

My name is Bob Groves and I'm chairman of the ISDP EIR/EIS committee for the more than one hundred families and their many guests who recreate on King Island and its adjacent waterways.

Mr. Monroe, Mr. Edwards, Mr. Candlish, Mr. Roberts, other agency management and staff, neighbors and friends of the South Delta. Thank you for providing the forum to receive public input regarding the Draft EIR/EIS of the proposed ISDP project. I'm a twenty five year recreational user of the South Delta and a thirteen year leaseholder on King Island. I spend in excess of ten percent of my time at the Delta. King Island lies adjacent to the north-east corner of Clifton Court Forebay bounded by Old River and West Canal. **We are** the most immediate neighbors to the proposed Northern Intake component of the preferred alternative of the ISDP. We will provide the shorthand reporter a partial list of names and addresses of King Island leaseholders who are critically concerned that impacts created by this project will be adequately mitigated. We respectfully request that this list be made a part of the record and each person on the list receive a copy of your responses to our comments.

The current Draft EIR/EIS is very comprehensive and voluminous compared to the 1990 draft. Your efforts to more fully understand the complex and far reaching impacts of the proposed project are commendable. The technical and statistical data provided is staggering. As would be expected of any document of this magnitude, it is not perfect and **can** be improved. We believe there are several flawed assessments of environmental impact based on incomplete, inaccurate or contradictory data. Some conclusions are vague, unfounded, short-sighted, or naive. I pledge every contribution I can make toward a more viable Final EIR/EIS as a basis for sound decisions of broader vision going forward. Our written comments will provide more specifics than time here will allow. My remarks tonight are focused on mitigation for aquatic and terrestrial habitat protection and restoration, and boating safety.

Adjacent to the forebay on the north and King Island is a precious yet precarious jewel of the remaining stands of riparian forest that are scattered throughout the Delta. I'm speaking of Widdows and Eucalyptus islands. Unfortunately the Draft does not completely illustrate or adequately describe the extensive bio-diversity of this very special habitat as well as that of King Island. Figure 10-6 on page 10-22 in Volume I does not depict the riparian forest on Eucalyptus Island's southern bank. The extent of the Eucalyptus stand is vague because its notation graphic is not included in the legend. King Island is identified as being developed when in fact it supports as much habitat as it does development. Swainson's Hawk and other nesting raptors are not identified with the Eucalyptus trees in Table 10-5 on page

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10-13. Also, one of my favorite bird species, the Banded Kingfisher, is not recognized by the Draft.

Appendix 6 in Volume II states that; "Many wildlife species reside in, or utilize riparian forest habitats. These areas provide refuge and shelter, food and water, resting and nesting sites for at least 50 amphibian and reptile species, 147 bird species, and 55 mammal species. The high species diversity is attributed to the complexity of habitat structure created by a multi-layer composition of trees, shrubs, vines and both herbaceous and aquatic vegetation". The footnote is Mayer and Laudenslayer, 1988. If these islands don't have all of this and more with the accompanying eucalyptus stands, they certainly support sufficient species diversity to warrant a much greater commitment to mitigation as a component of the ISDP. Quoting Volume I, page 13-10; "A 1980 San Joaquin County survey found nature study in the Delta is more popular than golf and boating among county residents."

One brief sidenote on the proposed barriers regards the reference on page A6-5, Volume II to the mature stand of Fremont cottonwood riparian forest at the proposed Grant Line barrier site. The impact on this habitat by this proposed barrier is significant and should be sufficient cause to select the alternate location upstream for any barrier on Grant Line Canal.

Chapter 11 on Hazards is quite brief and deals primarily with hazardous materials and toxic health hazards. One health hazard that receives no mention is injury or death from a boating accident caused by changes related to the proposed ISDP.

West Canal is likely the most heavily traversed channel in the South Delta. It serves virtually all boats entering through Del's Boat Harbor and Lazy M Marina, the two busiest launching facilities in the area. Much additional boat traffic comes from Discovery Bay, Orwood, and Tracy Oasis. The confluence of West Canal and Old River, directly across from the location for the proposed Northern Intake structure, provides access to North and Victoria Canals, two preferred skiing locations that easily exceed Grant Line and Fabian/Bell Canals in boat counts. This intersection is akin to a major freeway interchange and is extremely dangerous because it is blind from the south. I've had close encounters there and I'm certain others here can say the same. There is little room for evasive maneuvers because the navigable portion of the channel is very narrow due to silting, and there are no signs. The artists rendering of the proposed Northern Intake, being dimensional, grossly misrepresents the waterways to scale. The channel behind the unnamed island from the south is not used because it is shallow, narrow and also blind. The boats depicted in West Canal are quite underscale and serve to downplay the hazards of this very busy intersection.

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Aside from dredging, rocking, and scouring, West Canal remains just as it was dug many decades ago to facilitate barging sugar beets to the refinery in Tracy. The construction of West Canal is what created Widdows, Eucalyptus, King, Coney and the unnamed island next to it by connecting several old oxbows that were the original course of Old River as indicated by the Contra Costa and San Joaquin County line. Appendix 1 in Volume II states on page 4-4 that "South Delta channels were not modified for SWP and CVP operations; therefore, they limit the amount of water that can be pumped from the South Delta without eroding the channels and levees." My observations are that West Canal is marginally adequate to support current diversions and scouring has been substantial enough that Dutra Construction had to do major repair work in the proximity of the intake three or four years ago.

One alternative in the draft includes an **exciting opportunity for real solutions**. The ISDP Without the Northern Intake and With An Expanded Existing Intake alternative states on page 3-38 in Volume I that "The flow velocities in West Canal and Old River would be changed by the enlarged intake. No detailed modeling has been performed to evaluate the change, but velocities in channels may exceed the three fps likely to induce scouring." On page 3-36, it states that "The location and extent of any required channel enlargement has been analyzed. It is **anticipated that both dredging and setback levees** would be required in **West Canal and on Coney Island** to utilize the full pumping capacity at Banks Pumping Plant and avoid scouring the channel." The paragraph which follows that statement contains five conclusions on hydrodynamics. Three of the five statements contain the word 'SHOULD' or 'MAY' relative to the conclusion. This is **not** very definitive language for comparative evaluation of a project alternative and indicates an obvious need for further study. On pages 4-27, 4-28 and 4-32 in Appendix 1 of Volume II, in discussions of both intake alternatives, is the statement that "Some limited channel dredging would be required to assure greater flow capacity, therefore **lower** velocity of the water, so that channel scouring would not occur." Figure 4-4 on page 4-29 indicates that the dredging would occur in front of Widdows, Eucalyptus and King Island, yet it states on 4-27, 4-28 and 4-32 that it "would not be done in sections that affect the stability of channel islands levees. The dredging would only be done in areas of potential scour." These two statements are contradictory with respect to the three islands because they **are unstable and subject to scour** due to existing depths of 25 feet and more. Figure 4-6 on page 4-33 depicts the setback levee on Coney Island along the entire west edge. Page 13-30 in the chapter on Recreation in Volume I, says; "Coney Island borders the eastern bank of West Canal, a popular water skiing area. Expansion of West Canal approximately 300 feet eastward into Coney Island is **not** expected to **negatively** affect recreational use of the waterway, and could make a larger area usable for boating and water skiing. This is considered a less-than-significant adverse impact." **What an incredible**

understatement! Aside from the double negative wording, the impact assessment is 180 degrees off the mark. Doubling the width of West Canal would have the **most significant positive impact on safety imaginable in that very busy channel.** It would also allow for a usable access to Victoria Canal from the south behind the unnamed island. The short-sightedness of this component is that to properly complete the mitigation of velocity, scour and boating dangers in front of the islands in West Canal would require an equivalent levee setback on Victoria Island past the confluence with Italian Slough, also a very dangerous intersection. To overlook this equally beneficial channel enlargement spells further destruction to Widdows, Eucalyptus and King Islands regardless of the location of an additional intake. Widening the **entire** three miles of West Canal would make it compatible with Old River to the north and relieve the existing venturi condition.

It's probably no surprise that the King Island community is opposed to the Northern Intake, but before giving us a 'not in my backyard' brush off, please consider this. I wish to be on record that the environmental impact assessments on navigation and recreation in chapters 13.3.3 and 16.3.3, are naively wrong. One only has to operate a boat in the quarter mile stretch in front of the forebay's intake bay to experience a real life model that 15,000 CFS diversions generate a navigational and recreational hazard. On the morning of September 1st on labor day weekend, returning to King Island from Grant Line Canal, I encountered the most severe eddies I have ever seen in front of the intakes. There were waves as large as boat wakes being generated on the surface.

No matter what the intake alternative, we implore you to create a separate component to widen the **entire** length of West Canal and make it the **first** priority of construction. It is well within the scope of Governor Wilson's 1992 water management plan which "includes recommendations for enlargement of South Delta channels" and calls for "immediate actions".."that would help restore the environment." With nearly one billion dollars in Proposition 204 and an additional 440 million in matching funds from the last Congress, the window of opportunity is open. Our challenge to each and every agency representative here tonight is to crank up your political machinery and secure some of those funds for mitigation while Governor Wilson is still in office and accountable to his water program. Please strive to make this public process more than just lip service, remembering that we help pay your salaries too. It's a **win - win** opportunity that **will** provide solutions **and** create goodwill.

Thank you for listening.

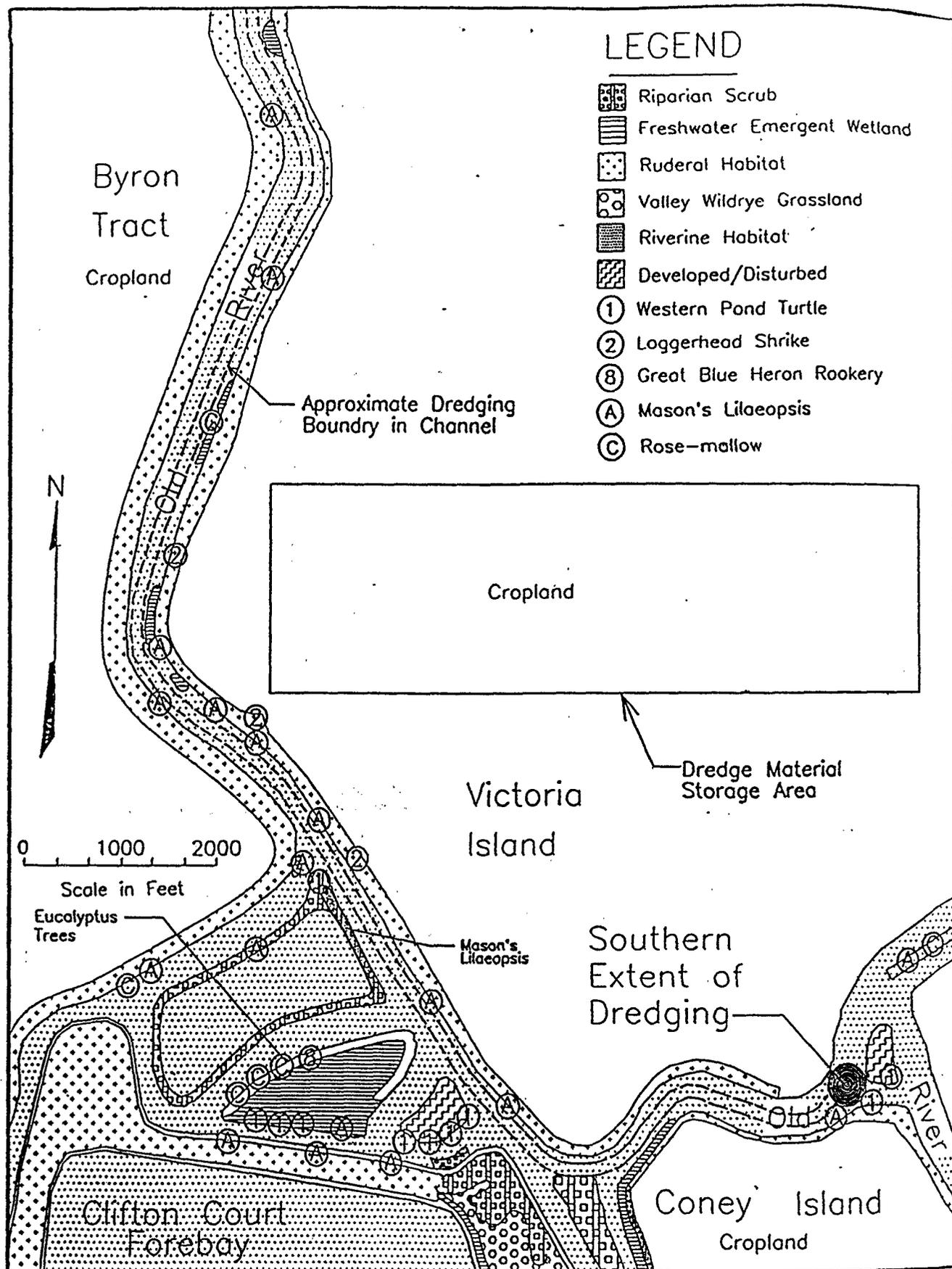


Figure 10-6. Habitat Map of the Victoria Island Dredged Material Processing Site (North).

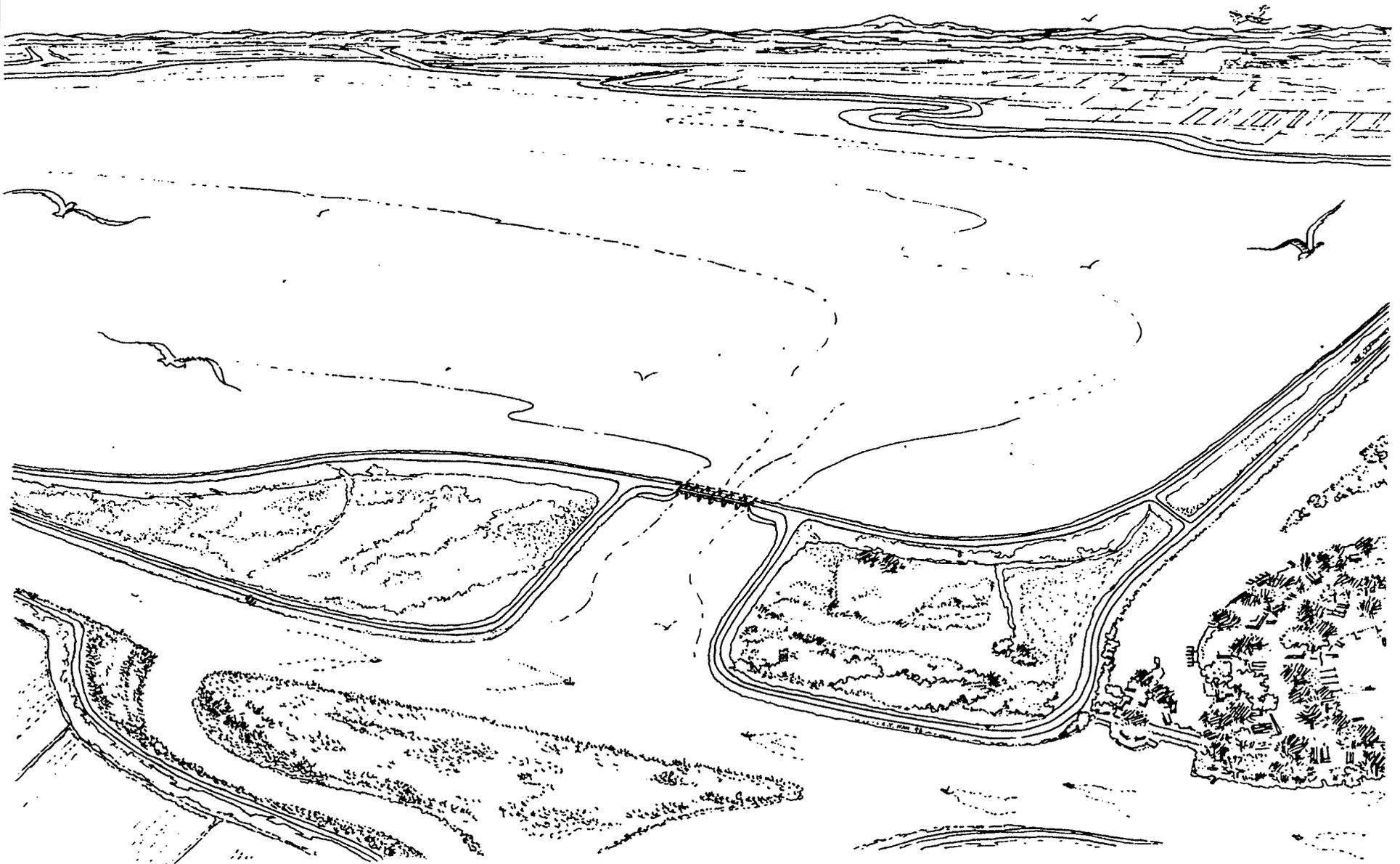


Figure 2-4. CCF Proposed Intake Structure.

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