

**Main Document Issues Matrices**

6/16/98

	Main Document Issues	When				Type		Workplan Efforts	Agency Participants
		Pref. Alt.	Final	Phase III	Elevate	Decision	Process		
1.	(WAPA) The power impact analysis in the Draft EIS/EIR do not adequately disclose Bay-Delta Program impacts to hydropower generation. (new)		✓				✓	The Storage and Conveyance Team will model potential changes.	
2.	(WAPA) (EPA) There is concern that water operations modeling for the CVP is based on annual flows in the Trinity River of 340,000 AF, with the remainder being diverted into the Sacramento. If the Trinity Flow Study and fishery enhancement actions now in progress result in substantially higher flows, the CALFED modeling efforts for the Sacramento River and the Delta will be inaccurate for flows, temperature and water quality. (new)		✓			✓		The Storage and Conveyance Team will model potential changes.	
3.	(EPA) What additional work will be done to refine and correct evaluation of Alternatives 1, 2, and 3 (reference to the type of evaluation appearing in the Interim Phase II Report).  Findings summarized in Table 6.1-1 suggest that we don't have enough information regarding water supply and water quality impacts (beneficial, adverse) of Alternatives 1, 2, or 3 to select one (assuming these are significant decision criteria). (new)							being addressed in the "Response to Comments Document"	

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4.	(EPA) Has the EIS adequately considered "without project" (future, no action) trends which could significantly affect resources of concern? (Examples would be stressors to ecosystem, trends in agricultural production and land use. Our preliminary conclusion is that assessment may not be adequate). (new)							being addressed in the "Response to Comments Document"	
5.	(EPA) We would like to reiterate administrative draft comments regarding 'scenario' analysis of impacts of water supply changes on regions and sectors. Improving treatment of this topic should be one task of economic analysis effort. (Ref. to sections of Chapters 6 and 8 of EIS). (new)							being addressed in the "Response to Comments Document"	
6.	(EPA) We would like to work with CALFED staff on a revision to discussion of drinking water issues and impacts. (new)							being addressed in the "Response to Comments Document"	
7.	(EPA) Substantial review and revision of the analysis of costs and impacts (beneficial, adverse) of water use efficiency measures will be needed, both for impact disclosure and for the economic analysis. (Follow-up discussion of this subject should reference recent comments on draft Bulletin 160-98 as well as comments on the CALFED draft documents). (new)							being addressed in the "Response to Comments Document"	

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8.	(DFG) Cal. and Fed Endangered Species Act Compliance:  Additional paragraph added at top of page 15: "CDFG may not authorize, by permit, the take of endangered species, threatened species, and candidate species if issuance of the permit would jeopardize the continued existence of the species."							being addressed in the "Response to Comments Document"	
9.	(DFG) DEIS/R Chapter 7:  Any impact associated with implementing alternative components other than the ERP should not be mitigated by the ERP, whether those impacts are temporary or permanent. Example, ERP wetland creation should not be used to mitigate for the temporary loss of wetland habitat as a result of reservoir construction.							Review draft and identify and change any implication the ERP is mitigation for rest of program.	
10.	(DFG) Phase II Interim Report:  Throughout this document the statement is made that "water will be purchased from willing sellers to meet the water needs and objectives of the Ecosystem Restoration Plan". In order to assure that water is available, it may be necessary to develop a drought water contingency program that acquires water at any cost to supplement poor flow conditions.							being addressed in the "Response to Comments Document"	

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11.	(DFG) The DEIS/R does not provide an effective tool to compare alternatives.	✓						follow current work efforts to determine if effective tool is forthcoming.	
12.	(EPA) Drinking water quality: conclusions regarding this relative magnitude and <u>significance</u> of effects (e.g., Table 6.1-1 p 6.1-9 Draft EIS/R) will be revised based on further work of water quality program. Differences in alternative with respect to bromides may not be significant in time frame relevant to decisions needed for compliance with drinking water standards.							Added to Water Quality Program Matrix.	
13.	(EPA) The quality of drinking source water at intake is "bottom line" to suppliers. Evaluate the significance of contaminants introduced from terminal reservoirs, watersheds, aqueduct conveyance in overall water supplier treatment requirements and economics. Evaluate, in this context, the relative significance of Delta water quality and differences in this water quality with respect to alternative diversion options.							Added to Water Quality Program Matrix.	

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14.	(EPA) Incorporation of earlier EPA comments on drinking water quality:							being addressed in the "Response to Comments Document"	
15.	(EPA) Water use efficiency: The Common Program uses a higher "baseline" (implicit, without CALFED Program) level of WUE implementation than is set out in Bulletin 160-98. This is not explained in the main text DEIS; in fact, the main text implies that the no action level is derived from Bulletin 160-98. (See p.2-6) Issues: consistency in CF documents; assurance(s) that baseline/assumed levels of implementation would occur absent CF assistance--need for CF to backstop?	✓						being addressed in the "Response to Comments Document"	
16.	(EPA) Transfer impacts: no analysis of potential economic, social, environmental impacts of transfers (associated with CF program). This is an issue of concern to agencies and stakeholders. (Ref. 2-15-16;)							replace current with Incorporate into water transfer program matrix at item 4.	
17.	(EPA) What are project selection criteria for Category III funds and in particular, Trinity, upper watersheds and SF Bay?							Question given to Cindy Darling for response.	

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18.	<p>(EPA) Trinity:</p> <p>Inadequate discussion of the amount of water diverted from the Trinity to the Sacramento system and recent planning to restore flows. The existing and future flows in the Trinity are assumed to be status quo requirements (340,000 af). Even cumulative effects does not discuss proposed increases substantively. All CVPIA PEIS alternatives assumed increases up to 750,000 af. Why isn't this increase (and potential consequences for Sacramento flows, project supplies) discussed in the CALFED document?</p>							added to the Hydropower issue. See item 2.	
19.	<p>(FWS) The PEIS/PEIR incorrectly models the CVPIA b(2) actions, and should be revised to incorporate the understanding of b(2) in the existing conditions and no action alternative.</p>	✓						Mark C. will discuss with BR, FWS need for and feasibility of making changes in revised draft. Then-current understanding will be incorporated into revisions for the final. Storage and Conveyance to model and discern differences with current draft results.	

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20.	(FWS) The "most severe" (p. 1-10) potential effects of each alternative on special status wildlife and plant species are not clearly presented in the document. The PEIS/PEIR should identify the potential for significant and possibly unmitigable effects from the implementation under one or more CALFED alternatives..							Additional information about impacts to special status species of CALFED actions will be developed in the Conservation Strategy. Available information will be incorporated into the final PEIS/PEIR. Being addressed in the "Response to Comments Document"	
21.	(FWS) The PEIS/PEIR (see Tables 7.2-1 and 7.2-2) may not fully disclose the potential for significant and unavoidable impacts of the CALFED Program to vegetation and wildlife. The PEIS/PEIR should identify the range of mechanisms that could result in potentially significant and unavoidable impacts to vegetation and wildlife.							Agency staff will provide additional information to the CALFED impact analysis team to incorporate in the final PEIS/PEIR. Some of this information will be developed in the Conservation Strategy work effort; additional information will be developed in the environmental screening of surface storage sites. Being addressed in the "Response to Comments Document"	

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22.	(FWS) The PEIS/PEIR should identify potential impacts to listed and proposed species, rather than (or in addition to) providing a summary of impacts by habitat type.							Additional information about impacts to special status species of CALFED actions will be developed in the Conservation Strategy. Available information will be incorporated into the final PEIS/PEIR. Being addressed in the "Response to Comments Document"	
23.	(FWS) The PEIS/PEIR acknowledges (p.7.2-8) construction of new storage facilities will have effects on vegetation and wildlife, but that specific impacts will depend on the specific sites chosen and can not be anticipated at this time. In that case, the PEIS should identify the "upper range or most severe" known potential impacts of construction of any of the sites still under consideration by CALFED.							Being addressed in the "Response to Comments Document"	

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24.	(FWS) The PEIS/PEIR should identify potential impacts of the CALFED alternatives to fish and wildlife resources in the CVP and SWP service areas. This analysis should include the interrelated and interdependent effects of improvements to water supply reliability. This analysis should be programmatic, and will be limited by the information available; it should also follow the PEIS/PEIR impact analysis strategy of identifying the upper range or most severe potential impacts.							Additional information about impacts to special status species of CALFED actions, including impacts in the service areas, will be developed in the Conservation Strategy. Available information will be incorporated into the final PEIS/PEIR. Being addressed in the "Response to Comments Document"	