

## CR 16 ISOLATED FACILITY/PERIPHERAL CANAL

This response is to the many comments that focused on whether or not to build an isolated facility (peripheral canal) and the pilot facility at Hood. These comments did not focus on other aspects of water conveyance. Individual comments were either in support of building an isolated facility as soon as possible or for never constructing an isolated facility. Some comments identified the pilot diversion at Hood as simply the first phase of an isolated facility and therefore felt it should not be considered.

It should be noted that while most of the comments used the term "peripheral canal", CALFED evaluated an isolated facility. This project has been compared to the Peripheral Canal which sparked a divisive confrontation in a 1982 state ballot initiative. While the isolated facility shares some of the same objectives of the Peripheral Canal, there are significant differences between the two projects. The scope of the two projects is significantly different. The Peripheral Canal proposed in 1982 was designed to transport 23,000 cfs of water. It was a stand alone project, to be operated as an extension of the State Water Project (SWP) principally for the purpose of increasing the state's developed water supply to meet future needs.

CALFED has evaluated an isolated facility in the size range of 5000 to 15,000 cfs as part of a comprehensive program designed to solve multiple problems in the Bay-Delta. The Program is not considering an isolated facility as a means of increasing water supply. An isolated conveyance facility would only be constructed if there is a future demonstrated need to improve export water quality or to improve operational flexibility which could reduce the impacts of diversions on fish. The isolated facility is not part of the Preferred Program Alternative.

### Evaluation of Conveyance Options

The water conveyance options have been extensively evaluated in Phase II of the CALFED Program. The March 1998 *Phase II Interim Report* provided a summary of preliminary alternatives analysis that was conducted. Eighteen distinguishing characteristics of the alternatives were identified and evaluated. Two key distinguishing characteristics were particularly important in identifying how well the alternatives perform. **Export Water Quality** and **Diversion Effects on Fisheries** were found to be highly dependent on the alternative selected. Therefore, irrespective of whether these two characteristics are the most important to selection of the Preferred Program Alternative, they are the characteristics most dependent on that decision.

Based on the assumptions made for evaluations in the March 1998 *Phase II Interim Report*, the dual Delta conveyance with an isolated facility appeared to provide greater technical performance than the other alternatives. At the same time, however, there are still major assurances issues associated with this approach, and CALFED needs to obtain better scientific information plus information on an array of other water management options to assess the need for the dual Delta conveyance. In addition, while the dual Delta conveyance may have technical

advantages over other Delta conveyance, it would likely take a decade or more to plan, design, permit, and construct.

To address the assurances, need for better scientific information, and long lead time required for the dual Delta conveyance, CALFED more fully integrated adaptive management throughout the program elements. This led to structuring implementation in stages over time. Each stage begins implementation of certain actions, gathers scientific information to help future decisions on other actions, and provides greater assurances that actions within each stage will move forward together and will be operated as intended. With this approach, a more informed decision on the need for the dual Delta conveyance can be made in the future.

The CALFED strategy regarding conveyance must consider fisheries and water quality for in-Delta uses and drinking water. These factors are critical to conveyance decisions both now and in the future as part of adaptive management. The existing Delta channels will be an integral part of CALFED's strategy for Delta conveyance. The reliance on these channels provides a shared interest in restoring, maintaining, and protecting Delta resources, including water supplies, water quality, levees, channel capacities and natural habitat. Some modifications to these through-Delta channels can improve all of these Delta resources.

### **CALFED's Delta Conveyance Strategy**

CALFED's strategy is to develop a through-Delta conveyance alternative based on the existing Delta configuration with some modifications, evaluate its effectiveness, and add additional conveyance and/or other water management actions if necessary to achieve CALFED goals and objectives. The initial through-Delta conveyance will be continually monitored, analyzed, and improved to maximize the potential of the through-Delta approach to meet CALFED goals and objectives, consistent with the CALFED Solution Principles. If the through-Delta conveyance fails to meet the CALFED goals and objectives, there will be a reassessment of the reasons and the need for additional Delta conveyance and/or water management actions.

Because of the many complex interactions within the Bay-Delta system, successfully implementing a through-Delta strategy requires careful balancing of actions to address a wide range of concerns, including water quality, flood control, fisheries, water levels, circulation patterns, channel scour and sediment deposition. Actions which improve water quality and flow direction in one region of concern, for example, may in turn create adverse impacts elsewhere. The understanding of these complex hydrodynamic, biological, and chemical interactions is still incomplete so it will be necessary to approach the optimization of CALFED's strategy with a high degree of cooperation, rigorous monitoring, scientific analysis, and an open-minded approach to solution options. It will also be essential that the implementation of proposed solution actions be linked so that the appropriate balance of benefits and impacts is maintained throughout the implementation period.

As noted above, CALFED has identified two factors, export water quality and diversion effects on fisheries, as especially important for evaluating the effectiveness of the CALFED conveyance alternative. These and other factors will be continually reevaluated during Stage 1 as part of the

adaptive management process. Under the Preferred Program Alternative, some additional actions may be taken to enhance the through-Delta alternative.

As part of the Preferred Program Alternative, CALFED will study and evaluate a screened diversion structure on the Sacramento River (or equivalent water quality actions) as a measure to improve drinking water quality in the event that the Water Quality Program measures do not result in adequate improvements toward CALFED drinking water quality goals. This evaluation would consider how to operate the Delta Cross Channel in conjunction with this new diversion structure to improve drinking water quality, while maintaining fish recovery.

If the Water Quality Program measures are consistently not achieving water quality goals, and the evaluation demonstrates that a screened diversion of up to 4,000 cfs would help achieve those goals without adversely affecting fish populations; a pilot screened diversion would be constructed. This pilot would likely include a fish screen, pumps and a channel between the Sacramento and Mokelumne Rivers. The design, size and operating rules for this pilot facility would allow for analyses of impacts to upstream and downstream migrating fish as well as impacts from habitat shifts resulting from increased flows in the eastern Delta on Delta species. Following evaluation of the pilot facility operations, a final decision would be made on whether the diversion channel and structure should continue to be used, and if so, what the operational rules and optimum size of the diversion should be.

If a pilot diversion at Hood was found to be necessary, it would be located within the same corridor that was identified as best suited for an isolated facility. If in fact the pilot diversion facility was approved and constructed, it would be prudent use of the funding to insure that it would be compatible with the needs of an isolated facility, if one was ever required in the future. It is important to reiterate that an isolated facility is not part of CALFED Preferred Program Alternative.

Other actions to enhance the CALFED conveyance strategy, such that CALFED goals and objectives could be achieved, would require consideration of a variety of alternatives and evaluation of available new information. This evaluation would take place in a supplemental programmatic evaluation focused on the goals and objectives that have not been achieved in addition to project-level evaluations. For example, if ongoing evaluation indicates that CALFED is not achieving its goals and objectives using the through-Delta alternative, supplemental programmatic evaluation of a number of water management options, including an isolated conveyance facility, would be conducted and a decision made based on this evaluation.

CALFED recognizes the need to develop solutions to the conveyance issues that provide appropriate balance in meeting all of CALFED's goals and objectives. CALFED believes that benefits to water quality and water supply reliability gained by conveyance improvements in Stage 1 and beyond must be shared between both consumptive and environmental water uses. Defining how the benefits are shared for particular projects will be determined during the implementation process.

## Future Conveyance Actions

CALFED will evaluate progress towards achieving its water quality and species recovery goals and objectives during Stage 1 with the advice and assistance of expert panels as described in the Water Quality and Ecosystem Restoration Program Plans. The deliberations of those panels will be part of the open, public decision making process CALFED will follow to determine if different conveyance and/or other water management actions should be evaluated in order to achieve water quality and species recovery goals and objectives.

CALFED will use the advice of water quality expert panels and the ERP Science Review Panel to conduct program reviews in 2003 and 2007 with stakeholder involvement to assess whether Stage 1 actions to meet CALFED goals and objectives have been successful and determine whether modifications in conveyance and/or additional water management actions should be evaluated to simultaneously achieve species recovery, water quality improvement, levee system integrity, and water supply reliability. CALFED will present the results of these reviews to the Legislature and Congress, along with its recommendations, if any, for legislative action.

In the event of a finding that a through-Delta conveyance system is inadequate to achieve CALFED goals and objectives, additional actions, including an isolated facility, source water blending or substitution, and other actions will be intensively evaluated through supplemental programmatic analysis for their ability to solve these problems, and a decision made to proceed with the most appropriate actions. If an isolated facility were ultimately found to be necessary for achieving CALFED's goals and objectives, it would be designed with each of the following assurances:

1. An agreement limiting the amount, or proportion, of water that can be exported (linked to water year types and flexible enough to allow additional exports when conditions allow) and needed assurances for compliance
2. Commitment to continuous improvement of in-Delta water quality sufficient to protect existing beneficial uses (Delta standards or contracts including assurances for implementation, permits, financing, and Operations and Maintenance)
3. Commitment to avoid potential seepage and flood impacts of an isolated facility along its alignment
4. Long-term funding for Delta levees (perhaps tied to quantity of water moved in the isolated facility or other institutional assurances ) and commitment to provide at cost, suitable excess excavated material from facility construction for levee and habitat improvements
5. Reaffirm commitment to protect all area of origin water rights and to continue implementation of the 1959 Delta Protection Act
6. Completion of all environmental documentation and permitting requirements

7. Demonstrated commitment to finance by beneficiaries
8. Agreement on operating authority and operating criteria
9. A determination that the through-Delta conveyance with the other program elements cannot meet CALFED goals and objectives, and that an isolated conveyance facility is the most cost-effective and least environmentally damaging measure to correct this deficiency in meeting the goals and objectives
10. A decision to proceed with implementation of the Program will come through State and potentially federal legislative action. CALFED intends that this legislative action will not include legislative overrides or exemptions from State or federal environmental laws (including, but not limited to, the federal and State ESA, the Clean Water Act, NEPA or CEQA).

Please refer to Chapter 2 of the PEIS/EIR, Alternative Descriptions, for an overview of conveyance by alternative. Please see Chapters 5, 6, and 7 for discussion of environmental consequences related to the differences in conveyance by alternative. For further information, please see the Revised Phase II Report, June 1999.

Revised 11/01/99 RDJ