

Bay Delta Conservation Plan
Review Document Comment Form

Document: **BDCP WORKING DRAFT OF CONSERVATION STRATEGY_CHAPTER 3**
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N o.	Page #	Section #	Line #	Comment	Disposition
1	3-38	3.3.6	Whole Section	Covered Fish Species Goals and Objectives: The phrase "existing conditions" (here and elsewhere in the draft) requires clarification. What are the "existing conditions" being used; what is the time period is associated with these conditions?	
2	3-52 to 3-53	3.4.1.1	Whole section	Operational Control Facilities – General Comment: Without guarantees that its water quality, water rights and contracts terms will be upheld and that mitigation for these impacts will be provided, The City of Antioch opposes the in-Delta isolated facilities as well as the North Delta and Isolated Conveyance Facilities.	
3	3-53	3.4.1	19-28	Water Operations Conservation Measures Section– General Comment: Without determining the Delta outflows required for fish species, both the operating parameters and design criteria are premature. There is no mention of Delta outflows required for fish or Western Delta freshwater quality to support habitat.	
4	3-53	3.4.1	33-35	Water Operations Conservation Measures Section What is the scientific evidence that construction and operation of North Delta diversion facilities and Isolated Conveyance will reduce entrainment and improve habitat for covered species in the long term? What is the scientific evidence that the proposed habitat restoration will increase biological productivity?	
5	3-54	3.4.1	2-5	Explain- Are you saying that habitat restoration on its own (without isolated facility) will not increase biological diversity?	
6	3-54	3.4.1.1	Whole Section	Operational Control Facilities – General Comment Operating and design criteria for the In-Delta portion of proposed Dual Conveyance are not mentioned. Proposed gates system will partially isolate the flows through the Delta. The City of Antioch requests a full hydraulic and hydrodynamic modeling analysis for all gates, including the 2-gate proposal, with impacts on flow and water quality at City of Antioch's intake.	

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7	3-54 to 3-55	3.4.1.1	9-16	<p>Operational Control Facilities - General Comment - Does not currently appear to consider potential impacts to existing in-Delta facilities or water rights from the proposed facilities and their functions. As there are existing water rights downstream of the proposed facilities superior to those of the SWP and CVP, it is critical that such impacts be analyzed and mitigated if necessary. These impacts and mitigations should be included as part of the Conservation Strategy and should be included as conditions in all applicable permits.</p>	
8	3-58	3.4.1.2	Whole Section	<p>Near Term Operations – WOCMN5: Delta Cross Channel: The historic condition of the Delta included significant Sacramento River flow from Georgiana and Three Mile Slough into the San Joaquin River. How will the proposed re-operation of the Delta Cross Channel Gates change this historic condition and what will be the impacts on the environment, fish, and in-Delta water users?</p> <p>What changes in siltation will occur in the Delta and what impacts will this have on environment, fish and in-Delta water users?</p>	
9	3-59	3.4.1.2	Whole Section	<p>Near Term Operations – WOCMN6: Rio Vista Flows: The City believes that it is unrealistic and unreasonable to use the current D-1641 standards for Delta flows, as those standards may not be adequate to protect in-delta users and the environment under the proposed project. D-1641 did not include or consider the impacts of a 15,000 cfs diversion facility on the Sacramento River upstream of the Delta. The City believes that all flows should include the original intent of the CVP, which included a minimum outflow requirement 0.6 miles west of Antioch and minimum salinity requirements at Antioch. Further, there is no discussion as to how changed flow regimes are going to impact the CVP's own in-Delta facility at the Contra Costa Canal.</p>	
10	3-60	3.4.1.2	Whole section	<p>Near Term Operations – WOCMN8: Two Gates: There is no discussion regarding potential impacts to navigation or siltation as the result of the Two Gates. Two Gates will directly impact recreational boating and fishing in the Delta.</p> <p>It appears that the same goals of the Two Gates could be accomplished by greater San Joaquin River outflow without impacts to navigation and siltation.</p>	

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11	3-61	3.4.1.2	35-44	<p>“Operation under WOCMN11 and WOCMN12 as well as many habitat restoration conservation measures implemented in the near-term could affect the position of the low salinity zone in the estuary.” The City of Antioch opposes any Delta-ward migration of the low salinity zone in the estuary, without assurances of protection of water quality, water rights, and mitigation for these impacts, and for the economic impacts related to in-Delta uses such as boating and fishing that rely on fresh water.</p>	
12	3-61	3.4.1.2	Whole section	<p>Water Operations Conservation Measures Section WOCMN9 – General Comment: The City supports the water operation factor to maintain and improve the low salinity zone in the western Delta. This is critical to not only maintaining a healthy ecosystem it is also critical to water quality and water supply for the City’s inhabitants. Significantly also it recognizes the historic condition of the western Delta as being a freshwater habitat. See for example, Thomas Means, <i>Salt Water Problem, San Francisco Bay and Delta of Sacramento, 1928. (see Attachment 2)</i></p>	
13	3-61	3.4.1.2	Whole Section	<p>Near Term Operations – WOCMN9: Changes to Sacramento river flow (reductions) will impact the Western Delta’s fresh water habitat. Reductions in Sacramento River flow will also degrade water quality for the City of Antioch, and will impact the fishing and boating recreational use of the Western Delta.</p>	
14	3-61	3.4.1.2	Whole Section	<p>Near Term Operations – WOCMN9: Delta Outflows: Antioch believes that it is unrealistic and unreasonable to use current D-1641 standards for Delta outflows. D-1641 did not include or consider the impacts of a 15,000 cfs diversion facility on the Sacramento River upstream of the Delta.</p> <p>The City believes to the use current D-1641 standards for Delta flows may not be adequate to protect in-delta users and the environment. D-1641 did not include or consider the impacts of a 15,000 cfs diversion facility on the Sacramento River upstream of the Delta. The City believes that all flows should include the original intent of the CVP, which included a minimum outflow requirement 0.6 miles west of Antioch and minimum salinity requirements at Antioch.</p> <p>The City believes that outflows should include the original intent of the CVP which included a minimum outflow requirement 0.6 miles west of Antioch and minimum salinity requirements at Antioch.</p>	

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15	3-62	3.4.1.2	39-40	<p>WOCMN 14-Maintain in-Delta agricultural, municipal and industrial water quality requirements during the near-term implementation period.</p> <p>Moving the D-1641 compliance point from Emmaton to the Three Mile Slough juncture may have significant water quality impacts at Antioch's intake. What is the reason for this move? Antioch has raised this question before the BDCP Steering Committee meeting, and also noted publicly that this change showed up without previous discussion at the Steering Committee meetings. Antioch again requests an answer to this question.</p> <p>Also, Antioch requests that the impacts of this adjustment to the existing M&I and Ag salinity requirements be evaluated and documented explicitly.</p> <p>Note that on pages 3-85 and 3-86 in Section WOCML#, Western Delta M&I is not included. Please add Western Delta M&I standards to WOCML#.</p>	
16	3-62 to 3-63	3.4.1.2	Whole Section	<p>Near Term Operations – WOCMN14: In-Delta Water Quality Requirements: Antioch believes that using current D-1641 standards for Delta flows may not be adequate to protect in-delta users and the environment. D-1641 did not include or consider the impacts of a 15,000 cfs diversion facility on the Sacramento River upstream of the Delta. The City believes that all flows should include the original intent of the CVP, which included a minimum outflow requirement 0.6 miles west of Antioch and minimum salinity requirements at Antioch.</p> <p>Managing Water Quality Requirements for municipal uses “adaptively” is not acceptable. It is not explained how this would occur specifically. Antioch has over a 100,000 residents that rely on water from the Delta. There needs to be specific measures implemented to protect water quality at Antioch. Water quality at Antioch should be a “trigger” to whether any upstream diversion under the BDCP could occur. Antioch would be happy to discuss this further with the BDCP.</p>	

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17	3-64 to 3-68	3.4.1.3	Whole Section	<p>Long Term Water Operations Measures – WOCML 1: New North Water Diversion Facility: There is no discussion regarding the impacts of this facility on downstream beneficial uses including water rights and the environment. The statement that a 15,000 cfs capacity is necessary to match the south Delta pumping facilities is misleading as the south Delta facilities have never in fact diverted this capacity – it is nearly double the actual operation. It is not clear why such a large facility is necessary or how it will be operated in tandem with the south Delta pumping facilities.</p> <p>The factors listed for developing north Delta diversion bypass flows should include impacts on downstream beneficial uses, including municipal water supplies and maintaining low salinity in the western Delta and Suisun Bay.</p> <p>Many of the hypotheses considered may be incorrect. For example, the San Joaquin River provides little outflow through the Delta due to upstream diversions and dams and in-Delta diversions. Taking significant Sacramento River flow from the north Delta, and thus preventing in-flow of Sacramento River water to the south and central Delta, will mean less fresh water in these areas. It is difficult to imagine that this will improve water quality or fishery and aquatic habitat. The existing Sacramento River flows in the central Delta emulate more natural historic conditions as significant amounts of Sacramento River water flowed into the Central Delta from Georgiana and Three Mile Slough.</p> <p>The hypotheses reference an improvement in water supply reliability. This improvement needs to be discussed more fully and specifically consider improvements to in-Delta water supply reliability including the water supply of the City of Antioch.</p>	
18	3-77	3.4.1.3	21-26	<p>WOCML1 – Hypothesis 8 “Relocation and operation of the primary point of diversion to the North Delta will improve water supply reliability and flexibility under conditions of future environmental change.” Antioch and other in-Delta contractor’s water supply reliability will not necessarily improve as a result of this project.</p> <p>Therefore, either add “for water exporters” after water supply reliability, or change the statement to read, “Relocation and operation of the primary point of diversion to the North Delta will improve water supply reliability and flexibility for water exporters, but not necessarily for in-Delta water contractors under conditions of future environmental change.”</p>	

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19	3-77	3.4.1.3	9-14	<p>WOCML1 - Hypothesis 6: Assertion that current management operations “maintain high quality water” in the south Delta is inaccurate. Several historical reports indicate that the extent of freshwater in the Delta during the late 1800s was much larger than the present-day freshwater extent. See, for example, the attached discussion of salinity at the City of Antioch’s intake, which shows that prior to 1918, fresh water was available nearly year-round at the City of Antioch, and that the number of days with “fresh water” (<1000 uS/cm) available at Antioch’s intake has declined over time. See Attachment 1</p>	
20	3-78	3.4.1.3	13-20	<p>WOCML – Hypothesis 13 – “Natural physical (e.g. salinity regimes) flow patterns and processes in the Delta under which native resident species evolved...” This statement seems to indicate that higher salinity is a “natural” physical pattern in the Delta. The City of Antioch has data that shows that this statement is not correct . See Attachment 2</p>	
21	3-84	3.4.1.3	19-22	<p>WOCML5 - Hypothesis: Operate the DCC Gates during the long-term for environmental benefits: “...preliminary modeling indicates that drinking water quality standards for the south Delta under D-1641 would not be violated under this revised set of operational criteria...”</p> <p>Antioch is concerned about the effects of this proposed measure on western Delta’s water quality. If this measure improves water quality in certain parts of the Delta while reducing water quality in other parts (e.g., Antioch), such an anticipated change should be stated clearly in the text.</p>	
22	3-85 to 3-86	3.4.1.3	Whole Section	<p>WOCML# - In-Delta Ag and M&I Water Quality Requirements – Add Western Delta water quality requirements</p>	
23	3-86	3.4.1.3	20-22	<p>WOCML14 - Same comment as in Comment # 15: Why is this compliance point change being made? Antioch is concerned about impacts on its water quality as a result.</p>	
24	3-87	3.4.2	Whole Section	<p>Physical Habitat Conservation Measures: It is unlikely that all habitat restoration measures will be completed all at once. What is the likely sequence and schedule of construction of these measures? Incremental and combined effects of these restoration measures should be evaluated and documented explicitly</p>	