

November 27, 1990

Mr. Fred Bachman  
Calif. Department of  
Water Resources

RE: SOUTH DELTA WATER MANAGEMENT PROGRAM DRAFT EIR/EIS

Pursuant to conforming with California Environment Quality Act comment guidelines, I respectfully submit the following comments and questions. It is my understanding from the September 20, 1990 public hearing, that questions submitted herein will be addressed in the final EIR.

The present day California Delta System of levee contained rivers, canals and dwindling natural habitat that crisscrosses the Central Valley's reclaimed farmlands is a treacherously precarious ecosystem. It lies nakedly exposed to periodic ravages of nature. Yet more importantly, it is constantly vulnerable to misuse and abuse by man. Only the most prudent decisions regarding the care and maintenance of the Delta will prolong its existence as a multifaceted resource for the benefit of future generations.

I only agree with increased diversions of Delta water during periods of excessive runoff or upstream dam releases because of problems with increasing salinity.

I am vehemently opposed to relocating the Clifton Court Forebay intake structure northward. The purported benefits of moving the intake a mere two miles cannot possibly justify either the seven million dollar cost or the detrimental affects such a move would most certainly have on environmentally sensitive King's, Eucalyptus and Widdows Islands. Additionally, the substantial water borne recreation that occurs in that vicinity on Old River would be adversely affected by the eddies and erratic current that occur near the forebay intake when the gates are open.

There are several statements in the draft EIR/EIS regarding proposed intake structure configurations and locations in the various alternatives. However, the statement on page 28 that "Each SDWMP alternative...would at least double the capacity of the existing intake gates..." is not distinctly clarified. The description on page 33 of the new northern intake structure seems evasive. It states that "the proposed intake structure is basically the same configuration as the existing...structure" and describes the current five gates and prices a typical five gate stricture at about seven million dollars. Does the statement that "the proposed intake will be sized to divert a peak flow of about 30,000 CFS", infer that it will be larger? Does the statement on page 28 and the inflow figures on page 42 imply that it will be twice as large? If it is to be larger, will it cost more than the seven million dollar figure on page 33? The estimate on page 437 in Appendix I shows six gates and a figure of 6.6 million dollars.

*Cost is not the only reason I'm opposed to a new northern intake. The fact that "scouring is definitely occurring at the intake gates..." is acknowledged on page 117. Concerns about the same problem occurring at proposed intakes appear on page 100. What is known about how bad the problem is in the vicinity of the existing intake? Are the levees being undermined or in any danger? What solutions to existing scouring problems will be offered before any new intakes are approved and built? What impact will increased channel velocities mentioned on page 120 have on the aforementioned problems or possible solutions?*

*It is sad testimony to the information presented in the draft EIR/EIS that in October, 1990, I observed a large chunk of native peat soil barely afloat in Old River near Eucalyptus Island. It was bigger than our 16 foot and probably weighed several tons.*

*Additional questions and concerns are as follows:*

*Why are there no proposals to increase the holding capacity of the forebay by dredging to deepen it?*

*Would not keeping the surface area of the forebay to a minimum act to conserve water by reducing evaporation losses?*

*Figure 5-9 on page 118 pinpoints what is significant siltation between monitoring locations OR180 & OR185 and also at OR190. Would not dredging to increase channel capacities north and east of Coney Island help to better serve the forebay intake gates?*

*Why aren't the levee breeches on Widdows, Eucalyptus and the islands east of Coney Island repaired to preserve the remaining habitat and protect the wildlife sanctuary values of those islands? That they are privately owned is not sufficient justification!*

*Are any measures being planned to halt or impede continued erosion of riparian habitat on their berms between Victoria and North Canals and in Middle River north of Union Point?*

*If not, why not, since the berm between Woodward and North Victoria Canals has all but disappeared in the past ten years?*

*What impacts of any of the proposed alternatives on King's, Eucalyptus and Widdows Islands immediately north of the forebay have been considered or studied?*

*Are any of the aforementioned islands considered preferred properties for acquisition?*

RE: SOUTH DELTA WATER MANAGEMENT PROGRAM DRAFT EIR/EIS  
page 3 of 3

*Where, and by what method, would water be drawn directly from Italian Slough as mentioned on page 186?*

*Was the dredging of Italian Slough and Old River north to Highway 4 and raising the west levee done in 1989 a preparation for using portions of Byron Tract as enlargement of the forebay?*

*If Byron Tract is used, will it be connected to the forebay without affecting continued operation of the marina at the west end of Italian Slough?*

*If so, how and where will it cross Clifton Court road and Brushy Creek that feeds Italian Slough?*

*If the mitigation barriers are installed on Grant Line Canal and/or Old River, will any additional accesses be provided east of the barriers?*

*As you can see, I have considerable interest in the waterways in the south delta and their future. The South Delta Water Management Program has stirred my interest as well as my concerns. If any of my comments need amplification or clarification I would be happy to assist any member of your staff.*

*I would also like to obtain a copy of the South Delta Recreation study mentioned on page 468. Please advise me how I can do so.*

*Respectfully submitted,*



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