

US Bureau of Reclamation  
CALFED Admin Draft Comments  
**Foundational Issues**

- A. Tone** [for example - see Table 3.1-1= pg 4 (vegetation); pg7 (flood measures)]
- \* Seems to "hard-sell" Alternative 3
  - \* Unbalanced articulation of potential significant impacts

Recommendation: Revise document to be written in unbiased tone, with sensitivity to varying perspectives on issues, and stating facts with no judgements.

**B. Report Organization**

- \* Components of program description (what there is) in appendices - not main body
- \* Common program actions are only generally described and assessed in main document - stated "independence of common programs"; "integration"; some elements not common
- \* Repeated reference to Phase II report - we have not seen this document, therefore, it is difficult to have comfort with what is in the Admin draft
- \* Upper Watershed Resource Area is not discussed as other resource areas are

Recommendation: Revise document to include program specifics in the main body of the text and allow for assurances, once finalized, to also be included in the main body of the report. Phase II report and Technical Appendices must be shared prior to release of draft document. There needs to be adequate time allowed for staff review and modifications to address "serious" concerns of Phase II report and Technical Appendices. The draft document should include a discussion on Upper Watershed resources as done for other resource areas.

**C. Report Content**

- \* Report written as if program and details are determined
- \* No articulation of uncertainties

Recommendation: Present the current status of program development and the proposed approach to determine definition, details, and complete analysis in the time between draft and final documentation.

**D. Program Approach**

- \* Resources approach - "how much water can be moved from north to south in each conveyance alternative while maintaining the ecological integrity of the Bay-Delta?"
- \* Water supply approach - "what's the demand for human uses and how to get the water where it's needed for human uses ? - the rest goes to the environment"

Recommendation: Revise document to acknowledge these different approaches, how they are used in the current analysis, and the need to work to merge these together in the final program.

**E. Need for "defensible" analysis**

- \* Current analysis is necessarily subjective and therefore open to legitimate criticism, if not qualified
- \* Current results are skewed by selection of parameters (unanticipated result of "distinguishing characteristics" approach)

Recommendation: Revise document to acknowledge the lack of inclusion of (known and unknown) parameters of concern. The draft document should also identify a process to use the time between draft and final to determine all parameters of concern, and a strategy to conduct an unbiased analysis of identified parameters that results in a "defensible" analysis (one that addresses issues and concerns from all perspectives).

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**Analytical Issues**

**A. Modeling**

- \* No Validation (hydrodynamic)
- \* Combination of CVP & SWP Power
- \* No reflection of changed Delta configuration

Recommendation: Revise document to separate power impacts between CVP and SWP, acknowledge that results do not reflect any changed configuration of Delta conveyance, and identify a process to complete and report model validation results in the final document.

**B. Assumptions**

- \* Flood restrictions - not included in modeling
- \* Temperature - assumed to not reduce flexibility of operations
- \* ERPP - dependency on water from unknown sources
- \* Common programs - no assessment in conveyance analysis; not fully developed; assumption that goals will be met
- \* CVPIA actions - role of (b)(2) in modeling
- \* Salinity - no reflection of different Delta configurations; Suisun Marsh
- \* No change in standards - no reflection of different Delta configurations

Recommendation: Revise document to acknowledge these (and other) assumptions and uncertainties. Include a discussion in the draft to assess the validity and significance of these assumptions as well as an approach to confirm or modify assumptions in the time between draft and final.

**C. Display of Results**

- \* Tables appear biased, summaries are hard to follow, information is unbalanced
- \* Little Dot evaluation is too subjective

Recommendation: Eliminate the tables or revise them to be a more complete representation of information presented in a balanced and unbiased tone, with articulation of the unknowns/holes.

**D. Impact Assessment**

- \* Lack of analysis or discussion to support stated determinations
- \* Common Programs - difficult to assess without more definition

Recommendation: Revise document to acknowledge unknowns and include a process to resolve issue in the time between draft and final.

**E. Adaptive Management**

- \* No consensus definition
- \* HUGE reliance on this unknown

Recommendation: Revise document to acknowledge the unknowns with this approach and include a process to resolve this issue in the time between draft and final.

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