ENVIRONMENTAL WATER CAUCUS CRITERIA FOR THE ANALYSIS OF THE ECOSYSTEM RESTORATION, WATER USE EFFICIENCY, AND STORAGE AND CONVEYANCE COMPONENTS OF THE CALFED ALTERNATIVES

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1.) Primary Goal. The primary EWC goal is comprehensive ecosystem restoration and the protection of public trust resources throughout the San Francisco Bay-Delta Estuary and its watershed. See Attachment A for a more complete description of what we believe comprehensive restoration entails.

2.) Preferred Approaches. Based on past experience with the impacts of new water supply and conveyance projects, the EWC considers solutions which rely on natural processes and more efficient water management policies as intrinsically superior to solutions which rely on more artificial approaches requiring higher levels of intervention and additional structural components. At the same time, we believe that any comprehensive Bay-Delta solution that fails to cap and ultimately reduce comprehensively both depletions within and exports from the entire Bay-Delta watershed is doomed to failure, because it will leave in place the unsustainable conditions that already place the environment at risk and perpetuate patterns of continued habitat degradation and inadequate stream flow conditions. Therefore, the EWC endorses the following approaches to comprehensive ecosystem restoration:

   a.) Large-scale, long-term restoration of a natural habitat mosaic and stream flow regime in the Bay-Delta system, in order to achieve a set of well-defined objectives and targets for restoring healthy populations and communities of native plants and animals and other desirable species and for maintaining naturally reproducing fish and wildlife populations at sustainable target levels for commercial and recreational harvest. Measurable restoration objectives and targets should include expansion of key tidal and floodplain wetland and riparian habitats by an order of magnitude or more, and should achieve or exceed the state and federal anadromous fish restoration objectives and requirements.

   b.) Maximum use of improved water management techniques, including extensive water conservation, recycling, conjunctive use of surface and groundwater resources, direct as well as market-based acquisition of water, water rights, and related interests, and environmentally sound water transfers, in order to decrease off-stream consumptive demands for water and improve the reliability of remaining supplies in the overcommitted Bay-Delta system.

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c.) Avoidance and minimization of major new storage and conveyance projects, including new conveyance facilities and off-stream surface storage. The adverse environmental impacts of additional on-stream storage are unacceptable in any scenario.

3.) The EWC recognizes that it is not clear which of the alternatives will be most successful in achieving the primary goal of comprehensive ecosystem restoration. For these reasons, EWC has adopted a tiered approach to evaluating alternatives:

a.) For each of the major alternatives, determine whether the approach can be configured so as to meet the primary goal of ecosystem restoration. Alternatives which cannot meet the primary goal should be rejected out of hand.
b.) Alternatives which can meet the primary goal should be configured to be compatible with the preferred approaches.
c.) If more than one alternative is generated through (a) and (b), then the EWC recommends selection of the alternative which provides for restoration in the most natural, efficient and cost-effective manner.

4.) Based on the principles articulated above, our view of the three CALFED alternatives follows:

a.) The no new facilities alternative. This alternative relies most heavily upon habitat improvements and efficiency measures, and least heavily upon a highly engineered approach, and thus is preferred by the EWC.
b.) The through-Delta alternative If the through Delta alternative is configured such that the changes in export conveyance and operation are compatible with large-scale ecosystem restoration in the Delta, then the primary EWC goal might be met.
c.) The dual facility alternative. This approach relies on new isolated conveyance facilities and relies on physical segration of export supplies from Delta inflows. EWC does not support such an alternative because, in our view, advocates of this alternative rely on a number of unproven assumptions, including:

(1) That the no-facilities and through Delta alternatives cannot be configured to achieve the primary goal of comprehensive ecosystem restoration as well as the legitimate needs of other beneficial users;
(2) That the dual facility alternative is capable of achieving the primary goal of comprehensive ecosystem restoration as well as the legitimate needs of other beneficial users;

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(3) That institutional assurances regarding the long-term operation of even a small isolated facility can provide unambiguous and permanent guarantees for protecting the health of the estuary; and,
(4) That the dual facility alternative will not cause damage to other waterways and ecosystems.

5.) Because CALFED intends to evaluate new physical storage as part of each alternative, the EWC recommends the following criteria for evaluation of new storage components:

a.) The benefits and costs of constructing and operating new physical storage components should be compared to the benefits and costs of achieving the highest possible levels of water use efficiency, including programs to extensively recycle and reclaim water and to aggressively reduce demand through direct and market-based mechanisms. The minimal level of water use efficiency likely to be achieved through the draft common program is not sufficient for purposes of environmental review of feasible alternatives.
b.) To the extent that increased storage capacity is considered, priority should be given to more natural approaches utilizing environmentally sound floodplain and groundwater storage opportunities.

6.) The EWC recognizes that the durability of any long term solution is best assured by addressing the legitimate needs of all stakeholders. However, the CALFED Programmatic EIR/S may fail to determine definitively whether approaches based on restoration and efficiency can fulfill the primary objective of ecosystem restoration while meeting the legitimate needs of other beneficial users. Therefore, implementation should be structured and phased such that the preferred approaches are tested first, before less acceptable alternatives that could pre-judge the final outcome are attempted. For example:

a.) The first phase of implementation, as well as the anticipated schedule of annual ecosystem restoration expenditures that CALFED will develop, should emphasize: (1) large-scale water acquisition, efficiency and conjunctive use programs. coupled with (2) extensive restoration of a natural habitat mosaic and stream flow regime in the Delta and other parts of the Bay-Delta ecosystem. In addition to meeting CALFED's ecosystem restoration goals, such a comprehensive and far-reaching restoration approach could well provide enough ancillary water

quality and water supply benefits so that the purposes of the CALFED Program are achieved.

b.) If the needs of the ecosystem and other beneficial users are not met in the first phase, then a second phase might involve: (1) changes in through-Delta export conveyance and operations, provided that they are compatible with large-scale restoration of a natural habitat mosaic and stream flow regime in the Delta and/or (2) appropriate off-stream surface storage.

7.) The phased implementation in the previous section would not necessarily delay the implementation of appropriate new water supply facilities, should such facilities turn out to be necessary. The process for design, approval, financing, and construction of new water supply facilities is likely to be significantly longer than those involving land and water acquisitions for restoration or improved utilization of existing surface supplies and groundwater basins. Thus, approaches based on restoration and efficiency can be implemented substantially before a final commitment is needed on additional elements.