

99-A-11



Department of Energy
Western Area Power Administration
Sierra Nevada Customer Service Region
114 Parkshore Drive
Folsom, California 95630-4710

MAY 10 1999

MAY 5 1999

Mr. Campbell Ingram
CALFED Bay-Delta Program
1416 Ninth Street, Room 252-35
Sacramento, CA 95814

Subject: CALFED Draft EIS/EIR Impact Analyses

Dear Mr. Ingram:

Over the past several months, Western has been working with CALFED support staff to resolve concerns regarding the power impact analysis as presented in earlier versions of the CALFED Draft EIS/EIR. Much progress has been made, and we appreciate the cooperative efforts of Rick Breitenbach, Chuck Vogelsang, Kreg McCollum and others that met with Western staff to resolve differences. We are writing to describe what remains to be done to refine the power impact analyses.

Recent revisions to the section on power production and energy include:

1. Refinement of the thresholds of significance;
2. Description of differences in determinations of impact significance between NEPA and CEQA for economic impacts;
3. Description of impacts resulting from shifts in generation that occur when hydropower either becomes more scarce or increases in price; and
4. Expansion and refinement of the list of mitigation options to alleviate economic and physical impacts resulting from CALFED actions affecting hydropower generation.

Remaining tasks include the following:

1. Model the water and power effects of the preferred alternative using DWRSIM and the PROSIM power module, calculate resultant impacts, and assign levels of significance (this is needed to fill in the blanks in the existing text);

2. Restore the mitigation measures for the economic impacts to the list with the mitigation measures for physical impacts where they were originally, rather than leaving them imbedded in the text where they were moved during the revision process (note: Western would rather have them imbedded in the text than removed altogether, if those are the only choices, but we believe they should be in the list with the mitigation measures for physical impacts because of the importance given economic impact analysis and mitigation in NEPA);
3. Complete the modeling and analysis of cumulative impact analyses, and supply the missing information identified on Page 7.9-26; and
4. Include examples of effects of rate increases on hypothetical representative CVP power customers.

Western understands that the CALFED EIS/EIR merely presents impacts and mitigation measures, but does not make the policy judgements as to which mitigation measures will be implemented and who pays. For purposes of the EIS/EIR, it is Western's desire to see the EIS/EIR adequately describe power impacts and mitigation measures, including economic impacts and mitigation measures. Our comments are submitted with this purpose in mind. We thank you for the opportunity to comment, and look forward to working with CALFED to resolve these remaining issues. If you have questions of need additional information, feel free to call me at (916) 353-4537 or Earl Nelson of my staff at (916) 353-4529.

Sincerely,



Nancy Werdel
Environmental Manager

cc:

✓ Mr. Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Mr. Rick Breitenbach
Assistant Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Ms. Marion Moe
Deputy Attorney General
P.O. Box 944255
Sacramento, CA 94244-2550

Mr. Alf Brandt
ClubFed Coordinator
Office of the Regional Solicitor
US Department of the Interior
2800 Cottage Way, Room E-1712
Sacramento, CA 95825