Final Staff Draft of the Delta Plan

Comment Source: Bureau of Reclamation

Chapter	Page	Line #	Comment
2	37	Table 2-1	The U.S. Bureau of Reclamation does not maintain more than 700 miles of Delta levees. Per narrative on page 250 in Chapter 7, most of the non-project levees are maintained by local reclamation districts.
2	46	Sidebar	The last sentence shows BDCP in parenthesis. BCDC should be in parenthesis.
3	90	Sidebar	The narrative says "The BDCP is planned to be implemented over a 50-year timeframe according to an adaptive management program. The parties seeking permits pursuant to the BDCP include California Department of Water Resources, Bureau of Reclamation, Metropolitan Water District of Southern California, the Kern County Water Agency, the Santa Clara Valley Water District, Zone 7 Water Agency, Westlands Water District…." The current assumption is that DWR will submit the BDCP to FWS and NMFS as an application for an ESA Section 10 incidental take permit for a new water conveyance facility and associated water operations, along with habitat restoration in the Delta. The information developed as part of the BDCP process will be used by Reclamation to help inform the ESA Section 7 consultation on the coordinated long-term operation of the CVP and SWP. Reclamation is not seeking a Section 10 incidental take permit. The BDCP will also serve as the planning and permitting document under California's Natural Community Conservation Planning Act for the new conveyance facility, operations, and habitat restoration, and will support issuance of a DWR take permit for these activities as administered by the California Department of Fish and Game.
3	98	29	The reference (Reclamation 2011) wasn't in the references section in the back of the chapter.
3	72	13	Water that flows to the ocean serves an ecosystem purpose – thus, to say it is "lost" is a misnomer.
3	72-73	11-4	This section is unclear as to the difference between water flowing to the ocean and so-called "developed" water. California's developed water supply is stated to be approximately 85 million acre-feet, and includes water used for ecosystem protection and restoration (a substantial percentage of which flows to the ocean). The draft Plan then goes on to say that 20 million acre feet of this "developed" water comes from Wild and Scenic rivers – again, this water ends up in the ocean. Under the Plan's own definitions, water that flows to the ocean cannot be considered to be "developed" - thus, the figure of 85 million acre-feet of "developed" is incorrect.
3	75	7	Change "(Reservoirs) generate clean electricity." to "(Reservoirs) generate non-greenhouse gas emitting electricity."
3	83	8-12	Change "Completion of the Tracy Pumping Plant and Delta-Mendota Canal allowed water from the San Joaquin River to be conveyed to areas along the Sierra Nevada foothills in the Madera, Chowchilla, and Friant-Kern canals,

			and to provide water from the Sacramento River through the Delta export facilities to the San Joaquin River Exchange Contractors that used to rely upon San Joaquin River water rights water" to "Completion of the Tracy Pumping Plant and Delta-Mendota Canal allowed water from the Delta to be conveyed to the San Joaquin River Exchange Contractors who used to rely upon San Joaquin River water rights water. This in turn allowed water from the San Joaquin River to be conveyed to areas along the Sierra Nevada foothills and east side of the San Joaquin Valley via the Madera-Chowchilla and Friant-Kern Canals."
3	85	34-36	Sentence implies deliveries of SWP water is a federal responsibility; delete reference to "federal systems."
3	86	11-14	Dry year hydrology can result in reduction in deliveries to the Sac. River Settlement Contractors to 75% of contract total. Therefore, sentence should read "As a result of the allocation requirements, in dry years, water rights contractors, such as the Sacramento River Settlement Contractors, <u>may</u> receive 100 percent of their water allocations..."
3	98	25-26	Reclamation performs Water Needs Assessments with input from its contractors – change sentence to read "and performs a "Water Needs Assessment for each federal contractor with input from that contractor,"
3	104	32-36	Any change in transfer procedures must not result in transfers that injure other water holders or the environment, as required by §1700 et. seq. of the Water Code.
3	105	10-15	Reclamation's contract negotiation sessions are open to the public, and the final contracts are published for 60 day review prior to execution. *See* §226 of the Reclamation Reform Act of 1982 (P.L. 97-293).
8	288	Table 8-2	The table shows Reclamation funding as $300 million. In reviewing the referenced document, it appears the $300 million included the entire Mid-Pacific Region budget for Reclamation. This level of funding is not representative of Delta related activities. Potential funding sources are limited to the Central Valley Project (CVP), CVP Restoration Fund, and the California Bay-Delta Restoration appropriation. In this case, $205 million would be more appropriate number to use on this table. It's also important to note that the expenditures relative to the CVP are subject to cost allocation and repayment by CVP water and power contractors through CVP water service rates.
General			The draft Plan mentions many activities such as improved Delta conveyance, new storage projects, local and regional water management projects, etc. Yet, except for a recommendation that DWR prepare an estimate of costs for rehabilitating/replacing existing infrastructure as well as an assessment of the costs of new infrastructure, there is no discussion of the costs associated with these activities, and more importantly, the mechanisms for making funds available for these projects.
General			The draft Plan discusses the problem of groundwater overdraft, and mentions several activities related to this problem. A discussion of the benefits of comprehensive groundwater regulation under the jurisdiction of the State Board would be a valuable addition to the Delta Plan.