

## Comments for the CALFED Draft EIS/EIR

### Submitted by the National Marine Fisheries Service

**Page 3-2: Table 3-1, Bay-Delta Hydrodynamics - Alternative 3:** This description should indicate Alternative 3 comes the closest to restoring historic Delta circulation patterns.

**Page 3-5: Table 3-1, Fisheries and Aquatic Ecosystems - Other Programs:** *"Modifications in flow timing"* has the potential to be beneficial to the aquatic environment, but it could also cause significant adverse impacts.

**Page 6.1-40: Low Inflow/High Pumping conditions, second paragraph, first sentence:** *"In the south Delta, the San Joaquin River experiences reverse flows."* This sentence should clarify that 100% of the San Joaquin River inflow is diverted to Old River under "reverse flow conditions".

**Page 6.1-72: Column 1, last paragraph:** *"Conveyance of water from new storage areas could result in a substantial increase in discharge in local stream channels."* Substantial increases in discharge in local stream channels could benefit or adversely affect local juvenile salmon or steelhead populations, depending on the timing, magnitude, and duration of the flow.

**Page 6.1-73: Column 1, second paragraph, last sentence:** *"Timing changes would benefit fish and aquatic ecosystems."* Under some circumstances, timing changes of flows can adversely affect local salmon and steelhead populations.

**Page 7.1-1: Sidebar - Impacts to Fisheries and Aquatic Ecosystems, Alternative 2:** This summary description of Alternative 2 should include impacts associated with upstream fish passage at the screened through-Delta facility near Hood.

**Page 7.1-2: Table 7.1-1, Screened through-Delta Facilities and the isolated facility intake would cause entrainment-related mortality for Sacramento River fish:** This impact may be significant for striped bass eggs and larvae, but state-of-the-art fish screen facilities are likely to screen juvenile salmonids effectively resulting in a "less than significant impact".

**Page 7.1-10: Table 7.1-2, Reoperation of reservoirs potentially degrades water temperature conditions and increases spawning and rearing mortality:** This impact may be significant for spring-run chinook spawning in the mainstem Sacramento River and Feather River.

**Page 7.1-14: Column 2, third paragraph:** *"Change in Shasta Reservoir operations may increase temperature-related mortality for winter-run chinook salmon."* Spring-run chinook may also experience adverse temperature conditions from changes in Shasta Reservoir operations.

**Page 7.1-30: Column 2, first paragraph, last sentence:** *"Actions may include... recommendations to the regulatory agencies for improved harvest practices relative to*

*maintenance of natural fish populations.* " These harvest management recommendations should be designed in a manner consistent with the CALFED solution principal of "no significant redirected impacts" to fishing interests.

**Page 7.1-33: Column 1, first paragraph, first sentence:** *"Change in Delta inflow and outflow relative to the No Action Alternative would most likely be minimal".* In this assessment of fisheries impacts, it is important to note that the hydraulic modeling results are in a monthly time-step which can mask daily conditions. In addition, Alternative 1C is anticipated to increase the magnitude of reverse flows in the central Delta (Table 6.1.2-2). This section should include additional discussion of the potential influence of these flow changes on salmon and other fish species. For example, the discussion of a "pre-development circulation pattern" in the Delta is "generally considered beneficial to anadromous fish" (page 6.1-48) presented under the Surface Water Resources section would also be appropriate to discuss in relation to the 3 storage and conveyance alternatives.

**Page 7.1-33: bottom of column 1 and top of column 2:** *"Flow from the new channel constructed under Configurations 2A, 2B, and 2D could cause additional deviation from the natural flow pattern and would have an adverse impact on flow patterns in the eastern and central Delta."* See comments above for page 7.1-33: Column 1, first paragraph.

**Page 7.1-34: top of column 1:** *"Reduced flow would affect habitat quality, but the effect of habitat changes cannot be determined with the available information."* The effects of reduced flows downstream of the intake at Hood in Alternative 2 should be similar to those described for Alternative 3. In the adjacent column on page 7.1-34, the impacts to striped bass from flow reductions below Hood for Alternative 3 would also apply to Alternative 2.

**Page 7.1-35: Column 2, first paragraph, first sentence:** Depending on the water year and salmon race, some juvenile chinook can rear in the Delta for several months prior to outmigrating as smolts.

**Page 7.1-43: Column 2, second paragraph, second sentence:** With four runs of chinook salmon in the Central Valley, adult chinook salmon are migrating upstream virtually year round.

**Submitted by U. S. Fish and Wildlife Service**

**Page 2-10: Column 2, potential concerns of the habitat restoration program:** Additional concerns regarding the habitat restoration program include the potential loss of terrestrial habitat to create aquatic habitat and potential conflicts among the needs of different species. As noted previously, what constitutes an improved habitat for one species may be a degraded habitat for another. These issues should be discussed in the EIS.

**Submitted by Jo Turner**

**Paragraph 3:** Should be 4-7-MAF, not 4-75-MAF (OK if we can find page)

**Table 6.5-1:** Need to add Navigation under the impact issues in the Delta Region. Need to add significant and not mitigable impacts under any alternatives which include the fish control structure, and the flow control structures at Old River near Tracy and Grant Line Canal.

**Sections 6.5.2.2 and 6.5.2.4: Transportation Section:** In the section on transportation, almost no mention is made of impacts to navigation, except to shipping routes. In the Interim South Delta Program DEIR/EIS, there are **unavoidable, significant impacts** to transportation due to the fish control structure and two of the flow control structures. The significance criteria for that analysis has been included on page 6.5.6, bullet 3, but none of the analysis is included in the text. The document should include the information about navigation impacts due the barriers. Text on pages 16-16 and 16-17 of the ISDP EIR/EIS discusses navigation impacts. Note: the Middle River flow control structure has a less than significant impact because boat use in this area is very infrequent. Also, the other three control structures will all be equipped with boat locks to allow boat passage. I can provide a copy of the relevant text.

**Table 7.1-1: Delta Region:** The impact issue table is sometimes inconsistent with the text. It looks like the category of impacts and the explanations were cut and pasted out of the technical appendix and makes the information here hard to follow. Examples of this are: p. 7-2, under "Through delta facilities would increase cross-Delta flow, potentially: Alternative 3H is listed as having a signif. Impact. This is confusing since this alternative has both isolated facilities and through delta facilities. Perhaps this could be corrected with a footnote explanation at the end of the table. P. 7-3, under "Construction of an intertie between the existing CVP intake and Clifton Court Forebay...In this case no discussion of this issue is found in the text. What is causing an impact from the intertie?"

**Column 1, 3<sup>rd</sup> paragraph on page 7.1-33:** Correctly identified the benefits and impacts of the HOR barrier under configurations 1B and 1C. This paragraph should be used to discuss the HOR barrier benefits and impacts under alternatives 2(7.1-33) and 3(7.1-36) as well.

**Table 8.3-1 Page 2 of table, 3<sup>rd</sup> impact:** There are significant and mitigable impacts to recreation associated with the barriers discussed in comments 12 and 14. 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. There should be ½ moons under configurations 1B and 1C.

**Section 8.3.2.4 paragraph 5:** Need to add information on recreational impacts due to the barriers under sections 8.3.2.4. The sentence in paragraph 5 should read " Operation of fish and flow control barriers... The sentence is valid for all alternatives, not just alternative 1. I will provide if requested a copy of the relevant information from the ISDP Draft EIR/EIS to use to complete these sections.

**Section 8.3.2.5:** 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.

**Table 7.1-2:** Many of the impact issues in this table are not discussed in the accompanying text. At a minimum the issues where there are adverse impacts noted in the table should be discussed in the text. I will list the issues with no text by alternative, as it was presented in the document.

Alter. 1-- Construction of the barrier facilities in config. 1B and 1c would modify and destroy spawning and rearing habitat; Entrainment losses would be increased by exports from south delta and construction of barriers under config 1b and 1c

Alternative 2--Aquatic productivity and food avail. In south and central delta would change in response to increased exports in the south delta; Construction of the barrier facilities in config. 2A, 2b, and 2d would modify and destroy spawning and rearing habitat; X2 may shift in summer and fall, potentially reducing habitat quality or quantity for organisms assoc. With it; Entrainment losses would be increased by exports from south delta and construction of barriers under config 2A and 2b

Alternative 3--Construction of the barrier facilities in config. 3A and 3B would modify and destroy spawning and rearing habitat; X2 may shift in summer and fall, potentially reducing habitat quality or quantity for organisms assoc. With it; Change in entrainment losses attributable from an isolated facility intake on the Sacramento River [need expanded discussion of this];

**Pages 9-4: Edits to description of ISDP:**

- **2nd paragraph, 4th line:** should say reverse flows, not ~~negative~~
- **2<sup>nd</sup> paragraph, 5<sup>th</sup> and 6<sup>th</sup> lines:** should read, "the operation of *either the Grant Line or Head of Old River* barriers..."

**Submitted by Stephen Spaar**

**Paragraph 2: Ecosystem Restoration -** Potential restoration activities could result in short-term localized impacts of traffic routes during construction activities, such as river restoration activities planned for the San Joaquin River Region.

**SJR Region, Existing Conditions:** It would be helpful to include paragraphs 3-4, p. 6-107 of the administrative draft in the description of existing conditions. The elimination of sloughs and side channel habitat and the impact of gravel extraction of fisheries habitat (in-river gravel pits) is important in terms of the aquatic ecosystem.

**Submitted by Kent Nelson**

**Main Doc, Pages 5-7, 5.2.1, paragraph 1:** Text says Table 5-3 "provides a menu of the actions that are currently contemplated...". Table 5-3 contains no "actions".

**Main Doc, Pages 7.1-21, 7.1.2.1, paragraph 3:** If more natural flow and salinity variability is to be introduced back into the Delta, freshwater quality standards will have to be relaxed in the west Delta, and the Contra Costa Canal intake at Rock Slough will have to be relocated. Can you explore this a little more? (*Use Kents' sentence no more*)

**Submitted by the Division of Planning and Local Assistance**

**Main Doc, Irrigated acreage, Table 8.1.1-2:** Acreage data needs to be checked and corrected. There are not, for example, 527,000 irrigated acres of rice in the San Joaquin River region.

**Main Doc, Groundwater Overdraft, page 6.2-29:** We disagree with the statement that the only sure way of preventing significant groundwater level declines is to regulate withdrawals – the only sure way is to reduce the users' reliance on groundwater, either through regulating extractions or through providing alternate water supplies.

**Main Doc, Colorado River 4.4 Plan, page 2-37:** Text needs to be updated to the most current public draft of the plan, which is currently the December 1997 draft.

**Main Doc, IID/San Diego transfer proposal, page 2-38:** Text needs to be updated to the most current public draft of the plan.

**Submitted by the Division of Operations and Maintenance**

**Jim Spencer**

**No Action Alternative technical Appendix, Page iii and 17:** Banks Pumping Plant capacity is not limited to 6680 cfs during mid-December through mid-March when San Joaquin River at Vernalis is greater than 1000 cfs. (*See Bardini*)

**No Action Alternative technical Appendix, Page A-6, Item C:** The threshold flow agreement of 2500 cfs is for the period of October 15 through the month of November.

**No Action Alternative technical Appendix, Page B23, paragraph 1:** There is no longer a recover power plant on the Coastal Aqueduct. San Luis Obispo Power plant has been deleted.