

DEPARTMENT OF TRANSPORTATION

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March 20, 2004

10-SJ-12 PM 0
Draft Feasibility Study
In-Delta Water Storage Project
(Delta Wetlands)

Jeremy Arrich
Department of Water Resources, DPLA
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Arrich:

Thank you for the opportunity to review and comment on the *In-Delta Storage State Feasibility Study Draft Report*, an evaluation of the revised Delta Wetlands (DW) project to determine what modifications would be necessary to make the project acceptable for public ownership. The In-Delta Storage Project would develop Webb Tract and Bacon Island into reservoir islands and develop Holland Tract and Bouldin Island as habitat islands to mitigate the environmental impacts caused by the proposed project.

The Department of Transportation's (the Department) concerns rest with that portion of the project adjacent to State Route (SR) 12 on Bouldin Island which may be impacted by any changes to existing conditions. In particular, modifications that would impact the safety of the traveling public, the integrity of SR 12 structures and roadbed, and the ability to widen the corridor to meet future needs, would be significant and require mitigation.

Revision of the original DW project seems to have alleviated the Department's major concerns with the structural integrity of the highway, and we look forward to working closely with the project proponents in the evaluation and implementation phases to insure the safety of the traveling public and the protection of the State's infrastructure investment. However, the Department is concerned that the existing agricultural land use of the adjacent land may be abandoned, leaving the land to revert to wetland status. This would seriously impact any future widening by greatly increasing the cost of right of way acquisition in order to mitigate for the loss of wetland habitat. Further feasibility and cost analysis should evaluate fully the increased costs of future SR 12 projects, and the availability of funds to cover those increased costs, and the risks associated with a no project alternative for those projects, if the land will no longer be in agricultural production, against the benefit of the proposed project.

Arrich
March 20, 2004
Page 2

If you have any questions, or would like to discuss these comments in more detail, please contact me at (209) 941-1921 (email: tdumas@dot.ca.gov), or Lynn O'Connor, of my staff, at (209) 948-7575 (email: loconnor@dot.ca.gov).

Sincerely,

[as signed by]

**Tom Dumas, Chief
Office of Intermodal Planning**

CC: Ken Baxter, Deputy District Director, Planning & Local Assistance
Caltrans District 10

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