

FISH, WILDLIFE, AND RECREATION ECONOMICS

The Affected Environment Summary is of appropriate detail for use in the EIR/EIS. The Environmental Consequences analysis requires substantial revisions to the significance criteria discussion to clarify that economic impacts alone are not a significant effect. The 10% change in economic variables significance criteria needs to be better substantiated. Much of this report is actually background to land use, recreation, and employment issues, and can be moved to the EIR/EIS appendix document. The impact assessment should address the impact of the large increase of the use of resources (either here or via cross-references to other relevant EIR/EIS sections). The only substantial data gap noted is that additional information is needed regarding commercial fish landing economic value.

Conformance to Outline

FISH, WILDLIFE, AND RECREATION ECONOMICS

Affected Environment

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

- The format guide was not followed in that the reports are single-column and the capitalization and underlining do not match the guide. However, the formats used are internally consistent and fairly easy to follow.

Environmental Consequences

- Conforms to outline.

REVIEW COMMENTS
CALFED BAY-DELTA PROGRAM PEIS TECHNICAL REPORTS
FISH, WILDLIFE, AND RECREATIONAL ECONOMICS

AFFECTED ENVIRONMENT

No.	Page/Para	Comment
1	TOC and general report format	Chapter numbers are used. To maintain consistency with other technical reports and the impact section, change chapter numbers to section numbers (e.g., 1.0 Summary, 2.0 Introduction, etc.). Change page numbering accordingly. See mark-up.
2	General report format	Single column used. To maintain consistency with other technical reports, a double column format should be used in final.
3	Affect Env. and Impact reports	Page number styles between reports. Change page numbering in Affected Env. (drop Chapter preface). This appears to be the standard of other reports.
4	ES	The Affected Environment summary appears detailed enough for incorporation into the PEIS, vol. II. No change needed.
5	Page 2-1, last para. Last sentence	Prices for commercial-fish landings are not provided. To compare apples to apples, it would be more informative if an average price per pound (over last five years?) be obtained and applied to the weight of commercial-fish landings.
6	Page 2-2, bulleted assumptions	If these apply to the Delta region too, they should be moved accordingly.
7	Page 3-4 Delta Comm. Fishing:	Prices for commercial-fish landings are not provided. Here again, it would be better to apply ballpark figures to support the impact analysis.

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ENVIRONMENTAL IMPACTS/ CONSEQUENCES

No.	Page/Para	Comment
1	Page 1, ES	2.0 Discussion does not compare or rank alternatives, does not state if mitigation is required. Expand discussion: (1) briefly state which alternatives provide the greatest economic benefits, which have the highest costs, (2) briefly state key features of each alternative that make them unique from others, (3) state clearly that there are no significant impacts and no mitigation measures are required.
2	Page 3, Section 4.0 Significance Criteria	Discussion on NEPA/CEQA requirements is lengthy and not true to the conclusions of this study. First paragraph can be deleted outright because it is irrelevant - econ. impacts, significant or not cannot trigger an EIS under NEPA, furthermore we are already planning to do an EIS. Second para., CEQA requires that the significance of socioeconomic impacts only need to be assessed in that they might result in indirect or induced impacts to physical resources (e.g., population growth on water supply). The impact analysis in this report does not cover this issue, only how changes in the physical resources impacts the economy. Recommend that the first two sentences of the 2 nd para., be deleted.
3	Page 3, Section 4.0 Significance Criteria	Significance is defined although not relevant to NEPA/CEQA. By defining significance, we inherently suggest that mitigation should be undertaken to reduce the impact. Although legally debatable, the public could perceive that CALFED would be responsible for mitigating economic impacts (not the spirit of NEPA/CEQA). We should not put CALFED in this position without their consent. Recommend this section be deleted and rewritten. Suggested text, "Significance determinations are not required for economic impacts, in and of themselves, under NEPA and CEQA. To assess the magnitude of the impact, a 10% change in any economic variable is considered substantial." If this approach is taken, the word significant should be replaced throughout the text with less value-laden terms (e.g., substantial or moderate).
4	Page 3, Section 4.0 Significance Criteria	Significance threshold does not have reasoning. If significance is used, the 10% threshold value needs to be justified. If the value is a reasonable but random figure, the authors should check historical records to assess historical fluctuations for the economic variables of concern. From this analysis, they can determine what is an average or economically acceptable change without causing economic hardship (e.g., above average nat'l. unemployment rate).
5	5.1 Impact Analysis	This is not a standard subheading. Delete 5.1 Impact Analysis. 5.1 should be Descriptions of No-Action Resource Conditions.

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6	Section 5.0 general	Local population growth figures are provided but it is unclear if expenditures from tourists outside the region are being captured. To be consistent with the Affected Env. Report, we need to make sure that all expenditures (from locals and outsiders) are captured. Add sentence clarifying if this is true in the analysis or include outsider spending in the analysis.
7	Page 6, 4 th para.	Here and throughout the impact section, figures are provided showing large increases in use of resources (e.g., fisheries, refuges, etc.). No impact analysis is provided. Recommend adding clarifying sentences that such impacts are evaluated in each resource technical report.

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