

Summary of issues raised on 11-3-2004 version of Draft Co-Chairs Report

At the December 10, 2004 SDFP Forum meeting and in subsequent comment letters and e-mails, the Co-Chairs received a number of comments. Summarized below are some common themes or issues gathered from the comments to date. The comments on the SDFP Forum Co-Chairs Report fall into several general categories of actions below. While the most recent version of the Co-Chairs Report tried to incorporate these issues into the revised draft, responses to the general issues are summarized below:

*NOTE: Please refer to the December 10, 2004 meeting notes and letter comments for all comments received to date. They are posted on the SDFP Forum website at:
<http://calwater.ca.gov/Programs/Conveyance/SDFP/SouthDeltaFishFacilitiesForum.shtml>*

1) Immediate actions to improve facilities or to meet operational objectives (i.e. actions that can have measurable benefits or will fix known deficiencies);

- Should OCAP BO and CVPIA actions be part of the vision?
 - Yes
- How specific does the list need to be and who decides?
 - *The implementing agencies will determine the actions that are necessary and put major actions in the CALFED Program Plans accordingly. These plans are reviewed annually.*
 - *The regulatory agencies (SWRCB, NOAA, DFG, USFWS, COE) will have to agree to proposed changes in facilities or modifications as appropriate. The fish facility technical teams set under the IEP also will continue to work on the technical and monitoring and evaluation efforts.*
- Who determines “performance objectives” goals and what happens if they can’t be met?
 - *Louvers are behavioral screening systems and, as such, have quite variable fish collection efficiencies. Considering hydraulic changes in the Delta since the facilities were constructed, there is a practical limit to modifying the existing facilities to meet their original performance objectives. Regulatory agencies will ultimately have to agree to the proposed modifications and operational changes as it relates to the mandates they have set in the CVPIA and in the OCAP Biological Opinions.*
- What are the schedules for implementation?
 - *This will have to be worked out by the implementing agencies and adopted in the CALFED Program Plans.*
- Can existing Prop. 13 and 50 funding be used for OCAP mandated actions? CVPIA actions?
 - *Yes. Funding actions that result in fish collection efficiency improvements are consistent with the uses of Proposition funding.*
- NOAA’s OCAP Biological Opinion related to the SDIP implementation indicated that facility actions (reductions in predation) are tied to 8500. Is there a link to immediate actions?
 - *Immediate actions are specific in the OCAP Biological Opinions. DWR is currently working on the predation studies that may be tied to the SDIP and barrier construction requirements as were outlined in the early consultation for that project. These studies are not necessarily those that are outlined in the CoChairs recommendations.*

- Is there a specific funding allocation that should go into immediate improvements?
 - *This allocation has yet to be determined.*
- There is a need to conduct more baseline fish salvage efficiency estimate studies to assess existing conditions and improvements.
 - *The USBR has already included these evaluations as part of their 2005 study plans. More work will likely be needed as improvement actions are identified.*
- What are potential rewards for improving efficiencies and facilities?
 - *Improvements in fish protection should result in improved water supply reliability due to reduced outages. Fish loss estimates are also likely to be reduced depending on the level of improvements.*

2) Immediate or staged planning actions to determine feasibility for scientifically based and cost effective decisions;

- Specifically what studies are being implemented now or are planned in the immediate future and what will they do?
 - *CHTR – will assess existing conditions and recommend implementation options. Started in 2004.*
 - *South Delta Hydrodynamics/Fisheries Investigations – will investigate indirect pumping influences and fisheries movements/impacts for various operational scenarios – primarily CCF gate operations. Pilot studies started in 2004, larger study planned in 2006.*
 - *Tracy Fish Collection Efficiency Studies – will determine or update overall fish collection efficiencies for various species for baseline purposes. Also, the USBR will investigate hydraulic performance and limitations of existing facility. These studies are on-going, but more studies planned in 2005 and beyond.*
 - *Feasibility study on facility alternatives that may reduce CCF predation impacts (i.e. short circuit, etc.) – will include costs, facility needs, and hydraulic impacts on Tracy and South Delta. DWR will establish a budget and timeline based on the Forum recommendations.*
 - *Feasibility study on new Secondary holding facility options at Tracy – will determine costs and potential facility needs to improve holding survival and debris issues. Some efforts are on-going, but engineering and biological feasibility study to be initiated pending Forum recommendations.*
 - *Debris studies – will be used to assess improvements in holding facilities, trashracks, louvers, and transport and release facilities. New automated trashracks installed at Skinner in 2004; new trashracks being designed at Tracy for implementation in 2006; new Tracy louver cleaner being designed for implementation in 2007 to reduce cleaning losses (OCAP requirement); improved Tracy debris boom under development.*
 - *Evaluation of predator losses and alternatives – CALFED Science is sponsoring a workshop in June 2005. The workshop will focus on practical solutions to reduce losses. The USBR and DWR are currently conducting investigative studies at their facilities.*

3) Long term strategy on fish facility actions considering functional equivalence with other Ecosystem and water management options or actions.

- Who will determine functional equivalence and cost-effectiveness including facility actions?
 - *The SDFP Forum Co-Chairs propose that the CALFED agencies develop a thorough and transparent public process that addresses functionally equivalent actions and assurances. A comparative analysis between facility options and alternative operational strategies and additional habitat investments should be conducted.*
 - *The SDFP Forum was not formed to address these larger issues. Whatever the process, this evaluation will have to occur in an open forum with agency and stakeholder input.*
 - *The Ecosystem Restoration Program or Science Program are possibilities to set up this process to evaluate functional equivalency of facility actions to other actions.*
- How will functionally equivalent actions be measured? ESA species or all Delta species?
 - *Benefits should be consistent with ERP's Multi-Species Conservation Strategy (MSCS). OCAP mandates will probably take a higher priority initially.*
- What are the dependencies of EWA actions to facility actions on future assurances?
 - *A reliable and funded EWA is critical to assurances. The present facility screening strategies should not be dropped unless these agreements are agreed to and properly financed.*
- How much information must be collected before long term facility decisions are made?
 - *There will always be some uncertainty in the data. Assurance agreements will have to address these contingencies.*
- Are facility actions driven by future increases in Delta diversions?
 - *The ROD was clear on the need for new facilities when the SWP increased its diversion to a permitted 10,300 cfs operation. All future actions related to increased diversions should be addressed in the functional equivalency evaluation.*
- Do we need other facility research and if so who will drive it?
 - *As needed in the analysis of benefits, ERP or Science should drive these data needs.*
- What is the life expectancy of benefits for cost metrics? Assurances?
 - *They should be compared on an equivalent lifecycle cost basis.*

General issues and comments:

- What is the value of testing to assess new facility costs for major upgrades?
 - *There is great value in this; however, ERP or Science should drive these data needs.*
- Will new facilities be required if Tracy flows increase above 4600 cfs due to future CVP/SWP intertie (i.e. 5100 cfs)?
 - *The USBR is permitted to divert 4600 cfs through its present fish facility. As with other diversions, increasing permitted capacity will likely trigger regulatory actions and facility modifications.*
- Are the existing fish facilities our new test facilities?
 - *Essentially Yes. Of course, hydraulic labs with biological capabilities will also continue to be utilized as appropriate. These facilities may include those at the USBR's hydraulics research lab, UC Davis, and new lab facilities recently constructed at the existing fish facilities.*
- What would be the impacts if fish loss estimates were revised?
 - *It could impact red light and the way incidental take is calculated.*