

From: Frank Michny
To: Rick Breitenbach
Date: 4/5/96
Subject: Response to analytical tools and level of detail

Provided below are the comments that we have on the referenced documents

Analytical Tools:

page 4 - A discussion of model integration is provided. The CVPIA-PEIS team was too optimistic on this score. Many of the models were developed independently and use data sets that don't quite match. This document is, in my view, too optimistic in general. Thought should be given to when holistic analysis is possible and for what situations partial analysis will have to suffice. A trial analysis could be done to show how this process will work. Cal-FED should take any existing operation study and from it do the economics, the Delta habitat, salmon mortality/populations, levee stability, water quality, and whatever else and then show the rest of the world what they have done. Also, a careful review of the degree of success the CVPIA-PEIS efforts in this area could be beneficial.

page 5 - Gives an example of this optimism. The last paragraph asserts that existing models which have calibrated to the existing physical environment can be used with "minor modifications." How this is known is a mystery to me.

page 7 - I could not find a figure 3.

page 11 - The DeltaSOS model is an abstraction of the RMA model which was calibrated to the existing (or a past) physical situation. Neither Reclamation or DWR sees fit to use the RMA model in their current work efforts.

page - 12 Appears to recommend use of the Kimmerer-Monismith model for X2 considerations. Why was this chosen instead of Denton's reverse G model? It is implied that average X2 will be used as the criteria of merit as PROSIM and DWRSIM now do. I believe this is a serious underestimate of water costs associated with X2.

Principles and Guidelines are not discussed as an analytical tool. They are at least a planning process tool which could be discussed here or elsewhere.

Ted Roefs will be our analytical tools coordinator and may be contacted directly for any detailed discussion on this matter at (916) 979-2278.

Level of Detail:

In general the level of detail indicated for the individual major components/elements seems appropriate for the type of analysis being undertaken. The more difficult question will be the portrayal of the cumulative effects of the components/elements within each alternative so as to

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allow a reasonable comparison between alternatives. If the impacts were realized upon only one type of resource, then comparisons would be a simple matter. However, with the various combinations of elements within each alternative how will the discrete benefits/adverse impacts associated with elements be coalesced for each alternative so as to illustrate the overall effects of a given alternative so that it may be compared with others? This paper states (on the bottom of page 1) that "To accomplish the objectives of the impact analysis....(the EIS/R)... needs to effectively and concisely assess the differences between alternatives. ...". As stated previously, the level of detail for the individual elements seems adequate. Is the means to differentiate between alternatives (i.e. weighing or prioritizing elements) part of this discussion or will it be addressed in a separate Section?

Specific to some of the aquatic/wildlife/ and habitat Issue Areas in Table 4-5, it is indicated that the changes will be represented by changes in habitat indices - while this is useful/appropriate for a general planning tool there should be recognition that as various elements are implemented there will be some sort of monitoring to ensure that expected effects are in fact occurring, and if not then appropriate changes can be made. This is imperative to ensure that there will be equal treatment of all resources in question. As an illustration of this concern for example - when it comes to water supplies it is possible to measure results in acre-feet and the water itself is the resource at issue, with fisheries and wildlife we are measuring habitat trends but the real resource at issue are the animals themselves. Therefore a full reliance on habitat indices may not be truly reflective of the real resource base at issue. It is suggested that at an appropriate level in the process of developing the EIS/R mechanisms be developed/described that will reflect changes to the actual resource base at issue to ensure an accurate comparison of the effects of implementing various alternatives.