

# **Timeline & Template ideas for the Delta Independent Science Board's Delta Conveyance Project EIR/EIS chapter and document review**

27 July 2022

**Timeline** - Our 90-day review timeline probably needs some internal targets:

Days 3-4 – Confirmation of willingness to lead, or help lead, chapter reviews (August 1)

Day 20 – Initial comments on Exec. Summary to Chapter 4 to Edmund for consolidation (August 15)

Day 30-40 – complete preliminary chapter reviews for further refinement and discussion (August 25 to September 4)

Day 40-50 – initial compilation of major review themes (September 4 to 14)

Day 60 – Initial draft of main report and an appendix containing chapter reviews (September 24)

Day 90 – Approval of final DISB review document and appendix (October 24)

Use a template for comments for each chapter reviewed (below).

## **Chapter Review Reports template**

Chapter number and title

Date of comments

Lead reviewer(s) [Omit from final document]

1. Overall Assessment (1 paragraph - 1 page)
  - 1.1. Summary of Major Strengths
  - 1.2. Summary of Major Concerns
2. Strength of Scientific Approach
3. Major Comments
  - 3.1. Construction impacts
  - 3.2. Operations impacts
  - 3.3. Maintenance impacts
  - 3.4. Comparative evaluation of alternatives
  - 3.5. Uncertainty & adaptive management
  - 3.6. Other major comments
5. References
6. Appendix
  - 6.1. Supporting materials or calculations

7 Supplementary comments, mostly for internal deliberations

7.1 More detailed suggestions, ideas, calculations, diagrams, etc.

## **Questions to consider**

### **I. Scope of Impacts Covered**

- a. Are the impacts addressed complete with known omissions and uncertainties acknowledged (including links to other chapters)?
- b. Are statutory requirements adequately addressed (beneficial flows, fish habitat, water quality, etc.)?

### **II. Quality of Analysis**

- a. Are overall analyses reasonable and scientifically defensible?
  - i. Are results conveyed clearly?
  - ii. Are models and assumptions appropriate (e.g., best feasible)?
  - iii. Is the literature cited appropriate?
- b. Do the analyses describe sensitivity of conclusions to assumptions and uncertainty?
- c. Are alternatives studied in adequate detail to differentiate outcomes among alternatives?
- d. Has climate change been appropriately considered and incorporated?
- e. Are risks of environmental change evaluated using the contexts of scarcity and social effects?
- f. Is the effectiveness of plans to avoid, minimize and mitigate negative impacts supported by the scientific analysis?
- g. Are goals of the adaptive management plan adequate to prevent substantial harm?

## **Delta Council Charge Questions for earlier Delta conveyance reviews, 2014**

### ***Completeness, Structure and Effectiveness of Description***

1. Are project objectives and purpose clearly articulated, to help identify a reasonable range of alternatives?
2. Are the alternatives clearly defined?
3. From a scientific perspective, does the EIR evaluate a reasonable range of potentially feasible alternatives that would reduce or eliminate significant project impacts and obtain most of the basic project objectives and purpose? If potentially feasible alternatives are not fully evaluated, is a clear rationale provided why not? Are there potentially feasible alternatives that would reduce or eliminate significant impacts of the project and obtain most of the basic project objectives that should have been considered (and either rejected or fully evaluated) but were not?
4. Are the alternatives studied in adequate detail to differentiate outcomes among the alternatives?
5. Overall, are analyses reasonable and scientifically defensible? How clearly are the roll-up comparisons among alternatives conveyed in the text, figures and tables?

### ***Approach, Analysis, Tools and Modeling***

1. Does the environmental impact analysis use appropriate evaluation methods? Were tools/analyses appropriate and described adequately?
2. How well is uncertainty addressed and communicated?
3. Do analyses describe sensitivity of conclusions to assumptions and uncertainty and describe how conflicting data and analyses are interpreted?
4. Are assumptions used in modeling and analysis clearly articulated and reasonable considering the complexity and current scientific understanding?

### ***Monitoring and Adaptive Management***

1. How well is the overall adaptive management strategy described and are the goals of the adaptive management plan achievable?
2. Is proposed monitoring adequate for evaluation of implementation in achieving goals and objectives, and are data management, analysis, reporting and decision making processes adequate to create a defensible and transparent adaptive management?

### ***Statutory Questions***

Comment on the scientific basis and clarity of the following:

- (a) The review and analysis of the range of flow criteria, rates of diversion, and other operational criteria required to satisfy the criteria for approval of a natural community conservation plan as provided in subdivision (a) of Section 2820 of the Fish and Game Code, and other operational requirements and flows necessary for recovering the Delta ecosystem and restoring fisheries under a reasonable range of hydrologic conditions, which will identify the remaining water available for export and other beneficial uses.
- (b) The potential effects of climate change (including possible sea level rise up to 55 inches), and possible changes in total precipitation and runoff patterns on the conveyance alternatives and habitat restoration activities considered in the EIR.
- (c) the potential effects on migratory fish and aquatic resources.
- (d) the potential effects of each Delta conveyance alternative on Delta water quality.