

Encl to CAMPBELL INL 11/1
 @ 10 PM
 5/6/99

H-002293

GENERAL COMMENT FROM NMFS:

The PEIS/EIR is inconsistent in its treatment of the Hood diversion in the Preferred Program Alternative. The description of the Preferred Alternative in section 2.1.1 is consistent with the April 27, 1999, version of the CALFED Program Decision: the Hood diversion will only be pursued if (1) the Water Quality Program measures do not result in adequate improvements and (2) an evaluation demonstrates the Hood facility would help achieve CALFED's drinking water goals without adversely affecting fish populations. However, section 4.3.5 describes the Preferred Alternative as including a pilot Hood diversion facility. All the impact analysis for the Preferred Alternative assumes a new 2,000 to 4,000 cfs screened diversion at Hood. Analysis of the Preferred Alternative without the Hood Diversion is treated as "similar to the consequences under Alternative 1". This approach to evaluation of the Preferred Alternative appears to apply to all the impact analysis sections, but is only stated once under section 5.2 Bay-Delta Hydrodynamics on page 5.2-23. Since the Hood diversion is part of a contingency plan and not yet an agreed upon component of the Preferred Alternative, NMFS recommends the entire impact analysis associated with the Preferred Alternative assume no new diversion facility at Hood between the Sacramento and Mokelumne rivers and the consequences of the Preferred Alternative with a new Hood diversion be presented as similar and within those impacts described under Alternative 2.

Comment Table, Agency Administrative Draft EIS/EIR

Comment Number	Chapter/ Sub - Chapter	Page Number	Paragraph, Figure, or Table No.	Commentor/ Agency	Comment
1	2.1.1	2-2	bottom paragraph	NMFS	"The Preferred Program Alternative begins with essentially the same features as Alternative 2 1"
2	4.3.5	4-16	last bullet	NMFS	Preferred Program Alternative description should be consistent with section 2.1.1
3	5.1.4.1	5.1-21	2 nd full paragraph	NMFS	Criteria A and B also set criteria for diversion to Sacramento River Region Surface Storage

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4	5.1.4.2	5.1-26	Instream req. Sacto River	NMFS	Shasta Reservoir carryover storage criteria is not presented or discussed
5	5.2.1	5.2-1	last paragraph	NMFS	Hood diversion between the Sacramento and Mokelumne rivers in the Preferred Alternative must be consistent with section 2.1.1.
6	5.2.1	5.2-2	top paragraph	NMFS	Confusing description of net flow conditions in Central Delta; suggest use "negative net flow", "upstream", or "negative QWEST" instead of "landward".
7	5.2.6.1	5.2-13	Channel flows	NMFS	Need paragraph on the influence of south Delta export pumps on flow of water in Delta channels.
8	5.2.6.1	5.2-14	Stage	NMFS	Need discussion of influence of export pumps on stage
9	5.2.7.1	5.2-18	3/ERP	NMFS	This appears to state that under the preferred alternative full implementation of ERP Delta flow targets will not be achieved in 60-70 percent of water years.
10	5.2.7.3	5.2-21	4 th paragraph	NMFS	Presents negative slant on changes resulting from improved forest and grazing practices. Yes, clear cutting of forests can increase water yield, but this is not consistent with restoration of natural hydrologic processes and other ecosystem processes.
11	5.2.8.1	5.2-23	top paragraph, 1 st sentence	NMFS	Hood diversion btw. Sacramento and Mokelumne rivers not component of preferred alternative yet.

12	5.2.8.1	5.2-23	3 rd paragraph	NMFS	Impact analysis associated with the Preferred Alternative should assume no new diversion facility at Hood between the Sacramento and Mokelumne rivers and the consequences of the Preferred Alternative with a new Hood diversion be presented as similar and within those impacts described under Alternative 2.
13	5.2.8.1	5.2-24	2 nd full paragraph, 4 th sentence	NMFS	Reverse flows are primarily caused by Delta exports and diversions; QWEST calculation does not currently take into account monthly tidal cycle. Would reverse flows occur in the absence of Delta exports and within Delta diversions?
14	5.2.8.1	5.2-24	3 rd full paragraph	NMFS	"Landward" QWEST not commonly used; suggest "negative" QWEST
15	5.2.8.1	5.2-29	4/New Reservoir Diversions 2 nd paragraph	NMFS	Need to reiterate difference between Criteria A and B for diversions to new Sacramento surface storage.
16	5.2.10	5.2-55	Trinity River Restoration Actions	NMFS	Impacts to Sacramento River instream flows, inflows to Delta, and overall water supplies are overstated. Under current USBR operations, Trinity releases are 340 TAF annually in all water years; FWS Flow Study recommendations include release of 368.6 TAF in critically dry years; net difference of 28.6 TAF annually under critically dry conditions.

17	Figure 5.2.8	Figure 20	5.2.8-20	NMFS	Missing label "Dry and Critical"?	
18	5.3	5.2-1	Water Quality	NMFS	Entire analysis dependant on year-round diversion of 2,000 to 4,000 cfs through new diversion btw. Sacramento and Mokelumne rivers near Hood. Diversion facility not yet component of Preferred Alternative.	
19	5.3.8.2	5.2-37	Delta Region 3 rd paragraph	NMFS	Very different impact for Preferred Alternative without Hood diversion.	
20	5.3.10.1	5.2-55	Trinity River Restoration	NMFS	Impacts to Sacramento River instream flows may be overstated. Under current operations Trinity releases are 340 TAF annually in all water years; FWS Flow Study recommendations include release of 368.6 TAF in critically dry years; net difference of 28.6 TAF annually under critically dry conditions.	
21	5.3.10.2	5.2-56	2 nd paragraph	NMFS	Impacts to Sacramento River instream flows may be overstated. Under current operations Trinity releases are 340 TAF annually in all water years; FWS Flow Study recommendations include release of 368.6 TAF in critically dry years; net difference of 28.6 TAF annually under critically dry conditions.	
22	5.4.1	5.4-2	top paragraph	NMFS	Hood diversion not yet component of preferred alt.	

23	5.4.7.3	5.4-22	bottom paragraph, 3 rd sentence	NMFS	Statement suggests this was not a significant adverse impact to start with.	
24	5.5.8.1	5.5-24	Preferred Program description	NMFS	Hood diversion construction not yet included in preferred alternative	
25	6.1.2	6.1-6	Addressing Uncertainty, 1 st paragraph, 2 nd sentence	NMFS	How will "consideration of social and economic factors" assist CALFED address the biological uncertainty of species and ecosystem responses?	
26	6.1.3	6.1-7	last paragraph	NMFS	Add "... that occur in the Delta during at least some portion of their life cycle..."	
27	6.1.4	6.1-15	bottom paragraph, first sentence	NMFS	Add "flow pattern" between "residence time" and "transport time". Restoration of natural flow pattern is also assumed to restore natural flow-related processes in the aquatic ecosystem.	
28	6.1.4	6.1-16	bullets	NMFS	add "Improved watershed management"	
29	6.1.4	6.1-16 and 6.1-17	last sentence	NMFS	Discussion of "increase the availability of cool water" to "increase and maintain water temperatures" is confusing.	
30	6.1.4	6.1-21	Structure: text following bullets	NMFS	Suggest additional discussion of Structure Reestablishment bullets presented above.	

31	6.1.4	6.1-26	3 rd paragraph, 1 st sentence	NMFS	There is a considerable body of information available regarding the need and timing of flow events for various Central Valley fish species. It has long been recognized that relationships exist between the life history strategies and streamflow patterns. Relationships between fishery habitat, channel conditions, and streamflow have also been established.
32	6.1.4	6.1-26	Movement Relationship	NMFS	Need discussion regarding attraction flows for upstream migrant adult chinook and steelhead.
33	6.1.4	6.1-26	3 rd paragraph, last sentence	NMFS	Flows also provide cues for upstream migration of many species.
34	6.1.4	6.1-26	last paragraph, last sentence	NMFS	Add "and steelhead" after "chinook salmon".
35	6.1.4	6.1-27	Species Interactions	NMFS	Man-made structures can create predatory fish holding areas and ambush sites. Man-made structures which block and delay fish passage increase predation opportunities.
36	6.1.8.1	6.1-46	bottom paragraph	NMFS	Why it is assumed the DCC would be closed "at least from September through July" in the preferred alternative? For juvenile salmon, there is flexibility with DCC operations in the summer and fall months.

37	6.1.8.1	6.1-49	top paragraph, last sentence	NMFS	Here and elsewhere, the document is quick to conclude that undescribed or unproven mitigation can reduce impacts to less-than-significant. Passing fish upstream over a large fish screen at Hood is no small task.
38	6.1.8.1	6.1-49	second paragraph, 4 th sentence	NMFS	In addition to delay, blockage of some individuals will occur.
39	6.1.8.1	6.1-49	4 th paragraph, last sentence	NMFS	FWS investigations have shown that increased streamflows in this reach improve survival. Impacts of flow reductions in this reach of Sacramento River can not necessarily be minimized with a minimum flow criteria.
40	6.1.8.4	6.1-53	3 rd paragraph	NMFS	Although it is likely survival of juvenile chinook is likely to remain lower in the Central Delta than the Sacramento River, survival within the Delta may be significantly improved over existing conditions with seasonal closures and reductions at the south Delta pumping plants.
41	6.1.15	6.1-60	Unavoidable impacts, 1 st sentence section	NMFS	Delete sentence; can not state "no potentially significant unavoidable impacts on fisheries".

AGENDA
Agency Administrative Review

May 10
Morning Discussion
Sections 5.1, 5.2, 5.3

Afternoon Discussion
Sections 7.1, 7.2, 7.3, 6.1, 6.2 and Chapters 1, 2, 3, 4 (as time allows)

May 11
Morning Discussion
Sections 7.4 - 7.15

Afternoon Discussion
Chapters 1, 2, 3, 4 and any other remaining issues

I - incorporated
IV - verify
C - conflict
CI - clarify
GC - General comment
NI - not incorporated

Comment Table, Agency Administrative Draft EIS/EIR

	Comment Number	
	Chapter/ Sub -Chapter	
Page Number	Paragraph, Figure, or Table No.	Commentor/Agency
		Comment
	1	
	8	
	8-1	
2nd	Koenigs/USACE	should be: "National Environmental Policy Act"