

DELTA PROTECTION COMMISSION

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2000-5

Tracie B.
cc Rick S.
GRAY DAVIS, Governor**RECEIVED**

JAN 31 2000

CALFED Bay-Delta Program



January 28, 2000

Steve Ritchie, Acting Executive Director
CALFED
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Advisory Comments on CALFED's South Delta Bundle of Actions

Dear Mr. Ritchie:

This letter summarizes advisory comments from the Delta Protection Commission regarding the proposed CALFED bundle of actions in the South and West Delta areas. At the Commission's November 18, 1999 meeting, Stein Buer of the CALFED staff made a presentation regarding the proposed bundle of actions. Among the proposed actions are: interim dredging at selected recreational facilities; a new screened intake to Clifton Court Forebay at the north end of the Forebay; localized channel dredging for flood control and navigation purposes; and construction of three barriers--one for fish, and two to control water surface elevations in the South Delta. A third water surface elevation barrier, in the Grant Line Canal, may be added at a later date if determined to be needed.

Effectiveness of Two Water Surface Elevation Barriers:

CALFED staff described the project as a two barrier project that may or may not be effective in maintaining the surface elevation in the South Delta at a height that will allow the needed year-round irrigation of South Delta agricultural lands. The proposed series of events—building two barriers and then evaluating the need for a third barrier--could have adverse impacts on South Delta farmers.

Comment: Adequate modeling and engineering should take place during the planning process to allow evaluation of the need for a third barrier on the Grant Line Canal. The findings of this technical evaluation should be submitted to the Delta Protection Commission for evaluation and concurrence prior to a final decision by CALFED regarding the final design of the proposed project. Finally, the Head of Old River Fish Barrier should be installed in coordination with installation of the water control barriers so as to not adversely impact local agriculture.

Relocation of Intake to Clifton Court Forebay:

The proposed South Delta Bundle includes evaluation of the relocation of the intake to Clifton Court Forebay from the southeast to the north end. This could have an additional impact to water flows in the South Delta, and eventually on water surface elevations. The relocation could have impacts to habitat near the proposed intake, and to recreational uses, especially small boats.

Comment: CALFED should carefully determine and evaluate the impacts to local facilities in the South Delta associated with relocation of the intake. This aspect of the project should be included in the modeling and compared to the existing location.

Operation of the State Water Project:

Currently, the State Water Project is operated in conjunction with tidal cycles—water is moved into the Forebay on the high tide, and then the pumps move the water out of the Forebay and into the canals. The proposed South Delta bundle is considering two other options which would export water on other portions of the tidal cycle that could result in lower surface water elevations in the South Delta (about six inches).

Comment: CALFED should carefully evaluate the impacts of proposed operation of the State Water Project on water surface elevations in South Delta channels. Water surface elevations in the South Delta should be adequate to allow year-round irrigation of agricultural lands.

Ecosystem Restoration:

The South Delta Bundle of actions will include an Ecosystem Restoration component that has not yet been developed. In preparation of this component of the South Delta bundle, the following comments should be considered.

On September 11, 1998, the Ad Hoc Group presented its recommendations to the Bay Delta Advisory Council (BDAC). BDAC accepted the recommendations and agreed that CALFED would conform to the recommendations to the fullest extent possible. The recommendations included:

- Restoration/enhancement of land in public or nonprofit ownership.
- Acquisition/enhancement of water-covered lands to enhance habitat.
- Protect, enhance, and restore in-channel islands and waterside berms.
- Develop/implement management plans for upland areas in public/nonprofit ownership.
- Develop/implement management plans for agricultural lands to enhance seasonal wildlife habitat.
- Develop/implement management for private managed wildlife habitat (duck clubs).
- Control of stressors should avoid duplication of existing regulatory programs.

In addition, the Ad Hoc Group made suggestions about enhancement of the riparian corridor along the San Joaquin River:

- From Mossdale, north to Stockton, enhance seasonal migratory fish passage through the release of pulse flows necessary to stimulate inland migration, and enhance seaward migration.
- Enlarge the weir to Paradise Cut by incorporating mitigation lands east of the Cut to be provided by Gold Rush City project (900 acres) and clearing and dredging the connection to Grant Line Canal.
- Enlarge and maintain in-channel islands in Old River.
- Clear portions of Middle River near Roberts and Union Islands to increase flood flow capacity and improve and possibly setback levees to allow planting of riparian vegetation.

Comment: The proposed Ecosystem Restoration component of the South Delta bundle should be developed as soon as possible and submitted to the Delta Protection Commission for review and concurrence. As much as possible, the Ecosystem Restoration plan should incorporate the recommendations of the Ad Hoc Group. As an alternative to the fish barrier at the head of Old River, the value of a hydrologic barrier that would be created from a three-barrier program should be analyzed as part of the ecosystem enhancement program.

Dredging in the South Delta:

The proposed South Delta bundle will include dredging at a few marinas where sedimentation has precluded use of existing docks and slips and in Old River between the Clifton Court Forebay north to the San Joaquin River. Local observations indicate sedimentation in the South Delta is an ongoing issue associated with upstream uses, the timing and volume of upstream water releases into the South Delta, and winter flood flows.

Comment: The Commission recommends that proposed dredging address multiple issues including enhanced flood water conveyance, enhanced recreational boating, and enhanced fish passage upstream and downstream. All proposed dredging should be included in the modeling and engineering analyses of the proposed project. Any dredging program undertaken by CALFED should have a maintenance component that is approved as part of the overall project.

Proposed Fish Screens on Agricultural Intakes:

The proposed project includes localized dredging adjacent to existing intakes, extending the existing intake pipes, and adding fish screens to the intakes in the Grant Line Canal, if no barrier is constructed.

Comment: The Delta Protection Commission previously adopted comments regarding fish screens on small agricultural diversions. The Commission recommended implementation of the State's existing screening policy and should include:

- *A blanket proposal for installation of fish screens on all water diversions is unreasonable and unwarranted based on the high cost of installation in relation to the cost of maintaining pumps/siphons.*
- *Prior to requiring installation, data from current studies should be released, the current DWR study associated with the South Delta program should be released, and studies paid for with Category III grants should be completed and released.*
- *Installation of fish screens should be evaluated Deltawide and prioritized to maximize benefits of fish screens.*
- *Funds for installation, operation, and maintenance of fish screens should be funded from State and federal sources.*

Recreation in the South Delta:

The proposed South Delta bundle of actions includes mitigation for impacts to recreational boating in the South Delta (installation of locks at the three proposed permanent barriers), but does not address opportunities for new or improved recreation of public access in the South Delta bundle.

Comment: The Ad Hoc Recreation Group recently reviewed the South Delta bundle of actions and has made a number of recommendations including:

General Comments:

- *CALFED should, in cooperation with the Committee planning efforts, develop a Deltawide recreation vision/master plan now.*
- *CALFED should strive to fully understand existing recreation activities, facilities, and uses in the South Delta planning area by utilizing the experience and knowledge of the Committee in the recreational planning processes for the South Delta bundle of actions.*
- *CALFED should ensure that proposals that would impact surface water elevations will not adversely impact recreational uses, existing recreation facilities, water quality, or water temperatures.*
- *CALFED should protect and enhance the water quality in the Delta for aquatic habitat and for water contact recreation.*
- *CALFED should take advantage of publicly owned lands and publicly owned facilities to provide facilities for the general public.*
- *CALFED should partner with private facility owners/managers to provide needed facilities for the public, with the private facility owners/managers providing oversight and maintenance.*
- *CALFED should partner with private interests, local governments, and special districts to provide needed recreational facilities in the South Delta, noting that local governments do not have adequate funds for operation and maintenance of recreation facilities. This could include assistance in establishing an endowment fund for local governments or a regional entity to utilize in operating and maintaining recreation facilities.*
- *There should be coordination between the water quality actions proposed under the CALFED Program and water quality improvement efforts of recreational boaters (i.e., funding pumpouts, waste disposal facilities, and restrooms).*

- *Plans to enhance habitat for a single species should not be detrimental to other species of fish.*
- *CALFED should protect and enhance the habitat of important game fish in the South Delta, such as the Black Bass.*

Specific Comments:

- *The proposed boat locks should provide public restrooms, docks, and other public use facilities if accessible by public roads, and if the facilities would not create conflicts with adjacent land uses (agriculture).*
- *Big Break is being acquired by the East Bay Regional Park District (EBRPD) and is suitable for development of trails and small boat facilities.*
- *EBRPD is interested in continuing construction of trails along appropriate shoreline areas, and should partner with CALFED agencies to carry out this goal.*
- *Clifton Court Forebay is publicly owned, and is suitable for and should provide for development of trails, camping, fishing, and associated recreational uses.*
- *Development of appropriate fishing rules for Clifton Court Forebay (i.e. lift length restrictions on recreational fish species) which will help eliminate predation and overpopulation.*
- *Areas which are being developed (Mountain House, Gold Rush City, etc) should incorporate fishing access areas, scenic overlooks, wildlife observation sites, trails, and other appropriate public recreation facilities in partnership with CALFED.*
- *The barrier at Middle River should be re-evaluated as to the appropriateness of a boat trailer versus a boat lock because it is anticipated that boating traffic will increase with the dredging of this channel (in accordance with FEAT recommendations on increasing the capacity of the Lower San Joaquin River (FEAT Report, 199, page 121)).*
- *Enhance publicly-owned Franks Tract and Little Franks Tract for recreation and wildlife habitat by incorporating water-related recreational activities possibly displaced by CALFED actions throughout the Delta*
- *All CALFED dredging programs need a maintenance component.*
- *Ensure that the fish screens at the project pumps will benefit recreational fishing by minimizing or eliminating the possible loss of fingerlings through pumping actions.*
- *Evaluate levees to determine if public parks and day use areas can be linked with a regional trail network without conflicts with on-going agricultural or recreational uses.*
- *Encourage and possibly assist in the funding of information/interpretive visitor centers at key Delta entry points (i.e., along Highways 12, 4, and 160, and Interstate 5).*
- *Encourage and possibly assist in the funding of shoreline trails and paths in urban waterfront areas.*
- *Encourage and possibly assist in the funding of installation and maintenance of public restrooms at existing public parks and facilities.*
- *Encourage and possibly assist in the funding of installation and maintenance of public docks/landings in Delta waterfront communities to allow access from the waterways to the communities and their visitor-serving facilities.*

- *Encourage and possibly assist in the funding of construction of launching facilities for small, car-top boats.*
- *Ensure that new facilities meet ADA requirements.*

The Commission and its staff look forward to working with CALFED and its staff to develop a South Delta bundle of actions which addresses key issues associated with protecting and enhancing wildlife habitat, recreation and agriculture in the Delta Primary Zone.

Sincerely,

A handwritten signature in black ink that reads "Patrick N. McCarty" with a small "(m4)" written below the name.

Patrick N. McCarty
Chairman