Bay Delta Conservation Plan
Document Review Comment Form

Please use this form to document your comments to the_____. Please number your comments in the first column, indicate your agency affiliation in the second column, and reference the comment's location in the review document in the Section, Page, and Line (if provided) columns. Return completed comment forms to _____ by COB _____

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column.

Document: EIS CHAPTER # 3

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Date: _12/6/11_____

No.	Agency	Page #	Section #	Line #	Comment	Disposition
3	EPA	GENERAL			So much information is missing from this document it is difficult to understand the alternatives. A few examples: 1) Table 3-1 refers to documents that are not described or provided in the chapter as part of defining alternatives; 2) maps, figures, & drawings are all missing making it difficult to understand the different alternatives, such as where specific components of the physical water facilities are proposed to be located; 3) most of the operations scenarios information is not provided making it impossible to understand the different Delta Conveyance alternatives; 4) many of the conservation measures are only vaguely described; 5) none of the conservation measures contain funding proposals that support the proposed activities, and 6) the physical habitat restoration CMs do not include property	

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					acquisition strategies, details on legal protection mechanisms such as draft conservation easement language, or funding proposals for long term protection of restoration sites,	
3	EPA	GENERAL			The range of operations alternatives should support the equal goals of the BDCP by providing reliable water supply and aquatic habitat for the suite of pelagic fishes protected by Clean Water Act state-adopted designated uses such as estuarine habitat, rare, threatened, and endangered species, and aquatic migratory corridors.	
3	EPA	3-10	3.3.1.1	16	Will all the intermediate pumping plants have a capacity of 15K cfs?	
3	EPA	3-14		Table 3-4	Primary Conveyance Facility does not have any x's in the table. Will none of the alternatives have this component or were the x's mistakenly omitted?	
3	EPA	3-15	3.3.1.2	16	Are the criteria related to Fall X2 from the existing BO's or the amended BO's. Where are the "criteria related to Fall X2" described?	
3	EPA	3-84	3.6.3.1	18-20	Explain why these species are targeted in this effort and not other species	
3	EPA	3-84	3.6.3.1		This section should describe how BDCP actions related to methylmercury are going to meet the adopted CWA Delta Methylmercury TMDL milestones • Phase I Control Studies – evaluate and ID control methods, 4/2010 – 4/2013. • Phase I Control Workplans and implementation – 2013. Control studies should be underway now for developing methods to control methylmercury.	
3	EPA	3-84	3.6.3.3		This section should describe how BDCP actions related to low DO in Stockton Deep Water Ship Channel meet the required milestones in the adopted TMDL and meet numeric water quality criteria.	
3	EPA	3-89	3.6.3.8		This section should reference adopted TMDLs (Stockton	

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					Urban Waters Pathogens) and TMDLs in progress (Central Valley Pesticides) that will require changes to NPDES and MS4 permits and how this effort will contribute to restoration of water quality for supporting beneficial uses. Link proposed actions to regulatory efforts for improving water quality.	
3	EPA	3-101	3.6.4.2	19	EPA supports the pulse flows. However, we would like to see an explanation of how the daily pulse flows are addressed in CALSIM, a model that uses a monthly time step. A model with a daily time step is needed to accurately forecast the effect of the daily pulse flows.	
3	EPA	3-101	3.6.4.2		Pulse flows for inmigrating fall run San Joaquin salmon that provide San Joaquin River flow from Vernalis to the bay should be included in most operations scenarios.	
3	EPA	3-105	3.6.4.2		Similarly, in Table 3-10, we are concerned that there are no flow criteria for the entire fall upmigration season for adult San Joaquin River salmon. One or more of the operations scenarios should include OMR or other flow criteria to protect upmigrants.	

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