

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1015	523	4	Compliance	BK, EPA	Consider noting that implementation of the Preferred Program could affect compliance with other requirements. For example, if implementation of the Preferred Program would affect an "existing use" of the waters of the U.S., or the attainment of a "designated use;" a change to such use would require compliance with requirements of §303(c) of the Clean Water Act.		
1014	524	4	Other	BK, EPA	Could include a time series of the "build-out" under one set of options, to show overlap of short-term and long-term effects among implementation phases.		
1016	525	4	Public	BK, EPA	Consider including description of future opportunities for public participation in 12.1, p.12-1; and under Adaptive Management (1.5.4, p.1-13)		
1133	1591	chapter 4		NY, EPA	On applied vs. real savings, and question of timing/quality, before final EIS, need to do some analysis along the lines of Gohring's paper. On charts in chapter 4, if inefficiencies were very great, and instream/water quality benefits of conservation were very high, I could see that the reservoir release needed to meet downstream uses could decrease. We need to determine the relative importance of that link between water quantity/quality/instream flow timing--I don't think we can ignore the link.		
1134	1595	Chapter 4		NY, EPA	On question of ag inefficiencies helping ecosystem--need to present more case studies/do some more analysis. I understand this is case-by-case. But the public (and agencies) should be able to sort through information that can help them understand how IMPORTANT the issue is. If there is data to back up that in 90% of the ag lands out there, water conservation is a bust, because ag runoff has substantial ecosystem benefits, let's see it. If data shows that in most cases conservation is beneficial, and that very occasionally inefficiencies provide very small ecosystem benefits, let's see it. We have heard the positions, and we need to understand the relative importance of the claims.		

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985	526	5	Figure	ALL, EPA	1. Highlight common program documents in a separate box. 2. Where will reports on groundwater/conjunctive use investigations and storage prefeasibility studies appear? (Is this implied in 404 compliance?)		
172	527	5 -1	Table 5.2-1 and the configurations on p 5-4	J Turner, DWR	This information should be in chapter 2 as part of the alternative descriptions. It would help clarify the narrative descriptions.	C	
171	528	5-4	Section 5.2.3	Mike Ford, DWR	Text indicated that an operable Head of Old River barrier will result in a loss of 100 acres and that channel enlargement along Old River will result in a loss of 300 acres. Our (ISDP) studies only indicate a loss of less than 1 acre for the Head barrier. Although the dredging along Old River will result in a loss of approx. 350 acres, it is only a short-term loss, not permanent, associated with the construction of dredge ponds for three years. This correction will also affect the results shown in Table 5.2.1	T	
635	529	5.4	5.2.3	Rick B., CALFED	Move first sentence top of page 5-4 right column so it follows first sentence this section as follows "...Configuration 1A. The estimated land areas..." delete "these" from the first sentence to of page 5-4 right column. Switch bullets in right column with those in left column so that we discuss makeup of conveyance then we tell the reader the acreage associated with each conveyance component.		
536	530	5-1	Right Column, Last Paragraph, Second Sentence	DFG	Change the second sentence to read, "Land disturbed temporarily during construction would be restored through revegetation and would return to pre-construction conditions at different rates. These temporary losses are estimated at between 1,000 and 1,500 acres." (these are only estimates)		
1177	531	5-1	Section 5.1, second paragraph, lines 5-7	FWS	The document states that discussions "generally include the upper range or most severe effects that are expected to be associated with each alternative." We do not agree that the "most severe effects" on special-status species have necessarily been disclosed in the document. The Service already knows, through review of other CALFED documents, that certain CALFED alternatives and specific projects have potentially significant and unmitigable effects on terrestrial special-status wildlife and plants. The Draft PEIS/PEIR needs to disclose the potential for such impacts even if decisions about specific projects have not yet been made.		

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168	532	5-1	section 5.2.1	K. Kelly, DWR	The Levee program contains other actions that may be perceived as changing land use (ie subsidence actions). The level of significance of these actions on land use conversion should be discussed.	T	
629	533	5-1	5 Introductory paragraph	Rick B., CALFED	replace "Lastly" in last sentence with "Further" and add the following sentence "Lastly, the chapter identifies the current institutional and regulatory framework that was considered in the evaluation of consequences."		
630	534	5-1	5.1	Rick B., CALFED	Delete all of the first paragraph of 5.1. Move these last two sentences to 5.2 and use as introductory sentences. Add the information in attached disc re: Nature of programmatic		
632	535	5-1	5.2	Rick B., CALFED	Add another bullet " A number of acres of land will be affected by the Water Quality Program." Then add "Facilities to control and treat various discharge effluents will have a direct impact on current land uses. The extent and locations of these facilities are unknown at this time and the acreage affected is not included in this document. The drainage management problem areas, on the westside of the San Joaquin Valley, are part of the No Action Alternative, i.e., retirement of lands in this area was to have taken place even if the CALFED Program did not proceed. The CALFED Program is looking to move this effort along as part of the Water Quality Program. Specifically, the Program is looking at land retirement within the Grasslands Subarea as a means of improving water quality in the San Joaquin River. This action could potentially impact up to 40,000 acres.		
631	536	5-1	5.2	Rick B., CALFED	Replace second sentences with " These assumptions regarding acreage potentially affected by the Program are necessary because the Program is preparing a programmatic EIS/EIR and is not aware of what specific actions would be implemented, where they will be put into place and as such what type and extent of lands that would be affected. The maximum acreage that could potentially be affected has been identified to provide the decision makers and the public a sense of the potential magnitude of land use change that could be brought about by the Program. No attempt has been made to reduce these numbers based on measures that would be put into place to avoid, minimize or mitigate these changes. However, because the Ecosystem Restoration Program actions have the potential to affect the largest number of acres, information is offered to illustrate what would be done, particularly in the Delta, during Phase III to reduce the affected acreage." Revise 3rd sentence as follows, "The assumptions and acreages..."		

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633	537	5-1 to 5-2	5.2.1	Rick B., CALFED	Insert the following before the last paragraph on 5-2, "Subsidence control will affect about 14,000 acres. Subsidence areas are identified in a draft report entitled "Priority Areas for Subsidence Mitigation in the Sacramento-San Joaquin Delta" dated October 23, 1997. In the draft report, subsidence areas are divided into 4 priority areas based on peat thickness and subsidence rates. Priority one areas encompass about 14,000 acres."		
708	538	5-10	Section 5.3	WAPA	The last sentence states that the summary table in Chapter 3 " <i>indicates significant unavoidable impacts in bold type.</i> " Either add the bold type or remove this sentence.		
640	539	5-10	5.3	Rick B., CALFED	Last paragraph - delete "of this Programmatic EIS/EIR"		
1031	540	5-10	5.3	BK, EPA	<p>Consider adding discussion of linkage of resource-specific assessments to an intra-EIS cumulative impact analysis; that in turn would be combined with the extra-EIS cumulative impact analysis of 9.2.</p> <p>Consider x-reference to description of cumulative analysis methodology (especially how (1) synergistic effects of, e.g., two or more chemicals [6-40, 6.1.3.2], and (2) normalization of qualitative symbol weights across resource-specific assessments) were handled;</p> <p>Consider including an explanation of the decision criteria, i.e., how the following relate: mission statement, primary objectives, solution principles, significance criteria</p>		
642	541	5-10	5.4?	Rick B., CALFED			
641	542	5-10	5.4?	Rick B., CALFED	Insert information re: Institutional and Regulatory Framework, Section 2.6		
173	543	5-2	Last Bullet	P. Wendt, DPLA (DWR)	Victoria IS. (6770 acres) used as example of in-Delta storage for 3-B; and Holland Tract (4,500 acres) used as example for in-Delta storage in 3-I. The in-Delta storage component for these Alt's. is presented at 200,000 acre feet (pg. 2-20). The Delta Wetlands project proposed to flood approx. 11,000 acres, and really could only produce approx. 160,000 acre feet average yield. The acreage used here should be greatly enlarged for a 200,000 AF reservoir in-Delta.	T	

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174	544	5-2	Section 5.2.2	Mike Cooney, DWR	The statement regarding the range of acres that could be affected by a 3 MAF storage facility on the Sacramento River tributaries is confusing and misleading since if you assume a storage capacity of 3 MAF, there is no facility near that capacity that would effect as little as 16,700 acres. It is likely that several reservoirs will be needed to achieve that capacity, and the <u>minimum</u> acres that would be affected by that configuration will likely be 30,000+ acres.	T	
175	545	5-2	Section 5.2.2	DWR Modeling Support	In-Delta storage for Configurations 3B and 3E is stated as being Victoria Island. Modeling assumed (as per CALFED instructions) that in-Delta storage for Alternatives 3B and 3E consisted of Victoria, Woodward, and Bacon Islands. Alternative 3E had no in-Delta storage component.	T	
176	546	5-2	Section 5.2.2	Mike Cooney, DWR	Again I am confused when I try to compare the numbers in the narrative with those in Table 5.2-1. The narrative shows an estimate of 8,050 acres being disturbed by a 500 TAF reservoir in the San Joaquin River Region but the table shows a range (for storage) of 13,000 to 14,000 minimum and 22,000 to 24,000 maximum.	T	
1178	547	5-2	2nd column, 3rd bullet:	FWS	Bullet discusses a west side San Joaquin Valley reservoir candidate site. It does not give a representative example similar to the other candidate sites. Give the representative example for this site.		
817	548	5-2	5.2.1	Gore, USBOR	It would be helpful to clarify whether this is the expected levee improvement under the Base Level Protection Plan or greater levels of improvement as defined in the levee system integrity program.		
818	549	5-2	5.2.2, last paragraph of page continuing on page 5-4	Gore, USBOR	In establishing a geomorphic criteria a better explanation of what is meant by "natural river channel," would be useful. Should state if 60,000 cfs represents a two year flow event on the Sacramento River under regulated or unregulated conditions. On the following page reference is made to "natural flow patterns." It is uncertain what this really refers to.		
634	550	5-3	table 5.2.1	Rick B., CALFED	Need to revise table per attached memo. Need to round-off to nearest 100 for acreage between 100-900; 500 for acreage between 1000 -19,999; and 1000 for acreages 20,000 and up.		

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169	551	5-4		K. Kelly, DWR	First full paragraph: The problem may not be the 60,000 cfs criteria but the way it is approximated into a monthly flow. Doing sensitivity analyses with DWRSIM does not get to this issue. I don't understand how DWRSIM analyses can evaluate the effectiveness of the criteria in achieving the goal of not substantially affecting natural flow patterns. I know this is a significant issue within the CALFED staff but isn't the issue here the problem of a daily requirement being approximated by monthly criteria?	T	
177	552	5-4	section 5.2.3, last bullet	jw, DWR	Configuration 3I says it includes the Old River barrier, but Alternatives Matrix Figure 2.2.4-1 does not include it in 3I. I can't tell from the chapter 2 text if it should be included or not.	T	
178	553	5-4	Section 5.2.3	DWR Modeling Support	Configurations 1C and 2B should include south Delta improvements as part of assumptions.	T	
537	554	5-4	5.2.3 Conveyance	DFG	The East Delta Habitat component which is associated with alternatives 2D, 2E, and 3H should be described and an estimate of acreage shown.		
636	555	5-4 to 5-5	5.2.4	Rick B., CALFED	2nd paragraph - add the following before the first sentence. "The Program would take a variety of steps including the following to reduce affects on farmland:", change the current 1st sentence to a bullet and put the following in bullet form as well - "Absent public lands, restoration efforts would occur on lands acquired from willing sellers where at least part of the reason to sell is an economic hardship, i.e., land floods frequently of levees are to expensive to maintain. Where small parcels of land are needed for waterside habitat, acquisition efforts will seek out points of land on islands where the ratio of levee miles to acres farmed is high. The Program would obtain easements on existing farmlands which would allow for minor changes in agricultural practices thus increasing the value of the crops to wildlife. and Floodplain restoration efforts would include provisions for continued agricultural practices on an annual basis. Delete 2nd sentence "In many ...". Delete last sentence of last paragraph.		

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707	556	5-5	Section 5.3	WAPA	This section should describe the methodology for developing the summary of environmental impact tables in Chapters 6, 7, and 8 as part of explaining the format for presentation of environmental consequences. In particular, the methodology should be discussed within the context of the introduction format and before the affected environment/existing conditions format on page 5-5. These summary tables use symbols to relate the level of impact of each issue for the various alternatives. For example, Alternative 2 is summarized in the box on page 7-54 as " <i>expected to have greater adverse impacts</i> " than Alternative 1. The differences between Alternative 1 and 2 as shown in Table 7.2-1 is essentially just the difference in the level of significance for only one (Delta Region) out of five regions -- a change from not significant to significant and mitigable. This equates to " <i>adverse impacts</i> "? The issues identified in these tables are often difficult to relate back to the information in the respective sections. Without the methodology used for assigning the levels of impact, these tables are confusing to the reader when trying to discern the relative merits and consequences of alternatives.	1.	
11	557	5-5	Section 5.3	Robin Reynolds, CDFA	"Environmental resources have been grouped according to the following resource categories: "As noted in other comments the failure of the ADEIR to address the environmental setting as CEQA requires, is a serious and fundamental flaw in the document and the underlying CALFED program. The unique approach of defining a rare and important aspect of the existing environment as being, instead part of an "Economics and social Environment" (which is an artifice unique to CALFED) precludes meaningful analysis in the ADEIR and frankly appears contrived as a ruse to avoid the admittedly difficult job of directly facing and addressing areas of significant conflict identified by the CDFA and others. This alone renders the entire document grossly inadequate.		
680	558	5-5	5.2.5 new	Rick B., CALFED	add a new section entitled Important Farmlands and the following text. "The Natural Resource Conservation Service distinguishes among four basic designations of farmland: prime farmland, farmland of statewide importance, unique farmland and farmland of local importance. Program activities have the potential to affect significant amounts of these farmlands. Table 5.2-3 provides a summary of the acreage of prime farmland, unique farmland and farmland of statewide importance that could potentially be affected by the Program. The acreage presented assumes that all Program actions will sit on top of these three types of farmland (worst case scenario)." <u>The table is the 2nd attachment.</u>		

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637	559	5-5 to 5-9	5.3	Rick B., CALFED	Delete 2nd sentence after bullets "While the specific...". Start a new paragraph beginning with the sentence immediately after the one just deleted. It begins "This section explains..."; First paragraph following bullets in right column - Delete from 2nd sentence to end and repace with "Assessment methods are resource specific and layout the approach used to identify consequences." 2nd paragraph following bullets - insert "assessment" between "The and methodology" in first sentence and change "methodology" to "methods". Delete the rest of this paragraph "CEQA requires...at the project-specific level"		
1030	560	5-5	5.3	BK, EPA	Q: re "Significance" under CEQA; compare language at 8-9, 8.1.2.2; 8-39, 8.2.3.2; 8-110, 8.3.3.2: are they consistent?		
638	561	5-6	table 5.2.2	Rick B., CALFED	Adjust #s per attached memo.		
181	562	5-6	Table 5.2-2	Finrock, DWR	Are the acreages truly going to be restored or do totals include enhancement? These are very different actions and should be separated as much as possible.	T	
179	563	5-6	Table 5.2-2	K. Nelson, DWR	The text on Page 5-5 says "Table 5.2-2 provides a menu of the actions that are currently contemplated, along with estimates of the land area that could potentially be affected by each action." In other words, are these target acreages for each of the habitat types per region?	T	
180	564	5-6	Table 5.2-2	jw, DWR	Having one table describing acres affected by ERP leads one to assume that these numbers are the same for all action alternatives; however, modifications to ERP are listed for most alternatives in chapter 2 including Alt 3H which will "involve about 10,000 -20,000 acres of more habitat". The ERP acreage table should show net habitat change <u>by alternative</u> for comparison.	T	
182	565	5-6	Table 5.2-2	jw, DWR	Does "affected" mean a change in habitat type? It is important to know the net change in each habitat type (for example: amount of freshwater emergent wetland removed or changed plus the amount created to give the net change in freshwater emergent marsh) due to the ERP.	T	
538	566	5-6	Table 5.2-2	DFG	Delta islands should be changed to "Delta channel islands". Fresh emergent wetlands should be displayed so that the tidal and non-tidal components are shown separately. The word "tidal" should be added to the habitat type "saline emergent wetland".		

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170	567	5-8		K. Kelly, DWR	Under introduction: replace "environmental consequences of all alternative configuration" with "environmental consequences of all storage and conveyance configurations"	C	
12	568	5-8	last paragraph	Robin Reynolds, CDFA	"Since this Programmatic EIS/EIR does not evaluate site-specific actions, no action-specific mitigation measures or monitoring plans can be developed." It is very true that the ADEIR does not evaluate site-specific actions: These are contained in exquisite detail in the "Common Programs" which are improperly excluded from analysis. The treatment of impacts, alternatives, and mitigation must be at least as detailed as the underlying actions being proposed. What the Lead Agency is proposing to do is make decisions to impact the existing environment, then later perhaps evaluate the environmental setting and evaluate mitigation, after all potential for avoidance through a reasonable rang of alternatives is lost. This is contrary to CEQA:		
184	569	5-8	Figure 5.3-1	Spaar, DWR	Additional information would make this figure more useful as a reference to the chapters. <u>Affected Env./Existing Cond.</u> - Should reflect actual section layout - Ex. 6.1.1.1 Delta Region A) Historical Perspective - 1) B-D Hydr. & R. Hydr. 2) Water Qty. 3) Water Supply & Mgmt. B) Existing Cond's - same layout. <u>Envir. Consequences</u> - List the 7 areas covered under this title. (Assess. Methods, Sign. Crit., Compare no action to existing, Compare prog. alt's to no action, Compare prog. ele. to existing, Mitigation Strat., Sign. unavoidable impacts) It makes it much easier to figure out where you're at if you can refer back to this, as I ended up doing.	P	
183	570	5-8	Figure 5.3-1	K. Nelson, DWR	Where and how do the geographic regions fit into this illustration? Modify figure to show this.	T	
185	571	5-8 (entire page)	"Organi-zation of a Typical Resource"	Steve Hayes, DWR	I appreciate the schematic which was very helpful in determining where I was (in Chapter 6) in relation to total discussion. I recommend use of similar schematics for Chapter 7 and following chapters discussing resources.	P	

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186	572	5-9 and so on	Mitigation Strategies sections	Chuck Vogelsang, DWR	<p>Some discussion should be presented on what is mitigable and unmitigable. For instance, does mitigable mean that some kind of action can be taken to replace a lost resource value regardless of its cost or regulatory and technical feasibility? For example, the tables show no unmitigable impacts in the water quality and fish and wildlife sections but finds some unmitigable impacts in recreation and agricultural land use. It gives the appearance that CALFED will take care of all impacts in some resource categories at the expense of impacts in other categories.</p> <p>There are two ways to deal with this. The threshold for "mitagable" be adjusted so that either 1) all impacts are mitigable at this programmatic level, or 2) some unmitigable impacts are identified in other resource categories where impacts are now all characterized as mitigable impacts. I prefer number 2. The criteria for mitigable should include economic, technical and regulatory feasibility. Also, where the programmatic level of analyses has identified an impact but further work is required in project specific analyses to determine if it's unavoidable/unmitigable, find the impact unavoidable/unmitigable for this programmatic document and note that future work may find that it is avoidable or mitagable. This makes the impact analysis a worst case analysis. It is important to identify the unavoidable or unmitigable impacts at the programmatic to facilitate the completion of program specific EIR/Ss. If unavoidable or unmitigable impacts are not identified at the programmatic level, proper CEQA findings cannot be made and these issues are likely to become significant (possibly fatal) issues in future project specific environmental documents. unavoidable/unmitigable impacts also highlights the differences among the alternatives.</p>	IA	
639	573	5-9	5.3	Rick B., CALFED	<p>Last paragraph bottom left column and top of right needs to be moved. "Technical reports... etc." It should be moved to the beginning of this section on page 5-3. Some adjustments to that paragaph follow: 3rd and 4th lines should read "...and consequences portion of <u>this section of the CALFED...</u>" Delete the sentence that reads "The more detailed... EIS/EIR." delete the last sentence "A top-level...". Add these technical reports are incorporated by reference and are available for review at the CALFED offices or in the various libraries noted in where</p> <p>2nd paragraph right column- delete "an are organized by" just befor bullets and delete the bullets.</p> <p>4th paragraph right column - delete the first two sentences "This Programmatic..." and modify 3rd sentence as follows, delete "can be developed" and replace with "are presented"</p>		

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1116	1646	pp. 5 -9 and App. D		KS, EPA	<p><u>Watershed Management Strategy</u>: Page 5 through 9, as well as Appendix D should be deleted. The need for a "watershed management structure" and "watershed implementation plan" is very unclear. The relationship between the watershed management structure and the institutional options discussed by the Assurances workgroup is confusing. We question the need for a watershed implementation plan, in addition to and separate from the implementation plans being developed for the Ecosystem Restoration and Water Quality Programs. These concepts (a watershed management structure and watershed implementation plan) have never been discussed by the CALFED Management Team or Policy Group. All this needs much further definition and development before being put before the public for comment.</p>	**	