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## THE RECLAMATION BOARD

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JAN 15 1998

JAN 13 1998

Mr. Lester A. Snow  
 Executive Director  
 CALFED Bay-Delta Program  
 1416 Ninth Street, Room 1155  
 Sacramento, California 95814

Dear Mr. Snow:

Staff for The Reclamation Board has reviewed the Draft Delta Levee System Integrity Program document and has the following comments:

**General:** The Board has jurisdiction over the Sacramento River Flood Control Project, the San Joaquin River Flood Control System, and designated floodways in the Central Valley. All alterations in areas under the Board's jurisdiction must have an approved encroachment permit before start of construction. Of special concern to the Board are actions that may reduce the existing level of flood protection in any given area or any modifications to the flood control system/project. To protect public safety, the Board may not permit a proposed project that reduces levee integrity, hinders the ability to inspect water and land-side levee slopes, or interferes with flood fight capability. Therefore, the Board may require detailed hydraulic and/or geotechnical studies which show that proposed modifications will not result in adverse impacts to flood protection. A copy of the Board's regulations are included with this letter.

**Specific: Pp. 11-13. Delta System Integrity Program Elements**

P. 12: *"This plan will build upon existing programs and activities to meet minimum federal flood control levee performance criteria for project and nonproject levees in the Delta."*

**Comment:** The report should include coordination with the federally and State authorized and funded *"Sacramento and San Joaquin River Basins Comprehensive Study - Flood Damage Reduction and Environmental Restoration Plan"* that was initiated recently by the U.S. Army Corps of Engineers and the Board. The Corps' draft Work Plan for the Comprehensive Studies envisions close coordination with CALFED staff both on the planning and the policy levels. The CALFED report should also acknowledge this.

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One goal of the comprehensive study is to develop hydrologic and hydraulic models for the Sacramento and San Joaquin Rivers. These models will be essential for any comprehensive flood management planning. The following will be included in the modeling effort:

1. Development of a reservoir operations model to incorporate historic rainfall-runoff data;
2. Development of a hydrologic model for unregulated sub-basins below existing reservoirs;
3. Development of baseline hydraulic models of existing conditions. The models will be a combination of steady and unsteady-state hydraulic models designed to analyze low flows and potential water supply questions as well as peak flow;
4. Modeling of sediment transport conditions to evaluate erosion and deposition trends.

**P. A-4: Delta Levee System Integrity - Objective Statements**

Comment: The report should include an objective to manage risks to human life and property.

**Figures B-1**

Comment: Figure B-1 appears to indicate that a Public Law 84-99 levee provides 100-year protection. This is not always true. The Sacramento River Flood Control Project which has PL 84-99 eligible levees, was not designed and constructed to provide a particular level of protection. Additionally, the calculations of flood risk changes with every flood event and a levee with 100-year protection today may have a lesser level after the next flood.

**Figures B 2-5**

Comment: None of the examples of bank protection and levee work shows a constructed waterside toe trench--a feature often considered important to provide bank stability.

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**Page G-1 Cost Estimate**

*"...do not include all other associated costs such as lands, easements, right of way and relocations..."*

**Comment:** Cost estimates without land and right of way and relocation costs are misleading and have very limited value. Land rights and relocations are a major cost component of levee improvement projects and should be included in the cost estimates.

Thank you for the opportunity to review the draft program document. If you have any questions or would like more information, you may contact me at (916) 653-5434, or your staff may contact Annalena Bronson, Environmental Specialist IV, at (916) 654-4532.

Sincerely,



Peter D. Rabbon  
General Manager