

Chapter 1. Introduction and Project Background

PURPOSE OF THIS DOCUMENT

This revised draft environmental impact report/environmental impact statement (REIR/EIS) on the Delta Wetlands Project has been prepared under the direction of the State Water Resources Control Board (SWRCB) and the U.S. Army Corps of Engineers (USACE). The SWRCB and USACE are the lead agencies under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), respectively.

The environmental impacts of the Delta Wetlands Project were previously analyzed in the 1995 Delta Wetlands Project Draft Environmental Impact Report and Environmental Impact Statement (1995 DEIR/EIS) (Jones & Stokes Associates 1995). During the public comment period on the 1995 DEIR/EIS, the SWRCB and USACE received numerous comment letters, many of which discussed water quality, fisheries, levee stability, and seepage issues. In 1997, the SWRCB convened a hearing to consider Delta Wetlands' water right applications for the project. Several parties presented conflicting testimony about the project's potential effects. Much of this testimony concerned stability of the proposed levees, seepage from the project reservoirs to neighboring islands, and the project's contributions to salinity and concentrations of dissolved organic carbon (DOC) in Delta waterways.

Because substantial controversy remains regarding the project's potential effects on levee stability, seepage, and water quality, the SWRCB and USACE believed that it would be prudent to identify available new information on these issues and to consider the relevance of this information to the analysis of potential project effects. The two lead agencies directed that a revised, quantitative analysis of geotechnical (levee stability and seepage) issues be developed to provide information to supplement the discussion of flood control features included in the 1995 DEIR/EIS.

The CEQA Guidelines (Section 15088.5) include the following guidance on recirculation of a draft environmental impact report (EIR) or portions of a draft EIR:

[A] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. . . . [T]he term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

... Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. . . . If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

The Council of Environmental Quality's (CEQ's) NEPA Regulations (40 CFR 1502.9[c]) direct that agencies "[s]hall prepare supplements to either draft or final environmental impact statements if . . . [t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts". They further direct that agencies "[m]ay also prepare supplements when the agency determines that the purposes of [NEPA] will be furthered by doing so".

Pursuant to Section 15088.5 of the CEQA Guidelines and Section 1502.9 of the CEQ NEPA Regulations, the SWRCB and USACE are recirculating those parts of the CEQA/NEPA analysis for the project for which significant information has been developed since the 1995 DEIR/EIS was published. These parts are the analyses of levee stability, seepage, water quality, and natural gas facilities and transmission pipelines.

The evaluation of water quality effects is based in part on the estimated timing and volumes of Delta Wetlands Project diversions and discharges. Therefore, the modeling of water supply and operations was also updated for this REIR/EIS, and the results of the modeling are presented for comparison with those of the 1995 DEIR/EIS. In addition, the fisheries assessment is updated with the most recent information available to address issues raised after the 1995 DEIR/EIS was published.

This REIR/EIS does not present a comprehensive analysis of the Delta Wetlands Project, but supplements the information presented in the 1995 DEIR/EIS. Together, the REIR/EIS and the 1995 DEIR/EIS provide the complete draft EIR/EIS analysis of potential environmental effects of the Delta Wetlands Project in compliance with CEQA and NEPA. Reviewers are therefore referred to the 1995 DEIR/EIS for background information on the project and for previously presented analyses. That document is hereby incorporated by reference.

This REIR/EIS does not include formal responses to comments on the 1995 DEIR/EIS, although it does address several issues raised in those comments. Formal responses to all comments on the 1995 DEIR/EIS will be presented in the final environmental impact report/environmental impact statement (FEIR/EIS) on the Delta Wetlands Project along with responses to comments on this REIR/EIS. Comments submitted on the 1995 DEIR/EIS do not need to be resubmitted.

PROJECT HISTORY

The Proposed Project

Project Description

Delta Wetlands proposes a water storage project on four islands in the Sacramento-San Joaquin Delta (Delta) (Figure 1-1). The project would involve diverting and storing water on two of the islands (Bacon Island and Webb Tract, or "reservoir islands") for later discharge for export or to meet outflow or environmental requirements for the San Francisco Bay/Sacramento-San Joaquin Delta (Bay-Delta) estuary. In addition, the project would involve diverting water seasonally to create and enhance wetlands and to manage wildlife habitat on the other two islands (Bouldin Island and most of Holland Tract, or "habitat islands") (Figure 1-2). Delta Wetlands also proposes to build recreational facilities for boating and hunting along the perimeter levees on all four Delta Wetlands Project islands.

The project islands are owned either wholly or partially by Delta Wetlands. To operate its project, Delta Wetlands would improve and strengthen levees on all four islands and would install additional siphons and water pumps on the perimeters of the reservoir islands. Delta Wetlands would operate the habitat islands under a habitat management plan (HMP) to compensate for impacts on, and promote the recovery of, state-listed threatened or endangered wildlife species and other special-status species, and to provide additional wetlands and wildlife habitat in the Delta. Figures 1-3 through 1-6 show the proposed project facilities on each island.

In the 1995 DEIR/EIS and this REIR/EIS, the Delta Wetlands Project is analyzed as a stand-alone water storage facility, operated independently of the State Water Project (SWP) and the Central Valley Project (CVP), and without regard to the specific entities to which the water could be sold. Several potential opportunities exist to operate the Delta Wetlands Project in conjunction with the CVP and the SWP or in coordination with the CALFED Bay-Delta Program (CALFED); however, no proposals have been made for which the SWRCB and USACE could reasonably assess the environmental effects, so discussion of such arrangements remains speculative.

The CEQA/NEPA analysis presented in the 1995 DEIR/EIS and this REIR/EIS does not analyze how state or federal facilities may be operated in the future in coordination with the Delta Wetlands Project. The impact analysis does, however, estimate the effects of project operations on operation of the SWP and CVP pumping facilities. Any coordinated arrangements with CALFED or the SWP or CVP may require additional environmental analysis. An analysis of the effects of such arrangements is beyond the scope of this REIR/EIS, but may be necessary before water from the Delta Wetlands Project is exported. A description of the potential relationship between CALFED and the Delta Wetlands Project or other similar in-Delta storage projects is provided in Chapter 2, "Changes to the Project Description, Alternatives Analyzed, and Future Conditions Considered".

The Delta Wetlands Project islands also could be used for interim storage of water being transferred through the Delta from sellers upstream to buyers served by Delta exports or buyers who would use it to meet Bay-Delta estuary outflow or environmental requirements (water transfers). Another option would be to use the islands to temporarily store water owned by parties other than Delta Wetlands for later use to meet scheduled Bay-Delta estuary outflow or environmental requirements or for export (water banking). However, no proposals exist for these types of uses of the project island facilities, so discussing such arrangements would be speculative. The 1995 DEIR/EIS and this REIR/EIS analysis consider the water supply yield of the project based only on water stored under Delta Wetlands' own appropriative water right permits and later conveyed to Delta channels. Delta Wetlands Project operations using transferred or banked water would require additional approvals from the SWRCB and, possibly, additional environmental documentation.

The changes that have been incorporated into the proposed project since preparation of the 1995 DEIR/EIS are described in Chapter 2.

Project Permit Requirements

Delta Wetlands has applied to the SWRCB, Division of Water Rights, for new appropriative water rights to divert water, store it on the project islands, and discharge it to Delta channels for export or to meet Bay-Delta estuary outflow or environmental requirements. Delta Wetlands Project fill activities associated with perimeter and interior levee work on the reservoir islands; habitat enhancement activities on the habitat islands; and construction of boat docks, pumps, and siphons in Delta channels would be considered discharges into waters of the United States. Delta Wetlands, therefore, also has applied to USACE for a permit under Section 404 of the Clean Water Act for the discharge of dredged or fill materials into waters of the United States and under Section 10 of the Rivers and Harbors Act of 1899 for other project activities in navigable waters.

Because the Delta Wetlands Project requires these discretionary approvals from the SWRCB and USACE, the project must comply with both CEQA and NEPA, with the SWRCB serving as the lead agency for CEQA compliance and USACE as the lead agency for NEPA compliance. Compliance with Section 7 of the federal Endangered Species Act (ESA), Section 106 of the National Historic Preservation Act, and other regulations is also required before USACE may issue a permit. Compliance with the California ESA also is required as part of the SWRCB permitting process. Various other permits and consultations are also required, as discussed in Chapter 4 of the 1995 DEIR/EIS. See Chapter 1 and Appendix 1 of the 1995 DEIR/EIS for details on Delta Wetlands' water right applications and the SWRCB water right process, and Chapters 1 and 4 of the 1995 DEIR/EIS for more information on the USACE permitting process.

Regulatory Compliance History

Table 1-1 shows an overview of the steps in the Delta Wetlands Project's history, which are described in this section, and those remaining in the project approval process, which are described under "Future Steps in the Consideration of Delta Wetlands' Applications", below.

The Water Right Process and CEQA/NEPA Compliance

Delta Wetlands originally applied for water rights to store water seasonally on all four of its project islands. The Delta Wetlands Project, as originally proposed, was analyzed in a draft EIR/EIS released in December 1990. In August 1993, Delta Wetlands submitted new water right applications that revised the project description to a proposal for two reservoir islands and two habitat islands (see "The Proposed Project", above). The 1995 DEIR/EIS was prepared at the direction of the SWRCB and USACE to assess the environmental effects of the Delta Wetlands Project based on the 1993 project description. The document was distributed for public review and comment in September 1995.

The lead agencies held a public meeting on October 11, 1995, to receive comments on the 1995 DEIR/EIS and accepted written comments on the document until December 21, 1995. Numerous comment letters were received; many commenters expressed concerns about levee stability and seepage potential and project effects on fisheries and water quality.

In 1997, the SWRCB convened a water right hearing to consider Delta Wetlands' petitions for new water rights and changes to existing water rights. Eighteen parties filed protests with the SWRCB against Delta Wetlands' water right applications. Delta Wetlands entered into stipulated agreements with five of these protestants. Four of the stipulated agreements affirm the seniority of the protesting parties' water rights and, to preclude interference with those senior water rights, outline general conditions under which the Delta Wetlands Project would operate. The fifth precludes Delta Wetlands' interference with the protesting party's ability to meet water quality criteria for salinity. These agreements are described in Appendix A.

As described in "Purpose of This Document" above, Delta Wetlands and several of the other parties presented evidence at the water right hearing. Topics included the potential effects of the Delta Wetlands Project on levee stability and seepage to neighboring islands, and the effects of the project on salinity and concentrations of DOC in Delta exports and the resulting effects of this increased salinity and DOC loading on treatment plant operations. Additionally, Pacific Gas and Electric Company (PG&E) presented evidence to show that the Delta Wetlands Project could significantly affect PG&E's ability to maintain its gas line across Bacon Island. The East Bay Municipal Utility District (EBMUD) and California Department of Fish and Game (DFG) raised questions regarding potential project effects on Mokelumne River salmon and predation of protected fish species at Delta Wetlands Project boat docks and other project facilities. (Other issues raised by DFG were subsequently addressed in DFG's biological opinion. See Appendix C.)

A broad range of assumptions and conclusions on these issues is reflected in the SWRCB's and USACE's administrative record. This REIR/EIS has been prepared to provide further clarification of these issues.

Endangered Species Act Consultation

At the same time that the 1995 DEIR/EIS was being prepared, the SWRCB and USACE prepared biological assessments that evaluated potential effects of the Delta Wetlands Project on fish and wildlife species listed or proposed for listing under the state and federal ESAs. The biological assessment for fish species concluded that the project could adversely affect several fish species that were listed or proposed for listing. The SWRCB began consultation with DFG pursuant to the California ESA about project effects on delta smelt and winter-run chinook salmon. Pursuant to the federal ESA, USACE began formal consultation with the U.S. Fish and Wildlife Service (USFWS) about project effects on delta smelt and Sacramento splittail, and with the National Marine Fisheries Service (NMFS) about project effects on winter-run chinook salmon and steelhead.

As part of the consultation process, the SWRCB, USACE, USFWS, NMFS, DFG, and Delta Wetlands held a series of meetings to cooperatively develop operating parameters for the Delta Wetlands Project that would protect these species. The outcome of the meetings was agreement on a set of "final operations criteria" (FOC) for the project. DFG, NMFS, and USFWS subsequently issued no-jeopardy biological opinions that defined "reasonable and prudent measures" (RPMs) to be implemented by Delta Wetlands for protection of the listed species. These measures included the operating restrictions described in the FOC. The final biological opinions for all three agencies are included in this REIR/EIS as Appendices C, D, and E.

CURRENT STATUS OF THE PROJECT

As described previously, the lead agencies determined that this REIR/EIS should be prepared to allow for recirculation of those parts of the environmental analysis for which significant new information exists, and to provide for additional public review of, and comment on, this information. The SWRCB water right proceeding has not yet been concluded. The SWRCB will hold further days of the public hearing. The lead agencies will receive oral and written comments on the REIR/EIS until July 31, 2000. A FEIR/EIS, including responses to comments on both the 1995 DEIR/EIS and this REIR/EIS, will be prepared. The water right hearing and the USACE permitting review process will continue after the CEQA/NEPA process is complete. Details of these processes are described below under "Public Review and Comment Period".

In addition, after the issuance of the biological opinions, splittail, steelhead (Central Valley Evolutionarily Significant Unit [ESU]), and spring-run chinook salmon were listed as threatened under the federal ESA, and spring-run chinook salmon was listed as threatened under the California ESA as well. Also, the requirements of Section 2090 of the California ESA have expired, resulting in the need to convert DFG's biological opinion to a take permit under the current requirements of

the California ESA. The USFWS and NMFS biological opinions included conference opinions on splittail and steelhead, respectively, because these species were proposed for listing at the time when the opinions were issued. USFWS has adopted the conference opinion for splittail as its biological opinion. USACE has asked NMFS to adopt the conference opinion for steelhead as its biological opinion and, pursuant to Section 7 of the federal ESA, has requested consultation on the effects of the Delta Wetlands Project on spring-run chinook salmon. Delta Wetlands is coordinating with DFG to ensure that DFG's authorization covers spring-run chinook salmon and is consistent with the latest requirements of the California ESA. (See Chapter 5, "Fisheries".)

CONTENTS OF THE REVISED DRAFT EIR/EIS AND PUBLIC REVIEW PROCESS FOR THE DOCUMENT

Key Issues Addressed in This Document

This REIR/EIS addresses the following issues:

- water supply and operations;
- water quality, including project effects on DOC, trihalomethanes (THMs), and salinity;
- fisheries, including Mokelumne River anadromous fish, spring-run chinook salmon, and predation at boat docks and other project facilities;
- levee design and stability;
- seepage and proposed seepage control measures; and
- PG&E's gas line on Bacon Island.

For each of these subject areas, the REIR/EIS:

- summarizes significant issues raised in the comments on the 1995 DEIR/EIS and water right hearing evidence;
- identifies sources of new information and analysis to supplement the information presented in the 1995 DEIR/EIS;
- describes the qualitative and quantitative methods used to revise the analysis of environmental impacts; and
- presents the results of the revised analysis, including recommended changes to the impact conclusions and mitigation measures presented in the 1995 DEIR/EIS.

In addition, changes to the project description, in the form of restrictions described in the FOC, biological opinions, and stipulated agreements, are described in Chapter 2.

As noted above, the REIR/EIS does not include formal responses to comments on the 1995 DEIR/EIS. Responses to all comments received on both the 1995 DEIR/EIS and the REIR/EIS will be presented in a FEIR/EIS on the Delta Wetlands Project. Nevertheless, for some of the issue areas listed above, the new analyses presented in the REIR/EIS address many comments received on the 1995 DEIR/EIS.

Issues Not Addressed in This Document

The State CEQA Guidelines (Section 15088.5) state that recirculation is not required where the new information added to the EIR “merely clarifies or amplifies or makes insignificant modifications” to the document. The lead agencies have determined that for the resource topics listed below, significant new information is not required in response to comments received, and any issues raised regarding these topics will be addressed in the FEIR/EIS:

- vegetation and wetlands,
- wildlife,
- recreation and visual resources,
- land use and agriculture,
- traffic,
- cultural resources,
- mosquitos and public health, and
- air quality.

It should also be noted that this REIR/EIS and the 1995 DEIR/EIS do not address, and the FEIR/EIS will not address, water right issues raised during the hearing that are beyond the scope of CEQA and NEPA requirements and are therefore outside the scope of the EIR/EIS process. These issues include identification of beneficial uses, financial feasibility of the project, real property disputes, and applicability of existing water rights for proposed project operations. These issues are addressed through the SWRCB’s water right hearing process and USACE’s public interest review. The environmental documents inform the lead agencies about the proposed project’s environmental impacts and recommend mitigation measures to lessen significant impacts. The SWRCB’s water right decision and USACE’s permit decision will take into consideration the EIR/EIS analysis of significant environmental effects.

Document Organization

Following is the organization of this REIR/EIS, in accordance with the State CEQA Guidelines and NEPA implementing regulations:

- Chapter 1. Introduction and Project Background
- Chapter 2. Changes to the Project Description, Alternatives Analyzed, and Future Conditions Considered
- Chapter 3. Water Supply and Operations
- Chapter 4. Water Quality
- Chapter 5. Fisheries
- Chapter 6. Levee Stability and Seepage
- Chapter 7. Natural Gas Facilities and Transmission Pipelines
- Chapter 8. Citations
- Chapter 9. Glossary
- Chapter 10. Report Preparers
- Appendices:
 - A. Summary of stipulated agreements
 - B. FOC
 - C, D, and E. Biological opinions
 - F. Daily simulations of project operations
 - G. Water quality assessment methods
 - H. Levee stability and seepage technical report
 - I. REIR/EIS distribution list

Public Review and Comment Period

This REIR/EIS serves as a full-disclosure document for the public to ensure that interested parties have an opportunity to express their views and concerns about the Delta Wetlands Project, as presented in the updated analysis in this document. The REIR/EIS is being circulated for public review through July 31, 2000. The public and interested agencies are encouraged to submit

comments on the document. In publishing this REIR/EIS, the SWRCB and USACE are recirculating for public review and comment only the revised environmental analysis presented in the REIR/EIS. Those portions of the analysis addressed in the 1995 DEIR/EIS that are not reevaluated in the REIR/EIS are not being recirculated for additional public comment. Comments received on portions of the 1995 DEIR/EIS not included in the REIR/EIS will be addressed in the FEIR/EIS and do not need to be resubmitted. Comments on the REIR/EIS should be sent directly to the SWRCB or USACE, the joint lead agencies, at the following addresses:

Jim Sutton
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000

Mike Finan
U.S. Army Corps of Engineers
Regulatory Branch
1325 J Street, 14th Floor
Sacramento, CA 95814-2922

Once all comments have been assembled and reviewed, USACE and the SWRCB will prepare responses about environmental issues that have been raised in comments on this document as well as comments received previously on the 1995 DEIR/EIS. The FEIR/EIS will consist of the responses to comments, the 1995 DEIR/EIS, the REIR/EIS, and revisions to the analyses that are made in response to comments.

FUTURE STEPS IN THE CONSIDERATION OF DELTA WETLANDS' APPLICATIONS

The SWRCB will decide on Delta Wetlands' water right applications after it completes the further days of its water right hearing. USACE's processing of Delta Wetlands' application for a Section 404 and Section 10 permit was suspended in early 1999 after the SWRCB denied without prejudice Delta Wetlands' Section 401 water quality certification. With the resumption of work to prepare CEQA/NEPA documentation in the form of this REIR/EIS analysis, USACE's permit processing has resumed.

Before it can make a decision approving Delta Wetlands' permit applications, the SWRCB must certify that the FEIR/EIS was prepared in compliance with CEQA, was considered before the project was approved, and reflects the SWRCB's independent judgment. If the SWRCB approves the water right applications, it will make findings for each significant environmental effect identified in the 1995 DEIR/EIS and the REIR/EIS. The SWRCB also will include in the decision a statement of overriding considerations for any impacts determined to be significant and unavoidable. The SWRCB will also adopt a program for monitoring implementation of mitigation measures required as part of Delta Wetlands Project approval.

USACE will circulate the FEIR/EIS for public review. If USACE determines that the FEIR/EIS meets NEPA requirements, it will adopt the document. When it decides on Delta Wetlands' permit applications, USACE will prepare a Record of Decision regarding its determination, the alternatives analyzed, the mitigation measures required as a condition of permit approval, mitigation measures presented but not required, and monitoring and enforcement of the required mitigation measures.

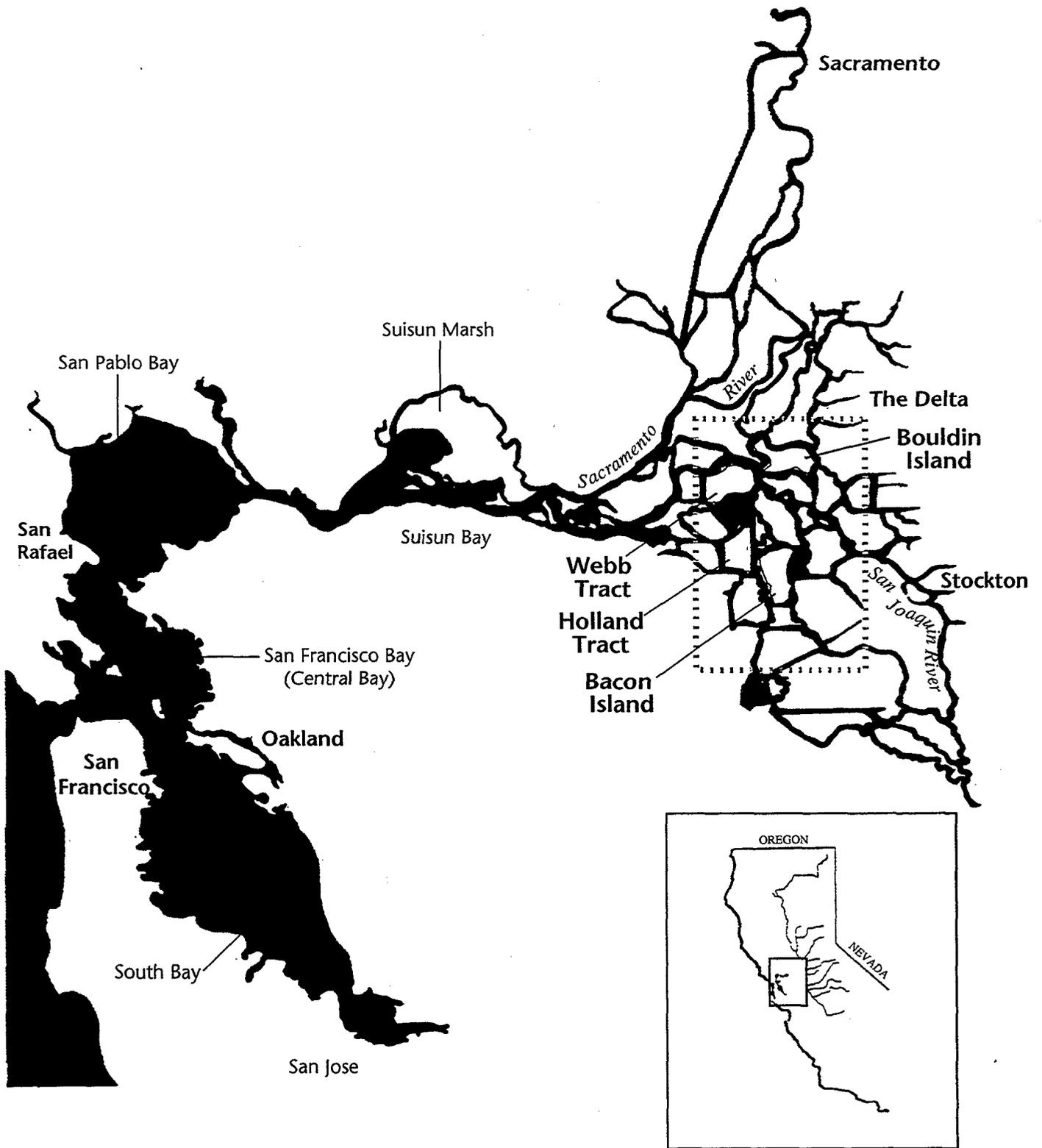
Table 1-1. Timeline of the Delta Wetlands Project

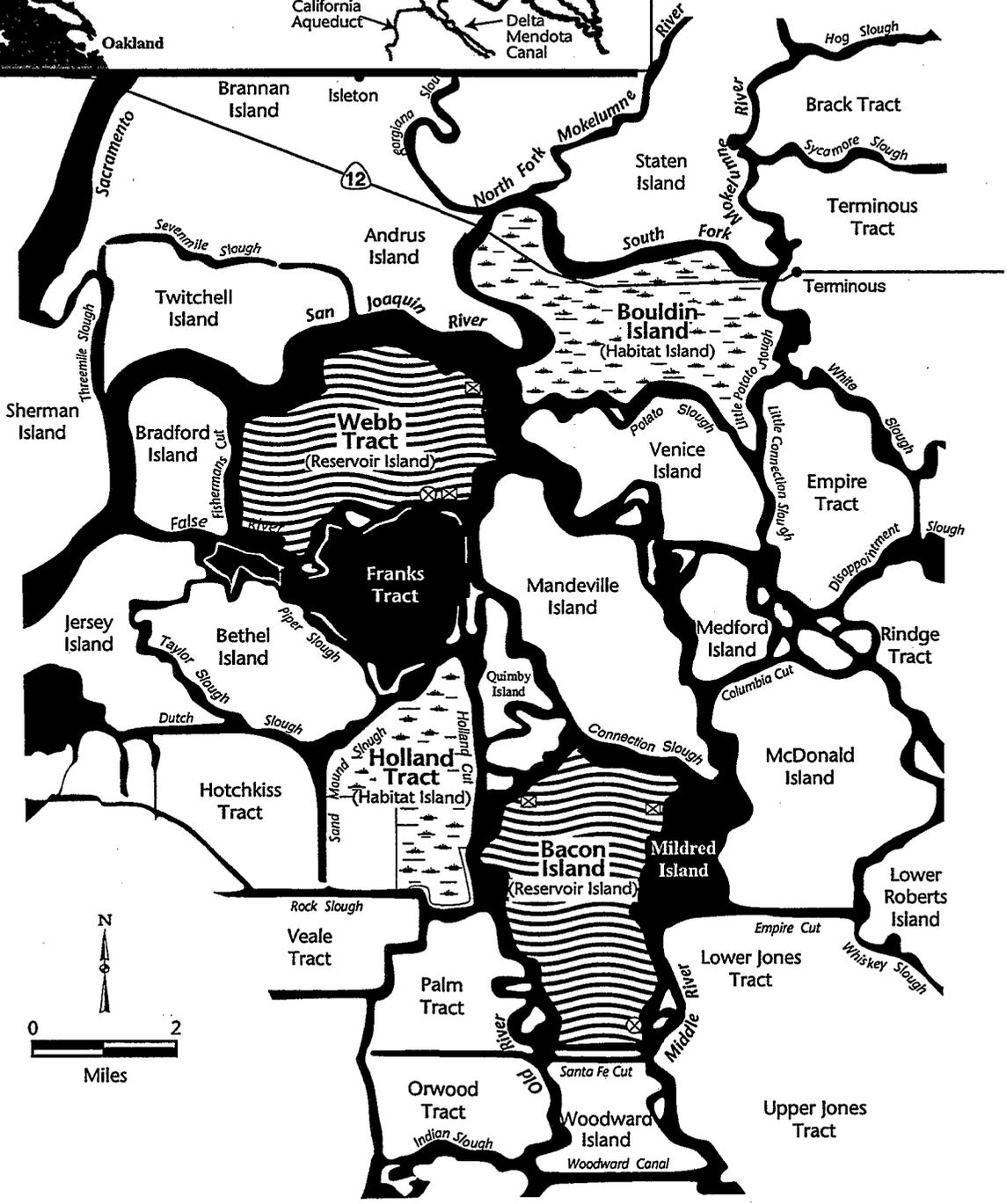
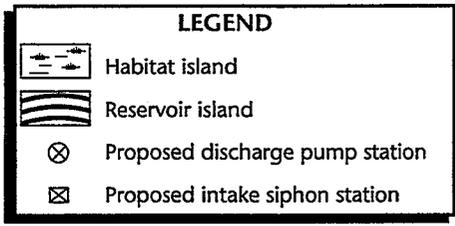
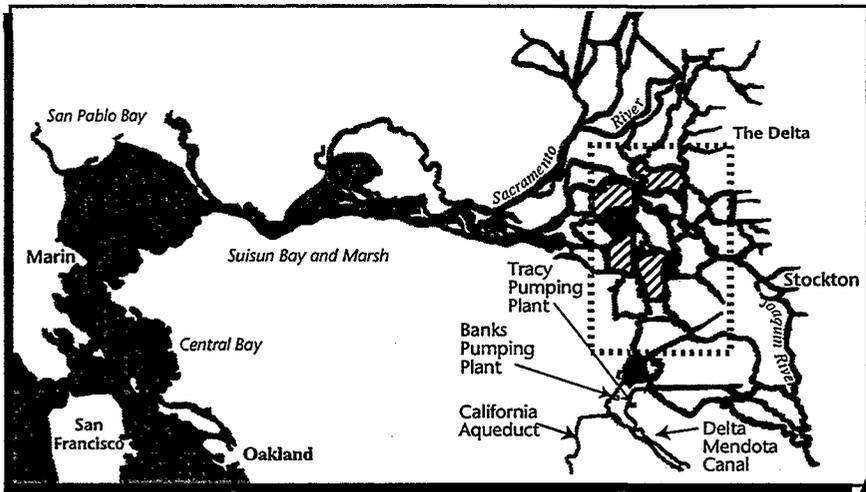
Year	CEQA/NEPA Process	Water Right Process	Section 404/Section 10 Process	Endangered Species Act (ESA) Process
1987		Water right applications filed with the SWRCB for storage of water on four islands		
1988			Department of Army application filed with USACE for discharge of dredged or fill material into waters of the United States and for effects on navigable waters of the United States	
1990	Draft EIR/EIS released (December)			
1993		New water right applications submitted for storage of water on two islands and creation of habitat on two islands		
1995	1995 DEIR/EIS released (September)			Biological assessment of project effects on state-listed and federally listed fish and wildlife species prepared California ESA consultation initiated by the SWRCB with DFG Federal ESA consultation initiated by USACE with USFWS and NMFS
1996	Comments received on 1995 DEIR/EIS			State and federal ESA consultation continues
1997		SWRCB water right hearing conducted to receive input on water right applications		No-jeopardy biological opinions issued by USFWS and NMFS
1998			SWRCB denies Section 401 certification without prejudice	Final no-jeopardy biological opinion issued by DFG
1999	The SWRCB and USACE determine that an REIR/EIS is required to present new information and to describe changes to the project resulting from the water right hearing and ESA consultations	Parties to the water right hearing invited to attend status meetings conducted by the SWRCB	USACE suspends processing of application due to the SWRCB's denial of Section 401 certification USACE resumes processing application with commencement of preparation of REIR/EIS	USACE consults with USFWS and NMFS about newly listed species; Delta Wetlands coordinates with DFG about newly listed species and changes to California ESA

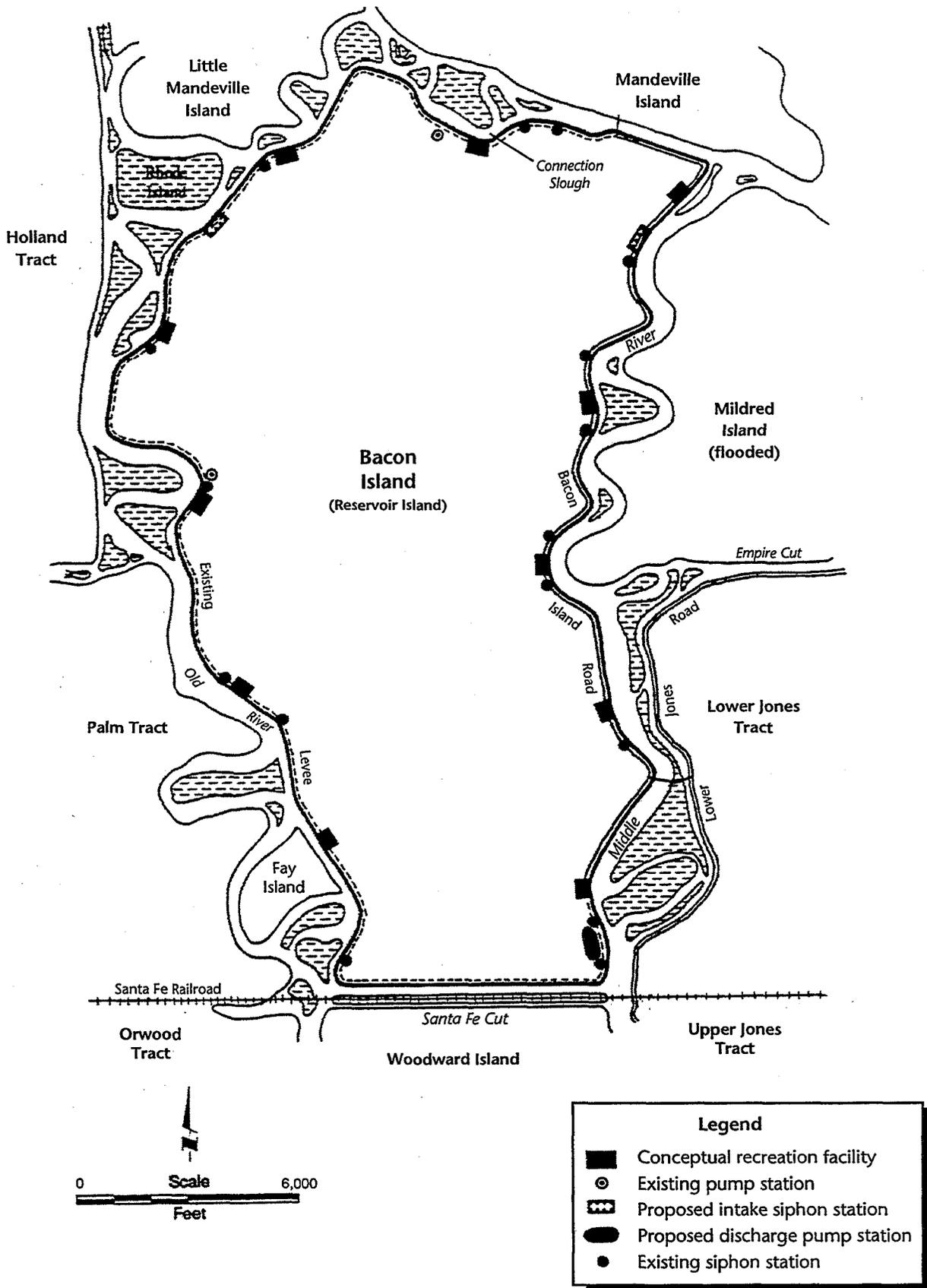
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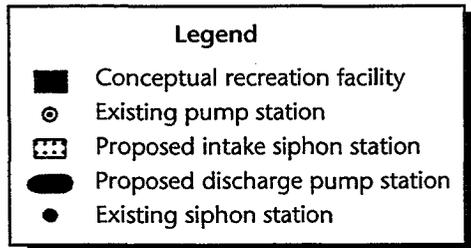
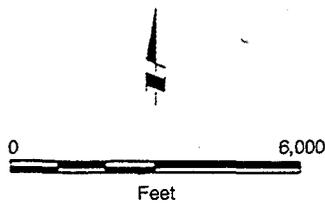
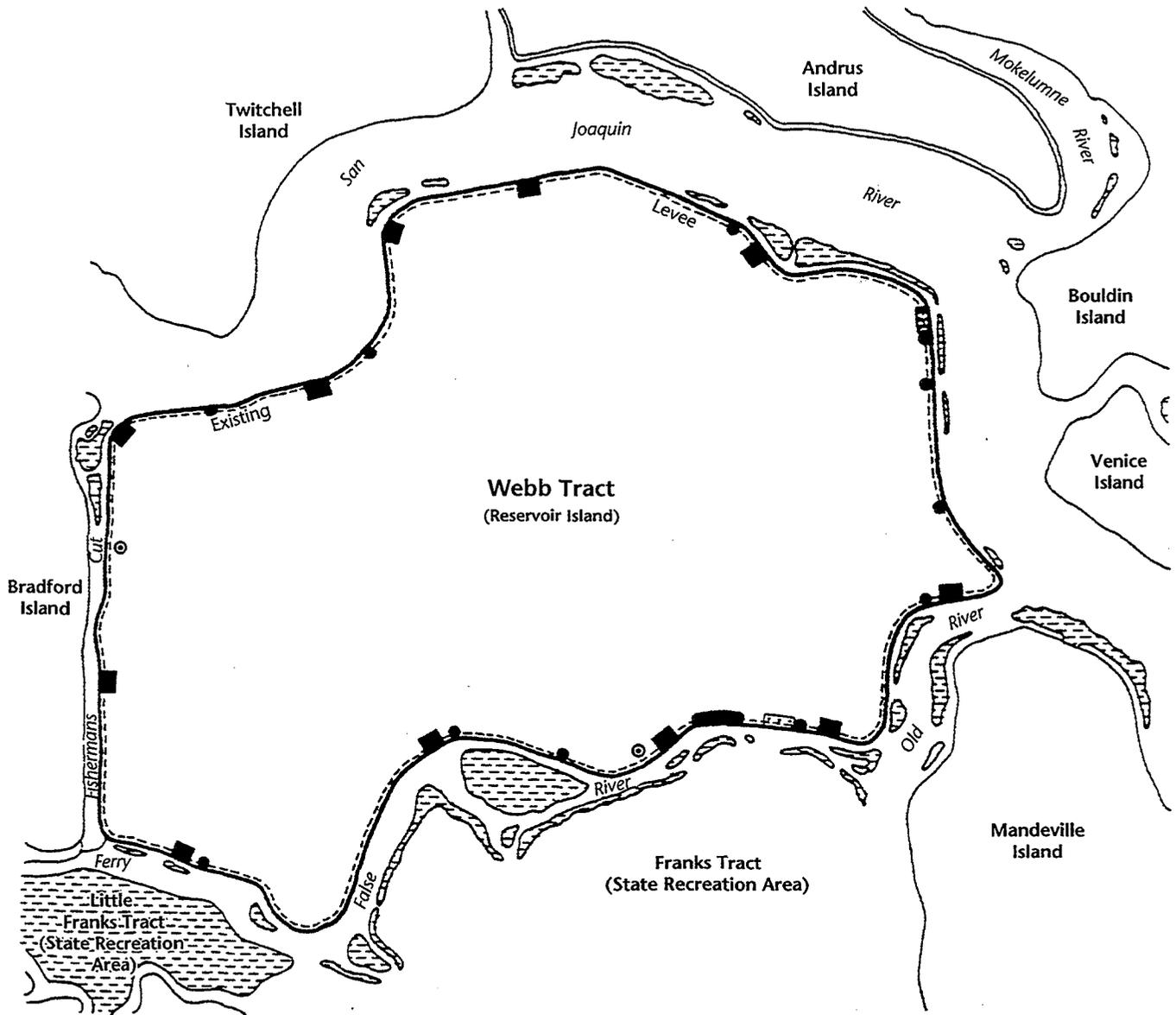
Year	CEQA/NEPA Process	Water Right Process	Section 404/Section 10 Process	Endangered Species Act (ESA) Process
2000	REIR/EIS issued for public review and comment <i>FEIR/EIS prepared, responding to comments received on the REIR/EIS and 1995 DEIR/EIS</i>	<i>After comments are received on the REIR/EIS, water right hearing proceedings continued by the SWRCB</i>		USFWS adopts conference opinion on splittail as biological opinion. <i>NMFS adopts conference opinion on steelhead as biological opinion; NMFS and DFG confirm that their authorizations apply to spring-run chinook salmon</i>
2001	<i>If the SWRCB approves the applications, it certifies the FEIR and adopts findings of fact and statement of overriding considerations for all significant and unavoidable impacts, and adopts mitigation monitoring program</i> <i>USACE circulates FEIS for public review and issues a Record of Decision (ROD)</i>	<i>After FEIR/EIS is prepared, the SWRCB releases a draft water right decision and receives comments on draft decision</i> <i>The SWRCB issues decision on water right permits</i>	<i>After FEIR/EIS is prepared and adopted, USACE confirms compliance with ESA, the National Historic Preservation Act, and Section 401</i> <i>After issuing a ROD, USACE decides whether to issue Department of Army permit</i>	

Note: *Italic type* indicates anticipated future actions.









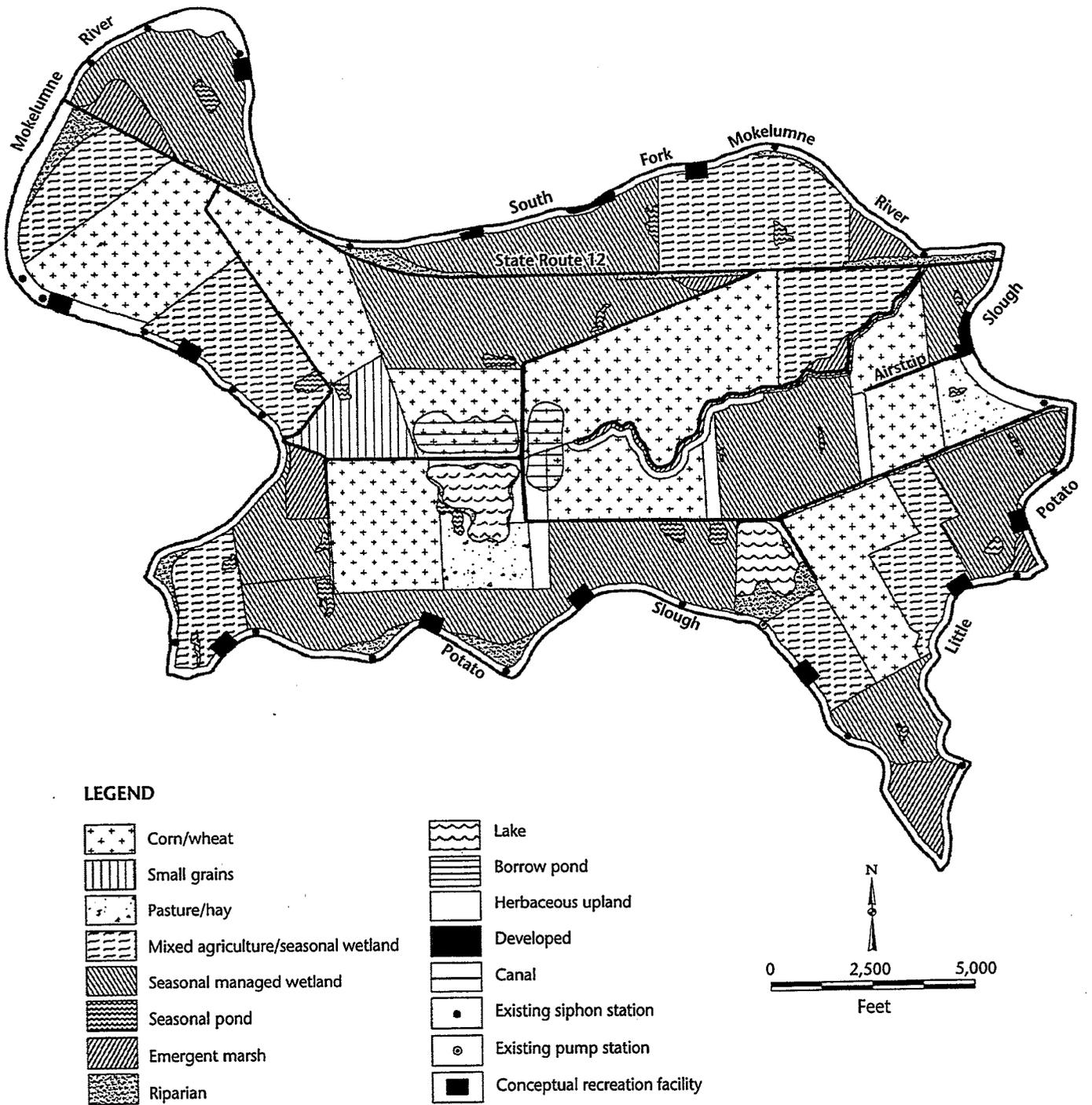


Figure 1-5
Habitat Management Plan Habitats and
Proposed Project Facilities on Bouldin Island

LEGEND

-  Corn/wheat
-  Small grains
-  Pasture/hay
-  Mixed agriculture/seasonal wetland
-  Seasonal managed wetland
-  Seasonal pond
-  Emergent marsh
-  Riparian
-  Lake
-  Borrow pond
-  Herbaceous upland
-  Developed
-  Canal
-  Existing siphon station
-  Existing pump station
-  Conceptual recreation facility

