

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
911	1274	8.2.3 Page 8-39		Stroh, USBOR	<p>Throughout the discussion of the agricultural economics subsection of the environmental consequences section, there are statements that various alternatives configurations would provide "x" or "y" amount of water for this of that region and that the additional water supply could include the development of additional acreage, and increased water supply reliability resulting in greater farm investments and shifts to higher water use and higher value crops. This could lead to a greater demand for labor.</p> <p>In order to review this section adequately, the reader will require much more information. Such as the bases for making such assertions. Whether or not the water provided through the construction of storage and conveyance facilities will be affordable for to agriculture, the information on construction and O&M costs, and estimates of per-acre foot costs of water. This should be revealed and discussed in the body of the EIR/EIS to avoid the perception of misleading and deliberate withholding of pertinent information significantly affecting conclusions reached in the EIR/EIS.</p>		
46	1275	8-1		Steve Shaffer, CDFA	Ch 8 - 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. (Also, the WQP and the WUE programs are not mentioned here for their potential impacts.)		
1086	1276	8-1	box insert and related discussions in text	CY, EPA	Saying that Alternative 3 would "provide more water savings to M&I users" could be misleading. Explain the basis of this conclusion (water quality improvements? Storage?). If storage, the benefit should not be specific to Alternative 3. If CALFED WUE has not been factored in, benefits of new facilities may be overvalued.		
716	1277	8-1	First full paragraph, column one	WAPA	Total revenue losses ranging from \$120 to \$240 million are described as "adverse." Recreational and fisheries expenditure increases ranging from \$29 to \$103 million are described as "minor." Given that the upper range of the recreation and fishery benefits are 43% to 83% of the total adverse impact, these should not be described as minor.		
715	1278	8-1	Third paragraph, first column	WAPA	Acreage conversion from agriculture to habitat and levee setbacks are described as adverse impacts. This is a subjective judgement that should be left to the reader. Viewing these conversions as adverse could be prejudicial.		

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889	1279	8-1	Column 1 Paragraph 3	Holt, USBOR	The assertion of negligible effects from Watershed Management should be qualified by adding "until implemented at large scales" to the end of the sentence. (See my comment no. 31 re yields from improved forest and range management).		
1243	1280	8-1	column 2, summary box on Impacts to Regional Economics	FWS	Add a new bullet: "Ecosystem restoration and other actions causing benefits to the environment will have beneficial impacts. These beneficial impacts include regional economic benefits from increased recreational opportunities, increased commercial fisheries, and less tangible but nonetheless significant benefits such as higher quality of life". This concept should be tracked through the various sections of the economic analysis for each alternative.		
890	1281	8-1	Column 2 Paragraph 1.	Holt, USBOR	It would be helpful to clarify which areas of "import", or "export" would receive benefit from water supply reliability. The only northern California subunit (Yolo County/Basin) that could be cited as benefiting is actually a water importing area, not an exporting area.		
67	1282	8-101		Steve Shaffer, CDFA	The Delta Protection Commission is referenced in the Urban Resources Section, but not in the Ag. Resources Section. It's primary mission is to protect ag. land, and thus should be discussed in the Ag. Resources section.		
1097	1283	8-105	"water supply"	NY, EPA	We are developing costs of alternatives, aren't we? In the Final these should be used to develop potential benefit-cost relations.	Fu tur e	
418	1284	8-105	s8.3.2.6 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	To the point. Table 8.3-1 should reflect these findings of significant unavoidable urban land use impacts and blackened circles should be placed in "Displace Residents" category as appropriate. Consider revising the bullet on "growth" as growth in itself is not a significant adverse impact: the impact is to how growth affects environmental resources.	IA	
722	1285	8-106	First full paragraph in second column	WAPA	Please refer to comment 14.		

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419	1286	8-106 and on	Section 8.3.3	R. Tom, DWR	Qualitative descriptions of increases and decreases in water quality (e.g., salinity, bromide, dissolved organic carbon, etc.) at diversion/intake sites are finally described under this section entitled Environmental Consequences: Economics (under the larger heading 8.3 Urban Resources). It seems more appropriate to describe the water quality impacts elsewhere in the draft document. The information which should be provided under this section is the economic impacts due to these water quality impacts.	T	
68	1287	8-107		Steve Shaffer, CDFA	- There should be similar tables for ag. water in the Ag. Resources Section.		
420	1288	8-108	4 th paragraph	V. Pacheco, DWR	The report should clarify if the salinity data from Rock Slough is at Old River or at Contra Costa Canal Intake.	T	
421	1289	8-109	Table 8.3.3-4	DWR Modeling Support	The results for Alternatives 3A and 3B are available to be included.	T	
723	1290	8-110	Second from last paragraph, second column	WAPA	The first sentence reads as follows: " <i>Because information on the costs of CALFED alternatives is not currently available, it is not possible to determine whether a net impact is adverse or beneficial at this time.</i> " This comments contradicts several statements made in section 8.3 and other parts of the PEIR/EIS. The first contradiction is that many changes in acreage are described as either beneficial or adverse (e.g., see comments 35, 38, and 39). Second, cost and affordability were decision factors in forming alternatives as described in comment 40. Third, economic impacts are described for a number of resource areas such as fisheries and recreation, acreage, and water pollutants that would be significantly impacted by the alternatives (see comment 40). If the comment refers only to urban resources, that should be made clear.		
922	1291	8-112	Table 8.3.3-5	Stroh, USBOR	Refer to note d. An explanation of consumer surplus should be provided.		
422	1292	8-114	Section 8.3.3.4 first paragraph	V. Pacheco, DWR	The use of CCWD may not be an accurate representation for water quality analysis. The modeling analysis is not representative of current operations for the Los Vaqueros Intake at Old River. This provides an alternative intake to CCC and is considered as part of the No Action Alternative for this document. The operation of the Los Vaqueros intake has resulted in revised operations at Contra Costa Canal pumping Plant No. 1 and resulting water quality in Rock Slough. Conclusions based on these current modeling analysis should be qualified based on current operations.	T	

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1098	1293	8-116	2nd paragraph, column 2	NY, EPA	The Final should consider the "costs and benefits of any conservation attributable to CALFED actions."	Fu tur e	
423	1294	8-118	Section 8.3.3.4	DWR Modeling Support	The discussion in this section needs to remind the reader that the TDS values presented are at Rock Slough.	T	
405	1295	8-12	Section 8.1.2.4	Sandino, DWR	The economic impacts in the Delta are large. Has anyone double-checked them? These number will generate significant comment.	IA	
898	1296	8-12,13		Stroh, USBOR	The text should elaborate on the implication that there are lands in the Delta Region with economic viability of which is threatened by excessive water use. Confirm or alter the text.		
424	1297	8-129	2 nd & 10 th Paragraphs	DWR Modeling Support	The text needs to specify that the TDS levels quoted are average annual over 16 years.	T	
1526	1298	8-137 and 8-142		SWRCB	The section titled "All Regions" appears to be repeated; it appears at the beginning and end of Section 8.3.4.4.		
1099	1299	8-137	last paragraph	NY, EPA	Take out the words "policy-based." Meaning is unclear.		
425	1300	8-144	s8.3.4.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Be alternative specific. The significant unavoidable impacts are not identified in all alternatives, refer to Table 8.3-3.	IA	
426	1301	8-145	Text box	K. Nelson, DWR	In the first two bullets, recreation impacts are related directly to the loss of "open space". I can't find in the document where the assumption is developed that equates open space with recreation use. Can it be assumed that open space means undeveloped and unfarmed? Unless the open space you refer to are specific recreation facilities, most other land in any use is privately held.	IA	
427	1302	8-145	Alternative 2	K. Nelson, DWR	It would be helpful in this chapter to disclose what land-based recreation facilities might be displaced in the Delta. Isn't most of the land in private agriculture?	T	

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429	1303	8-146	Table 8.4-1	J. Turner, DWR	There are significant and mitigable impacts to recreation associated with the barriers discussed in comments 16 through 18. A discussion of the impacts and mitigation is in chapter 13 of the ISDP EIR/EIS. Need to add Impacts to Recreational boating under the Delta section of this table.	IA	
428	1304	8-146	Table 8.4-1	K. Nelson, DWR	I'm concerned about the liberal use of the "closed dot" symbol that indicates "significant and not mitigable" impacts. In the Delta specifically, I am reluctant to accept that the conversion of open space equates to a loss of recreation unless you can identify examples. What little open space remains amongst and agricultural landscape can't all be available to the public for recreation. Regarding the "Displacement of Recreational Resources"; until the facilities and elements of the preferred alternative are located, how can the impacts be significant and not mitigable?	IA	
923	1305	8-148 to 8-150		Johannis, USBOR	Symbols inconsistent sometimes +D, or D+, or D/+ Please be consistent , if they have the same meaning.		
924	1306	8-149	Table 8.4-2	Stroh, USBOR	Under SWP and CVP Service Areas, there is an untitled line with entries. Please correct.		
406	1307	8-15	Section 8.1.2.6	Sandino, DWR	DEIR makes statement that mitigation is not required for economic impacts. This is true except when these impacts cause environmental impacts. Do any of the economic impacts translate into environmental impacts? For instance, does any of the agricultural land taken out of production serve as a prey area for wildlife.	IA	
408	1308	8-15	Col 1, 1 st para	Stuart, DWR	No action to firm up Southern California water supplies would put more pressure on SoCal Agriculture and would probably price them out of the water market.	IA	
900	1309	8-15	Column 2 Bullet 2	Holt, USBOR	Please clarify the intent of this mitigation strategy.		
899	1310	8-15	8.1.2.6	Stroh, USBOR	Several of the agricultural measures are not with the purview of governmental units, such as "Minimize the amount of water conservation . . ." Conservation is a private decision and appears to be in conflict with the goals of the Water Use Efficiency common program.		
49	1311	8-15, 16		Steve Shaffer, CDFA	Is there a difference between significant and substantial? In two places it is stated that no significant economic impacts are expected, but substantial effects from agricultural land use changes may occur. This doesn't make sense.		

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430	1312	8-150	Table 8.4-3	K. Nelson, DWR	For the Sacramento and San Joaquin River Regions, I don't understand the split symbol ratings for "Recreation Opportunities".	IA	
431	1313	8-151	ERP	K. Nelson, DWR	Again an assumption is made that the loss of open space equals a loss of recreation. Some supporting documentation is needed. What percent of the Delta's open space is available for recreation?	IA	
433	1314	8-152	8.4.1.1 ¶ 2	K. Nelson, DWR	You mention the Primary Zone. I know what that is, but where is the term defined for other readers?	C	
432	1315	8-152	8.4.1.1 ¶ 3	K. Nelson, DWR	When you talk about the conversion of marshland to duck clubs and wildlife areas, you should clarify that this applies primarily to Suisun Marsh, not the entire Delta. The Delta is still primarily agriculture with incidental hunting with permission of the landowners.	C	
434	1316	8-154	¶ 1	K. Nelson, DWR	A graphic would be helpful to familiarize the reader with the distribution of recreation facilities in the Delta. Maybe from DWR's Delta Atlas for a general overview.	P	
435	1317	8-155	¶ 2	K. Nelson, DWR	How much total open space is there in the Delta? I've never seen this figure. Then what is the percent of this total open space available for recreation use?	T	
925	1318	8-158	Column 2 Paragraph 2	Holt, USBOR	Please correct to "U.S. Forest Service, not "U.S. Forestry Service."		
926	1319	8-159		Holt, USBOR	It seems that it would be useful to discuss the shifts in the types of recreational activities over time as well as simply noting the number of days of recreational use. The number and cost of recreational vehicles (boats, motors, jet skis, etc.) have increased over time so mere numbers of visitor days are inadequate to really evaluate the changes over time and the potential sensitivities of recreation to operational changes in the Federal and State water systems.		
409	1320	8-16	Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	No significant economic impacts but substantial effects on farm revenues and employment? Consider rewriting this and/or finding that there is a significant unavoidable impact to farm revenues and employment.	IA	

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436	1321	8-162 to 8-168	Section 8.4.2	J. Turner, DWR	Need to add information on recreational impacts due to the barriers under sections 8.4.2.1, 8.4.2.2, and the Delta sections of 8.4.2.3 and 8.4.2.4. I will provide if requested a copy of the relevant information from the ISDP Draft EIR/EIS to use to complete these sections.	IA	
724	1322	8-163	Second paragraph, second column	WAPA	1995 was used as the base population for the recreation assessment. Other parts of the PEIR/EIS use other base years (e.g., page 8-9 lists a 1991 population.) Was a standard base population year used, and why was that particular year chosen?		
725	1323	8-163	Second paragraph, second column	WAPA	The first paragraph states that recreation values were adjusted for population changes between 1995 and 2020. The second paragraph states that these economic variables were then "adjusted to reflect the predicted magnitude of change...for each of the alternatives." Please describe how the values were "adjusted." How were percentage changes in use of recreation facilities derived? How were impacts to fisheries included in these estimates? Were fishery populations assumed to remain at 1992 levels as the human population grew?		
437	1324	8-164	8.4.2.3 Rec. Opport.	K. Nelson, DWR	You refer to adverse impacts on fisheries and wildlife habitat resulting in potentially significant reductions in recreation opportunities. However, wouldn't the ERP more than compensate for these potential reductions? Shouldn't the ERP be mentioned here?	T	
50	1325	8-17		Steve Shaffer, CDFA	Crop trends? California dairy is growing and depends on feed grains and alfalfa. Impacts in side bar characterized as economic, rather than environmental.		
901	1326	8-17	Box Bullet 5	Holt, USBOR	Suggest using the word "changed" instead of "foregone" to fit spatially and contextually. Some opportunities might be foregone, but others would open. (See my comment No. 31 re yields from improved forest and range management).		
718	1327	8-17	Last paragraph in column 1	WAPA	Converting agricultural lands to habitat should not be described exclusively as an adverse impact; it can be both adverse (to agriculture) and beneficial (to wildlife).		
1294	1328	8-17	Bullet #6	Madalene Ransom, NRCS	Statement that a water use efficiency program could result in farm worker job loss. What studies have shown this? It is our opinion that the nature of work associated with these jobs is likely to change, and that the skill sets needed to carry out these jobs will also change, however we would not anticipate significant job loss		
438	1329	8-173 to 8-174	Section 8.4.2.5	J. Turner, DWR	Need to summarize the mitigation for recreational impacts due to the barriers in this section. I will provide, if requested, a copy of the relevant information from the ISDP Draft EIR/EIS to use to complete this section.	IA	

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69	1330	8-174		Steve Shaffer, CDFA	- Ag. mitigation could be similar to the proposed mitigation for impacts to recreation facilities.		
1249	1331	8-175	First Bullet	FWS	"Permanent closure of recreation facilities in the Delta due to ERP restoration projects." The ERP is not the only CALFED program that could potentially close a recreation facility. Change the bullet to "Permanent closure of recreation facilities in the Delta due to CALFED program activities."		
439	1332	8-175	8.4.2.6	K. Nelson, DWR	You refer to impacts that are "potentially unavoidable". How does this terminology correlate with terms in the legend of Tables 8.4-1, 8.4-2 and 8.4-3? It seems that "potentially unavoidable" is more appropriate to describe potential impacts resulting from non-specific alternatives, rather than "significant and not mitigable".	IA	
440	1333	8-175	s8.4.2.6 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	The language in this section gets to the point made early in these comments about making findings based on current knowledge while acknowledging that future analyses may find that impacts can be mitigated. Table 8.4-1 contains additional unmitigable impacts that should be added to this section.	IA	
442	1334	8-176	Para 5	Stuart, DWR	"Seepage" needs clarification. What kind? Oroville Dam seepage? Oil seepage? Sacramento River seepage (\$30 million litigation)? Delta Seepage?	T	
441	1335	8-176	5th para	WTabor, DWR	Seepage through levees, including in the Delta, is not an insignificant issue. Seepage through the levee can lead to failure. Seepage on both project and non-project levees is an issue that needs to be addressed in the short and long term.	IA	
443	1336	8-179	1st para	WTabor, DWR	It is incorrect to state that no State or Federal agencies have jurisdiction over non-project levees. The Reclamation Board requires permits on many reaches of non-project levees in the Delta. The Board and DWR implement the Delta Levee Maintenance Program which provides jurisdiction over the reclamation districts achieving prescribed levee standards. The Federal Emergency Management Agency exercises jurisdiction over the levees to the extent that compliance with the National Flood Insurance Program is an issue (which it is) for receiving FEMA disaster assistance. The Corps of Engineers, through its PL 84-99 precertification program, has jurisdiction to review non-project levees and impose requirements as a condition to pre-certification	T	

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17	1337	8-18	Table 8.2-1	Robin Reynolds, CDFA	See also Page 8-38, Section 8.2.2.6 and numerous other locations in the ADEIR. The conversion of agricultural land to other uses is listed as significant and not mitigable. In reality, CALFED has simply chosen to not evaluate avoidance, reduction, or mitigation of these significant impacts to the existing environment. This is contrary to CEQA, and not a basis for informed decision making.		
444	1338	8-180	2nd col, 3rd para	WTabor, DWR	CVP was not authorized in 1993, it was in the 1930's	T	
445	1339	8-181	last para	WTabor, DWR	There is no mention of the Yolo Bypass as part of the existing system. The Yolo Bypass carries 5/6 of the volume of the Sacramento River at peak flood flows, the lower end of the bypass is in the Delta and provides significant spawning habitat for Delta smelt.	T	
446	1340	8-185	2nd full para	WTabor, DWR	There is no mention of a significant federal emergency response, namely the Corps of Engineers' PL 84-99 flood fight and rehabilitation authority. In 1997, the Corps expended approximately \$120 million in this effort in the Central Valley.	T	
927	1341	8-186		Stroh, USBOR	Please verify the date for the ending of hydraulic mining.		
928	1342	8-187		Stroh, USBOR	Please explain how Clair Engle Lake provides flood protection to the Sacramento River Region.		
929	1343	8-187		Holt, USBOR	This list of reservoirs locations, such as Trinity, Clear Lake, and Lake Almanor in the Central Valley should be explained. Other reservoirs of similar size and location, such as Berryessa, Union Valley, and French Meadows are left off. Moreover, there are order of magnitude differences in the sizes of these reservoirs. Suggest categorizing Shasta, Oroville, and Folsom as either "major (approximately 1,000,000 AF or larger)" and perhaps designate the other as "moderate (>10,000 but 1,000,000 AF)."		
930	1344	8-187	Reservoirs	Fujitani, USBOR	Note that although Whiskeytown is not operated specifically for flood control, some flood control benefits are realized through its normal operation.		
447	1345	8-187	Weirs and Bypasses	Annalena Bronson, DWR	There are five bypasses. Please include Tisdale and Sacramento Bypasses. Tisdale directs water into the Sutter Bypass and the Sacramento Bypass conducts flow into Yolo Bypass.	T	

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449	1346	8-187	2nd para	WTabor, DWR	Clair Engle (Trinity) Lake is not in and therefore does not provide any flood significant flood protection for the Sacramento River region; it does provide flood protection for Trinity basin.	T	
448	1347	8-188	Right column, last paragraph	Annalena Bronson, DWR	Change "Cacalia" Bypass to Chowchilla Bypass (Spell check error?)	C	
450	1348	8-188	2nd col. 4th para	W Tabor, DWR	One of the most significant issues on the San Joaquin system is inadequate flood carriage capacity. On many tributaries, e.g. Stanislaus, non-project levees are very important for the flood system.	T	
451	1349	8-189	2nd para	W Tabor, DWR	List of reservoirs fails to include Friant, Terminus and Success Reservoirs, all with Federally designated flood control space.	T	
453	1350	8-189	2nd col, 2nd para	W Tabor, DWR	The North Delta document, I believe was only a "draft", text implies a final document	T	
452	1351	8-189	4th para	WTabor, DWR	Cacalia presumably should be Chowchilla	T	
51	1352	8-19	Table 8.2-2	Steve Shaffer, CDFA	- object to conversion of agricultural land as not mitigable - many questions as to beneficial impacts or not significant impacts		
454	1353	8-191	last para	W Tabor, DWR	There is no mention in this section or others on flood control issues about burrowing rodents, which are blamed for many levee failures, including in the Delta.	T	
455	1354	8-191	1st 2 paras	W Tabor, DWR	The discussion of F.C. Economics and significance criteria is very difficult to follow, even for one who knows the subject.	C	
456	1355	8-191	2nd col, 3rd para	W Tabor, DWR	Very difficult to understand. Discussion probably needs to distinguish FEMA assistance from Corps PL 84-99, from SB 34 assistance	C	
931	1356	8-192	Other Flood Control System Projects, Folsom	Fujitani, USBOR	Note that even though some benefits for the CALFED program may result from the reoperation of Folsom Reservoir for additional flood control, the reoperation also increases the risk of not filling Folsom, reducing the available water supply.		

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457	1357	8-192	4th para	W Tabor, DWR	Discussion fails to reflect AB 360 (1996) or its requirements. Last sentence should read: "California Water Code Section 12987(d) requires the Department of Fish and Game to make a written determination, as part of its review and approval of a plan or project, that program expenditures are consistent with a net long-term habitat improvement program and have a net benefit for aquatic species in the Delta."	T	
459	1358	8-193	2nd col, 5th para	W Tabor, DWR	Implies most of levees are part of state and federal system, probably about half, so there are significant levee mileage (2,000) which are not part of either system.	T	
458	1359	8-193	4th para	W Tabor, DWR	The flood control assumptions are weak. The two 25% assumptions appear suspect. To assume constant appropriations for the SB 34 program is questionable. The appropriations have been any thing but constant. There is one year remaining of identified funding for the program. There are other sources of flood control spending in the Delta. Corps/Rec Bd projects, PL 84-99 activities, Sacramento River Bank Protection Program projects, etc.	T	
932	1360	8-194	Table 8.5.2-1	Stroh, USBOR	Explain the basis for estimating the expected annual cost of levee failure at 3% of total value.		
461	1361	8-195	2nd para	W Tabor, DWR	Designated flood control reservoirs are required to maintain flood reservation as a matter of Federal (Corps') regulations.	T	
460	1362	8-195	3rd para	W Tabor, DWR	Deterioration of Delta floodways, as opposed to levees, is not discussed any where else in this discussion and is not discussed as a Delta flood control issue.	T	
462	1363	8-196	5th para	W Tabor, DWR	The so-called PL 84-99 (there is no such thing as PL 99) standard does not provide 100 year protection.	T	
891	1364	8-2	Table 8.1-1	Stroh, USBOR	The accompanying narrative should support all impacts being rated Not Significant. Impacts on the Delta Region for Employment and Income from Ecosystem Restoration and Levees for agriculture could be negative and possibly offset any positive impacts from other Program actions in the Region. The narrative on page 8-12 uses the phrase "substantial economic impacts" and cites percentage changes that are clearly "Significant."		

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1244	1365	8-2	Table 8.1-1	FWS	All effects are shown to be insignificant, which contradicts the text. This table (or the accompanying text) should be fixed. (We understand that significance determinations are not required for economic impacts under CEQA and NEPA, but the table should still state which impacts are considered to be significant, based on stated objective criteria)		
933	1366	8-204	Column 1 Paragraph 7	Holt, USBOR	The additional storage would also have regional effects if it were obtained by raising Shasta Dam. The text should be amended to reflect this. Suggest replacing the second sentence with "Unless the 3 MAF of additional surface storage were obtained by raising Shasta Dam, only localized flood control would be available when a large storm event occurs."		
1250	1367	8-205	4th and 5th paragraphs	FWS	<p>These paragraphs discuss adverse effects of ERP on flood control. Paragraph 4 states that removal of diversions and other obstructions to flow could cause flooding downstream. Perhaps, but removing obstructions to flow (usually called "levee maintenance", "clearing and snagging", or "dredging") is a common flood management measure. Also state the flood control benefits of this proposed ERP action.</p> <p>Paragraph 5 states that trees along stream banks would increase roughness (another obstruction to flow). Again, provide a more balanced assessment by stating that banks will be stabilized by vegetation, thus providing a flood control benefit.</p>		

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1251	1368	8-206	"Mitigation Strategies"	FWS	<p>This section incorrectly suggests that no significant adverse effects would result from implementing the LSIP goal to reconstruct and maintain Delta levees to meet PL84-99 standards. The mitigation strategy should not suggest that because (some) LSIP actions are compatible with (some) ERPP actions, there is no need for a mitigation strategy to address impacts to existing fish and wildlife habitat. There is a large conflict between LSIP and ERP goals; we have previously commented to CALFED on this unrealistic LSIP goal, and this issue apparently still needs resolution. ERP goals cannot be obtained if the LSIP really does seek to maintain all levees in this manner. Further, we believe this level of maintenance may be unmitigable. Delete the second paragraph of this section, and replace it with the sentence: "Any vegetation clearing associated with levee improvements will be fully offset by replanting riparian vegetation along oversized levees, berms, and in other appropriate areas." This is more consistent with our understanding of the LSIP, and more consistent with Program goals.</p> <p>Another reason to replace this paragraph is that it also seems to suggest that ERP actions would compensate (mitigate) for this loss of riparian vegetation ("It is assumed that the increase in the quantity and quality of riparian habitat resulting from implementation of the [ERP] would replace marginal habitat values now provided by vegetation growing on levees"). Our understanding is that the ERPP is not to serve as "mitigation" for other CALFED actions, and that these other actions, including LSIP actions, should come with their own mitigation where needed.</p>		
463	1369	8-207		Chuck Vogelsang, DWR	Add a Potentially Significant Unavoidable Impacts section stating that there are none.	IA	
464	1370	8-207	Left column, last paragraph	Annalena Bronson, DWR	When more site- specific projects are analyzed in the future, DFM and Reclamation Board strongly recommend that hydraulic studies be performed to show whether the proposed vegetation on berms, banks and levees will reduce the existing level of flood protection. A risk-based analysis that is used by the U.S. Army Corps of Engineers may be appropriate. Any reduction in the level of protection is an adverse impact to public safety and should be mitigated.	T	

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465	1371	8-207	Left column	Annalena Bronson, DWR	DFM and Reclamation Board strongly recommend that the proposed monitoring program and mitigation measures be implemented to ensure that subsidence does not reduce the existing level of flood protection. Any reduction in the level of flood protection is an adverse impact to public safety.	T	
934	1372	8-208	Box	Welch, USBOR	Delete last bullet, "Impacts to NRHP..."		
935	1373	8-208	Column 1 Paragraph 3 Sentence 1	Welch, USBOR	Delete phrase, "eligible for inclusion...because of their association." Replace "association" with "associated."		
936	1374	8-208	Column 1 Paragraph 3 Sentence 2	Welch, USBOR	Replace last part of this sentence to read, "...culture groups may acknowledge traditional cultural properties of their own."		
937	1375	8-208	Column 1 Paragraph 3 Sentence 3	Welch, USBOR	Delete sentence beginning with "Although traditional cultural properties..." and replace it with "Traditional cultural properties may be listed on the National Register of Historic Places (NRHP)."		
938	1376	8-211	Column 2 Paragraph 5 (8.6.1)	Welch, USBOR	Add this sentence to end of this section, "The following discussion is a summary."		
939	1377	8-212	Column 1 Last line	Welch, USBOR	Replace with ..."agriculture, although subsurface deposits..."		
940	1378	8-214	Column 2 Paragraph 3 Line 14	Welch, USBOR	Replace sentence with "Due to intensive occupation of the area in prehistoric times, prehistoric resources are common within the region."		
941	1379	8-215	Column 1 Paragraph 2 Line 2	Welch, USBOR	Change "existing" to "exist."		
942	1380	8-216	Column 2	Welch, USBOR	Add following paragraph after the CEQA paragraph: "NHPA requires Federal agencies to take into account the effect of their undertakings upon historic properties. The Advisory Council on Historic Preservation must be provided and opportunity to comment on the agencies' efforts to consider cultural resources, as described in 36 CFR part 800."		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
943	1381	8-217	Column 1 Paragraph 1 Last line	Welch, USBOR	Delete ..."who consider these locations sacred."		
944	1382	8-217	Column 1 Paragraph 4 Line 1	Welch, USBOR	Replace with "Some natural or geologic features are considered..."		
945	1383	8-219	Column 2 Paragraph 1 Line 1	Welch, USBOR	Change text as follows, "identified per methods described in the Cultural Resource Technical Appendix."		
466	1384	8-225	s8.6.2.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Since further work is required to analyze this impact, recommend the finding that there may be unavoidable adverse impacts and Table 8.6-1 should reflect these findings of significant unavoidable impacts to cultural resources and blackened circles should be placed in appropriate categories.	IA	
70	1385	8-226		Steve Shaffer, CDFA	- Power - Enlarging existing on-stream storage (e.g. Shasta) could have a beneficial impact on power production. This is not addressed, but should be.		
726	1386	8-226	Bottom	WAPA	The statement that significance criterion for impacts on Western preference power customers is unnecessary, since the customers can avoid adverse impacts by switching to alternative suppliers in the market, is incorrect. To the extent that CVP energy available for sale is reduced or the CVP price for energy is increased, Western customers could be significantly impacted. The need to shift to market power will require the purchase of energy at market rates, which in the long run can be expected to be higher than Western CVP rates. Further, any reduction in Western sales will either require Western to charge its customers more to cover the CVP repayment and other fixed charges, or will force Western into a position of not meeting its repayment obligations. This could initiate a "death spiral" yielding a situation in which project repayment would become impossible.		

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
946	1387	8-226	General Comments Section 8-7	Johannis, USBOR	<p>Because the numbers that are included do not support the statements that power is not significantly impacted, please re-assess.</p> <p>Please remove the statements made in several places the SWRSIM was modified to use the PROSIM power algorithm for the CVP. To our knowledge this was not done.</p> <p>Unclear how capacity valued - Please indicate the different values for capacity with and without energy.</p>		
947	1388	8-226 8-227	General Comments	Dang, USBOR	<p>Specific impacts of changes of operations and energy should be defined. It is unknown at this time who will absorb the substantial costs of additional power required for pumping operations (\$42 million dollars in config. 1c and up to \$54 million dollars in config. 3b) and whether the increase in energy and capacity use would come from CVP and to what extent. Until more detail studies are conducted and some type of joint costs are defined and allocated to the CVP and SWP, it is premature to imply that these impacts would not be significant and require no mitigation strategies as discussed on page 8-226 and 8-227.</p> <p>The CAL-FED proposed projects are not covered under existing Reclamation Law. Until new legislation is enacted or congressional authorization is in place. The additional power requirements should not be construed as CVP "project-use". The power-related cost impacts should be treated as cost to a special project.</p>		
949	1389	8-226	Section 8.7	Holt, USBOR	<p>The impacts of CalFed actions on the utility industry seem to extend beyond the CVP and SWP. Because power systems are linked every bit as much as the water supply network, the effects of CalFed actions could be felt to some degree throughout the west. Moreover, if parties other than the CVP and SWP are required to help maintain Delta water quality, the effects of CalFed could be felt on these other parties as well. Finally, changes in the utility industry could affect CalFed's economics by changing the profitability of the power generation operations. Further discussion is required in this section.</p>		
948	1390	8-226	Section 8.7	Holt, USBOR	<p>This sections should mention energy deregulation of the industry and its potential affects..</p>		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
950	1391	8-226	2nd Paragraph	Johannis, USBOR	Please correct the statement made that generation from both projects is used primarily for pumping energy. While project use is the first priority for CVP energy, the majority of energy is sold to preference customers.		
951	1392	8-226	3rd Paragraph	Johannis, USBOR	Please explain the basis for the statement made that CALFED alternatives would cause power impacts, but they would not be significant and would not require mitigation.		
952	1393	8-226	4th Paragraph	Dang, USBOR	The "significance criteria for potential impacts on Western power customers are not needed because they can avoid adverse power rate or supply impacts by switching power providers in a deregulated market." The potential impacts on CVP power customers would depend on how the power-related costs are allocated and where the supply sources for the increase in power use are which is unknown at this time. The draft indicates reduction of CVP available power for sale in the range of 44% to 56%. Without CVP hydro generation, the CVP power customers would potentially have to purchase more costly energy and capacity from other utilities/resources. This statement needs to be fully explained or adjusted to reflect the unknown.		
953	1394	8-226	4th Paragraph	Johannis, USBOR	There is a statement made that Western customers can avoid impacts by switching to a lower cost power provider. Please explain the assumption that alternate sources will be equal to or lower priced than CVP energy.		
727	1395	8-227	Bottom, Unnumbered Table	WAPA	The table indicates either no impacts or no significant impact to Western or its customers from any of the alternatives proposed. While it correctly summarizes the remaining text, it is, at best, an oversimplification. For example, Table 8.7.2-1 indicates energy available for sale by Western in Scenarios 7 and 8 to be reduced from 3,700 GWh under Existing Conditions to 1,615 GWh in an average hydro year. It is unclear how this impact can be considered as insignificant. Significance thresholds must be clarified. Western strongly disagrees with the "insignificant" determination.		
956	1396	8-227	Table 8-227	Johannis, USBOR	Table implies there are no significant impacts in any Alternatives, yet text on pages 8-240 to 8-243 shows large impacts to energy available for sale. Please make text and table consistent.		
957	1397	8-227	Table 8-227	Dang, USBOR	Explain the basis for using July electrical capacity rather than other periods/months.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
954	1398	8-227	Table 8-227	Johannis, USBOR	Includes row for Total Available Capacity in July. Typical critical month for capacity in CVP has been in fall when reservoirs are low and pumping is high, this information should be included in the table. Dry or critical year should also be represented.		
955	1399	8-227	Table 8-227	Johannis, USBOR	Studies have usually indicated that as water rights are fully developed and CVP deliveries approach 2020 level, that energy available for sale has decreased. Suggest changing No Impact to be Not Significant.		
729	1400	8-228	Alternatives 2 and 3	WAPA	Conclusions similar to that noted above for Alternative 1 are drawn without adequate supporting data.		
728	1401	8-228	Alternative 1	WAPA	The statement is made that in Configuration 1C, CVP energy available for sale will decrease and Western's rate will only increase slightly and none of the configurations in Alternative 1 have the potential for significant impact. We have not found sufficient data within this document or the technical reports to support this statement. We would need to see the input and output from the PROSIM model runs to fully evaluate all the analyses.		
958	1402	8-228	1st Paragraph	Johannis, USBOR	Unclear why CALFED will impact restoration fund. If CALFED increases CVP water deliveries, may reduce Power 's contribution to Restoration fund.		
959	1403	8-228	2nd Paragraph	Johannis, USBOR	Should expand to explain how these factors impact power.		
960	1404	8-229	1st Paragraph under 8.7.1	Johannis, USBOR	Paragraph states that analyses can't be done on a region by region basis, then refers to Table 8.7.1-1 which contains Regional information. This table should be modified to reflect the whole system rather than the regions.		
961	1405	8-229	3rd Paragraph Second Column	Johannis, USBOR	CVP generation and supplemental purchases should be treated separately. Make clear supplemental purchases are to support preference customers and that project needs are met by project resources.		
902	1406	8-23		Slavin, USBOR	In water short areas, the WUE program could result in less fallowing and/or more double cropping which when coupled with a more reliable water supply could result in an increase in the labor force needed to carry out farm related activities.		
52	1407	8-23		Steve Shaffer, CDFA	Common program impacts - The WQ program is not discussed and should be. Along with agricultural land conversion is a reallocation of agricultural water, especially resulting from the ERPP. This needs to be identified and discussed.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
962	1408	8-230	Table 8.7.1-1	Holt, USBOR	This table should include the City of Redding's power plant at Whiskeytown Dam and the City of Santa Clara's plant at Black Butte as it would be affected by any changes at Black Butte due to a Sites Reservoir. There should be some mention of the negotiations/discussions now under way with PG&E concerning their facilities on Battle and Butte Creeks. These are direct CVP/CalFed action. The more general impacts to PG&E, Southern Cal Edison, San Diego Gas and Electric, etc. should also be reflected.		
963	1409	8-231		Johannis, USBOR	CVP power facilities are authorized to first meet project needs. Characterizing this as a "market" is inappropriate. Should show Project Use as first priority for CVP power, than preference sales as a use or market.		
730	1410	8-231	Table 8.7.1-1	WAPA	The primary market for CVP power is noted as " <i>Project Use</i> ." Sales to Western customers is not acknowledged.		
731	1411	8-234	Fourth paragraph, left column	WAPA	The rate data presented should be updated to include Western's most recent rates. Note that the current rates are given in the Technical Report. Also, note the bottom of the right column where the current melded rate is stated.		
965	1412	8-234	Last Paragraph First Column	Johannis, USBOR	It would be useful to explain what is dry year or dry period. Also, the basis for using July should be mentioned.		
964	1413	8-234	1st Paragraph	Johannis, USBOR	Western was not formed until the late 1970's and should be corrected in text. Also important to differentiate between Generation and purchases for preference customer support.		
966	1414	8-234	4th Paragraph Second Column	Johannis, USBOR	Indicates PROSIM power module used. To our knowledge this is untrue, and should be deleted for the draft		
968	1415	8-235		Dang, USBOR	The U.S. Bureau of Reclamation's PROSIM model, was not used in this draft. Thus, the power numbers/results shown in this draft are underestimated; specifically, CVP project-use energy and capacity requirements. To accurately assess the CVP project-use load obligations, it is imperative the Bureau's power module be incorporated in DWRSIM or utilized as a post-processor. When this is done, we expect to observe even higher increase (more impact) in energy use due to the fact that simulations for this draft did not include all CVP pumping facilities/project-use requirements. It would be helpful if simulation data of CVP pumping plants requirements are made available for review.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
732	1416	8-235	Left column, bottom paragraph	WAPA	The statement is made that at this time it is not known how changes in capacity or energy generation will be allocated between the CVP and SWP. However, throughout the text there are numerous places where this is done. For example, note Tables 8.7.2-1 and 8.7.2-2. The intent of the statement is unclear and confusing and should be clarified.		
967	1417	8-235	3rd Paragraph Second Column	Johannis, USBOR	Indicates PROSIM power module used. To our knowledge this is untrue, and should be deleted for the draft.		
733	1418	8-236	Left column, second paragraph	WAPA	We assume capacity value has been included within the energy value. It is not clear how ancillary services were valued, i.e., what is the "value attributed to ancillary services". The next paragraph speaks about the level of ancillary services available. From the description, it appears the primary consideration is spinning and non-spinning reserves; however, there is no information provided to determine the value or quantity of ancillary services used in the calculations. The last paragraph notes the effect on value associated with the time the energy is produced. Again, no definitive data is offered.		
734	1419	8-236	Right column, second paragraph	WAPA	No definitive data is offered to support the prices stated and it is not clear as to the time frame for which these prices are stated. That is, do they represent 1998 prices, or some long-term present value, or what? The third paragraph states that some undefined levels of Western's revenue requirements were used in developing an average Western rate. When one looks at the data in Table 8.7.2-1, one should be able to calculate the Western Revenue Requirement; however, such calculations result in a very wide and seemingly inconsistent range of revenue requirements. It is not clear as to how revenues from Project Use have been treated or the level of power purchases included in the calculation. CVP hydro energy should calculate to be approximately \$20 per MWh based on the energy available for sale in the No-Action case. The table places the CVP rate at \$24.03 per MWh for the No-Action case. Additional data is necessary to reconcile this difference.		
969	1420	8-236	8.7.2	Fujitani, USBOR	Energy also has a time value and should be included. There are benefits to generating during certain periods of the year, generally more value in the late summer and fall than in the winter and spring. Reoperation of reservoirs can alter the generation schedules and have this type of adverse energy impacts.		
736	1421	8-237	Left column, first paragraph	WAPA	We do not agree that there is no significant impact and that significance threshold criteria are not necessary. (Ref: Pages 8-226, bottom.)		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
735	1422	8-237	Significance Criteria	WAPA	The assumption that there is only a significant impact when rates are raised above market is incorrect. See comment 46, above. Also, the document assumes that a Western customer is not adversely affected as long as Western rates are at or below market. Any competitive advantage a Western customer may enjoy as a result of Western's power being priced considerably below market is completely discounted by the approach used to determine significance.		
970	1423	8-237	2nd Paragraph 2nd Column	Johannis, USBOR	There is a statement made that Western customers can avoid impacts by switching to a lower cost power provider. Please explain the assumption that alternate sources will be equal to or lower priced than CVP energy.		
971	1424	8-237	3rd Paragraph	Johannis, USBOR	Indicates Restoration fund has a "floor", but no ceiling. Requires clarification since some believe there is no specific floor to power collections.		
737	1425	8-238	Table 8.7.2-1	WAPA	As noted in reference to pages 8-236, right column, second paragraph, the composite rate for Western does not appear to be calculated consistently for all cases. Note the LARGE change in energy available for sale between the No-Action case and Scenarios 7 and 8. How a 56% decrease in energy sales can be judged not to be significant has not been discussed or justified. This table is also contained in the Technical Report but there is little in the way of additional supporting information contained in that document.		
972	1426	8-238	Table 8.7.2-1	Dang, USBOR	On page 8-238 shows the net CVP average annual energy use increases in the range of 17% (618 GWh from Alt. 2a) to 44%(1618 GWh from Alt. 1c) to as high as 56%(2056 GWh from Alt 3b) which equate to a cost of about 16 to 54 million dollars in annually. Depend on how the power costs are allocated, this may have significant implication to the CVP project repayment. There needs to be discussion of where the supply sources for the additional energy requirement would come from. Note that unless it is acquired from resources/utilities other than the CVP generation, the CVP's ability to support its own load requirements on a daily/weekly may be adversely hindered, and may significantly alter the Bureau operations. These effects, if hold true, warrant significant impact status for most of the proposed scenarios.		
973	1427	8-238	Table 8-238 (8.7.2-1)	Johannis, USBOR	The table shows decrease in energy for sale for CVP of almost 60% for some alternatives, yet these are not significant impacts, please explain.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
903	1428	8-24		Holt, USBOR	The benefit of "reduced grazing activities" should be better explained. Measures exist that would increase water yields, protect habitat, and increase grazing opportunities although they require more fencing and more management effort. (See my comment No. 31 re yields from improved forest and range management).		
974	1429	8-240 through 8-243		Johannis, USBOR	Shows significant decreases in CVP power for sale for various alternatives. This is not consistent with the impacts on page 8-227.		
738	1430	8-240	First paragraph	WAPA	The discussion of Western's composite energy rate and the cost of supplemental purchases is not clear. The amount of supplemental purchases has not been defined, nor has the 26 mill per kWh energy price been justified.		
739	1431	8-240	Right column, second paragraph	WAPA	It is not clear why the entire reduction in generation seems to be allocated to Western. Tables 8.7.2-1 and 8.7.2-2 seem to reflect larger reductions that are prorated to both CVP and SWP.		
975	1432	8-241		Johannis, USBOR	Indicates that increase in Western energy rate would be less than 1%. Based on changes in energy for sale, and the fact that the rate includes a repayment base that would probably not change significantly, rates would have to go up more than 1%.		
740	1433	8-241	Left column, first paragraph	WAPA	The " <u>short term production cost</u> " is not appropriate in the evaluation of a <u>long-term</u> program, such as being evaluated here. There is no justification offered to support the statement that power rates may remain " <i>relatively flat for some time.</i> " There are many theories as to how market prices will behave in the future and, as a minimum, some sensitivity analysis is in order.		
741	1434	8-241	Left column, paragraphs two and three	WAPA	An increase of \$20 to \$40 million annually in purchase power expenses should be judged to be a significant increase and one would expect more than a 1% increase in the CVP composite rate. Again, the lack of any meaningful data precludes more detailed comments. Where significance determinations are made, applicable significance threshold criteria should be described.		
742	1435	8-243	Right column, first paragraph	WAPA	As noted in comments for pages 8-240, right column, second paragraph, it would appear that the entire decrease is allocated to Western. Also, we believe that the reference to increase in "net energy requirements for the CVP" should refer to an increase in <u>purchase</u> energy requirement.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
743	1436	8-245	Left column, paragraphs one and two	WAPA	An increase of \$18 to \$52 million annually in purchase power expenses should be judged to be a significant increase and one would expect more than a 2% increase in the CVP composite rate. Again, the lack of any meaningful data precludes more detailed comments.		
744	1437	8-245	Right column, second paragraph	WAPA	We disagree with the conclusion that composite energy rates will not be affected significantly. As noted above, the significance criteria relative to rates remaining below market is incorrect.		
976	1438	8-245	3rd Paragraph Second Column	Johannis, USBOR	Statement made that Western's composite energy rate would be below expected market rate. This contradicts the justification given on page 8-226 of why customers would not be impacted.		
977	1439	8-246	2nd Paragraph	Johannis, USBOR	Statement made that CALFED actions will change hydrology in streams affected by CVP operations. Probably more appropriate to say flows in rivers below CVP and SWP facilities will be changed than Hydrology will be changed.		
467	1440	8-246	s8.7.2.5 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Given the magnitude of some of the power generation requirements and the uncertainty over some impacts that are deferred to future site-specific analyses, I recommend that consideration be given to identifying some impacts as may being unavoidable with future analyses making a more accurate assessment.	IA	
1527	1441	8-247		SWRCB	There is an inconsistency between the material presented in the box in the upper right hand corner and that in the text. The information in the box states that the Water Quality Program and Levee Systems will increase mosquito-breeding habitat, while the text under these subsections state that mosquito-breeding habitat will decrease.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
53	1442	8-25		Steve Shaffer, CDFA	<p>Affected Environment -</p> <ul style="list-style-type: none"> An overview of the entire study area should be presented before the discussion of each region. The number of farms is not really relevant information, the number of acres and when they came into production is. It should be clear that between 1976 and 1993 14,500 acres was converted from agriculture to habitat. Existing conditions section should be more than a description of agricultural land classifications. The last paragraph is a discussion of California agricultural diversity and importance, not economics. 		
1088	1443	8-25	8.2.1.1	CY, EPA	Text under Delta existing conditions (through the bottom of the page) should be placed as an introduction for all regions, not specifically the Delta.		
904	1444	8-26		Holt, USBOR	Please expand on the connection between water pricing and cropping patterns. It is probable that water pricing will result in shifts in cropping patterns. Alfalfa for example is a heavy water using, but low value crop that might get replaced by higher value, lower water use crops as prices rise.		
54	1445	8-26		Steve Shaffer, CDFA	the sections on agricultural water and agricultural land should be consecutive - both are resources, part of the existing environment and should be so linked in the document, as they are in reality.		
1089	1446	8-26	1st paragraph on ag water use and pricing	NY, EPA	Why no numerical estimate of cost of water in Delta region? Estimates are included for other regions.		
468	1447	8-260	s8.8.2.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Table 8.8-1 should reflect these findings of significant unavoidable impacts to cultural resources and blackened circles should be placed in appropriate categories.	IA	
71	1448	8-265		Steve Shaffer, CDFA	- Visual Resources - Ag. land is a major visual resource in the Delta (and other regions), but is not listed.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1100	1449	8-269	second col, third para	CY, EPA	Be clear that the sites used are examples, that site selection is not a Phase II decision. A similar caution applies to discussion of surface storage sites on page 8-271. Discussion should indicate that a site of this kind... would have the following types of impacts..., which could be dealt with in the following ways....		
56	1450	8-27		Steve Shaffer, CDFA	How are Tables 8.2.1-1 and 8.2.1-2 relevant?		
72	1451	8-270		Steve Shaffer, CDFA	- Many would argue that ag. lands provide visual resources of equal, or greater value than habitat lands.		
978	1452	8-272		Holt, USBOR	Raising Shasta and perhaps Trinity Dams should be mentioned in this discussion of aesthetic impacts.		
469	1453	8-274	s8.9.2.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Add a category to Table 8.8-1 to illustrate the significant unavoidable impacts to visual resources due to construction activities.	IA	
745	1454	8-276 to 8-279	Section 8.10	WAPA	This section must include an evaluation of the impacts to Environmental Justice from a programmatic standpoint. It is not adequate to state that the alternatives will be evaluated at the project-specific level. The PEIR/EIS was able to evaluate other impacts despite the need for further evaluation at the project-specific level, e.g., the evaluation of environmental consequences for the Indian Trust Assets in Section 8.11.2.4.		
1252	1455	8-276	1st column, 2nd paragraph	FWS	We suggest deleting this paragraph, or change the first sentence to say "Environmental justice impacts are <i>more easily</i> evaluated at the project-specific level...". This same logic could be used for fisheries impacts, effects on flood control, or any other aspect of the program. If not in the other sections, why is it necessary here?		
979	1456	8-280	Box, Impacts to Indian Trust Assets	Welch, USBOR	Delete contents and replace with the following • It is unlikely that Indian Trust Assets will be affected and identification of potential Indian Trust Assets is needed once specific projects are proposed.		

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
746	1457	8-280 to 8-283	Sections 8.11 to 8.11.2.7	WAPA	The discussion of environmental consequences in each region does not lead the reader to the conclusion that the alternatives "could adversely affect Native American resources" as stated in Table 3.1-1 and the box on page 8-280. Table 8.11-1 more accurately represents the discussion as "significant and mitigable" impacts. Since the impacts will have to be determined on a project-specific level in some regions, and some impacts may have beneficial affects, then this needs to be added to the summary of alternatives in the box on page 8-280.		
980	1458	8-281	Table 8.11.1	Welch, USBOR	Table 8.11-1. is not consistent with the text. Please modify the Table as follows: Delta Region: use <input type="checkbox"/> symbol for the three Alternatives; for the Bay, Sacramento River, and San Joaquin River Region, use the U symbol for all alternatives.		
470	1459	8-282		Chuck Vogelsang, DWR	Add section 8.10.2.4, Potentially Significant Unavoidable Impacts, stating that there are no unavoidable environmental justice impacts.	IA	
747	1460	8-282	Section 8.11.2.3	WAPA	The summary of the No Action Alternative and this section state that there will be impacts to Indian Trust Assets as part of implementing CVPIA. Without a discussion on how the CVPIA activities affect the No Action Alternative, there is no justification for this statement. Either include an overview in this section of CVPIA activities and relate the potential impacts, or reference where the information can be found.		
981	1461	8-282	Section 8.11.2.3	Welch, USBOR	Delete phrase, "already expected as a result of implementing the CVPIA."		
471	1462	8-283	s8.11.2.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	Recommend rewriting this section to "There are no known significant unavoidable impacts to Indian Trust Assets as a result of implementing provisions of the Bay-Delta Program. If any significant adverse impacts are determined in future project specific environmental analyses, measures are available to mitigate the impact." Based on what I read in the section, any Indian Trust Assets impact is either avoided or mitigated through consultation with the affected tribe. Therefore, it would not seem that this category of impact would be irresolvable and cause significant problems in a future EIR/S.	IA	

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1245	1463	8-3		FWS	<p>The text for each alternative shows only (1) economic loss associated with conversion of agricultural lands, and (2) economic gains associated with storage. This is a particularly narrow view of the project as a whole. Economic gains from environmental restoration, flood protection, improved water quality and supply reliability appear to be virtually ignored. Expand this analysis (for the entire chapter) to include other Program benefits, not just the effects on particular aspects of agricultural economics.</p> <p>The economic assessment of the ERPP in particular is poorly balanced: is there no economic benefit of the ERPP at all? If the program functions as designed, commercial fisheries and recreational opportunities in particular would benefit.</p>		
717	1464	8-3	First full paragraph, column one	WAPA	Recreational and fisheries expenditures are estimated to increase by \$29 million to \$103 million per year for Alternative 1. Similar estimates are made for other alternatives and for each region. It is unclear how these estimates were made. Are they based on an increase in fishery productivity, additional access to recreational facilities, commercial fishery activity or some other approach?		
1087	1465	8-3	column 1, second par and following	CY, EPA	The impacts of converting land for ecosystem restoration, levee stability, and storage occur in all alternatives. The text should cite these impacts for Alternative 1, as well as 2 and 3.		
1289	1466	8-3	Column 1 and 2, Alt 1,2, and 3	J. Lowrie NRCS	Revenue losses across regions associated with each alternative are identified as total revenue losses. These values should be identified as annual revenue losses.		
892	1467	8-3	Paragraph 2	Holt, USBOR	The "minor" increases of \$29-103 million appear very similar to the \$149 million of "moderate" benefits for M&I users. Suggest using "minor to moderate increases in recreational and fisheries sector expenditures".		
905	1468	8-30 8-31		Holt, USBOR	Suggest deleting each from line 5 of Para. 2 on page 8-30. Then bring the discussions of water prices in Para. 3, page 8-30 and Para. 5, page 8-31 into agreement. The ranges in groundwater cost overlap and are misleading. Also, the potential for changes in water supplies, reliability of supply, and prices to induce shifts in cropping patterns should be mentioned.		
57	1469	8-30		Steve Shaffer, CDFA	Agricultural land use - more space is devoted to urban land uses, which should be discussed in the urban section.		
906	1470	8-31	8.2.1.4	Stroh, USBOR	Please confirm the statement "...during the 1964-1950 period."		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
907	1471	8-32	Farm profiles	Stroh, USBOR	"About 80% of farms in this region" is not a sentence.		
58	1472	8-33		Steve Shaffer, CDFA	Significance Criteria - Agricultural water supply should be added.		
908	1473	8-34	8.2.2.3	Stroh, USBOR	The format of this section does not appear to address the comparison of No Action Alternative to Existing Conditions. Beginning with the Delta Region the text addresses Program actions, not the No Action future. There should be a comparison of current conditions and the no action future.		
1090	1474	8-34	8.2.2.3 and following	CY, EPA	After first paragraph under heading comparing no action to existing conditions, the text moves into the regions and discussion of alternatives. The appropriate topic heading is missing. Also, discussion of footprint impacts of surface and groundwater storage in the Delta is out of place (these sites are upstream of the Delta).		
59	1475	8-37		Steve Shaffer, CDFA	WQP - Up to 90 thousand acres may be retired under this program.		
60	1476	8-38		Steve Shaffer, CDFA	Add the WQP as having potentially significant impacts. They should not be labeled as unavoidable.		
1247	1477	8-38	insert, 8.2.2.5, Land Use Mitigation Strategies, 4th set of bullets:	FWS	This section discusses mitigation strategies for decreasing the impact of various common programs to agriculture. Add a bullet: "Conversion of agricultural land to habitat will have economic impacts to growers and owners. These impacts may be lessened through programs that allow growers and owners to manage habitat for beneficial purposes and conjunctive use with farm practices compatible with ecosystem functions. Mitigation banks are examples of lands managed for environmental purposes that have economic benefits for managers and owners. Other habitats are often compatible with continued economic use (e.g., vernal pool habitats are compatible with continued grazing)."		
909	1478	8-38	8.2.2.4	Stroh, USBOR	The section is titled "Comparison of Program Elements to Existing Conditions." The very first sentence states ". . . that differentiate existing conditions and No Action conditions . . ." Which is it?		
910	1479	8-38	8.2.2.5	Stroh, USBOR	The first bullet at the bottom of the replacement section should be better explained or removed as a mitigation strategy. Water from the Program's storage features will probably not be affordable to all but the highest net value crops.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
18	1480	8-38	8.2.2.5	Robin Reynolds, CDFA	Section 8.2.2.5, follows page 8-38. This short section on potential mitigation strategies for impacts to environmental resources and human uses related to agriculture appears to have been inserted after the ADEIR went to press. It reflects some of the input of CDFA and others and contradicts much of the content and organization of the ADEIR. The CDFA hopes that this reflects a intention of the Lead Agency to reconsider its treatment the existing environment. This said, there are significant problems with the content of this section. The CDFA has previously provided CALFED with information and policy regarding impacts on agricultural resources, and these must be addressed in the EIR.		
410	1481	8-38, 8-48	s8.2.2.6, 8.2.3.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	To the point, you bite the bullet here, why not for economic impacts to farms? Table 8.2-2 should reflect these findings of significant unavoidable agricultural economic impacts and blackened circles should be placed in appropriate categories.	T	
61	1482	8-39		Steve Shaffer, CDFA	Environmental consequences - <ul style="list-style-type: none"> • not agricultural economics, but agricultural resources • percentage thresholds are unacceptable, do not comply with CEQA • Nedd to present impacts on existing agricultural environment of the whole of the action 		
19	1483	8-39	Section 8.2.3.2	Robin Reynolds, CDFA	It is unclear what these "Significance Criteria" are intended to be used for. It is clear that the program as proposed would have significant adverse impacts on those aspects of the existing environment related to agriculture. Significance criteria are therefor not needed at the programmatic level, unless CALFED is proposing to mitigate to insignificance. If these criteria are intended to be applied to site-specific actions, they are inadequate, give the massive scale of the cumulative impacts of the whole of the program as proposed. In any event, this should be explained and CALFED should develop the appropriate criteria in consultation with CDFA, the public agency responsible for the resource.		
407	1484	8-39, 8-48	Section 8.2.2.5, Section 8.2.3.6	Sandino, DWR	Mitigation strategies for land use and economic impacts need explanation. A discussion of how these measures are to be implemented and which agency may be responsible would be helpful here.	IA	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
895	1485	8-4		Stroh, USBOR	The discussion for the Delta Region should not be compared to those for other regions. A comparison would require median family income, poverty rates, industry output and income levels.		
14	1486	8-4 to 8-9		Robin Reynolds, CDFA	The analysis considers the entire counties of the various regions. By approaching the analysis in this manner the impacts of the program on agriculture are understated. In particular, for the Delta region, this analysis must be conducted for the Delta, which is the focus of the impacts of the proposed project.		
894	1487	8-4	Column 1 last Paragraph	Holt, USBOR	Please clarify if the cited growth in Contra Costa and San Joaquin Counties occurred in the Delta or simply in the counties as a whole.		
893	1488	8-4	Paragraph 1	Holt, USBOR	Please include the potential for beneficial changes in land management, in this case grazing practices, that would increase both yields of the products of the land and of water, particularly increases in summer and drought flows. (See my comment no. 31 re yields from improved forest and range management).		
62	1489	8-40		Steve Shaffer, CDFA	Is there more recent data? Does it reflect California conditions?		
912	1490	8-40	Table 8.2.3-1	Stroh, USBOR	The last column refers to percent yield decrease. This statement is confusing and should explain the reference, that the yield decrease at the threshold salinity level, and how the yield further decrease as salinity increases.		
63	1491	8-41		Steve Shaffer, CDFA	disorganized; can't tell the discussion starts with WQ, not agricultural land conversion. Need an overview comparison at the beginning of sec. 8.2.3.4		
412	1492	8-41	Section 8.2.3.4 & Table 8.2.3-2	DWR Modeling Support	The analysis in this section is confusing and/or misleading. The 16-year average TDS for April and June is used for the maximum/minimum TDS for some locations, but the 16-year average from other months is apparently used for other locations. Using these values ignores all other values available and aren't the maximum/minimum values. Where the values labeled as 'average' come from is not stated and is unknown.	T	
411	1493	8-41	Section 8.2.3.4	DWR Modeling Support	The text needs to state that the salinity results used in the analysis are based on model runs which all use study 472B and that variations in Delta inflow and exports which will occur between the alternatives is not accounted for.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1091	1494	8-41	8.2.3.3	CY, EPA	Analysis of potential future transfer activity (both short and long-term) should be provided as part of a broader economic evaluation of water supply and demand management options. This is additional information which should be presented in the Final EIS. Approach to be taken should be similar to the CVPIA PEIS.	**	Fu tur e wo rk
413	1495	8-41	8.2.3.4, para. 1, lines 1-2	Steve Hayes, DWR	Clarify definition of "...water quality..." in statement "In the middle Delta, irrigation water quality averages between 121 and 240 ppm, which converts to an EC range of 0.22 to 0.37 mmho/cm". Water quality is a general definition and involves many variables and units of measurement. Possibly use total dissolved solids (TDS) in this situation, and in all subsequent situations when only TDS levels are being referred to.	T	
64	1496	8-45		Steve Shaffer, CDFA	Should be separate sections on Sac. River Region and SJ River region. Alt. 1 at bottom of column 1 should provide a range of acres to be converted and should state that this is a significant environmental impact.		
1288	1497	8-45	Column 1, Alternative 1, para 1	J Lowrie NRCS	Crop revenue losses associated with the conversion of prime farmland to habitat, would likely exceed the general range of \$500 to \$1000 per acre, per year.		
913	1498	8-45	Column 2 Paragraph 4	Holt, USBOR	Please re-write comments on effects of conversion of land to avoid a perceived negative tone. There could be increases as well decreases associated with changing land management practices and land uses. (See my comment no. 31 re yields from improved forest and range management).		
915	1499	8-46	Alternative 1	Stroh, USBOR	Under 1C, there is a statement that in the Sacramento river Region "the direct value of this water to agriculture ranges from \$30 to \$40 per-acre foot, making it relatively costly." Please explain "making it relatively costly." Does it refer to net value after deducting the cost of developing the water?		
914	1500	8-46	Paragraph 1	Holt, USBOR	Suggest mentioning evapotranspiration loss in this sentence.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
916	1501	8-47	8.2.3.6	Stroh, USBOR	While some of the mitigation strategies are realistic and attainable, such as the first in the list, others appear unrealistic, expensive, and/or likely unattainable. An obvious example of the latter is using public funds to develop a regional solution to the drainage problems of the San Joaquin Valley. Another is to implement financial incentives to increase forage on The list should be re-examined and edited to portray realistic and attainable strategies.		
65	1502	8-48	8.2.3.7	Steve Shaffer, CDFA	These impacts are environmental, as well as economic. Agricultural water supply impacts must also be recognized as well as land impacts.		
1092	1503	8-48+	8.2.3.6	CY, EPA	Good mitigation strategy summary; a number of these actions are appropriate for several CALFED common programs (WUE, Water Quality).		
1033	1504	8-49	6.2.4.2	BK, EPA	Q: re "stability" - is disruption of a trend included in "historical fluctuations"?		
896	1505	8-5	Table 8.1.1-1	Stroh, USBOR	Suggest including population for San Joaquin River Region.		
1293	1506	8-5	Table 8.1.1-1	Madalene Ransom NRCS	What are the definitions and references for the column headings? Are these definitions from State Dept of Finance reports?		
20	1507	8-50		Robin Reynolds, CDFA	Suggesting that impacts to "...farmers and families...could be mitigated by social service and support programs such as welfare..." is outrageous. In this vein, why not simply accept the loss of fish populations as unavoidable and mitigate by distributing canned catfish.		
1093	1508	8-51		CY, EPA	Discussion of alternatives under "Sacramento River Region" cites water delivery numbers. This information is far more specific than discussions elsewhere in the DEIS and should be omitted. Other parts of the DEIS (e.g., ag econ) suggest agricultural users probably wouldn't purchase new water. Thus, this social analysis may be based on premises inconsistent with other analyses in the text. Conclusions regarding impacts of new supplies should be qualified. This "social well being" text could be tied in with environmental justice discussion.		
719	1509	8-51	First full paragraph	WAPA	Improved water efficiency will have direct effects on Project Use and agricultural customer power requirements for the Western Area Power Administration. These effects should be quantified.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
414	1510	8-54	s8.2.4.7 Potentially Significant Unavoidable Impacts	Chuck Vogelsang, DWR	My draft had this section crossed out. If there are unavoidable impacts, Table 8.2.3-3 should reflect these findings of significant unavoidable agricultural social issues impacts and blackened circles should be placed in appropriate categories.	IA	
1248	1511	8-55	column 2, summary box on Impacts to Urban Resources	FWS	In bullets for Alternatives 1, 2, and 3, the economic impacts of improved system reliability, higher water quality, and increased water supplies are understated. The service area impacts throughout California are enormous. Add an introductory bullet stating: "It is difficult to calculate the effects of improved system reliability, higher water quality, and increased water supplies on population, urban development or agriculture. The completion of the CVP and SWP has had incalculable effects on the economy, population, and urban development of California. The CALFED program may have similar effects."		
1094	1512	8-55	8.3, generally	CY, EPA	Consider explaining briefly at this point analytical approach (models, assumptions) underlying the quantitative economic benefits cited, or refer reader to page 8-105 discussion of assessment methods. (This is quantitative, specific compared with very qualitative water supply reliability benefits cited in Chapter 6.)		
1095	1513	8-58	Table 8.3-2	CY, EPA	The Table identifies water quality differences for certain alternatives (e.g., M&I water quality, Alts 3B and 3E; DBP precursors) which are not picked up in earlier impact summaries for water quality. The apparent inconsistency should be corrected. (See our earlier comments on Chapter 6, water quality.)		
720	1514	8-60	Third full paragraph second column	WAPA	The PEIR/EIS states that " <i>economic impacts of the water quality, ecosystem restoration, and levee system integrity programs have not been estimated.</i> " This statement seems to contradict other statements in the PEIR/EIS. For example, page 8-55 states that " <i>salinity reduction is worth \$100 to \$175 million annually.</i> " Comments 36 and 37 refer to economic effects on fisheries and recreation. Some level of economic analysis must have been conducted. A troubling aspect of the referenced statement pertains to the importance of these programs to the purpose and need statement (see comment 11). Further, cost was an important decision element in refining alternatives (see Page 1-8, "Be Affordable," section).		
1096	1515	8-60	4th Paragraph, 2nd column	NY, EPA	In the final, an analysis of WUE differences between no action and alternatives should be presented.	Fu tur e	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
917	1516	8-64		Stroh, USBOR	There is an incomplete sentence at the end of the paragraph describing "provider" also requires further explanation.		
918	1517	8-70	2nd Paragraph	Johannis, USBOR	Information on CVP generation should be included.		
919	1518	8-71	Figure 8.3. 1-5	Holt, USBOR	The data for geothermal power plants appear incomplete. Twenty years ago, small plants were going into service in Central Nevada and facilities have since gone on line in Southern California at Coso Hot Springs. Moreover, the geothermal plants near the Mexican border appear to be depicting the Mexican plant at Cerro Piereto rather than the plants in the Imperial Valley. There were at least two plants on line in the U.S., just north of the border, twenty years ago. Suggest contacting the Sacramento-based Geothermal Resources Institute for current data.		
415	1519	8-72	7 th Paragraph	V. Pacheco, DWR	The description for pumping by CCWD from the Delta does not reflect recent implementation of the Los Vaqueros Intake at Old River.	T	
404	1520	8-8	Sec 8.1.1.5	Stuart, DWR	Shouldn't the significant regional economy of Los Angeles, the South Coast, et. al. be mentioned?	T	
920	1521	8-86, 8-91	Tables 8.3.1-7 and 8.3.1-10	Stroh, USBOR	Please indicate the units of measurement.		
921	1522	8-88	Paragraph 3	Holt, USBOR	Please update the discussion of the Shasta TCD. It has been operational for a year.		
16	1523	8-9	Section 8.1.2.2	Robin Reynolds, CDFA	"Significance Criteria are not required for economic impacts..." This is true, however, agriculture is part of the environment, "'Environment' means the physical conditions which exist within the area which will be affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The 'environment' includes both natural and man-made conditions." (State CEQA Guidelines, Section 15360)		
1287	1524	8-9	Column 1, line 32	J Lowrie NRCS	We question the assumption that "Gross revenue per farmed acre is between \$500-\$1000 dollars/ acre. This value may be accurate if considering all ag lands potentially impacted by the program (i.e rangeland, pasture, and cropland) however gross revenues are likely higher if cropland only is considered.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1246	1525	8-9	Sec. 8.1.2.1 Assessment Methods, second paragraph	FWS	The bulleted assumptions are incomplete thus making it impossible to track most benefits. How much revenue is provided by an increased fishery? How many jobs? How many jobs do recreation revenues bring in? What are the hydropower benefit assumptions? Show a complete set of assumptions, not just a select few, or refer the reader to the precise location of the assumptions package.		
897	1526	8-9	8.1.2.3	Stroh, USBOR	Reference in the text is made to IMPLAN. If this is a technical appendix to support the data provided in the text, it must be mentioned since the reviewer has not seen such an appendix. Without one, it is impossible to provide a technical review of section 8.1 (Regional Economics). In addition, it would seem appropriate to use a data base more recent than 1991; in 1997, the 1994 data base must have been available.		
416	1527	8-96	Col 2, 2 nd para	Stuart, DWR	The Salton SEA does not have agricultural areas. The Imperial Valley does.	T	
721	1528	8-98	Fifth paragraph, second column	WAPA	The description of utility infrastructure goes way beyond the scope of urban resources, which is the topic for section 8.3. Economic costs of moving or modifying powerlines should be incorporated into estimates for levee improvements, storage and conveyance facilities, and other capital improvements.		
417	1529	8-99	Table 8.3.1-14	Stuart, DWR	The tables is titled "providers", yet the list perhaps only includes cities? San Bernardino Valley Municipal Water District, Ventura County Flood Control District, Mojave Water Agency, and Antelope Valley-East Kern Water Agency "provide" significant volumes of water.	T	
1085	1598	Chapter 8		CY, EPA	<p>1. For the economic impact analyses, explain briefly how water supply benefits to specific sectors and regions have been estimated. It should be clear to readers that in some senses these analyses are more "scenarios" (reflecting certain assumptions, which could change, regarding affordability of supplies, allocation of new yield, etc) than analyses which reflect the impacts and benefits of proposed policies. This information might also be covered in a short chapter following the main body of the EIS.</p> <p>2. Identify additional analyses planned which could change information currently provided in the DEIS.</p> <p>Note: The urban resources section is the best example of explaining method and assumptions.</p>	**	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
13	1599	Chapter 8		Robin Reynolds, CDFA	Environmental resources of land and water, and the existing human use of these elements of the existing environment, is part of the environmental setting under CEQA. This must be corrected throughout the document. The statement on page 8-1 "Most adverse impacts are the result of converting agricultural land to other uses, such as for habitat or for levee setbacks, or a change in water use or quality that reduces production or increases costs." May be fairly accurate. The EIR will be inadequate if it does not include alternatives to avoid or reduce these impacts and mitigation measures for impacts which are truly unavoidable.		
15	1600	Chapter 8		Robin Reynolds, CDFA	Impacts on humans are among the "Mandatory Findings of Significance." CALFED is proposing actions which impact the human food supply. The EIR fails to address this impact. For example, California produces about half of the fresh fruits and vegetables consumed in the nation. CALFED is proposing actions which would greatly reduce the output of California agriculture. Recent studies have found that a large fraction of the human cancer deaths in the US are preventable by increasing consumption of fresh fruits and vegetables. This is not speculation and should be the subject of a formal health risk assessment, so that the public and decision makers can make an informed decision on the program.		