

March 23, 2021

Delta Stewardship Council  
980 9<sup>th</sup> Street, Suite 1500  
Sacramento, CA 95814

**Subject: Lookout Slough Tidal Habitat Restoration and Flood Improvement Project**

Delta Stewardship Council:

This letter is submitted on behalf of the Solano County Water Agency (**Agency**) to support its appeal of the Delta Stewardship Council's (**Council**) Consistency Determination of the Lookout Slough Tidal Habitat Restoration and Flood Improvement Project (**Project**). While the Agency is firmly committed to supporting co-equal goals in the Delta, this Project does not do so; rather, while the Project may improve conditions for the Central Valley Project (**CVP**) and State Water Project (**SWP**) Operations, it would do so at the sole expense and detriment of Solano County interests. Within the Yolo Bypass Cache Slough Complex (**Complex**), there are numerous existing agricultural and municipal water supply intakes including the North Bay Aqueduct (**NBA**), the City of Vallejo Pumping Plant, Reclamation District 2068, and many others which the Lookout Slough supporting documents do not adequately resolve with respect to water quality, endangered species, and the corresponding cumulative adverse impacts of the more recent and significant Complex restoration projects (i.e., Lower Yolo Ranch, Lower Egbert Tract, and others). In addition, while the NBA represents only 2% of the SWP, the vast majority of habitat restoration for the SWP is being implemented within the Complex and Suisun Marsh regions, within or in close proximity to Solano County and the NBA.

While the Agency has significant concerns about the consistency of the Project with the Delta Plan, the Agency is not seeking to stop the Project. Instead, we believe there is ample opportunity to work collaboratively with the Council, Department of Water Resources (**DWR**), and/or other agencies to meet co-equal goals throughout the entire Delta. Additionally, the Agency is looking for firm, committed support to help implement multi-benefit, co-equal goal projects such as the NBA Alternate Intake Project (**AIP**). The NBA AIP provides multi-agency regional benefit, achieves co-equal goals, and is one of the recommendations in the Delta Plan (WQ R5).

Thank you for the opportunity to submit comments. Should you have any questions or concerns, please don't hesitate to contact me or Roland Sanford, General Manager of the Agency, at (707) 455-1103 or by e-mail at [rsanford@scwa2.com](mailto:rsanford@scwa2.com).

Very Truly Yours,



JEANNE M. ZOLEZZI  
Attorney-at-law

I. APPELLANT / CONCERNED PARTY

Solano County Water Agency  
 819 Vaca Valley Parkway, Suite 203  
 Vacaville, CA 95688

II. COVERED ACTION THAT IS SUBJECT OF CONCERN

Lookout Slough Tidal Habitat Restoration and Flood Improvement Project (Project)  
 California Department of Water Resources  
 3500 Industrial Blvd  
 West Sacramento, CA 95691

III. SPECIFIC GROUNDS FOR APPEAL / CONCERN

The Project is not fully Consistent with the Delta Plan, for the Delta Plan Policies listed below. Additional explanation is provided in Section IV.

- G P1 (b) (1)
- G P1 (b) (2)
- G P1 (b) (3)
- G P1 (b) (4)
- ER P5
- DP P2
- RR P1

IV. STATEMENT OF FACTS

<b>Delta Plan Section</b>	<b>Title</b>	<b>Language Summarized</b>
G P1(b)(1)/Cal. Code Regs., tit. 23, § 5002 (b)(1)	Consistency with the Delta Plan; Co-equal Goals	If the proposed action cannot achieve full consistency with all relevant regulatory policies contained in Article 3, an agency may make an overriding determination that the action is nevertheless consistent with the Delta Plan’s co-equal goals.

The Project both compliments and conflicts with Article 3 – Consistency with the Regulatory Policies Contained in the Delta Plan. For example, the Project compliments §5007 (Protect Opportunities to Restore Habitat) but conflicts with § 5002(b)(1) (Co-Equal Goals). Most notably, the Project has direct adverse impacts upon (i) water quality and (ii) endangered species concerns to existing municipal and agricultural intakes in close hydrodynamic proximity to the Project, including the NBA, City of Vallejo Pumping Plant, Reclamation District 2068 intake, and other local agricultural intakes in the Complex.

Water Quality

Changes in salinity and bromide resulting from the Project will impact the Agency’s operations at the NBA, increasing the cost of pumping, adversely impacting water quality, greatly increasing the cost to treat and the difficulty of water treatment. This failure by DWR to consider the co-equal goals of the Delta Plan renders this Project non-compliant with this policy. Given this adverse impact, it is impossible for the

Council to make a consistency determination without a full evaluation of the ramifications of the impacts and sufficient mitigation to eliminate the inconsistencies.

DWR has simply not sufficiently studied the impact of its Project on the water quality in the Complex. This is illustrated by DWR's Environmental Impact Report for the Project (**EIR**), in which the discussion of salinity is considerably sparse and lacking in sufficient detail to protect the municipal and agricultural beneficial uses in the Delta. No analyses, modeling results, or data are provided in the EIR or appendices for agencies to proficiently assess the Project's impacts. In addition, there is also no discussion, analysis, or modeling of bromide which is of critical importance to municipal water users in the Delta. When municipal water supplies are treated to meet drinking water standards, bromide can form bromate, a known and regulated carcinogen, which can impact human health. Municipal water purveyors in the Central and South Delta are highly sensitive to changes in bromide concentration in the Delta. Major land use changes, such as that proposed at Lookout Slough, have the potential to enhance sea water intrusion upstream of Rio Vista, and elevate salinity and bromide above baseline concentrations. Since many of the water purveyors in the area utilize ozone to deal with high levels of organics, they would be highly sensitive to changes in bromide above baseline conditions. **Without sufficient evaluation of the impacts, a consistency determination simply cannot be made.**

In addition, the Project will increase organic carbon and adversely impact municipal water quality. In the drinking water treatment process, organic carbon can react with chlorine to form a variety of carcinogens harmful to human health. The NBA water purveyors are highly sensitive to organic carbon levels as users often need to blend or switch water sources, or aggressively treat NBA source water to maintain safe high-quality municipal drinking water standards. Major land use changes such as the Project export organic carbon and modify hydrodynamic process that will further degrade NBA municipal water quality which already experiences the poorest water quality throughout the entire SWP in regards to Total Organic Carbon levels. These issues have not been quantified or mitigated by DWR. Again, **without sufficient evaluation of these impacts, a consistency determination simply cannot be made.**

#### Endangered Species Concerns to Existing Municipal and Agricultural Intakes

One of the Project purposes is to increase endangered species. The Agency's pumping of municipal water supplies from the Complex are subject to a Biological Opinion that makes pumping directly related to the presence of endangered species in the vicinity of the NBA intake. In addition, agricultural pumping intakes in the vicinity of the Project will be adversely impacted by any increase in the presence of endangered species. Again, DWR did not disclose this potential adverse impact, and did not study its extent, nor attempt to mitigate for its impacts on existing agricultural and municipal users in the Delta, specifically within the Cache Slough Complex (**CSC**). Within the CSC, several public agencies including the Agency, Napa County Flood Control and Water Conservation District (via the NBA), City of Vallejo, and Reclamation District 2068 have major diversion facilities, as well as numerous private agricultural intakes.

The presence of listed and endangered species at the location of agricultural diversions presently makes diversion difficult if not impossible. The Project here is intended to increase the population of listed and endangered species; therefore, the Project will adversely impact the ability of agricultural users to divert water in the location of the Project.

At the NBA, the location at which water is diverted to serve a population of over 500,000 people in Napa and Solano counties, DWR's operations are governed by a 2019 USFWS Biological Opinion and March 2020 Incidental Take Permit that imposes restrictions on the amount of water that can be pumped in relation to the number of Delta Smelt present. As a result, an increase in Delta Smelt presence in the Cache Slough Complex is a direct and intended result of the Project that would have a direct adverse impact on the ability

of SCWA to continue to meet their water demands from the NBA by reducing the quantity of water that can be diverted.

DWR’s failure to fully analyze, or even recognize, the impacts of these water quality and endangered species issues on agricultural and municipal intakes makes the Project inconsistent with the Delta Plan’s co-equal goals which include protecting and maintaining agricultural activities and reliable water supply.

Delta Plan Section	Title	Language Summarized
G P1(b)(2)/Cal. Code Regs., tit. 23, § 5002 (b)(2)	Mitigation Measures	Covered actions not exempt from CEQA must include all applicable feasible mitigation measures adopted and incorporated into the Delta Plan or substitute mitigation measures the agency finds are equally or more effective.

DWR’s Certification of Consistency for the Project states that the covered action is consistent with this regulatory policy because it includes all applicable feasible mitigation measures adopted and incorporated into the Delta Plan, or substitute measures DWR finds equally or more effective. DWR’s conclusion is implausible when many of the major adverse impacts have not been adequately evaluated or measured. In addition, many of the so-called mitigation measures have been exempt from public scrutiny and meaningful comparison to Delta Plan mitigation measures because in the EIR, DWR made significant changes to at least 39 of the Project’s mitigation measures and added 15 new measures not included or discussed in the draft EIR. None of these changes or new measures were subject to a noticed comment period.

By way of example, in their comments on the draft EIR the Council pointed to a potential deficiency in DWR’s proposed mitigation to address invasive nonnative species. Specifically, the draft EIR describes how the project will address invasive nonnative species, including proposed mitigation measures to reduce potential invasive species to a less than significant level. DSC expressed concern the proposed measure may not be equally or more effective than related Delta Plan mitigation measures as Delta Plan Mitigation Monitoring and Reporting Program Measure 4-1 requires development and implementation of an invasive species management **plan** for any project whose construction or operation could lead to introduction or facilitation of invasive species establishment. As demonstrated by DSC’s comments and the fact that the Project provides open water space and emergent marsh available for non-native species to proliferate, this Project likely falls within the Delta Plan mitigation requirement that an invasive species management plan be adopted. However, DWR summarily dismissed these concerns in the final EIR and did not elect to adopt a dedicated invasive species management plan. **Therefore, the Project is not consistent with this Delta Plan Section.**

Delta Plan Section	Title	Language Summarized
G P1(b)(3)/Cal. Code Regs., tit. 23, § 5002 (b)(3)	Best Available Science	All covered actions must document use of best available science.

DWR’s Certification of Consistency for the Project states that this provision is applicable and the covered action is consistent with this policy. However, the data underlying specific conclusions in the draft EIR was severely lacking.

For example, the draft EIR evaluated the Project’s impacts on salinity using results from a simulation modeled and analyzed only for the year 2009. The selection of a single year does not account for uncertainties and variations found in the hydrologic conditions of the Delta and does not constitute making use of best available science. This is in light of the fact that standard technical analyses for CALFED storage projects involves longer simulation periods that cover a variety of hydrological conditions to evaluate the potential consequences of a project with an effect on Delta hydrodynamics. While in the final EIR DWR expanded the modeling analysis to include an analysis of potential impacts over three different calendar years (all which occur as part of a multi-year drought period), this modeling failed to include analysis of salinity in critically dry years and further was not subject to recirculation or further public comment.

In addition, the draft EIR failed to include an analysis of the proposed Project’s effect on organic carbon because there is no regulatory standard to form a threshold of significance. However, employing best available science, DWR could have conducted this analysis based on CALFED’s adopted total organic carbon water quality target. DWR is a CALFED agency and thus had ample access to this information and thus the ability to conduct a reasoned analysis of the proposed Project’s potential effects on organic carbon.

Delta Plan Section	Title	Language Summarized
G P1(b)(4)/Cal. Code Regs., tit. 23, § 5002 (b)(4)	Consistency with the Delta Plan; Adaptive Management	<p>Ecosystem restoration must include adequate provisions to assure continued implementation of adaptive management.</p> <p>This requirement may be satisfied through either:</p> <ul style="list-style-type: none"> <li>A. An adaptive management plan</li> <li>B. Documentation of access to adequate resources and delineated authority by the entity responsible for the implementation of the proposed adaptive management process.</li> </ul>

As part of the Consistency with the Delta Plan, projects must have adequate provisions to assure continued implementation of adaptive management. In addition, there must be documentation of access to adequate resources and delineated authority by the entity responsible for the implementation of the proposed adaptive management process.

The Project does not include adequate resources, on-the-ground staff, clearly delineated authority, or long-term accountability to ensure for continued implementation of adaptive management of the Project. For example, Table 11 in the Adaptive Management and Monitoring Plan (AMMP) shows major commitments made by both DWR and California Fish and Wildlife (CFW), however, there is a lack of detail on future funding commitments for future Operation and Maintenance (O&M) of the Project, implementation of the AMMP, and third-party verification. In addition, leaving implementation and oversight to overtaxed resource agencies like DWR and CFW is not a guarantee of success, as shown by the CFW Lindsey Slough Restoration Project, discussed below. The Agency is extremely concerned that the Project will become a “build-it and forget-it” project, lacking in adequate resources to conduct the AMMP and required future and long-term O&M activities.

DWR has not demonstrated that it will be financially feasible for Reclamation District 2098 to provide long-term O&M for the Duck Slough Setback Levee, which they would be responsible for maintaining after Project completion. The Project will reduce revenues for RD 2098 to operate and maintain the Duck Slough Setback Levee in perpetuity. RD 2098’s lack of revenue to operate and maintain the levee will cause flood risk impacts to surrounding properties and flood facilities, an impact not addressed by DWR in any project documents. **Without adequate assurances, the Project cannot be deemed consistent with this Delta Plan Section.**

Delta Plan Section	Title	Language Summarized
WR P2/Cal. Code Regs., tit. 23, § 5004	Transparency in Water Contracting	The contracting process for entering into or amending a water supply contract for the SWP must be done in a publicly transparent manner consistent with DWR Guidelines 03-09 and/or 03-10.

DWR’s Certification of Consistency for the Project states that this provision is not applicable because the project does not involve water supply contract from the SWP. However, proceeding with the Project is a *de facto* amendment to the Agency’s State Water Project Water Supply Contract with DWR. Section 19 of that contract provides:

19. WATER QUALITY (a) Table of Water Quality Objectives. It shall be the objective of the State and the States shall take all reasonable measure to make available, at all delivery structures for delivery of project water to the Agency, project water of such quality that the following constituents do not exceed the concentrations stated as follows:

<i>Constituent</i>	<i>Unit</i>	<i>Monthly Average</i>	<i>Average for any 10-year Period</i>	<i>Maximum</i>
Total Dissolved Solids	ppm.	440	220	
Total Hardness	ppm.	180	110	
Chlorides	ppm.	110	55	
Sulfates	ppm.	110	20	
Boron	ppm.	0.6		
Sodium Percentage	%	50	40	
Fluoride	ppm.			1.5
Lead	ppm.			0.1
Selenium	ppm.			0.05
Hexavalent Chromium	ppm.			0.05
Arsenic	ppm.			0.05
Iron and Manganese together	ppm.			0.3
Magnesium	ppm.			125
Copper	ppm.			3.0
Zinc	ppm.			15
Phenol	ppm.			0.001

The Project anticipates potential violations of this contractual provision. Therefore, in violation of this Section of the Contract, DWR is not “taking all reasonable measure to make available” water of the quality provided in the contract; in fact, quite the opposite. In California, every contract has an implied covenant of good faith and fair dealing. This is a promise the law implies into every contract that the parties will act

in good faith to fulfill the contract. The covenant exists to prevent the kind of actions being proposed by DWR with the Project: to prevent one contracting party from unfairly frustrating the other party’s right to receive the benefits of the agreement actually made.

Delta Plan Section	Title	Language Summarized
ER P5/Cal. Code Regs., tit. 23, § 5009	Avoid Introducing / Improving Habitats for Invasive Nonnative Species	The potential for new introductions of or improved habitat conditions for nonnative invasive species, striped bass, or bass must be fully considered, avoided, or mitigated in a way that protects the ecosystem.

DWR’s Certification of Consistency for the Project states that this provision is not applicable because the Project would not result in a reasonable probability of introducing or improving habitat for nonnative invasive species. However, the Project provides open water space and emergent marsh which may allow non-native species to proliferate, further increasing their overall presence in the region.

The Project does not detail which agency (if any) will manage the Project for invasive nonnative species. Table 11 of the AMMP indicates that DWR will be responsible for the management and monitoring responsibilities of the Project with oversight and some monitoring from CFW. However, the Division of Boating and Waterways (**DBW**) is the lead agency that conducts all invasive nonnative species management (primarily with plants) in the Delta on behalf of the State of California. Similar to DWR and CFW, DBW is significantly taxed in managing invasive nonnative species throughout the entire Delta. Practically, DBW will not have the dedicated on-the-ground resources and staffing, to effectively manage invasive nonnative plants species at the Lookout Slough Project. Additionally, over the last 10 years, invasive nonnative plant species including Water Hyacinth, Brazilian Waterweed, and others have aggressively moved into the Complex. CFW’s Lindsey Slough Restoration Project, is one of the most recent restoration projects in the Complex, and has been aggressively populated by both Water Hyacinth and Brazilian Waterweed as shown in *Figure 1*. Without a funding mechanism, dedicated on-the-ground personnel assigned to the project, and no-third party oversight, the Project will reach a similar fate as other similar restoration efforts, and will improve and support habitat for invasive nonnative species, conflicting with the Delta Plan and Policy ER P5.

Further, the presence of non-native species would impair the ability of the Project to increase the population of native species and increase the cost of the District’s maintenance activities, if any. The draft EIR and Certification of Consistency are silent on these impacts. **Without assurances that this serious issue will be addressed, a consistency determination simply cannot be made.**

Delta Plan Section	Title	Language Summarized
DP P2/Cal. Code Regs., tit. 23, § 5011	Respecting Local Land Use When Siting Water, Flood, or Restoring Habitats	Projects must be sited to avoid or reduce conflicts with existing uses, general plans, spheres of influence when feasible, considering comments from local agencies, and the Delta Protection Commission.

The Project does not appropriately respect local land use including existing municipal and agricultural water supply intakes within the Complex. The Agency is specifically concerned about (a) water quality and (b) biological impacts to existing municipal and agricultural intakes within the lower Complex, including the NBA, Reclamation District 2068 intake, and numerous agricultural diversions, as shown in *Figure 2*.

For water quality, extensive modeling was conducted by DWR in 2015 as part of the Bay Delta Conservation Plan (**BDCP**) – Recirculated DEIR (**RDEIR**). In Section 5.2.2.4 (Cumulative Impacts, Water Quality) of the RDEIR, Impact WQ-3 identifies the NBA as being negatively impacted by Bromide associated primarily with habitat restoration projects, as described below (excerpt from page 5-77 of the RDEIR). The EIR does not adequately address the cumulative impacts associated with all of the planned restoration projects with regards to existing local and regional water supply intakes within the lower Complex.

The primary driver of the adverse cumulative condition was the assumed amount and location of tidal habitat restoration to be implemented as part of the alternative. The amount of tidal habitat restoration assumed for Alternatives 4A, 2D, and 5A is substantially less than assumed for Alternative 4, such that it is not expected to significantly affect Delta hydrodynamics and source water fractions. However, a substantial amount of tidal habitat restoration is still anticipated to occur in the future as part of separate actions (e.g., the California Water Action Plan/EcoRestore), which could result in a greater portion of higher-bromide concentration water in the restored areas, thus contributing to elevated long-term average and drought period bromide concentrations in those areas. Thus, the cumulative condition for bromide is still considered adverse.

DWR’s Certification of Consistency further states the Project is compatible with the Solano County General Plan and relevant zoning policies - this is simply not accurate. The Solano County General Plan designates the property subject to the Project as “Agriculture,” defined as “areas for the practice of agriculture as the primary use, including areas that contribute significantly to the local agricultural economy, and allows for secondary uses that support the economic viability of agriculture” (Solano County General Plan at LU-19). While this designation recognizes natural resource uses, adopting such natural resources within land designated as Agriculture requires such uses to maintain “the viability of underlying land use designations” (Solano County General Plan at LU-25).

As presented, the Project: (1) does not present “the practice of agriculture as the primary use”; (2) does not “support the economic viability of agriculture”; and (3) does not maintain “the validity of the underlying land use designation”.

Further, the site for the proposed Project is subject to three separate Williamson Act contracts, and the Project uses conflict with the permitted and consistent uses as defined by the Act and local Williamson Act guidelines. The Solano County Williamson Act guidelines define open space use as “the use or maintenance of land in such a manner as to preserve its natural characteristics, beauty, or openness for the



benefit and enjoyment of the public, to provide essential habitat for wildlife, or for the solar evaporation of sea water in the course of salt production for commercial purposes.” The Project does not “preserve the natural characteristics” of the real property nor “provide for the enjoyment of the public.”

The Farmland Mapping and Monitoring Program designates almost the entire Project property as prime farmland. Table A of the Solano County Williamson Act Guidelines indicates that no habitat land use – namely management of wetlands and restoration of tidal managed and season wetlands using approved dredge sediments – are permitted on prime farmlands under contract. Proceeding with a project located on land restricted by an enforceable Williamson Act contract when some of the project uses conflict with the permitted and consistent uses according to the Williamson Act constitutes a failure by DWR to avoid project conflict with existing land use and policies, clearly inconsistent with the Delta Plan policies.

Lastly, the Certification of Consistency states the Project is compatible with Solano County’s Climate Action Plan for Energy and Efficiency as construction energy use would not be wasteful and because there would be negligible further operational energy use. However, it remains unclear how DWR arrived at this conclusion as nowhere in any project documents does it discuss any means or methods of avoiding or reducing inefficient, wasteful or unnecessary consumption of energy from this Project, as required by CEQA. The EIR omits any discussion of energy consuming equipment to be used by the Project, energy requirements of the Project by fuel type, energy conservation equipment, energy costs, or energy consumption per vehicle trip in the project description section. Further, the environmental setting described fails to disclose existing energy supply and use patterns in Solano County or the surrounding region.

Delta Plan Section	Title	Language Summarized
RR P1/Cal. Code Regs., tit. 23, § 5012	Prioritization of State Investments in Delta Levees and Risk Reduction	

The Certification of Consistency states that the Lookout Slough Project is consistent with the goals listed in the Priorities for State Investment in Delta Integrated Flood Management Table Ecological and flood risk considerations warrant levee improvements on the Project site.

A primary goal of the Project is to “provide additional flood storage and conveyance within the Yolo Bypass to reduce the chance of catastrophic flooding and protect existing nearby infrastructure.” In the draft EIR and appendices, many assumptions are made in regards to levee impacts including tidal dampening, wave run-up reductions, benefits of emergent marsh vegetation, benefits of the PG&E access roads in reducing waves, roughness coefficients, etc. However, DWR has not provided any details on funding mechanisms, site repairs, and/or remedies to determine if any of the assumptions are incorrect. Additionally, some of the core aspects of Yolo Bypass levee management are (a) continuous annual maintenance and (b) immediate repairs during and post Yolo Bypass flood events; yet DWR has not provided specific details on the funding mechanisms, including annual O&M funding, capital funding when larger repairs are needed, and accountability of potential impacts to neighboring Reclamation Districts including RDs 2068, 2098, and 2060. Impacts to neighboring RD 2098 appear most detrimental as the intended flooding of two-thirds of the District means the O&M costs for remaining RD 2098 levees will be spread over fewer acres.

DWR has failed to demonstrate a detailed and transparent plan to provide dedicated O&M funding, capital funding, and on-site personnel to meet core flood control and levee maintenance responsibilities to reduce risk, **without which a consistency determination simply cannot be made.**

V. PROPOSED SOLUTIONS

It is clear that the Project is inconsistent with the Delta Plan. Nevertheless, the Agency believes the Project can be made consistent with the Delta Plan and meet co-equal goals if it fully evaluates and mitigates serious adverse impacts to neighboring water users and landowners. This can be done in conjunction with projects such as the North Bay Aqueduct Alternative Intake Project (NBA AIP). The NBA AIP is also a listed recommendation (WQ R5) and meets all of the recommended policies below that are part of the Delta Plan. However, at a cost of \$600 million, the NBA AIP is not locally cost-feasible amongst the 500,000 residents in Napa and Solano County. Additionally, the NBA represents only 2% of the entire SWP, and neither Napa nor Solano County are participants in the CVP. However, the Complex and Suisun Marsh regions are providing the majority of ecosystem benefit primarily for the South Delta CVP and SWP operations. To achieve co-equal goals, there is a synergistic opportunity State, Federal, and local agencies to partner and provide supplemental funding for the design and construction of the NBA AIP while also furthering the goals of habitat restoration in the Complex. Lastly, the Agency is also the landowner of 1,600-acres within the Priority Habitat Restoration Area of the Complex and is interested in partnering with other agencies to fully meet co-equal goals in the Delta thorough both improved water conveyance such as the NBA AIP, protection of agricultural intakes such as Reclamation District 2068, as well as additional habitat restoration within the Complex.

**List of Delta Plan Policies & Recommendations that Align with the NBA AIP**

<b>Policy #</b>	<b>Main Title</b>
<b>WR 12a</b>	Promote Options for New and Improved Infrastructure Related to Water Conveyance
<b>WR 12b</b>	Evaluate, Design, and Implement New or Improved Conveyance or Diversion Facilities in the Delta
<b>WR R12c</b>	Improve or Modify Through-Delta Conveyance
<b>WR R12h</b>	Operate Delta Water Management Facilities Using Adaptive Management Principles
<b>ER P2</b>	Restore Habitats as Appropriate Elevations
<b>ER P3</b>	Protect Opportunities to Restore Habitat
<b>ER R2</b>	Prioritize and Implement Projects that Restore Delta Habitat
<b>ER P5</b>	Avoid Introductions of and Habitat Improvements for Invasive Nonnative Species
<b>DP P2</b>	Respect Local Land Use When Siting Water or Flood Facilities or Restoring Habitats
<b>WQ R1</b>	Protect Beneficial Uses
<b>WQ R5</b>	Complete North Bay Aqueduct Alternative Intake Project



**Figure 1: DFW Lindsey Slough Restoration Project (Photo taken 11/8/2018, Water Hyacinth in Foreground)**

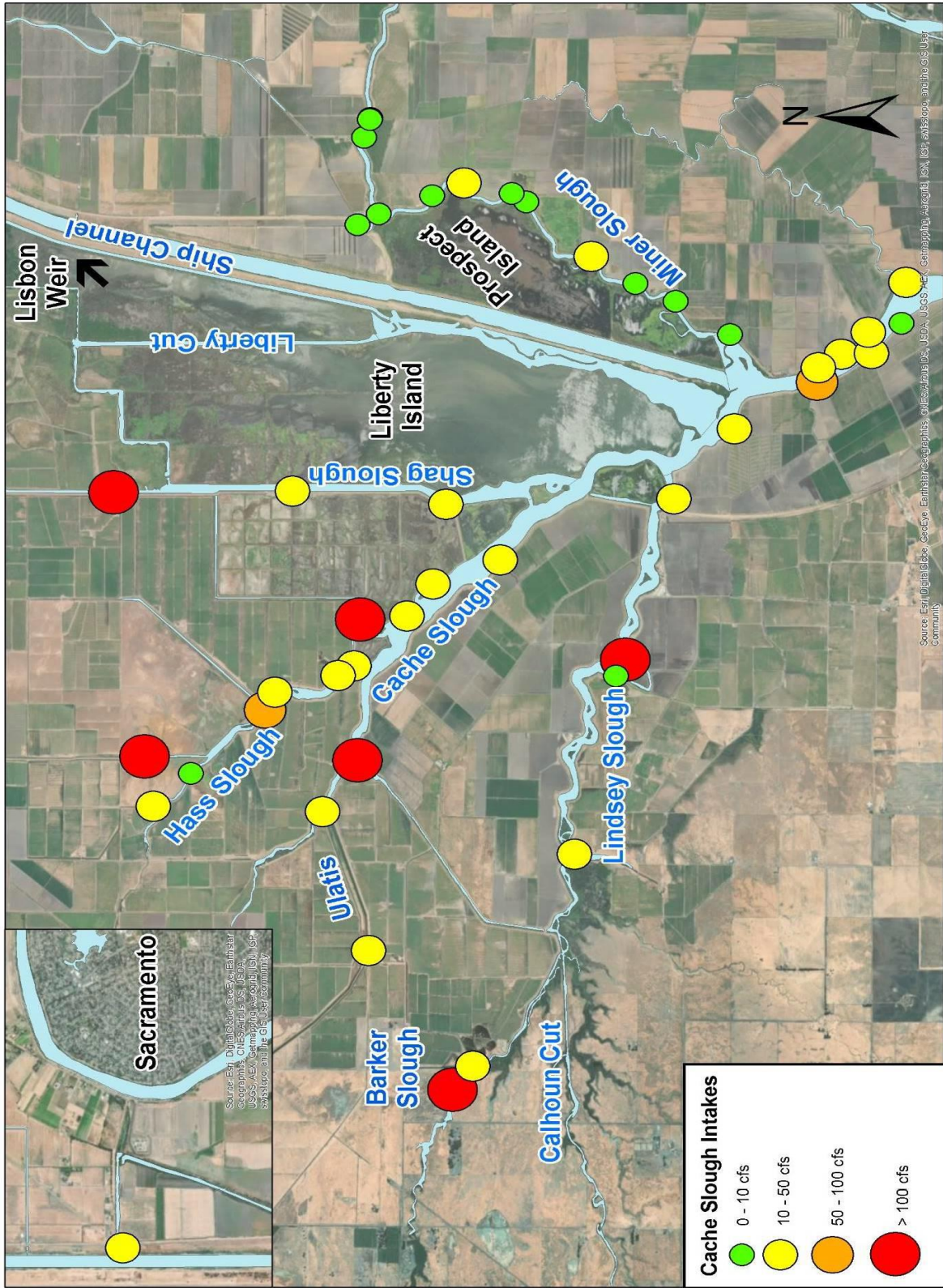


Figure 2: Existing Municipal and Agricultural Diversions in the Cache Slough Complex