ENVIRONMENTAL, ENVIRONMENTAL JUSTICE, AND FISHING COMMUNITY JOINT SCOPING RECOMMENDATIONS FOR THE DELTA STEWARDSHIP COUNCIL

January 25, 2011

Sierra Club California

Defenders of Wildlife

NRDC
The Earth's Best Defense

Planning and Conservation League

california water impact network

Environmental Defense Fund
finding the ways that work

Restore the Delta
Fishable, Swimmable, Drinkable, Farmable by 2010

The Bay Institute

Friends of the River

California Sportfishing Protection Alliance

California Coastkeeper Alliance
A Statewide Voice for Our Waters

Environmental Justice Coalition for Water

Endangered Species Coalition

Southern California Watershed Alliance

Desal Response Group

Pacific Coast Federation of Fishermen's Associations
PCFFA
Stewards of the Fisheries

Environmental Water Caucus

Foothill Conservancy

Clean Water Action
California

River Watch
Northern California River Watch PO Box 817 Sebastopol CA 95472 www.ncriverwatch.org

Southwest Council FFF
Many Clubs...One Goal

Friends of Trinity River

CA Save Our Streams Council

AquAlliance
Defending Northern California Waters

Northern California Council
Federation of Fly Fishers

The Fish Sniffer

Institute for Fisheries Resources
Unite. Protect. Restore.

Sacramento River Preservation Trust

Philip Isenberg, Chair
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA
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January 25, 2011

Re: **Notice of Preparation for the Completion of an EIR on the Delta Plan**

On behalf of a broad coalition of environmental, environmental justice and fishing groups, we are pleased to submit scoping comments in response to the Council's December 10 Notice of Preparation. This is an important moment for the Council and the Bay-Delta ecosystem. The Delta's ecosystem is in a state of ongoing collapse and there are concerns regarding the long-term physical stability of the Delta. Drafting a visionary and effective Delta Plan will require the careful consideration of a wide range of alternative actions, including significant new directions in water management.

We respectfully urge the Council to consider the attached detailed recommendations, which address water management and ecosystem restoration issues. These recommendations are intended to be the beginning of a dialogue with the Council. They represent our initial thoughts on the steps necessary to develop an adequate plan, and we are committed to working with you to refine and improve these recommendations in the coming months. **In the near future, we will submit additional recommendations for inclusion in the Delta Plan, addressing water quality, environmental justice, governance, finance and other issues.**

We recommend that the Council use the following broad recommendations to guide the development of the draft Delta Plan and a draft EIR that analyzes an appropriately broad set of alternatives.

- **Restoring Adequate Flows for the Delta and Fisheries**: The Council should clearly recognize that the Bay-Delta system is over-appropriated and that ecosystem restoration will require stronger flow standards and reductions in average annual diversions. The evaluation of alternative Delta conveyance facilities (see the following recommendation) must be consistent with the best available peer reviewed science and include a protective operational scenario guided by the State Water Board's flow criteria.
- **Analyze a Full Range of Conveyance Facilities**: The Council should clarify the meaning of the term water supply reliability. Specifically, the Council should clearly state that the purpose of state and federal investigations of a Delta isolated facility is to decrease the physical vulnerability and increase the predictability of Delta supplies, not to increase average annual Delta exports. Investigations of new Delta water conveyance facilities must evaluate a full range of capacities (3,000-15,000 cfs), operations, and costs at a common level of detail, as well as an alternative that would not include a new conveyance facility.
- **Reducing Reliance on the Delta and its Watersheds**: Recognize that California has dramatic opportunities to invest in regional water supplies (e.g. agricultural and urban conservation, wastewater recycling, groundwater management and urban stormwater capture) that can allow the state to meet its future needs, while simultaneously facilitating the restoration of the Delta ecosystem and its watersheds.
- **Restoring and Protecting Habitat**: Include an ambitious, large-scale habitat restoration effort in the Delta and upstream, undertaken through a phased approach and a process that includes local communities in the planning process. Habitat restoration and protection must complement, not replace, improvements in flow conditions. A similar approach to phasing can help in other areas as well, such as strengthening flow requirements and investing in regional self-reliance.
- **Enforcing Existing Water Pollution Control Laws.** Commit to full implementation and enforcement of state and federal laws to protect both surface water and groundwater quality. The state is failing to meet existing standards to protect Bay-Delta surface water and groundwater quality, and is lagging in

the development of new standards and pollutant loads needed to ensure the health of the estuary's waters. Contaminants such as salt, selenium, mercury, nutrients and pesticides pollute drinking water and damage the health of the Delta, and the damage is mounting. See http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml for the latest information on impaired surface waters.

- **Grounding the Delta Plan in Biological Objectives**: Base the Delta Plan on the development of SMART (specific, measurable, achievable, relevant to the goal, and time bound) biological objectives to guide and measure ecosystem recovery. These objectives should be developed using the "logic chain" and the April 29, 2010 federal "White Paper on Application of the 5-point Policy To the Bay Delta Conservation Plan." Those objectives should serve as the foundation for designing projects, analyzing the effects of major decisions, monitoring, and adaptive management. Finally, these objectives should include a full range of species (e.g. doubling fall-run salmon) and ecosystem functions, not just listed species.
- **Basing the Plan on the Best Available Science**: Include a strong emphasis on science, particularly on ensuring that the results of the best available science are actually incorporated into decision-making. In the past, careful scientific reviews have frequently not been incorporated into key agency decisions.
- **Incorporating Economics and Financing**: Include a strong focus on economics and a "beneficiary pays" approach to financing. We offer three specific examples. First, investigations of Delta facilities should consider cost-effectiveness, not just maximum diversions. A "beneficiary pays" approach to a Delta facility requires that export water users pay for the costs associated with planning, capitalization, finance, operations and maintenance, and mitigation. Second, a package of targeted water fees is essential to accomplish ecosystem restoration and Delta flood management improvements. Third, a reduction in subsidies and movement toward full-cost pricing can significantly improve water use efficiency.
- **Establishing Equitable Governance**: Ensure that major Delta decisions are reached through efforts designed to include all stakeholder groups with a legitimate stake in the outcome. In the past, all too often, water exporters have dominated key decision-making forums and some groups have been excluded.
- **Achieving Environmental Justice**: Assure that all policies are designed to comply with environmental justice standards by avoiding negative impacts and assuring equitable benefits to environmental justice communities. Achieving environmental justice must be founded on engagement of EJ communities in the planning and development of the plan and any mitigation plans that are necessary.

Thank you for considering the above and the attached comments. We look forward to providing additional comments and to working with the Council in the development of the Delta Plan.

Sincerely,

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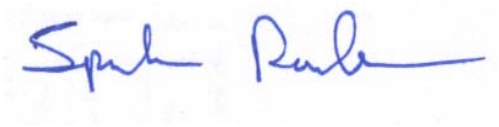

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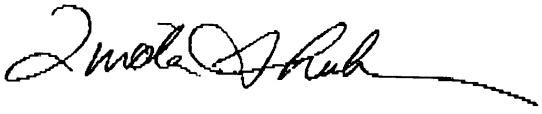

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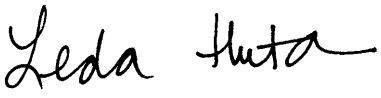

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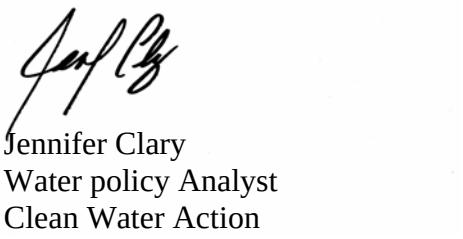

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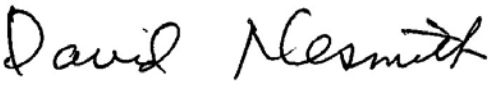

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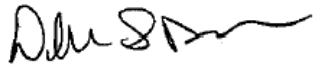

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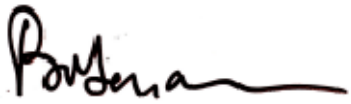

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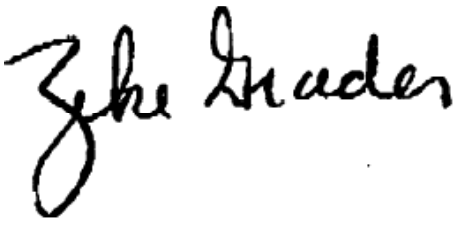

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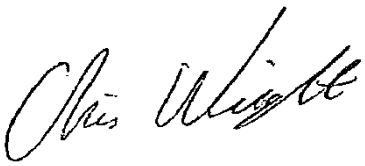

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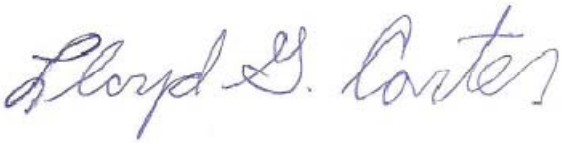

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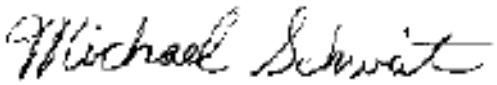

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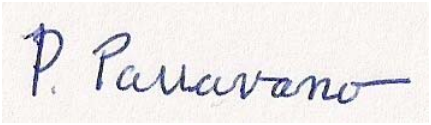

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FINAL DRAFT
ENVIRONMENTAL, ENVIRONMENTAL JUSTICE, AND FISHING COMMUNITY JOINT SCOPING RECOMMENDATIONS FOR THE DELTA STEWARDSHIP COUNCIL
January 25, 2011

ECOSYSTEM RESTORATION

Findings

The major environmental objective of the Delta Plan is to recover the health of the Delta. The recent Delta Flow Criteria Report produced by the State Water Resources Control Board clearly indicated the need for increased flows through the Delta in order to protect public trust resources and to recover Delta ecosystems. As stated in the report, one purpose of the flow criteria is "to inform planning decisions for the Delta Plan."

The health of many species that spend a portion of their lifecycle in the Delta is dependent on conditions in the upstream tributaries; therefore a healthy Delta ecosystem requires healthy conditions in those upstream tributaries.

Policy Recommendations for Delta Flows

1. Develop SMART (specific, measurable, achievable, relevant to the goal, and time bound) biological objectives using the logic chain approach developed by the Bay Institute and others and the April 29, 2010 federal "White Paper on Application of the 5-point Policy To the Bay Delta Conservation Plan." Those objectives should serve as the foundation of the analysis of the effects of major decisions in the Delta as well as of adaptive management efforts. These objectives should include a full range of species (e.g. fall-run salmon doubling) and ecosystem functions and not be limited to listed species.
    - Develop enforceable assurances and enforcement mechanisms to ensure the achievement of the above biological objectives.
2. Implement stronger flow protections through a phased approach to making continuous progress toward ecosystem restoration:
    - The initial phases should include the current smelt and salmon BOs, along with improved flows on the lower San Joaquin River, to be developed by the SWRCB.
    - Establish stronger subsequent protections to be adopted by the SWRCB, including increased spring outflows and San Joaquin River pulse flows. Adopt new requirements by 2012, with implementation beginning no later than 2015.
    - Over the longer term, establish a policy of fully achieving the SWRCB and DFG recommended flows – to be modified as necessary, if the Delta's fundamental flow patterns are physically modified.
    - Once the ecosystem has recovered and additional restoration programs are implemented (e.g. the completion of wetland and floodplain habitat restoration and improvements in water quality), the SWRCB may consider whether modest adjustments in flow requirements, consistent with flow protections, are justifiable while maintaining ongoing achievement of biological objectives.

3. Create enforceable mechanisms to ensure that water exports from the Delta and water transfers are consistent with protective Delta flow standards.

Policy Recommendations for Tributary Flows

1. Provide stream flows in tributary rivers that are necessary to protect public resources; direct the SWRCB and DFG to complete recommendations for instream flows for high priority rivers by 2015 and for all major rivers and streams by 2020.
2. Ensure that upstream water operations and diversions are consistent with the updated flow and temperature standards, including management of reservoirs to maximize cold-water pools for later downstream releases.
3. Evaluate dam removal and improved fish passage opportunities and, wherever feasible, provide effective fish passage for all salmonid species. Prioritize efforts to benefit tribal communities (e.g. on the McCloud River) that have lost access to historic fisheries.
4. Integrate floodplains with rivers and streams and salmon restoration programs.
5. Support the full implementation of the Trinity River Record of Decision in a manner that respects Native American rights and aids Humboldt County in implementing in-basin fish restoration actions.
6. Support the full and timely implementation of the San Joaquin River restoration agreement, including the full restoration of specified flows from Friant Dam to the Delta.

Policy Recommendations for Physical Habitat Restoration

1. Aquatic habitat restoration of wetlands, marshlands and riparian areas and floodplains is a necessary complement to adequate restoration flows; habitat is not a substitute for flow nor is flow a substitute for habitat.
2. As the Delta is both a man-made and natural place, habitat for endangered terrestrial species is the result of the reclamation of Delta agricultural lands. A balance should be achieved to protect present terrestrial habitat that is agriculture dependent while embarking on aquatic habitat restoration projects.
3. Implementation of the Delta Plan must contribute to implementation of the Central Valley Joint Venture' habitat goals in order to protect, restore, and enhance wetlands for waterfowl as well as for numerous other wetland dependent species.
4. To the greatest extent possible, habitat restoration within the Delta and its watershed must be based on sound science and community viability. Specifically, in-Delta and upstream interests must be full partners in developing and implementing habitat restoration programs so that a desirable mix of aquatic habitat restoration and sustainable agriculture is achieved.
5. Aquatic habitat restoration programs should be incentivised so as to encourage the involvement of landowners. In-Delta interests should be brought to the table to identify, create, prioritize, implement, monitor and evaluate restoration projects.
6. Habitat restoration should be accomplished through "willing seller / willing buyer" provisions and should avoid condemnation proceedings.
7. To the maximum extent practical integrate habitat restoration with sustainable farming practices and flood management activities in the Delta and its watersheds.
8. Incorporate rigorous scientific input and review in the identification, prioritization, monitoring and evaluation of projects and establish a robust program for learning from

evaluations and applying lessons-learned to future management activities. A clear and explicit adaptive management strategy must be integrated into the Plan from the outset; its description cannot be left undefined until or left as a "next step".

9. Develop clear connections between proposed restoration activities and the goal/objective statements that will allow evaluation of the activity in the context of the overall plan and post-implementation learning and evaluation of success.
10. Recognize that habitat restoration upstream of the Delta is a necessary component for restoration of species dependent on the Delta and its watersheds. Develop clear goals and objectives for habitat restoration upstream of the Delta.
11. Develop a restoration plan that contains a schedule for restoration and identifies priority areas that science suggests provide the greatest benefit for achieving restoration objectives. The plan should be reviewed and modified periodically to accommodate new information learned as a result of implementation and subsequent monitoring and research.
12. Recognize that habitat restoration will be accomplished in phased stages and will take a long period of time, probably 40 to 50 years to fully implement.
13. Habitat restoration should be fully funded to accommodate monitoring, evaluating and reporting provisions.
14. Annually evaluate progress towards achieving habitat objectives and targets and conduct a formal review of restoration priorities every 5 years as part of the Delta Plan update process.

System-wide Policy Recommendations

1. Develop recommendations and legislation recognizing protective instream flows as a water right for the protection of public trust uses, including permanently protecting water needed to ensure ecosystem health. Consider Oregon's system as a possible model.
2. Discourage mechanisms, such as the Environmental Water Account, which require the public to purchase water for bedrock environmental compliance purposes and that interfere with ecosystem restoration and science-based adaptive management.
3. Water Transfers.
    - Establish a comprehensive process for evaluating permanent, and serial short-term water transfers, specifically with regard to potential Delta, groundwater and upstream impacts. These long-term transfers raise issues that are different from true short-term transfers.
    - Perform and independent evaluation of potential groundwater management impacts and the relationship between groundwater and proposed permanent surface water transfers.
    - Ensure that water transfers do not result in harm to source areas groundwater aquifers or aquatic resources.
    - Recommend policies and legislation that would require the reallocation of a portion of the amount of water transferred in any permanent or serial water transfer, in order to reduce over-allocation problems and assist with ecosystem restoration efforts.
    - Develop and implement policies that minimize third party impacts to disadvantaged communities, particularly disadvantaged rural communities, tribes and to subsistence fishing activities.
    - Where third party impacts are unavoidable, consult with impacted communities in the development of a mitigation plan and ensure the policy implementation is contingent on funding for implementation of the mitigation plan.

WATER MANAGEMENT

Findings

In view of continuing population pressures, economic development and climate change – which will reduce natural water supplies – the major challenge facing California water users is to manage existing supplies more efficiently. Greater efficiency has the proven potential to save water and actually reduce total demand, despite increasing population and development.

Defining Water Supply Reliability

To guide the Council's work to "provide a more reliable water supply for California" (Water Code Sec. 29702(a), it is important to define the term "water supply reliability." The assurance of a reliable water supply is a common goal for all water districts, whether they are urban or agricultural water suppliers. But the Council's definition must recognize that it is not possible for the Delta alone to meet the state's water needs. Improving the reliability of water supplies from the Delta means decreasing the vulnerability of Delta water supplies to disruption from natural disasters (e.g. earthquakes, sea level rise, floods and levee failures), and increasing the predictability of those supplies. Improving water supply reliability does not require increasing, or even maintaining, current levels of diversions. As a result, it is perfectly possible to increase the reliability of supplies from the Delta, reduce diversions, reduce reliance on Delta supplies and restore the Delta ecosystem.

This definition of reliability is reflected in the Council's November 15 letter to Byron Buck, which clearly confirmed that the mandate to reduce reliance on Delta supplies "includes all current water supply needs *as these needs will continue into the future"* (emphasis in the original). That letter also confirms that the legislature intended to "reform *current* unsustainable uses in the Delta" and that "(p)rudent and resilient management must seek to redesign the system in ways that allow for the probability of reduced exports." Finally, the letter concludes, "the legislature expects our water supply system, and the economy that relies on it, to be more resilient and <u>less reliant</u> on the Delta."

The Council can also work to "provide a more reliable water supply for California" (Water Code Sec. 29702(a)) through a focus on tools that are broader than a narrow focus on Delta water management. In developing water supply reliability recommendations that reach beyond the Delta, the Delta Plan should include provisions that reflects the following:

- It is not possible for the Delta and its watersheds to meet all the state's water needs.
- All of California's water systems are inter-linked and it is imperative that solutions for the Delta include consideration of statewide implications.
- The state's aquatic ecosystems and fisheries also need reliable water supplies, and as such should hold rights as the most senior water users.
- We have reached – and exceeded – the amount of water can be responsibly diverted from the Bay-Delta, groundwater and other surface water sources statewide.

- Improving water supply reliability begins with a responsibility to use water reasonably, efficiently and to increase that efficiency over time.
- Although the state must plan for a water supply adequate to meet the needs of Californians and the state economy, the state itself does not have the obligation to provide all of those supplies. The state cannot and should not assume responsibility to provide all of the water demanded by all water users in all locations. Water users bear a responsibility to take steps to plan responsibly and implement appropriate water supply programs.
- The state has a responsibility to ensure that disadvantaged communities can have access to safe and affordable drinking water.
- Climate change is likely to reduce the amount of water available from existing surface and groundwater sources.
- Ongoing and historic contamination threatens ecosystem health, human health and the reliability of water supplies.
- Planning a more reliable water supply requires a focus on cost-effectiveness and a "beneficiary pays" approach to financing within biological and hydrologic constraints.
- Planning a more reliable water supply means planning for periods of shortages. It is not possible to provide supplies that are not subject to some uncertainty, for example, from prolonged or severe droughts.
- Different uses require different levels of reliability. Because of the higher economic value of water in urban uses, along with a lower level of flexibility in comparison with agricultural uses, urban water use requires a higher level of reliability.
- There is no silver bullet to providing a reliable water supply. The winning approach will include a portfolio of investments, emphasizing tools such as efficiency, water recycling, improved groundwater management, Low Impact Development and conversion of drainage-impaired lands.

System-wide Policy Recommendations

1. Develop alternatives designed to implement the state's existing policy of reducing reliance on Delta diversions. Each alternative should include a program of specific water management actions designed to achieve this goal.[1]
2. Recommend incorporating the goal of reducing reliance on Delta supplies by promoting regional self sufficiency in every region of the state.
3. Require mandatory reporting to the State Board of all surface and groundwater diversions by 2012.
4. Support legislation to strengthen the State Board's ability to detect and prosecute illegal diversions.
5. Enact legislation to require all urban and agricultural water agencies to integrate more aggressive tiered pricing into their rate structures, with lifeline provisions for low income residential customers.

[1] Los Angeles County Economic Development Corporation (LAEDC). 2008. Where Will We Get the Water? Assessing Southern California's Future Water Strategies. P 6. http://www.mwdh2o.com/BlueRibbon/pdfs/Water_SoCalWaterStrategies.pdf

6. Establish clear responsibility for coordinating and monitoring accomplishment of the enhanced conservation targets.
7. Reform water contracts and water rights to reduce the current over-appropriation of the Bay-Delta system
    - Modify CVP and SWP contracts to reflect realistic levels of water delivery, compatible with ecosystem restoration.
    - The Delta Stewardship Council should recommend that the SWRCB make an official finding on the extent of over-appropriation of the delta watershed by season and water year type; this should be accomplished by 2014. In the interim, the SWRCB should not issue any new water rights in the watershed.
    - Over the long-term, the SWRCB should undertake a program to modify existing water rights to incorporate comprehensive, new flow requirements, the likely impacts of climate change and realistic total diversions from the Delta and upstream tributaries.
9. Support the Delta Watermaster's call for the establishment of a Reasonable Water Use Unit within the State Water Resources Control Board's Division Of Water Rights.[2]
10. Implement forecast-based flood releases with needed downstream channel improvements in order to provide increased flood protection and increased water storage.[3]
11. Evaluate the potential for surface water storage for multiple purposes within the Tulare Lake bed.
12. Increase flood plain restoration to provide water storage benefits.
13. Analyze the energy use impacts and associated greenhouse gas emissions of each proposed conveyance alternative, a full range of projected water export levels, as well as alternative water supply strategies.[4]
14. Evaluate the potential for the State Water Board to evaluate a mandatory water "loading order" that would make conservation and efficiency improvements the highest priority investments.
15. The Delta Stewardship Council should recommend a package of reforms to reduce subsidies and move to full-cost water pricing to encourage efficiency.

Policy Recommendations for Urban Water Use

1. Integrate full implementation of the 20/20 plan into the Delta Plan and IRWMPs.
2. Establish a more ambitious long-term urban water conservation target to succeed the 20/20 goal.
3. Advance the date by which all urban water agencies must be fully metered to 2017 – from the current deadline of 2025.
4. Require statewide volumetric pricing for wastewater service for the 70% of residential customers that currently pay a flat rate for sewer service.
5. The State Water Board should develop regulations by 2013 to allow for non-potable indoor use of captured rainwater.

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[2] Craig M. Wilson, Delta Watermaster. The Reasonable Use Doctrine & Agricultural Water Use Efficiency. 2010. P. 14.

[3] Aris Georgakakos. Reducing Vulnerability with Probabilistic Hydrological Forecasts and Modern Decision Support Systems, Sixth Annual California Climate Change Research Symposium, 2009

[4] 2008 Water-Energy Sector Summary, AB 32 Scoping Plan, GHG Emission Reduction Strategies

6. The State Water Board should establish by 2015 quantified statewide goals for infiltration and direct use of urban runoff.
7. By 2012 require all state agencies, including Caltrans, to integrate low impact development into retrofits for all state facilities, leading to a state wide LID retrofit requirement for all major facilities in California.

Policy Recommendations for Agricultural Water Use

1. Establish a statewide agricultural water conservation target of 1 MAF by 2020, 2.5 MAF by 2030 and 3.5 MAF by 2040.
2. Establish programs to assist farmers in meeting water conservation goals.
3. Require, through legislation, all agricultural water districts to prepare and update agricultural water management plans that meet the conservation objectives and time frames established in the final plan.
4. Explore mandatory water application and consumption rates for principal crops and soils.
5. Establish a specific State Water Board definition, which will evolve over time, of "water waste". Immediately begin "waste and unreasonable use" hearings that fully implement the mandates of Water Code Section 275 and California Constitution Article X; water rights being exercised for wasteful or unreasonable uses should be considered for termination and allocation to appropriate uses under the law,[5] including meeting instream flow criteria.
6. Establish user-friendly web-based tools to allow farmers to improve their ability to make real time weather-based irrigation decisions.
7. Establish mandatory minimum performance criteria for management and maintenance by agricultural water suppliers, e.g. scheduling "on demand" deliveries, leak prevention, delivery efficiency and measurement.
8. Pursue the conversion of a minimum of 380,000 acres of drainage impaired farmlands in export areas.[6] Include a mitigation plan for displaced workers and disrupted communities and make implementation contingent on funding for the mitigation plan.
9. Encourage federal agencies, the CPUC and other state agencies to provide incentives for the voluntary installation of solar facilities on drainage-impaired land in the Central Valley.

Policy Recommendations on Groundwater Management

1. Create a statewide system of regional mandatory groundwater management programs addressing both quantity and quality by 2015. The state should establish minimum requirements for groundwater management plans and empower local agencies to write and implement those plans, while assuring that the plans have broad representation from all interest groups.
    - Empower the State Water Board to intervene and write management plans if regional plans are not adequate or completed by 2015.
2. Require mandatory reporting of infiltration and extraction from groundwater basins.

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[5] Legislative Analyst Office, California's Water: An LAO Primer. Ch. 6. Oct. 2008.

[6] US Fish & Wildlife Service. Fish & Wildlife Coordination Act Report, San Luis Drainage Feature Reevaluation Project. March 2006. P. 63. http://www.usbr.gov/mp/nepa/documentShow.cfm?Doc_ID=2236

3. Require scientifically based evaluations of intact aquifers in order to maintain their integrity and ensure that problems in one region are not transferred to another region.

Policy Recommendations on Water Recycling

1. Develop policies to strengthen, accelerate and implement the state's water recycling targets.
2. Establish a new state target of 1.5 MAF of recycled water by 2015.
3. Assure the current Department of Public Health deadlines of 2013 for uniform water recycling criteria for indirect potable reuse and 2016 to adopt criteria for surface water augmentation.
4. By 2014, require all large wastewater treatment plants that discharge to salt or brackish water to prepare, in cooperation with local and regional water supply agencies and the Regional Water Quality Control Boards, a feasibility report regarding recycling opportunities that comply with water quality laws.

Policy Recommendations on Delta Conveyance Facilities

1. Explicitly state that the purpose of the evaluation of any Delta facility is to decrease the physical vulnerability and increase the predictability of Delta supplies, not to increase Delta diversions.
2. Analyze, at an equal level of detail, facility capacities from 3,000 cfs to 15,000 cfs as well as alternatives that would utilize existing conveyance without major new conveyance facilities, such as the Delta Corridors Plan or other non-structural alternatives.
3. Analyze a full range of operations, including an environmentally preferred alternative scenario developed using the SWRCB flow criteria.
4. Focus this analysis on designing a cost-effective project that is compatible with achieving maximum ecosystem protection, rather than achieving maximum diversions.
5. Ensure the preparation of scientifically credible effects analysis prior to any decision on facility size or operations.