

FLOOD CONTROL SYSTEM

This report contains generally adequate setting and impact information for the PEIR/EIS. The discussion of levee financing should be moved to the economics chapter of the PEIS/EIR. The "Historical Perspective" discussion is redundant with many other technical reports - this should be rectified in the PEIR/EIS. The entire "levee stability" section of this report should be moved to the geology section of the PEIR/EIS, and this portion of this report should be revised to focus on recurrence intervals of failures and associated flooding. Section 4.8 needs to be re-focused to flood facilities. Significance criteria should be more clearly defined, and the significance of each impact determined. The mitigation strategies should be formulated as more specific mitigation measures that provide direction to implementable mitigation and allow for some level of monitoring and enforcement. This comment applies to many of the technical reports.

Conformance to Outline

Flood Control System

Affected Environment

- The Affected Environment report exactly follows the outline established for that report.

Environmental Consequences

- The Impacts report also follows the 6/25 outline except that the analysis is not broken down in terms of the various program components, but rather in terms of specific issues relevant to the flood control system. The report also numbers specific impacts and mitigations.
- Formats generally follow the style guide, except that underlining is not used in this report.

**REVIEW COMMENTS
CALFED BAY-DELTA PROGRAM PEIS TECHNICAL REPORTS
FLOOD CONTROL SYSTEM**

AFFECTED ENVIRONMENT

No.	Page/Para	Comment
1	6-9	Table 1 and Figure 2 should be placed in an overall "Regulatory Requirements" appendix.
2	12	The discussion of levee financing should be deleted from this EIS chapter and merged with one of the economics sections.
3	12	The discussion of "Historical Perspective" is included in several different technical reports and can be minimized or eliminated from this EIS section.
4	14, para 1	Page 12 states that there are 76 islands/ tracts in the Delta; this paragraph says 70. Needs to be made consistent.
5	15	Figure 4 doesn't match text, which says that all islands have flooded. Figure needs classification. What, exactly, is it trying to show?
6	18-23	Entire "Levee Stability" section should be moved to the Geology section of EIR/S. The flood section here should focus on frequency and magnitude of levee breaches and flooding.
7	24	Levee stability problems listed here should be combined with other levee failure mechanisms discussed on p. 22.
8	28	Levee Financing info. should be moved to Economics discussion.
9	31	The specific role of the Suisun Marsh Salinity Control Gates with respect to flooding/flood protection should be described here.
10	32	Historical Perspective: Add more recent USEPA (1995) information re probability of sea level rise.
11	33	For the EIR/EIS, the levees should be addressed in one section and not broken out by region.
12	35	Add owning/maintaining agency in parens after each reservoir name.
13	36, top of 2nd column	Something's missing.
14	37	For EIR/EIS, merge levee discussion with other levee discussions.
15	38, Sec. 4.7.2.2	Add owning/maintaining agency in parens after each reservoir name.
16	38, Sec. 4.7.2.3	Add brief description of each bypass.
17	38, sec. 4.8	Needs to be revised to focus on flood facilities.
18	39	Delete Fig. 17

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ENVIRONMENTAL IMPACTS/ CONSEQUENCES

No.	Page/Para	Comment
1	1	Move Figure 1 to Section 4.2, Levees
2	3	Replace Mitigation Strategies discussion with bullet item mitigations
3	4	Add examples to discussion of synergistic effects; are they potentially important?
4	4	Will model runs be available for EIR/EIS? Are they necessary?
5	4	Column 2 focuses on relative impacts; EIS should also describe impacts in absolute terms.
6	5	NEPA significance criteria should be more specifically identified.
7	8	EIR/S should make it clear up front that the No Project Alternative does not include continued adequate maintenance of levees.
8	11	Structurally, the EIR/S would flow better if all of the beneficial impacts are grouped together under one heading, followed by the significant adverse ones, etc.
9	13	The Mitigation Strategy on the second column seems to conflict with the program's biological goals; need to address secondary impacts of mitigation strategies.
10	14-16	Needs to be re-written to focus on levee integrity issues as they affect flooding.
11	17	2nd to last paragraph: clarify: 3,000,000 acre-feet is substantial storage if all is available for flood control.
12	general	Where impact is not significant or is beneficial, I'd still put in a mitigation heading followed by "none required" to avoid reader confusion.
13	18, 5.2.1.2	Can any of the alternatives' impacts be lumped?
14	20, Conveyance facilities	What percentage beneficial impacts on flooding would the conveyance facilities have?
15	20	Impact 2-5: Can the forebay and Tracy Pumping Plant handle all of these diversions operating at full capacity simultaneously?
16	23	Conveyance Facilities: Break out impacts with separate headings.
17	27	General comment: per CEQA, these and all other vague "mitigation strategies" are not acceptable; need to be rewritten as definite policies that allow some level of monitoring and enforcement. These "strategies" don't actually assure any sort of mitigation.
18	29, 5.2.4.3	Are Common Program Impacts significant or not?
19	30	Separate discussions of Alternatives 2 and 3.

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