To: CN=Erin Foresman/OU=R9/O=USEPA/C=US@EPA[]
Cc: []
From: CN=Karen Schwinn/OU=R9/O=USEPA/C=US
Sent: Wed 11/16/2011 4:24:52 PM
Subject: Fw: BDCP draft Alternatives Description outline
BDCP_Ch_3_Outline_annotated_090211.pdf

we commented on the earlier version of chapter 3, alternatives description. then we just a revised version yesterday. makes sense for you to look at that one, i guess.

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----- Forwarded by Karen Schwinn/R9/USEPA/US on 11/16/2011 08:22 AM -----

From: Karen Schwinn/R9/USEPA/US
To: "Barajas, Federico" <FBarajas@usbr.gov>
Cc: "Paul.J.Robershotte@usace.army.mil" <Paul.J.Robershotte@usace.army.mil>, david_nawi@ios.doi.gov <'david_nawi@ios.doi.gov'>, "Nepstad, Michael G SPK" <Michael.G.Nepstad@usace.army.mil>, Tanis J SPK Toland <Tanis.J.Toland@usace.army.mil>, "Idlof, Patricia S" <PIdlof@usbr.gov>
Date: 09/08/2011 03:11 PM
Subject: BDCP draft Alternatives Description outline

Federico -

Thanks for allowing us to review the outline of the BDCP DEIS chapter on Alternatives. I realize that it is at an early stage and most of the information is yet to developed or added. Because of this missing detail, some of our comments are on the organizational nature of the chapter. We also highlight particular information we will need to make decisions. I expect ICF is already thinking of much of this.

Given the lack of information available to us to date, we are not able to comment on the range of alternatives at this time. We look forward to receiving a package of material, as DWR has committed to provide, to allow us to provide substantive input on the alternatives, and ultimately concurrence per the soon-to-be-final NEPA/404 MOU.

We would be happy to participate in follow-up meetings with the lead agencies or consultants, if that is useful. Feel free to call on myself or Erin for any follow-up.

1. General Comments:

a. The DEIS should include the actual content of any documents that contain critical substance, rather than simply referring to those documents (e.g., "Other ecosystem stressors addressed by conservation

measures will be summarized based on the March 25, 2010 Steering Committee Handout guidance").

b. The organizational structure of the alternatives document may make comparisons and presenting information in tables difficult. For example, Alternative 1 includes three separate geographical alternatives, two construction alternatives (pipeline or canal) and two additional construction variations (lined or unlined): Central Delta Pipeline, Eastern Delta canal (lined or unlined), Western Delta canal (lined or unlined).

c. It is confusing how each of the variations within each named alternative will be evaluated. We recommend separately identifying each alternative that will be evaluated so they can more easily be compared. For example, on page 3, Alternative 1 is described as consisting of "either a pipeline/tunnel generally located in the central Delta with an intermediate Forebay, or an unlined or lined canal along the eastern Delta, or an unlined or lined canal along the western Delta".

d. The DEIS should include detailed maps for each of the alternatives that will be evaluated in the NEPA document. Maps should show the location of alternatives and natural resources. Detailed engineering drawings can be put in an appendix, if you prefer.

2. Introduction - Operational components: The DEIS should include summary descriptions of all the operational pieces of each alternative. Some things are very vague in the Alternatives descriptions at this point like "Fall X2" and "Fall X2 as described in the 2008 and 2009 FWS and NMFS BOs". Are these the same or different?

3. Alternatives Development Process:

a. It would be helpful to explicitly state that only one geographic location is being considered for the pipeline and why. It is an obvious question that arises when one reads that there are two locations being considered for a canal (whether or not they are lined) and only one location for the pipeline. Likewise, describing how the locations for the canal were derived and why others are not being considered or have been eliminated is appropriate to include in the EIS.

b. This would be a useful place to describe that since the BDCP is not a water supply augmentation project, water conservation alternatives have not been developed.

4. Screening criteria: Have screening criteria been drafted? Is the "Alternatives Screening Report" complete? As this is one of the "checkpoints" in the NEPA/404 Integration MOU, I expect you'd want to get input from EPA and the Corps asap.

5. Section 3.5.3 – Operational Components: Either here and/or in each of the sections of 3.4, the Operations Criteria need to be described in sufficient detail to be able to analyze the impact on aquatic resources.

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From: "Barajas, Federico" <FBarajas@usbr.gov>
To: "Paul.J.Robershotte@usace.army.mil" <Paul.J.Robershotte@usace.army.mil>, Karen Schwinn/R9/USEPA/US@EPA
Date: 09/05/2011 08:27 AM
Subject: FW: BDCP draft Alternatives Description outline

Hi Karen and Paul,
Attached for your review is ICF's deliverable #2 (Alternatives Description) under the EIR/EIS schedule. Please review and let me know if you have any comments by the end of the week. Federal consolidated comments are due to ICF on September 12th. Thanks, FB

From: Hoffman-Floerke, Dale [dalehf@water.ca.gov]
Sent: Friday, September 02, 2011 10:24 PM
To: Barajas, Federico; Idlof, Patricia S (Patti); Stein, Russell; Hoover, Michael; Milligan, Ronald E; Mike Tucker (Michael.Tucker@NOAA.GOV); Barnett-Johnson, Rachel; Israel, Joshua A; Fry, Susan M; Scott Cantrell; Nobriga, Matt; Chotkowski, Michael A; Harrell, Bill; David.Swank@NOAA.GOV; Grimaldo, Lenny F; Maria Rea; Hoffman-Floerke, Dale; Castleberry, Dan; Norris, Jennifer; pcoulston@dfg.ca.gov; Webb, Heather; Beggs, Barbara; Rinek, Lori; CFERRARI@dfg.ca.gov; Yvette.Redler@noaa.gov; Darby, Nicole; Chotkowski, Michael; jmoose@rtmmlaw.com; Van Nieuwenhuyse, Erwin E; Allen, Kaylee; Monroe, Jim; Culberson, Steven; Morrow, Michelle M; Reaves, Terri R
Cc: Chuck Gardner; Bogdan, Kenneth
Subject: BDCP draft Alternatives Description outline

Folks, attached for your review is the draft Alternatives Description outline, ready for you review. Please provide your comments to Russ Stein (State reviewers) or Federico Barajas (Federal reviewers), not later than COB, September 12th.

Thank you in advance for your time and effort in reviewing this next installment of BDCP deliverables.

Dale H-F

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