

**DWR Comments and Recommendations on Fish Facility Development
for consideration by the South Delta Fish Facility Forum
October 30, 2003**

Under the Department of Water Resources' South Delta Improvement Program, a new intake for the Clifton Court Forebay was planned with new fish screening and handling facilities as one of the major CALFED ROD actions under the Conveyance Program. This new facility would allow the State Water Project to increase SWP export capability up to 10,300 cfs and reduce the effects of State Water Project exports on both aquatic resources and direct losses of fish in the south Delta.

The strategy for the development of the new Clifton Court Forebay Intake and Fish Facility has been to improve fish protection capabilities at SWP and CVP export facilities in an effort to improve water supply reliability. The Tracy Fish Test Facility was to be constructed first and operated for three years so state-of-the-art fish salvaging processes could be evaluated under the difficult debris conditions in the south Delta. Due to the high potential cost of constructing these state-of-the-art fish facility improvements and the uncertainty of whether a system could be designed to adequately separate and manage the large amount of fish and debris in the water, it was important that these potential fish facility improvements be tested in the field. From what was learned at the Tracy Fish Test Facility, the new, production-level intake and fish facility for Clifton Court Forebay would be designed. The Clifton Court facility would be constructed in phases so that improvements could be implemented progressively. However, due to the high cost of the Tracy Fish Test Facility and Clifton Court Forebay Intake and Fish Facility, and the limitations in funds, it was decided to reevaluate the strategy for the development of fish facilities in the South Delta based upon the latest scientific information.

Reevaluating the need for fish salvaging facilities in the South Delta has been a good decision. It has given the Department the opportunity to take a step back and reconsider whether we have and are currently making the science-based decisions on our projects. We have gained much knowledge about fish in the Delta and regarding our existing fish intake and salvaging facilities. However, there is a significant amount of information still needed to make science-based decisions in protecting fish in the Delta. We support well developed, scientific studies designed to help identify the most effective decisions for each of the Conveyance projects. With the limited funds and resources currently available, we need to make the best, cost-effective decisions we can to develop new projects so that benefits can be maximized. Our concern is that the desire for more information and the resources needed to obtain this information will exceed the funds available. Therefore, objectives and priorities need be set with this in mind.

We appreciate the efforts of the South Delta Fish Facility Forum in its reevaluation process and have the following comments and recommendations which we hope it will consider:

1. First, a science-based strategy should be developed to determine what information is needed to protect fish in the Delta and how to acquire this information with the limited funds and resources that are available. Cost-effective measures/actions should be considered that will best protect fish beginning at their source in the Delta, minimize the detrimental impacts of export operations, and minimize fish entrainment in our export facilities. We should also consider all potential possibilities such as those proposed Alex Hildebrand and John Winther as well as pursuing the south Delta fisheries and hydrodynamic studies.
2. The Clifton Court Fish Screen Project may have small marginal benefits at improving protection of entrained fish at a very high expense when compared with the existing Skinner Fish Facility. We need to reevaluate whether this is the most cost-effective use of our limited funds. We should continue to put the development of the Clifton Court Fish Screen Project on-hold until it is determined that new positive barrier fish screens are the most cost-effective and feasible alternatives to protect fish in the south Delta.
3. We should consider the benefits and cost-effectiveness of a short-circuit intake for Clifton Court Forebay. Additionally, we should also consider the benefits and cost-effectiveness of an exclusion system for Clifton Court Forebay. This would eliminate the high cost of a new fish salvaging facility, but the net impact to fish would need to be evaluated.
4. We should continue to implement a cost-effective Tracy Fish Test Facility to evaluate the feasibility of implementing positive barrier screens and other potential fish protecting technologies. The revised proposal for TFTF may still be a high cost investment, and this needs to be recognized and weighed against the benefits of the information we expect to obtain from this project.
5. We should continue to evaluate the performance of our existing fish salvaging facilities (Collection, Handling, Transportation and Release studies) and whether improvements to those facilities or other more effective alternatives are appropriate.
6. Since SWP and CVP export facilities may entrain a very small percentage of the fish population, we need to confirm the need and cost-effectiveness of the fish salvaging at those facilities and whether other mitigating alternatives will better protect the fish in the Delta.
7. The Conveyance Program has limited State funding to implement fish protection improvements in the Delta. These funds as well as other resource constraints need to be considered in the overall development and implementation of a strategy for the protection of fish in the Delta.