

5 North California Street
Lodi CA 95240
February 25, 1999

CALFED Bay Delta Program
1416 Ninth St. Suite 1155
Sacramento CA. 95814

Attn: Dick Daniel

Regarding: The "Restoration of Frank's Tract"

Dear Sir,

I am deeply concerned and troubled about the following paragraph in the CALFED, "Ecosystem Restoration Projects and Programs" February 1999, Proposal Solicitation Package. Chapter III.

Central and West Delta. *Restore Frank's Tract to tidal marsh using clean dredge materials and natural sediment accretion in conjunction with the eradication and control of nuisance, introduced aquatic plants.* Frank's Tract can be restored to the largest expanse of tidal wetlands in the Delta with no impact to agriculture. Frank's Tract levees were breached and the island has been flooded since the early 1900's. The subsided island is deep and provides warm-water habitat for predatory, non-native fish. The island bed must be elevated through a combination of dredge disposal, natural sediment accretion, and peat accumulation. Frank's Tract will be a functional component of the San Joaquin River corridor, a major fish rearing and migration area. Reclaiming the tract must also occur in conjunction with the eradication and control of nuisance, introduced aquatic plants for restoration to be most beneficial to native species. A study to evaluate the restoration of Frank's Tract was previously funded. Proposals should be for the second phase of the previously funded proposal if there is a demonstrated readiness for the next phase of funding.

While some of the goals of this proposal may have merit, many factors surrounding the current use of Frank's Tract have been completely ignored. I believe these factors far outweigh any benefits generated by the above proposal. The factors not mentioned in the above proposal include:

The uniqueness of Frank's Tract in the delta:

While there are a series of flooded tracts and islands in the delta, Frank's Tract is the only large, isolated, open body of water that is extremely accessible and currently used by large numbers of people for recreation, fishing, hunting, boating, and other watersports.

This inland lake is surrounded by levees which block wind and waves that can build to dangerous size in areas such as Suisun Bay, Grizzley Bay, Big Break, and Sherman Island. This property of the Tract allows for safe boating when other areas are unusable due to inclement weather.

While the lake is not free of tidal currents, they are much less severe than those found in bays that are an in-line part of the Sacramento/San Joaquin River System. This again makes Frank's attractive for all of the sports mentioned above.

Frank's is a junction for travel from the San Joaquin system to the Sacramento system by boaters, fishermen and commercial vessels due to the excellent set of sloughs and canals surrounding the tract.

Current Use of Frank's Tract and its unique properties allows the following activities:

- Sailing- the open expanses of the tract, combined with its adequate size and practically unobstructed bottom depths of 8-13 feet allow sailboats to hold regattas, and allow for day and weekend cruising. This is the only tract close to a large boating community where minimal current and other obstructions allow for safe open water sailing for the novice sailor.
- Boating – The tract, again because of its unique properties, is ideal for sport boating .
- Houseboating- A number of operators as well as private owners rent or own cruising houseboats. These houseboats use the tract extensively since it is convenient to water accessible restaurants, stores, and is relatively calm compared to other open water. Houseboat operation in the tract is much safer than other areas of the delta where strong currents and major effects of wind can quickly place property and people's safety at risk.
- Fishing- the tract is a hub for Delta fishing and has been for many, many years. A large industry has built up around the tract dealing with sport fishing. The tract offers one of the finest areas for fly fishing the Delta for Striped Bass, a sport requiring water depths of 5-20 feet. Black Bass fishing both at the recreational level and tournament level makes use of Frank's extensively. Finally, conventional fishing centering on the Striped Bass has been a staple of the tract for over 50 years, with many Striper Derbies and other festivals centered on this great game fish.
- Hunting- Frank's is located on the Pacific Flyway. Many duck and goose hunters build floating blinds and moor them in the tract in the winter months. These blinds do not inhibit the other activities on the tract and provide a quality alternative to expensive duck hunting clubs for the hunter that is limited in resources. These blinds are removed when the season is over and have worked in harmony with the other tract activities for years.
- Recreation- Many hundreds of homeowners have built their homes on the levees and sloughs surrounding the tract. Most of these homes have landings and boat docks where the owners park their craft for year round use in the tract. In addition to the use of the boats themselves, the docks provide picnic and leisure areas for the homeowners and their guests to enjoy this unique delta lake.
- Shopping and dining- numerous stores and restaurants have docks for access by boating traffic for use in their cruising pleasure. The calm waters that the tract and the adjoining waterways allow provide for secure and safe docking, even in less than perfect weather.

The Economics of Bethel Island (dependent on Frank's Tract)

- The commercial businesses in and around Bethel Island depend on the boating traffic generated by Frank's Tract for a large portion of their income. Virtually every business in the community of Bethel Island, with a population exceeding 2,000, relies on the boating industry. The town boasts several bait shops, a canvas and ship's chandler, a marine hardware store, dozens of marinas, numerous restaurants, gas docks, yacht and boat sales, and boat repair facilities.

All of these businesses would be seriously affected and most driven to bankruptcy by the filling in of the tract to a tidal marsh, making it unusable by the boating public at large. These businesses provide the support and income for thousands of people and are responsible for many millions of dollars in sales and property taxes.

- The value of private property would be severely reduced by the filling of Frank's Tract. Where homeowners now have properties providing excellent boating access to one of the delta's unique assets, they will instead have access to a tidal marsh with limited recreational properties. It could be expected that many of these homeowners would find the area much less desirable and seek to sell their properties, even at reduced values.

Alternatives

Since the goals of the proposal are well intentioned and will benefit the delta, more reasonable and less costly alternatives exist to the above proposal. Numerous delta islands exist that are fairly isolated and are becoming increasingly difficult to farm due to their size, the cost of maintaining levees and the fact that they are slowly sinking even further, causing additional expenses every year in attempts to hold off the waters of the delta.

While some of these islands have already been identified, a survey of delta farmers may reveal additional properties that they may be willing to surrender to delta restoration if properly reimbursed for the cost of the land.

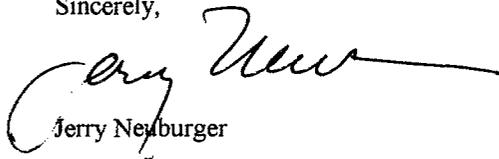
Utilization of these other properties will provide additional benefits, not present with the filling of Frank's Tract.

- The islands can be terraformed while dry, allowing for optimum shaping and grading for maximum marshland habitat. Since they will be engineered while dry, the deadly silting of surrounding waterways can be prevented.
- The islands will be in far less frequently traveled portions of the delta, encouraging the "wilderness" character of the delta marsh and the health of the fragile species the new ecosystem is designed to encourage.
- Utilizing this additional property will increase the total delta "wetlands" acreage.
- The actual cost of the conversion may be less than that of filling the Tract since the cost of the land and the dry land terraforming may actually be cheaper than the "wet" filling of Frank's Tract with dredge tailings.
- The severe environmental damage caused by silting to the existing marine ecosystem in the sloughs and waterways surrounding Frank's Tract would be prevented.
- The long term economic benefit to the state will be greater since the current economy of Bethel Island will not be adversely effected and state monies currently spent on levee maintenance of the islands selected for conversion to delta marsh will no longer be necessary.

Please give careful consideration to the above points. I believe that all are valid reasons for re-considering the current plan to convert Frank's Tract from it's current multiple beneficial uses to a single purpose delta marsh.

I would appreciate a response regarding the above.

Sincerely,



Jerry Newburger

Past president, Delta Fly Fishers; Past President, Lodi Sunrise Rotary; Past President, Northern California Council of the Federation of Fly Fishers; member Lodi Chamber of Commerce; member California Sportfishing Protection Alliance; Co-founder, Committee to Save the Mokelumne; Past Board Member, Mokelumne River Conjunctive Use Committee; past Board Member, San Joaquin County Water Board.

CC: Bethel Island Chamber of Commerce, Oakley Chamber of Commerce, Antioch Chamber of Commerce, Brentwood Chamber of Commerce, United Anglers, California Striped Bass Association, Northern California Council of the Federation of Fly Fishers, the California Sport Fishing Protection Alliance, Dan Blanton Outdoor Ventures, Save Our Stripers, the Environmental Water Caucus, the Department of Fish and Game, Bay Keeper, Delta Keeper, Contra Costa County Board of Supervisors, San Joaquin County Board of Supervisors, other interested parties.