

AGRICULTURAL ECONOMICS

This section provides generally adequate information for use in the PEIR/EIS economics section. Additional quantification and tables are needed in the Executive Summary to show the magnitude of change for each variable under each alternative. In addition, there are some conflicts between the significance determinations in the Executive Summary and those in the Environmental Consequences text. In some cases, this analysis fails to compare the program impacts with those of no-action or existing conditions. Pursuant to NEPA/CEQA requirements, such a comparison is required. In addition, this report uses erroneous significance criteria for the PEIR/EIS. Significance determinations should not be included for purely economic impacts. In this regard, the section is really a background document for the environmental justice and land use impact analyses. This background information should be placed in the PEIR/EIS appendix document.

Conformance to Outline

Agricultural Economics

Affected Environment

- Summary is missing
- 4.3 Other information. No other information is included.
- 4.7 SWP and CVP Service Areas Outside Central Valley. CVP needs to be addressed.

Environmental Consequences

- Includes all of the elements of the 6/25/97 outline, but does not use the same heading numbering system as the outline.

**REVIEW COMMENTS
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AFFECTED ENVIRONMENT

No.	Page/Para	Comment
1	1.0, Summary	Provide summary in final report. Be sure enough detail is provided to support the conclusions provided for the Impact Report Executive Summary.

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ENVIRONMENTAL IMPACTS/ CONSEQUENCES

No.	Page/Para	Comment
1	2.0 ES	Area by area impact summary is provided. This approach makes it difficult to compare tradeoffs among alternatives. No discussion is provided defining significant impacts or mitigation strategies. This section should provide a discussion of impacts by alternatives, then by area (what is currently written may be more appropriate for section 5.3 Impacts by Region). Enough detail should be provided to evaluate each alternative against no action. Discussion should also be provided summarizing the significance criteria and ranking each alternative in terms of benefits/adverse impacts. The text needs to clearly state if there are significant impacts and what mitigation is required.
2	2.0 ES, Table 1	This table provides a general summary of impacts, but lacks detail to compare alternatives by the magnitude of impacts. This table would be more useful if quantified figures (e.g., change in irrigated acreage, change in cost/revenue, and change in water use) were also provided. Also a tabular graphic would be useful showing the magnitude of change for each variable under each alternative.
3	2.0 ES, Table 1	"C" is used to indicate potentially significant negative impacts due to increased or decreased revenue. However, in Section 4.0 Significance Criteria, it states; "Changes in costs and revenues would not, in themselves, be considered significant environmental impacts." The Significance Criteria definition for economic impacts is correct. We should not apply significance determinations to purely economic impacts (this is not required by NEPA/CEQA). If Table 1 claims there are significant economic impacts to revenue flows, it is inherently implied that mitigation should be applied. 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 the word "significant" be deleted from the definition of "C." By providing more quantified data, the public will be able to judge how substantial the economic impact could be.
4	5, last para, 1 st column:	This para. states, "The potential impacts described below have not been specified as relative to No Action vs. Existing conditions." Pursuant to NEPA/CEQA, the alternatives need to be compared to the no action. I'm not sure that this paragraph is correct. Looking at tables 5-13 there are quantified data for changes in resource variables (e.g., water use, irrigated acreage). I would image that these changes are tied to a baseline of some sort, be it existing conditions or no action (it appears to be existing conditions). It would be more appropriate if tables 10-13 are revised to represent the delta between no action and the action alternative (even if the difference is minimal or qualitative). Recommend deleting the paragraph.
5	Tables 5-9	No Action descriptions tend to be qualitative while action alternative variables have more quantification. This data gap makes it difficult to provide defensible impact analysis. Recommend adding quantified data for no action

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		variables in order to provide an equal comparison with the data provided for action alternatives (notably irrigated acres and water use). Without equal information, it is difficult to compare apples to apples.
6	Section 5.2	Table 1 in the Exec. Sum. shows potentially significant impacts for all alternatives (although some are economic and may not truly be significant - see above). However, the text throughout 5.2 does not describe the impacts as significant, does not state why they are or are not significant, and does not provide mitigation measures to make the impact less than significant. Revise text and incorporate discussion on significance and mitigation.
7	General	Short-term (construction-related) impacts are not addressed. Direct and indirect impacts are not distinguished (indirect impacts not identified). Mitigation measures are not described.

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