



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Region
Bay-Delta Office
2800 Cottage Way
Sacramento, CA 95825-1898

IN REPLY REFER TO:
BDO-100
PIO-1.10

JUN 24 2011

Ms. Terry Macaulay, P.E.
Deputy Executive Officer
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, California 95814

Subject: Comments on the Fourth Staff Draft of the Delta Plan

Dear Ms. Macaulay:

This letter provides the Delta Stewardship Council (DSC) with the Bureau of Reclamation's comments on the fourth staff draft of the Delta Plan (Plan). We appreciate that many of our previous comments have been addressed in this version of the Plan. We also applaud the effort that you and your consultants have made this far in the Plan's development.

Following are items we believe are relative to the Federal government in the fourth staff draft:

- We agree that it is time to develop a comprehensive Science Plan as called for on page 35. Reclamation, and I believe other Federal agencies, look forward to working with the Delta Science Program to begin the organization of Delta science activities in more of an integrated manner.
- Federal agencies would like to be consulted in advance regarding the inclusion of any Federal policies determined to be inconsistent with the Act, prior to posting on the DSC's website as described lines 1 through 3 on page 49.

The following comments are specific to Reclamation in the fourth staff draft:

- WR R3 on page 65 says, "To be consistent with the Delta Plan, a proponent for a new proposed point of delivery that results in new or increased demand for diversions from the Delta or the Delta Watershed should demonstrate that the project proponents have evaluated and implemented all other feasible water supply alternatives." The definition for the baseline used to determine if there is increased demand may vary depending on stakeholder interests.
- Line 29 on page 67 says, "DWR anticipates completion of its Surface Water Storage Investigation and the selection of the best options for the State by the end of 2012." As a

partner in the development of the feasibility reports and environmental documentation, Reclamation believes these documents will be completed sometime after 2012.

- Relative to RR R9 on page 149, Reclamation operates its reservoirs based on the U.S. Army Corps of Engineers (Corps) flood control diagrams. The Corps would be required to update these flood control diagrams prior to any modification to operations for flood management or water supply purposes.
- In the Finance Chapter, under Guiding Principles on page 168, there is a bullet on line 30 that says, "Existing contributions for closely related activities should be considered for crediting. Site specific contributions by agencies should not be credited (for example, the installation of fish screens and waste treatment costs)." This may be problematic in application; therefore, consideration should be given to crediting an action tied to the beneficiary versus stressor key tenets shown on page 167. As written, the principle may discourage agencies from submitting site specific actions which may benefit the eco-system in general.
- On page 169 the funding 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 the Reclamation. This level of funding is not available for Delta related activities. Possible 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.

It's also important to note that the expenditures relative to the CVP are not 100% borne by the Federal taxpayer. Expenditures are subject to cost allocation and repayment by CVP water and power contractors through CVP water service rates.

- On line 5 on page 4 of Appendix A it says, "A public draft of the BDCP Environmental Impact Statement/Environmental Impact Report is planned for release by the end of 2011." This date is inconsistent with BDCP milestone dates elsewhere in the document.

Sincerely,



FOR

Susan M. Fry
Office Manager

cc: Mr. Donald R. Glaser
Regional Director, MP Region
Bureau of Reclamation
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