

Letter	Comment #	Comment	Relation to Final EIR/EIS
American River Water Agencies	1	For the American River Water Agencies (ARWA), we appreciate the opportunity to comment on the final environmental impact report/environmental impact statement (FEIR/EIS) for the California WaterFix project. These agencies rely, in part, on diversions from Folsom Reservoir and its releases to the lower American River for our water supplies. As discussed in more detail below, the information contained in, and supporting, the FEIR/EIS demonstrates that the document fails to adequately analyze the impacts that implementation of the California WaterFix would have on reservoir storage levels in Folsom Reservoir and related flows in the lower American River, and therefore our agencies' water supplies, in severely dry years. The FEIR/EIS contains so many varying hydrologic modeling runs, with so many different possible effects on Folsom Reservoir, that it is impossible to understand how much water-supply risk implementation of the California WaterFix would present to our agencies. Although the FEIR/EIS does not disclose this fact in its narrative, review of the electronic modeling files upon which the FEIR/EIS is based reveals that there is a significant risk that implementing the California WaterFix would cause Folsom Reservoir storage to be drawn down significantly going into potentially dry winters and also affect flows in the lower American River. Such a result would significantly impact our water supplies by increasing the risk that overly aggressive releases from the reservoir in one year could cause a water-supply crisis in the next year if the intervening winter were very dry. Notwithstanding our previous comments on this issue, the FEIR/EIS does not analyze this risk and proposes no mitigation measures to address it. Indeed, the FEIR/EIS does not even disclose this risk. The FEIR/EIS therefore does not comply with applicable law and is invalid.	<p>This is a general comment on the hydrologic modeling conducted for the EIR/S. DWR and Reclamation believe the analysis of environmental impacts in the EIR/S is supported by the hydrologic modeling conducted for the proposed project and alternatives.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p> <p>The Final EIR/EIS complies with all applicable laws.</p>
American River Water Agencies	2	<p>1. Background</p> <p>As discussed in previous ARWA comments, our agencies serve over 1,000,000 people in Placer and Sacramento Counties. Collectively, our agencies divert water directly from Folsom Reservoir, as well as from the lower American River below the reservoir, and pump groundwater from aquifers near the American River. Historically, those aquifers were overdrawn, but, in the last 20 years, our agencies have coordinated to stabilize and recover those aquifers. We have achieved this success by providing surface water from Folsom Reservoir and the lower American River to areas that historically were dependent on groundwater pumping. We have accomplished this as part of our efforts to implement the Water Forum Agreement, which is an agreement among water suppliers, land use agencies, environmental groups and civic organizations in the Sacramento metropolitan region to manage water supplies and the lower American River's environmental resources cooperatively. In order to protect these interests, we are submitting the comments below, as well as incorporating by reference prior ARWA comments on the Bay-Delta Conservation Plan (BDCP) and the California WaterFix and also the related comments by the North State Water Alliance. Our agencies all participate in that group as members of the Regional Water Authority.</p>	This is background information on the role of ARWA and does not include comments on the Final EIR/EIS.
American River Water Agencies	3	<p>2. By Enabling Increased Exports Of Water Released From Folsom Reservoir Storage, The California WaterFix Could Increase Risks To American River Water Supplies In Severely Dry Years</p> <p>One of the most critical concerns our agencies have about the California WaterFix is that it could threaten our agencies' water supplies by enabling overly aggressive releases from Folsom Reservoir in a year leading into a subsequent severely dry year.</p>	As explained in Master Response 30, the modeling conducted as part of the CEQA/NEPA process is used for comparative, not predictive purposes, and adequately discloses the potential impacts of various operational scenarios to determine the project-specific impacts, as well as impacts attributable to climate change. Please refer to Master Response 30 in the Final EIR/EIS for a detailed discussion of the modeling approach. Please also refer to Master Responses 32 (Water Rights Deliveries Related to SWP and CVP Operations) and 25 (Upstream Operations) which explain that the action alternatives only include the use of water from existing SWP and CVP water rights. The environmental analysis reported

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		<p>Recent experience has demonstrated the significant risks to water supplies for American River-dependent water agencies resulting from overly aggressive Folsom Reservoir releases in such a situation. In 2013, notwithstanding the fact that there had been little significant precipitation that year, fall releases from Folsom Reservoir were managed to a relatively standard rate of approximately 1,500 cubic feet per second (cfs). When extremely dry conditions continued into early 2014, the reservoir was drained to historically low levels, reaching a low point of 162,617 acre-feet (AF) on February 6, 2014. If dry conditions had continued for another few weeks, the reservoir could have been drained below the level of its municipal and industrial (M&I) water supply intake by approximately April 2014. That intake becomes inoperable when there is approximately 65,000 AF stored in Folsom Reservoir. The intake's supply capacity would be significantly reduced prior to that point as a result of the likely creation of a vortex effect around the intake when there is little water above the intake. In addition, lower releases to the lower American River that necessarily occur when Folsom Reservoir storage is drawn down to very low levels can impair the physical availability of water from the river for those agencies that depend on diversions from it. Those lower river releases resulting from reduced reservoir storage also could impact sensitive fish species in the lower American River, including steelhead listed under the federal and state Endangered Species Acts and fall-run Chinook salmon.</p> <p>The California WaterFix could increase the frequency of water-supply crises such as the one that occurred in late 2013 and early 2014 by increasing the combined capacity of the Central Valley Project (the CVP) and the State Water Project (the SWP) to divert from the Delta water released from storage in upstream reservoirs like Folsom Reservoir in the months preceding what turns out to be a severely dry winter. While the FEIR/EIS asserts that the California WaterFix would not change any "upstream operational criteria" for the CVP and the SWP, the Department of Water Resources' (DWR) SWP operator John Leahigh testified in the State Water Resources Control Board's (the SWRCB) related hearing that implementing the California WaterFix would enable the CVP and the SWP to export more water released from reservoir storage. Mr. Leahigh's PowerPoint presentation to the SWRCB states that the "Proposed CWF [California WaterFix] North Delta Diversions" would "[i]ncrease opportunity to use existing [CVP/SWP] water rights" by enabling "[r]e-diversion of stored water during Balanced Conditions" in the Delta. (See attached DWR exhibit 4-e, p. 35.) Modeling work conducted by MBK Engineers, and submitted in the SWRCB's California WaterFix hearing, demonstrates the risks to upstream storage associated with this "increased opportunity" to move water from upstream storage reservoirs South of the Delta. (See exhibits SVWU-100, ¶ 8, and SVWU-108 (copies submitted with the North State Water Alliance letter commenting on the FEIR/EIS).)</p>	<p>in the Final EIR/EIS did not include reoperation of upstream reservoirs, but the outputs do allow comparison of reservoir levels between various baselines (existing conditions, Early Long Term (ELT) and Late Long Term (LLT) as well as the various operational scenarios associated with the project alternatives. For purposes of the comparative impact analyses, this assumption regarding upstream operations was applied to all alternatives including the proposed project. The environmental impacts disclosed in the EIR/EIS are reflective of this assumption and adequate to allow meaningful assessment of impacts.</p> <p>The information contained in Appendix 5G, <i>Comparison of FEIRS Alternative 4A Modeling Results to the California Water Fix Section BA Proposed Action Modeling Results</i>, was provided for information and comparative purposes, but does not call into question the adequacy of the modeling used for CEQA/NEPA purposes. As explained in Master Response 30, the modeling is neither suitable for nor intended to predict future conditions, but is used to compare modeled project operations against one or more modeled baselines to identify the impacts of the proposed project (in the BA) and all project alternatives (in the Final EIR/EIS). The modeling conducted as part of the CEQA/NEPA process compared the effects among various operational scenarios to disclose the impacts of the various project alternatives relative to existing conditions, and the No Action Alternatives in the Early Long Term (ELT) and Late Long Term (LLT). Please refer to Master Response 30 in the FEIR/EIS for a detailed discussion of the modeling approach. The hydrologic modeling results were not changed in the Final EIR/EIS and the comparative nature of the impact analysis between all alternatives was maintained and adequately discloses the impacts of various project alternatives.</p> <p>Despite commenter's expert's difference of opinion on certain assumptions used in the modeling, the modeling and assumptions within the modeling relied upon by the lead agencies reflect their own expertise and is considered appropriate to support the lead agencies' analysis of environmental impacts associated with the Proposed Project.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p>
American River Water Agencies	4	<p>3. The FEIR/EIS Fails To Adequately Disclose The California WaterFix's Potential Impacts On Folsom Reservoir Storage Because Its Analysis Varies Widely Depending On The Hydrologic Model Used</p> <p>The FEIR/EIS discloses – for the first time during the CEQA/NEPA review of first the BDCP and now the California WaterFix – hydrologic modeling based on terms that are proposed as part of the Endangered Species Act (ESA) permitting of the project. The FEIR/EIS's Appendix 5G compares the results of the prior modeling of the project in the recirculated draft environmental impact report/supplemental environmental impact</p>	<p>See response to comment 3, above.</p> <p>The information contained in Appendix 5G, <i>Comparison of FEIRS Alternative 4A Modeling Results to the California Water Fix Section BA Proposed Action Modeling Results</i>, was provided for information and comparative purposes, but does not call into question the adequacy of the modeling used for CEQA/NEPA purposes. As explained in Master Response 30, the modeling is neither suitable for nor intended to predict future conditions, but is used to compare modeled project operations against one or more modeled baselines to identify the impacts of the proposed project (in the BA) and all project alternatives (in the Final EIR/EIS). The modeling conducted as part of the CEQA/NEPA process</p>

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		<p>statement (RDEIR/SDEIS) and the modeling resulting from the ESA process (called the CWF Section 7 Model or BA Model). Appendix 5G also discloses two important differences about the models themselves and the assumptions made in the modeling about how the CVP and the SWP would operate with the California WaterFix in place. First, a different version of CALSIM II, the relevant hydrologic model, was used in preparing the modeling in the RDEIR/SDEIS versus the ESA process. (Appendix 5G, pp. 5G-1 to 5G-3.) Second, the assumed level of spring Delta outflow that the CVP and the SWP must maintain apparently was different in the modeling for the DEIR/EIS, the RDEIR/SDEIS and the ESA process. (Appendix 5G, p. 5G-5, Table 5G-3.) The required level of Delta outflow – in any season – is a key driver of the coordinated operations of the CVP and the SWP. The effects of varying required levels of Delta outflow are not limited to water supplies that may be exported from the Delta, but can affect the amount of water stored in upstream CVP reservoirs like Folsom Reservoir.</p> <p>These significant differences in the hydrologic models, and the different modeling assumptions used, result in the FEIR/EIS failing to present reliable information about how the project’s implementation will impact Folsom Reservoir storage and therefore our agencies’ water supplies. Figures 5G-7 and 5G-8 depict the California WaterFix’s impacts on end-of-May and end- of-September Folsom Reservoir storage in comparison with the no action alternatives used for, respectively, the FEIR/EIS and the biological assessment (BA) prepared as part of the ESA process.</p> <p>Those figures show that even the results of modeling the no action alternatives vary widely in dry years. Between approximately the 95th and the 99th percentiles for end-of-May storage on Figure 5G-7 – on the left side of the figure representing the very driest years when there is maximum pressure on Folsom Reservoir and our agencies’ water supplies – the figure indicates that, in the BA Model, the reservoir would hold approximately 100,000 acre-feet more than the FEIR/EIS modeling. Figure 5G-8 shows a similar difference between the BA Model and FEIR/EIS no action alternatives for Folsom Reservoir’s end-of-September storage between roughly the 87th and 95th percentiles. Similar differences also appear in the modeling results for the “with project” alternatives depicted in Figures 5G-7 and 5G-8. (The “with action” alternatives are identified in Figures 5G-7 and 5G-8 as the “CWF BA PA_ELT” curve for the BA Model’s proposed action and the “FEIRS Alt4A_ELT” curve for the FEIR/EIS’s Alternative 4A.) For context: (1) Folsom Reservoir’s total capacity is approximately 977,000 acre-feet; (2) as discussed above, its municipal water supply intake would go dry when the reservoir holds less than approximately 65,000 acre- feet; and (3) after the severe dry years of 2013 through 2015, the reservoir reached an all-time low of approximately 135,561 acre-feet in storage on December 6, 2015.</p> <p>The approximately 100,000 acre-foot variation in Folsom Reservoir storage in even the modeling of the different no action alternatives depicted in the FEIR/EIS’s Appendix 5G causes the FEIR/EIS to fail to meet an EIR’s fundamental mission of disclosing a project’s potential impacts. The FEIR/EIS’s Alternative 4A and the BA’s proposed action both are possible ways in which the California WaterFix might be implemented and Figures 5G-7 and 5G-8 indicate that those two implementation options would result in very different conditions in Folsom Reservoir in very dry years. Based on the comparative model runs depicted in Appendix 5G, it simply is impossible for our agencies to determine how implementation of the California Water Fix may affect our water supplies through its</p>	<p>compared the effects among various operational scenarios to disclose the impacts of the various project alternatives relative to existing conditions, and the No Action Alternatives in the Early Long Term (ELT) and Late Long Term (LLT). Please refer to Master Response 30 in the FEIR/EIS for a detailed discussion of the modeling approach. The hydrologic modeling results were not changed in the Final EIR/EIS and the comparative nature of the impact analysis between all alternatives was maintained and adequately discloses the impacts of various project alternatives.</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.</p> <p>The Final EIR/EIS complies with both CEQA and NEPA.</p>

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		<p>effects on Folsom Reservoir.</p> <p>This lack of clarity is compounded by the fact that the FEIR/EIS states that the operational assumptions reflected in the various hydrologic modeling analyses are still subject to possibly significant change. The FEIR/EIS's Master Response 28 states that, notwithstanding the modeling, the actual operations of the CVP and the SWP with the California WaterFix will be governed by permits and biological opinions that have not been prepared and then will be subject to further change through adaptive management. (FEIR/EIS, pp. 1-262 to 1-263.) Master Response 44 similarly states that "initial operating criteria" for California WaterFix will be determined "[p]rior to the start of construction" and then will be modified through adaptive management "after initial operations . . ." (FEIR/EIS, p. 1-344.) Master Response 30 states that the models cannot capture real-time decision-making that affects how the CVP and the SWP operate upstream reservoirs (FEIR/EIS, p. 1-268), which suggests that the FEIR/EIS provides essentially no guidance about how those reservoirs will be operated with the California WaterFix in place. Due to all of these compounding uncertainties, it is impossible to understand how the California WaterFix may affect Folsom Reservoir, and our agencies' water supplies. The FEIR/EIS therefore is fundamentally inadequate and not compliant with either CEQA or NEPA.</p>	
American River Water Agencies	5	<p>4. Information Available In The Electronic Modeling Files That Support The FEIR/EIS Show That Implementation Of The California WaterFix Could Cause Significant Drawdowns Of Folsom Reservoir Storage That Are Not Depicted Anywhere In The FEIR/EIS</p> <p>As discussed above, a significant water-supply risk to our agencies is that Folsom Reservoir may be operated overly aggressively in one year, resulting a water-supply crisis due to extremely low reservoir storage the following year if the intervening winter were to be very dry. The California WaterFix could cause this scenario to occur more frequently, and be more severe, by enabling the CVP and the SWP to export water released from Folsom Reservoir from the Delta more aggressively in the first year of such a scenario. The electronic modeling files prepared by DWR and Reclamation as part of the CEQA/NEPA process show that implementing California WaterFix could have this exact impact, even though the FEIR/EIS does not disclose this information. This information confirms MBK's testimony to the SWRCB that the California WaterFix's implementation could increase risks to upstream water supplies by enabling more aggressive Delta CVP and SWP exports. (See exhibits SVWU-100, ¶ 8, and SVWU-108.)</p> <p>Despite our agencies' prior comments about the California WaterFix's possible impacts on our water supplies in multi-year cycles, the FEIR/EIS does not contain any information disclosing the project's possible effects under the scenarios we previously identified as needing analysis. Consistent with the draft EIR/EIS and the RDEIR/SDEIS, the FEIR/EIS depicts the California WaterFix's possible impacts on Folsom Reservoir storage largely as exceedance plots over the whole period of record. This approach causes non-sequential years to be depicted sequentially, so that, for example, the end-of-September reservoir storage for 1991 and 1977 may be depicted next to one another because they are similar in amount. This approach, however, does not disclose the impact that the California WaterFix could have in a repeat of sequential years, such as in a repeat of the 2013-2014 cycle. This is another reason why the FEIR/EIS fails to adequately disclose the California WaterFix's possible effects.</p>	<p>This commenter's issues insofar as the model used for the analysis (CALSIM II) have been addressed multiple times in response to previously-made comments on the Draft EIR/EIS as well as the RDEIR/SDEIS. As discussed in the Final EIR/EIS, the CALSIM II model is a monthly model that does not reflect the allow for flexibility that operators, reacting to real-time conditions, employ in managing the CVP/SWP system in the operational rules during extreme events, including responding to low storage volumes in Folsom Lake during consecutive drought years. The CALSIM II model operations do analyze a range of conditions based upon a repeat of historical hydrology that includes consecutive drought years that occurred in the 1920s, 1970s, and 1980s/1990s. The model results are presented in exceedance curves and in water year tables in Appendix 5A, Section C of the FEIR/EIS.</p> <p>Despite commenter's expert's difference of opinion on certain assumptions used in the modeling, the modeling and assumptions within the modeling relied upon by the lead agencies reflect their own expertise and is considered appropriate to support the lead agencies' analysis of environmental impacts associated with the Proposed Project. As stated in Appendix 5A, Section B.2, these assumptions were selected by the DWR management team for the EIR/EIS in coordination with the Bureau of Reclamation, Fish and Wildlife Service, and National Oceanic and Atmospheric Administration National Marine Fisheries Service. The assumptions were selected to satisfy CEQA and NEPA requirements. The basis for these assumptions is described in Appendix 3D of the EIR/EIS. The modeling assumptions presented by the commenter would result in a different project than the one selected for analysis by the lead agencies.</p> <p>Commenter previously voiced concerns regarding Folsom Reservoir operations in Comments RECIRC 2588-6 and 2588-8. The lead agencies responded to these comments within the FEIR/EIS. The FEIR/EIS recognizes that there are ongoing and future studies to address the need for flexibility in reoperation of upstream reservoirs in the American River watershed and Folsom Lake related to balancing the need to maintain available volume for flood management with the projected changes in snowfall and rainfall occurrence in the future with climate change. As is consistent with CEQA and NEPA, these ongoing and future studies will require separate engineering and environmental documentation, as well as regulatory approval from the U.S. Army Corps of Engineers and State Water Resources Control Board; therefore, inclusion of potential outcomes of these studies would be considered to be too speculative</p>

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		<p>When sequential-year results are extracted from the electronic modeling files on which the FEIR/EIS's depiction of modeling results are based, however, those sequential-year results show that the California WaterFix could have the exact effect on Folsom Reservoir storage that concerns our agencies. As stated in the attached materials, Jeff Weaver, a hydrologic engineer, extracted, from the electronic files made available by DWR, modeled Folsom Reservoir storage and American River streamflows for the 1932-1933 cycle and the 1980-1981 cycle.² (The modeling reflects what would happen with and without the California WaterFix, assuming certain regulatory conditions and repeats of the hydrologic conditions that occurred historically during those cycles.) As depicted in the attached information for the 1932-1933 cycle from the BA Model, the California WaterFix could result in Folsom Reservoir being drawn down by approximately 200,000 acre-feet in June and July of 1932 relative to the no action alternative. This reduced reservoir storage would carry over into 1933, which was a critically dry year.</p> <p>Similarly, the BA Model shows that, in June and July of 1981, implementation of the California WaterFix could result in Folsom Reservoir being drawn down by approximately 200,000 acre-feet more than the no action alternative. Moreover, the FEIR/EIS modeling shows that, in that scenario and using that modeling's assumptions, implementation of the California WaterFix could result in Folsom Reservoir being drawn down by approximately 150,000 acre-feet more than in that modeling's no action alternative. Finally, the draft EIR/EIS modeling shows that, in that same 1981 scenario, the California WaterFix could result in Folsom Reservoir being drawn down by approximately 250,000 acre-feet more than that scenario's no action alternative – so low that, with the California WaterFix, the reservoir would be drawn down to the lowest level that CALSIM apparently could model, approximately 100,000 acre-feet. In each of these 1981 scenarios, the above-referenced model runs show that Folsom Reservoir could start the 1981-1982 water year at very low levels as a result of the California WaterFix's implementation.</p> <p>The FEIR/EIS ignores these impacts on Folsom Reservoir storage – and therefore on our agencies' water supplies – that the California WaterFix could have and proposes no mitigation of these impacts whatsoever. Moreover, the FEIR/EIS fails to discuss the indirect effects on groundwater in the Sacramento metropolitan area that would occur if agencies that generally rely on water from Folsom Reservoir and the lower American River were forced to pump more groundwater as a result of reservoir water becoming less reliable with the California WaterFix's implementation. For all of the reasons expressed in this letter, which incorporates by reference prior ARWA comments and all North State Water Alliance comments, the FEIR/EIS does not comply with either CEQA or NEPA.</p>	<p>to be included in the No Action Alternative or any of the action alternatives. For purposes of a comparative analysis, the CALSIM model used the same assumed reservoir operations rules for the No Action Alternative or all of the action alternatives; therefore, the comparison between action alternatives and the No Action Alternative result in changes related to the alternative implementation only. This focus on the No Action future condition as a factor in assessing the significance of impacts under CEQA is authorized by CEQA case law. (See <i>Neighbors for Smart Rail v. Exposition Metro Line Construction Authority</i> (2013) 57 Cal.4th 439, 454; see also Master Response 1, Environmental Baselines.) The analysis provided by the commenter was reviewed, and it indicates that the two occurrences of reduction in Folsom Lake storage out of the 984 months simulated in the model were caused by a CALSIM II logic decision in a single-month based on the mathematical logic in the model; such an outcome is not necessarily reflective of daily operational decisions that occurs in real-time operations.</p> <p>It also should be recognized that the frequency of low storage elevations in Folsom Lake increases from 3 out of 82 years under the Existing Conditions (CEQA baseline) to 6 times out of 82 years for the No Action Alternative (ELT) and in 9 times out of 82 years for the No Action Alternative (LLT). This occurs due to the sea level rise and climate change assumptions for the No Action Alternative (ELT and LLT), including the assumed reduction in snow pack with an increase in rainfall volume, and an additional 177,000 acre-feet/year of water use by senior water rights and municipal water users in the American River watershed as compared to the assumptions for the Existing Conditions (which are based on 2005 CALSIM II model assumptions).</p> <p>This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. The Final EIR/EIS complies with both CEQA and NEPA.</p>
American River Water Agencies	6	<p>5. Conclusion</p> <p>The hydrologic modeling results depicted in the FEIR/EIS's Appendix 5G indicate that the FEIR/EIS's analysis of the California WaterFix's impacts on Folsom Reservoir storage are so uncertain that it is impossible for our agencies to determine how implementing that project could affect our water supplies in multi-year cycles. Moreover, when one reviews the underlying electronic modeling files that the FEIR/EIS does not include or</p>	<p>Please see comments 2, 3, 4, and 5 above. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS. The Final EIR/EIS complies with both CEQA and NEPA.</p>

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		describe, but which are the basis of the FEIR/EIS's hydrologic analysis, the information from those files demonstrates that implementing the California WaterFix could seriously impact our agencies' water supplies through potentially significant drawdowns of Folsom Reservoir storage. The FEIR/EIS does not disclose, or propose to mitigate, this impact. The FEIR/EIS therefore fails to comply with CEQA and NEPA.	
American River Water Agencies	ATT 1	Attachment 1: DWR_4_errata Excerpt.pdf	This attachment is DWR_4_errata Excerpt presented by DWR for the hearing proceedings regarding petition filed by the Department of Water Resources and U.S. Bureau of Reclamation requesting change in point of diversion for the California WaterFix. See Section 4, State Water Board Change Petition Process, Developments after Publication of the Proposed Final Environmental Impact Report, for discussion on State Water Recourses Control Board hearing materials. Commenter's statement does not include comments on the Final EIR/EIS.
American River Water Agencies	ATT 2	Attachment 2: Model Results of Comments on Ca Water Fix Final EIR/EIS, January 27, 2017, Jeffrey Weaver	This attachment is modeling results conducted by Jeffrey Weaver. This attachment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/EIS.