

EPA Comments: CALFED Administrative Draft EIR/EIS

Major Issues

February 9, 1998

1. There should be more information on anticipated Program benefits. In particular, the Document needs to describe better the benefits of the Common Programs (independent of the variable storage/conveyance components).

*This relates to disclosure of beneficial impacts. Benefits information can be developed in more detail through implementation planning; it pertains to equitable cost allocation (to carry through on the principle that beneficiaries pay).*

2. EIR/EIS should identify additional work (policy discussions, analyses) which will be needed between the Draft and Final, and should acknowledge where there are significant, unresolved issues which preclude defining CALFED proposals and associated benefits/adverse impacts at this time.

*We recognize that some of this discussion may fit into the Phase II or other documents. However, it should be flagged in the EIR/EIS.*

*Example of subjects which should be flagged: economic analysis of different water supply management options/ analysis of need for storage.*

3. Several areas of the water quality analysis are deficient: 3a-- Conclusions on how alternatives differ in water quality impacts and benefits are not conveyed clearly. For example, there needs to be more discussion on the impacts of salinity intrusion on drinking water quality. Further, comparison of alternatives does not reflect that the various configurations under Alternative 3 are generally believed to provide significantly better water quality for those exporting water from the Delta. 3b-- There needs to be more discussion of the impacts of agricultural drainage, including timing of salinity loads and temporal variations in salinity concentrations; this information should be taken into account when addressing the effects of conversion of agricultural lands to habitat.

4. The Watershed Management Strategy needs much further definition and development before being put before the public for comment. The need for a "watershed management structure" and "watershed implementation plan" is very unclear. We question the need for a watershed implementation plan, in addition to and separate from the implementation plans being developed for the Ecosystem Restoration and Water Quality Programs.

5. In Chapter 7 the "Productivity" category of impacts should be clarified. Information that would support conclusion of reduced productivity should be better supported, since this issue appears to be a major distinguishing factor between alternatives. Reduction of productivity from higher water flows through a channel system may be offset by increased productivity from additional shallow-water, wetland and riparian habitat.

5. Discussion of impacts associated with changed outflows is inadequate. With new storage, while there may be additional incidental outflows at certain times of year due to storage releases, the more significant impacts on SF Bay may come from reduction of high flow periods (because

these will now be skimmed off for storage) and the consequent adverse impacts on circulation flows in the South Bay. Another example is the statement under Alternative 3 that the eastward movement of X2 location will not result in a significant impact on SF. This appears to gloss over the potential impacts of reduced outflows (or lessening of high flow periods) on the Bay.

6. There is inconsistent treatment of flows and water supply-related modeling outputs in the DEIR/EIS. The document apparently does not reflect results from recent modeling runs (for example, in the surface water resources-- water supply and water management-- which is very vague and deficient). On the other hand, economics analyses provide very specific impact assessments using, to some degree, water supply outputs. We have suggested that the EIR/EIS disclose the status of these analyses and identify additional work planned. There should also be an explanation of the assumptions used to conduct the economics analyses, which are closer to "what if" scenarios than to analyses of impacts of proposed actions.

*EPA 2/9/98 File: issues*