

Other PEIS/R issues:

The PEIS/R needs to contain an analysis of water demands inherent in the habitat development actions of the ERPP, as well as the potential in-stream flow requirements. How will land use changes impact water demand?

Stage 1 Implementation includes specific habitat development actions especially in the north Delta. The level of detail, already the knowledge of CALFED, should be reflected in the PEIS/R in the form of maps, overlays, etc.

- Ch 3 - adverse impacts to ag water supplies need to be described in Table 3-1 pg 2 of 10.
adverse impacts to ag crops need to be described on pg 4 of 10.
adverse impacts to ag water supplies need to be described in Table 3-1 pg 5 of 10.
There should be an ag water supply economics evaluation on pg 5 of 10 just as there is one for urban water supply economics on pg 8 of 10.
Visual impacts resulting from the ERP may or may not have beneficial effects. Beauty is in the eye of the beholder.

Ch 5 - Guide to Impact Analysis and Description of Land Use Changes

- map of prime ag land in the delta Problem area
- map of publicly owned lands
- trend for public habitat development over past 25? years
- trend for next 20-30 years (CALFED timeframe)
- table of overall potential impacts to important farmland - Table 5-2 provide Totals - 202,300 to 289,500 acres
- explain difference between these figures and the total footprint - 235,000 to 350,000 acres.

Ch 6 - Surface Water; Groundwater

- Reference Chapter 8 for a discussion of ag. water supply impacts

Ch 8 - Ag Resources Impacts

- Table 8.1-1 - change all impacts due to conversion or loss of ag land to a range of Significant and mitigatable to Significant and unavoidable - D/●.
- Provide an analysis of water supply impacts resulting from land use changes from ag (range of crops) to habitat (range of habitats).
- Include table similar to table 8.1.1-3 showing sources of supply by percentages for each region and total.
- Provide map of Delta showing primary and secondary zones.
- Provide ag water cost data for 1995, don't stop at 1990.
- add to significance criteria - water supply reduction resulting from land use changes

Ch 9 - Cumulative Impacts

The cumulative impacts section of the PEIS/R does not analyze the CALFED Program (the project under CEQA) for cumulative impacts as required. Cumulative impacts include such changes to the environment as the incremental loss of agricultural land and/or water within the context of losses resulting from other recent and planned projects. For example, a relevant question would be: what is the potential impact to agricultural land and agricultural water supplies resulting from CALFED, when combined with CVPIA actions, the Delta Wetlands Project, etc.? It should be acknowledged by CALFED in Chapter 9 that these projects also have the potential to impact ag. resources, therefore creating additional cumulative impacts to them. Appropriate mitigation measures will be developed using the CALFED agricultural mitigation policies and principles described in Chapter 5.