertainty.
6. To the extent possible general costs should be displayed with proposed project benefits of each alternative. This information is necessary in order to provide the reader with a basis for alternative comparison and to provide a more detailed evaluation of the criteria.

### No Action

1. It would be helpful to have a complete description of the no action alternative, specifically in regards to the assumptions, projects, procedures and CVPIA and RRA policies.
2. Another review of the No-Action alternative and assumptions will be required once CVPIA related decisions are finalized.

### Alternative 1

1. It is critical, from a NEPA perspective, to ensure that each alternative is crafted and articulated so that it meets the project purpose. It will be sufficient to state the inadequacies of an alternative.

There is concern as to whether Alternative 1 is actually a viable alternative as required under NEPA regulations, since it does not appear to fully meet the project purpose. The analysis should also discuss the utility of this alternative in light of meeting SWRCB 95-6 standards.

### Alternative 2

1. Need to describe the conveyance mechanisms for groundwater recharge locations and off stream storage. It is unclear as to the ability to capture this water and transport it to the required locations.
2. On page 17, next to the last bullet: It remains unclear how water will enter this system from the Sacramento River (e.g. through the Delta Cross Channel Gates and/or the Mokelumne River) and what operation requirements will be necessary (e.g., existing operations of Delta Cross Channel Gates).

### Alternative 3

1. No general comments

## COMMON PROGRAMS

### General

1. There is a concern that the level of effort and detail has differed in the development of the common programs. This difference may prevent an equitable evaluation of the proposed alternatives. We believe the alternative would be more credible if there was closer parity among common programs.
2. There is a need for an outlined implementation process to address the following common

program issues: contractual commitments; operational flexibility; and environmental improvements.

3. We understand that the goal of the CALFED program is not to necessarily provide a program to meet the water needs of the State, however, it will be important to identify a baseline amount of water considered acceptable for each of the alternatives.

4 It would be helpful to clearly identify the strategies CALFED is considering to ensure no significant redirected impacts.

#### Ecosystem Restoration Program Plan

1. There needs to be a detailed discussion pertaining to water availability specifically for the Ecosystem Restoration Program Plan (ERPP). The program appears to rely heavily on water transfers as a means of accomplishing restoration activities. This assumption may be unrealistic. The draft document will need to identify potential sources of transferred water including examples of past transfers in order to demonstrate that transfers are a realistic approach. We understand that it is not possible to specify the exact transfer.

2. Please describe the tools that will be used to assess the ERPP 400,000 AF e.g. source of water supply, timing of releases, and the relationship to other actions (SJAMP). In addition, the supporting documentation, (e.g. DWRSIM model run) indicating that this water is in fact available should be provided in the technical report.

3. All three volumes give little attention to resources and issues outside the floor of the Valley and Delta. The major exception is a chapter on upper (forested) watersheds in Volume 1, but there is no comparable follow-through in Volumes II and III. Management of grazing lands is not mentioned in any systematic manner at all.

4. Volume III of ERPP does not clearly define Adaptive Management Approach. A more detailed definition of the Adaptive Management Approach and a list of triggers is necessary for a comprehensive evaluation.

5. The desired flows for the Sacramento and San Joaquin Rivers may not be reasonable targets. We suggest that CALFED evaluate these targets again before assuming such flows are implementable.

6. On page 25 of Volume I, the reference to the "800 TAF of CVP water to be allocated for fish and wildlife purposes" is wrong. There has been considerable debate over the last 5 years because the CVPIA refers to dedication and management of CVP yield. Please ask the CALFED staff to insert "yield" and also to substitute "dedication and management" for "allocation" wherever 3406(b)(2) is referenced.

Water Quality Common Program

1. Suggest CALFED consider water quality and flow conditions that are not founded on Decision 95-6. Variations in Delta configuration and operational approaches may in fact, negate or alter the need for specific water quality standards. There appears to be a need to describe the overall strategy or vision for the Delta and how water quality parameters will ultimately be incorporated into this strategy or vision.
2. The level of detail provided in the Water Quality Technical report is recognized as being programmatic in nature, however, there remains a need to address certain key issue such as, the sources and fate of bromine, water use efficiency actions and their impact on water quality with a degree of specificity.
3. The prioritization of the specific pollutants of concern needs to be clearly described in the document. Prioritization could be developed in accordance with a species specific approach or from a regional perspective.
4. There remains a concern regarding salinity management and the potential for significant redirected impacts to Reclamation customers. Unless salinity is adequately addressed, significant impacts will occur in the Reclamation service area. Salinity in the system will increase in one area if reduced in another. (Please note, our concern relates to other constituents in addition to Bromine.)
5. It is still unclear what is meant by "reducing pollutants in water diverted from the Delta" and the purpose of such a reduction. This section relates to treatment actions, please describe the proposed level of treatment.
6. In the Water Quality Appendix B there are lists of indicators of success which may not adequately monitor the action(s) being taken. Given the scientific uncertainty we again suggest an expansion of the list of indicators both in number and detail. There is also a need to describe the prioritization of alternatives with regard to water quality.
7. We believe performance measures should be linked to the actions in such a manner useful for evaluation. We wish to reiterate our belief that the number of public workshops and other outreach activities is not an adequate scientific measure of the action to reduce the impacts associated with recreational water use and domestic waste (outreach is an "action" only "results" can be measured). CALFED should assess the utility of toxicity testing and the documents should stress the limitations of toxicity testing and apply this method only when appropriate.
8. CALFED should address the difference and significance between what level of a constituent is detected and what is biologically available.
9. We continue to believe that the increase in juvenile anadromous fish is an inappropriate performance measure for reduction of sediment loading and turbidity.

10. We agree with the comment response that CALFED documents should clearly explain the issues associated with evaporation ponds (e.g. Kesterson) and assume such an explanation will be provided in the EIR/EIS.

11. We agree with the statement that DWRSIM may not sufficiently assess water quality impacts, however a adequate quantitative analysis can efficiently be done by hand - the choices are not just DWRSIM or qualitative.

12. We believe that salinity impacts to DMC are significant enough of a concern that all the subalternatives should be analyzed (not just Alt. 1, Alt. 2, Alt. 3e).

13. There continues to be a need for specific studies to address water quality concerns. A yield increase study that provide quantitative data and one that indicates changes to water quality are essential elements to the water quality program.

#### Water Use Efficiency Program

1. Information related to sediment loads and flows has not been fully incorporated into the alternatives. Specific program outcomes need to be quantified and parameters defined.

2. The Water Use Efficiency Program could impact actions in both the ERPP (specifically in relationship to fish screens) and the water quality program, as well as water transfers. A more detailed analysis of linkages and impacts would serve to clarify the specific effects of these common programs.

#### Levee System Integrity

1. Need to generally define the location of proposed setback levees and describe the impact if any to existing structures and water quality. It is difficult to assess the impacts of the proposed program based on the existing level of detail.

2. The acceptable level of flood protection should be defined more clearly. It is important to know whether this level includes tidal influences.

#### Operations Assumptions for Existing Conditions Modeling

1. Operations and potential limitations of specific fish screens should be identified e.g., diversions into proposed sites reservoir.