



To: Loren Bottorff

From:

Tim Cohen
Charles Smith

November 5, 1997

Date:

Subject: Responses to Comments Provided by CALFED on Land Use Technical Report

For your convenience and use, this memo summarizes revisions which we have made to the August 25, 1997 Land Use Technical Reports in response to comments and additional information provided by CALFED staff and other reviewers. These revisions have been made in underline and strikeout type, so you can see how and where the changes have been made. We have updated the draft to show today's date. We have also included comments and proposed revisions to text provided by CALFED regarding footprints, reservoirs, watershed management, and the Water Transfer Program. Responses are organized by topic and commentator, as appropriate.

I. Land Use Affected Environment

Rick Breitenbach advised per telephone conversation on 10/22/97 that the only revisions necessary to the Affected Environment section were to: expand upon the description of Indian Trust Assets; and provide a range of gross acres for prime and unique farmland potentially affected by the project alternatives. These comments were addressed as follows:

1. Indian Trust Assets - Descriptions of statewide Indian Trust Assets identified in the CVPIA EIS and CVPIA Technical Report were reviewed for applicability to the CALFED project. Summary text regarding Indian Trust Assets was added to Section 2.2 of the Affected Environment report (and to the renumbered Sections 4.1 and 4.2.1 of the Environmental Impacts analysis).
2. Prime and Unique Farmland - Ranges of prime and unique farmland acreage for the Delta Region, Sacramento River Region, and San Joaquin River Region were obtained from Susan Shanks of CALFED on 10/27/97. These acreages have been inserted into the document for each respective region. Prime and unique farmland acreage for the Bay Region and

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SWP/CVP Service Areas are considered to be minimal, and have not been estimated by CALFED.

II. Land Use Environmental Impacts

1. Rick Breitenbach Comments - Revisions have been made as requested. The comments related to document format (i.e. avoid replication when describing impacts) required the most substantial revisions to the document. As requested, where impacts are the same across other regions as they are for the Delta Region, those impacts are described in the Delta Region section and not reiterated elsewhere. Tabular data for all regions has been consolidated into a one-page table. Selected alternatives have been deleted as requested. However, to facilitate review, the remaining alternatives have not been renumbered.
2. Unidentified Comments Re: Summaries - Revisions have been made as requested.
3. Roger Mann Comments Re: References to "Land Use Economics" - we are uncertain as to the basis for this comment, as our section has always been submitted as simply "Land Use." No changes required.
4. Greg Young's Comments - Revisions have been made as requested. The impact analysis has been revised to find that indirect adverse land use impacts would result from implementation of the Water Use Efficiency Program, as described in this comment.
5. Frank Piccola Comments
 - a. Consistency with Local Plans - As requested, the local plans of principal developed areas (i.e., those areas potentially most-impacted by the project alternatives) have been identified for each region. Detailed review of local plan consistency with the project alternatives is outside the scope of this programmatic-level document, but is recommended for future project- and location-specific environmental analyses.
 - b. Mitigation Strategies - References to mitigation during "Phase III" have been deleted. (Note: the purpose of their original inclusion was not to defer analysis, but merely to recognize that more-specific mitigation strategies cannot be meaningfully described until definitive types and locations of program improvements are identified).
 - c. Summary of Potential Significant Unavoidable Impacts - No change made. The conclusion that the various project alternatives will result in significant impacts to

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agriculture in no way suggests that CALFED has failed to avoid, reduce, or mitigate those impacts. To the contrary, mitigation strategies are recommended; however, the impacts are considered "potentially significant" even after mitigation.

6. Tetra Tech Comments

- a. Level of Detail - No change made. The information presented for the Delta Region is necessarily more-detailed than that for the other regions, since the majority of storage and conveyance improvements would be implemented in the Delta Region. The formatting requests of other commentators (see above) have, in fact, widened this difference in level of detail among regions, since the impact analyses for regions other than the Delta have been edited to avoid replication of impacts throughout the report.
- b. Presentation of Impacts and Mitigation Measures - Revisions have been made as requested. Statements of significance have added for clarification, where appropriate.
- c. Conformance to Outline - Followed format; no changes required.
- d. Section 3.0, Assessment Process - The text in this section was edited and moved to Section 1.0, as requested. The majority of the text was not deleted, however, as it provides critical background and contextual information necessary to understanding the impact analysis which follows.
- e. Organize by Alternative, Rather than by Region - No change made. This comment is counter to all other formatting guidance provided by CALFED.
- f. Summaries of Significant Impacts - Separate summary sections for each alternative by region have been deleted. One summary section has been retained for each region, however, as requested by other commentators.
- g. References - These have not been deleted, as they are a standard and valuable part of all technical reports.

III. Estimated Acreage of the CALFED Footprint

We understand that the most-current acreage estimates are those provided in Loren Bottorff's e-mail of 11/3/97. We have incorporated numbers into the Land Use Impacts report where appropriate. Footprint acreages are not addressed in the Land Use Affected Environment report, so no changes were made.

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IV. Reservoir Report Inserts

1. Minor editorial revisions are recommended to Sections 3.1 and 3.7. See attached proposed revisions.
2. Impacts to "Road and Utility Relocations" would perhaps be more appropriately located in another type of technical report (such as Traffic/Transportation or Public Services and Utilities) rather than in Land Use.
3. Impacts regarding "Reduced Potential for Local Flooding" would perhaps be more appropriately located in another type of technical report (such as Hazards or Public Safety) rather than in Land Use.
4. Mitigation strategies are grouped into four main categories (short-term disruption of adjacent land uses; permanent land use changes; conflicts with applicable land use plans of local jurisdictions; and road and utility relocations). These categories are somewhat different than those listed under Significance Criteria. The document's internal consistency would be strengthened by establishing and using a fixed set of categories for significance criteria, impacts, and mitigation.
5. Example 6: In-Delta Storage Project (received via e-mail from Loren Bottorff 11/4/97) - Minor editorial revisions are recommended to the Mitigation Strategies section. See attached proposed revisions.

V. Upper Watershed Actions Report Inserts

1. The attached revisions are proposed to focus the text on impacts to the Sacramento River Region and San Joaquin River Region only, as requested in Loren Bottorff's memo received 10/30/97.
2. Environmental Impacts Section 1.1.6, Sacramento River Region, includes references to the "Bay Region (Section 3.12.6.2)." These references may need to be removed if discussions of the Bay Region will be deleted from the report.

VI. Water Transfer Program

We received draft text regarding the Water Transfer Program via e-mail from Loren Bottorff on 10/22/97. We have no proposed revisions to the text.

I. General Comment



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It would be very helpful to obtain an updated project description which consolidates all of the changes made to date for the CALFED alternatives. These changes include: 1) elimination of selected subalternatives from consideration; 2) modifications to Program components; 3) updated terminology (e.g., no more "Common Programs"); and 4) revisions in the estimated footprint acreage for project impacts. Distribution of an updated project description would aid in ensuring the accuracy and internal consistency of the various technical reports.

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Attachments

c: Peter Standish-Lee, W-C
Steve Hatchett, CH2MHill