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SPECIAL ASSISTANT TO THE GENERAL MANAGER

June 17, 1997

Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, California 95814

Dear Mr. Snow:

Subject: System Integrity Considerations Related to the Mokelumne Aqueducts

The purpose of this letter is to provide information to CALFED for the programmatic Environmental Impact Report/Environmental Impact Statement (EIR/EIS) regarding the levees that protect the Mokelumne Aqueducts and to recommend actions to improve the integrity of the levees in the South Delta.

East Bay Municipal Utility District (EBMUD) Aqueduct Security Program

EBMUD's Water Supply Management Program (WSMP) adopted by EBMUD's Board of Directors in October 1993 includes five components: reclamation, demand management, conservation, an aqueduct security program, the lower Mokelumne River Fisheries Plan, and a supplemental water supply project. These components are in various stages of implementation. Attached for your information is a section of the Final Environmental Impact Report (EIR) covering the security of the Mokelumne Aqueducts and potential risks (Attachment A). The aqueduct security project is currently at the 90% design stage and construction bidding is expected later this summer. Selected drawings for this work are also attached (Attachment B).

*These significant investments and upgrades will be constructed based on the present location and configuration of the levees crossed by the Aqueducts. The Aqueduct system is the primary conveyance for delivering water to EBMUD's 1.2 million customers. The seismic risks to the drinking water supplies of the 1.2 million EBMUD customers are sufficiently urgent that our aqueduct security program must be implemented now. We cannot afford to wait until the conclusion of the CALFED programmatic environmental review process and any subsequent project-level environmental review process to implement these seismic improvements to our system. EBMUD would expect that implementation of any future projects (including any resulting from the CALFED Bay-Delta program) affecting those levees over which our aqueducts traverse would mitigate any adverse impacts upon those levees and EBMUD's*

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aqueducts. In addition, the implementation of any future projects should also ensure that there are no increases in the seismic risks to our drinking water supplies or new costs to our customers. Substantial costs are implicated if new or improved channel crossings are required to protect the Aqueducts.

Additionally, EBMUD has been actively working with local reclamation districts (No. 2072 - Woodward, No. 2024 - Palm Orwood, No. 2039 - Lower Jones, No. 2038 - Upper Jones, and No. 684 - Lower Roberts) through the Department of Water Resources subvention program to improve the levees in these districts. EBMUD is helping to evaluate the integrity of levees that protect islands or tracts where the Aqueducts are located. The preliminary results of this evaluation indicate that almost all of the 50 miles of levee protecting the Aqueducts do not meet Public Law 99 Corps of Engineers standards. Any CALFED levee mitigation or system integrity program should meet Corps of Engineers standards to lessen risks to the Aqueducts and other facilities.

#### CALFED System Integrity Component

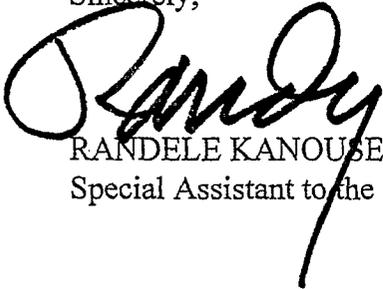
The direction of the CALFED System Integrity Common Program is unclear to EBMUD. At the December 1996 workshop in Walnut Grove, a prioritization process was outlined whereby specific levees would be earmarked for upgrade. Understandably, the January 1997 flooding took priority and brought about changes; however, since January, it has been difficult to obtain information about where this process is heading. Reducing risks of levee failure to high-risk levees should be a guiding principle. If set-back levees are proposed, whether for habitat or channel conveyance, they should result in a net risk reduction over the no-action case and this should be demonstrated in the EIR/EIS.

At the March 20, 1997 Storage and Conveyance CALFED Workshop in Sacramento where 16 CALFED alternatives were discussed, set-back levees for various channels were included in several alternatives. If high-risk levees are not part of a set-back alternative or system integrity project, the risk of failure could even increase due to CALFED improvements on other levees. At the April 30, 1997 Impact Assessment CALFED Workshop, one option that was repeatedly discussed for illustrative purposes was an alternative that included set-back levees along the west side of Old River for habitat purposes in the area where the Mokelumne Aqueducts cross Old River without any discussion of risk analysis or linkage to the System Integrity Program. Woodward Island on the east side of Old River is one of the more vulnerable areas that the Aqueducts cross due to the condition of the levees and limited accessibility. This needs to be addressed in the programmatic EIR/EIS as well as the mitigation costs.

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EBMUD is committed to working with CALFED staff and the other stakeholders to cooperatively develop and implement a Bay-Delta solution. These comments are intended to constructively support the CALFED program. We look forward to incorporation of these comments during preparation of the EIS/EIR. If you have any questions, please call me at (916) 443-6948 or Brian Campbell at (510) 287-0680.

Sincerely,



RANDELE KANOUSE  
Special Assistant to the General Manager

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Attachments