

Summary of Agency Comment Meeting & Status of the Programmatic EIS/EIR 2/26/98

Agency Comment Meeting

On February 9-11 staff from the 15 CALFED agencies participated in a 3 - day meeting. The purpose of the meeting was collect agency comments and to discuss and resolve agency issues, concerns and conflicts.

The agencies were asked to focus on technical content and non-editorial comments for their written submissions. During the meetings, the focus was on major or red flag issues. Agency staff were asked not to discuss straight forward comments which had been submitted in writing during the meeting. During the first half day agencies were asked to identify their major issues. All agencies felt the document could move forward if their concerns were addressed.

Approximately 2,000 individual written comments were received. An additional approximate 200 discussion comments were recorded.

Written and discussion comments from the meeting have been sorted into several categories:

- Editorial comments
- Comments associated with readability
- Technical comments
- Major technical comments
- Issue (political or soft) comments

The following are examples of each type of comment:

Editorial:

"Symbols in the summary table are inconsistent. Please be consistent if they have the same meaning."

"Under SWP and CVP Service Areas there is an untitled line with entries. Please correct."

"Please correct to US Forest Service not US Forestry Service."

"Section 1.4 is referenced incorrectly. It should be 1.3."

Comments Associated with Readability:

“A graphic would be helpful to familiarize the reader with the distribution of recreation facilities in the Delta.”

“Chapter 1 and section 2.1 could be combined and streamlined. So much of these first pages are too wordy, there is a lot of repetition and too much non-essential information is given.”

“There are four subjects addressed over and over again: ecosystem health, water supply reliability, water quality and levee system stability. The importance of these subjects can be presented without so much repetition.”

“It would be very helpful to include at least a map of the Delta area, if not figures describing each alternative. It is really difficult to visualize the alternatives and in turn be able to understand their impacts.”

Technical Comments:

“For clarity text should be modified to say “.... installation of the old river barrier would increase.....”

“The summary Table for listed and proposed species should be expanded to include other important species of concern, at a minimum those used in the RFP for Category III funding. San Joaquin fall run salmon is one example with specific impact issues that must be clearly identified.”

“There is an inconsistency between the material presented in the summary text box and that in the text.”

“These pages discuss the water supply impacts of the alternatives. Other related effects, such as X2 location, are also discussed here. These effects are caused by the operating criteria used to model the alternative, not by the changed configuration. This fact is not discussed in the text, and the operating criteria that cause the differences in water supply impacts are not discussed.”

Major Technical Comments:

“The Table indicates that the requirements of section b(2) of the CVPIA are met in the No Action Alternative. We recommend that the modeling for No Action incorporate the 11/20/97 b(2) actions for fishery restoration. The modeling tools CALFED is using are capable of simulating all of these actions. There are several significant actions in the 11/20/97 package that are apparently not now included in the No Action Alternative.”

“By discussing agricultural resources impacts in the Economics and Social Environment chapter, the inference is that these impacts are economic and therefore don't need to be

mitigated. The sidebar on pg 8-1 is labeled Impacts to Regional Economics and discusses removal of agricultural lands from production, resulting in adverse economic impacts. These are environmental impacts."

"Numerous comments relative to the content or adequacy of the water supply and management section."

Issue/Soft Comments:

"The watershed management strategy needs much further definition and development before being put before the public for comment. The need for a watershed management structure and watershed implementation plan is very unclear. We question the need for a watershed implementation plan in addition to and separated from the implementation plans being developed for the Ecosystem Restoration and Water Quality Program."

"Interrelated and cumulative does not mean non specific. That is environmental review focused on broad policy and resource allocation decisions is not likely to have enough detailed information to provide decision makers meaningful information about interrelated and cumulative effects."

"There is inconsistent treatment of flows and water supply related modeling outputs in the DEIR/EIS. The document apparently does not reflect results from recent modeling runs (for example, in the surface water resources -- water supply and water management which is very vague and deficient). On the other hand, economics analyses provide very specific impact assessments using, to some degree, water supply outputs."

"Tone - Seems to hard sell Alternative 3. Unbalanced articulation of potential significant impacts."

"We recommend that the top five areas of controversy be disclosed and briefly discussed in the DEIS/EIR in a separate chapter dedicated to these issues."

"Report written as if program and details are determined. No articulation of uncertainties."

In general the comments were valuable and substantive. Our intent is to address all comments before the final.

Schedule

The public release of the Programmatic EIS/EIR is currently scheduled for March 16, 1998. In order to accomplish this several key dates must be met.

February 20th was the last day for addition of new information to the document.

February 27th is the date the document is delivered by the Contractor.

March 6 is the day the document goes to the printer and copies are made in-house for filing purposes.

March 9th the document leaves CALFED for Washington D.C. and federal filing with the Bureau, Federal Register, and EPA.

Status of the Document

In the two weeks since the Agency comment meeting substantial progress has been made on incorporation of agency comments and preparing the document for public release. The following tasks have been completed:

- Substantial effort was made to improve readability, remove redundancy and bias, improve balance and tone. A number of CALFED staff, consultant staff and agency staff focused specifically on these issues.
- In cooperation with CDFA, the Agricultural Resources Section has been revised.
- The water supply and management section has been revised.
- In cooperation with WAPA the Power section has been revised.
- All technical errors identified were corrected.
- Impacts which were identified but not previously included in the Administrative Draft, have been included.
- Summaries, summary tables, and text have been checked for consistency.
- Editorial changes have been made.
- A majority of technical comments have been reviewed, addressed and incorporated. There was not sufficient time to address all technical comments. Focus was made on key issues. Because of time constraints, some comments were deferred to be addressed between draft and final.
- The analysis comparing Program Alternatives to existing conditions was reviewed and checked for all resource categories. In many cases the conditions present under the existing condition baseline were similar to those found with the No Action Alternative. In these situations differences between the existing conditions and No Action Alternative could not be distinguished at the programmatic level and the results of comparing to both the No Action Alternative and existing conditions were the same. Where there were potential differences between the existing conditions and No Action Alternative the

analysis focused on the following questions:

Are all significant adverse impacts identified when comparing Program Alternatives to the No Action Alternative still significant when Program Alternatives are compared to existing conditions?

Are there any additional significant adverse impacts identified when Program Alternatives are compared to existing conditions as compared to the No Action Alternative, or is the magnitude of the impact greater?

Are all beneficial effects identified when comparing Program Alternatives to the No Action Alternative still beneficial when the Program Alternatives are compared to existing conditions?

Where differences were identified between the comparison of Program Alternatives to the No Action Alternative and comparison of Program Alternatives to existing conditions, the additional analysis is provided within the appropriate resource section.