

March 18, 2004

TO: Jeremy Arrich, Senior Engineer, In-Delta Storage Project

FROM: David Breninger, General Manager, Placer County Water Agency (PCWA) & Director,  
Recreational Boaters of California (RBOC)

RE: In-Delta Storage Program/Project: Comments

I appreciate the briefing provided by state officials at the February 25, 2004, In-Delta Storage Program/Project Feasibility Study public briefing. As you mentioned to me after the meeting that I offer you comments from the perspective of a water manager and as a recreational boater "in" the Delta, I have done so as you'll find below. There are a number of colleagues and associates with whom I have talked to about this Project - from time to time over the years - and so I have included them as "cc's" to this email. You may receive some follow up comments from one or more of them.

**General Observation on "Project" title:**

Over the years, as I have attended meetings on this proposed Project, I've been struck by the fact that there are at least two different titles and/or names used to identify this endeavor with resultant differing information circulated or available to the public. One title used is In-Delta Storage Program or Project while the other is The Delta Wetlands Project. I've come to learn that the "Storage Project" is the title preferred by CALFED (Federal & State) government officials while the "Wetlands Project" is the titled preferred by a private firm located in Lafayette, California. As I talk with colleagues, they too notice this oddity about this particular Project.

Accordingly, to help assure clarity, staff might want to make sure that at public meetings in the future the CALFED materials ("hand outs") are the ones which are discussed and referenced and if "other" materials or maps are circulated that they are clearly identified from who they originate.

With this in mind, my comments below are related to the CALFED "In-Delta Storage Program Feasibility Study (Program)" documents received at the February 25, 2004 public briefing.

**1) Water Transfers: EWA:**

On page 3 of the Draft Executive Summary there is a sentence that reads:

"Environmental Water Account (EWA) – In-Delta Storage Project could provide water needed to support the EWA program, enhancing the EWA agencies ability to respond to real-time fisheries needs and would eliminate the need to purchase a substantial portion of water needed by EWA each year."

Frankly, I can not find the facts to support a phrase that this Project will truly and for all times "...eliminate the need to purchase a substantial portion of water needed by EWA each year". The use of such a phrase for this Project relevant to the EWA and water transfers with out strong supporting facts is of concern.

I recommend that in this document and all others related to this Project be reviewed and changed by staff so that this Project does not in any manner over-state that with which it can assuredly deliver in the form of real, "wet" water yield on an annual basis from the actual operations of the Project.

I recommend that this and any other references in any other Project documents be changed accordingly. An example of such a correction - such as to the above referenced sentence - could be shorten it to read: "Environmental Water Account (EWA) – In-Delta Storage Project could provide water needed to support the EWA program, enhancing the EWA agencies ability to respond to real-time fisheries needs."

**2) Fish Screens:**

I appreciate that at the briefing staff mentioned that it will be a challenge to develop appropriately designed and operational fish screens for this Project (relevant to the in-flow and out-flow of water within the Webb Tract and Bacon Island storage reservoirs). An opportunity

available to this Project, as it moves forward, is that it can help lead or even facilitate discussions on what is the latest “state-of-the-art” fish screen.

I recommend that consideration be given in the next or pre-design stage for the Project’s fish screens that staff host a meeting(s) that includes colleagues from local water agencies and the agricultural community so that all can mutually learn and share information on this important matter.

### **3) Invasive & Non-Native Aquatic Weeds:**

In as much as the In-Delta Storage Project’s proposed storage of water within Webb Tract and Bacon Island will each be very shallow reservoirs, it should be anticipated that there will be a great accumulation of and serious problem in controlling the growth of invasive & non-native aquatic plants or weeds. Such plants are a very serious problem in the Delta water ways now. (Such plants are also a serious problem in irrigation canals and tributaries within and up-stream to the Delta system.) The briefing didn’t provide any information on how this serious operational problem will be addressed.

Accordingly, I recommend that this matter be more fully identified with suggested resolutions set forth during the next stage of this Project with appropriate studies reported upon at subsequent meetings as well.

I also recommend that staff consult with the staff of Department of Boating and Waterways - Ray Tsuneyoshi, Director - to learn more about that which DBW is confronted with “in” the 1,000 miles of Delta waterways on this matter. Likely wise, there are members within the Association of California Water Agencies - Steve Hall, Executive Director - who could also be consulted on the matter of canal and ditch system problems with aquatic plants.

The seriousness of addressing and resolving invasive & non-native aquatic weeds has reached a very critical level in the Delta. My observations both as a water manager and while boating in the Delta is that the Webb and Bacon reservoirs – because of their resultant shallowness and warm waters that will held within each – will likely be “plagued” by such species unless a very carefully identified and aggressively implemented eradication program is carried out at such time as the Webb and Bacon reservoirs become operational.

### **4) Reservoir Embankment Design: “Bench” Option:**

The briefing and documents provided at the briefing identify two options to be utilized to enhance certain levee embankments. One is called the “Rock Berm Option” and the other the “Bench Option”.

The “Bench Option” needs further consideration to address, for example, how to help boats avoid going “aground” upon the “bench” on the slough side of the levees where ever this option is constructed for this Project.

I recommend staff coordinate on this matter with the Department of Boating and Waterways and the US Corps of Engineers (who have considerable experience along the Sacramento River with levee construction). Members within the organization Recreational Boaters of California (RBOC) can also assist on this matter from the perspective of the recreational boater.

### **5) Recreation:**

I am familiar with the fact that most public water resource projects and reservoirs impounding the “waters of the state” must also provide recreational opportunities for the public as part of a water storage project.

Neither the briefing nor the Draft Feasibility Study provides sufficient information as to what the intentions of the In-Delta Storage Project will be or will provide or will finance for recreation at Bouldin Island, Webb Tract, Holland Tract and Bacon Island or the Project as a whole.

Page 4 of the Draft Feasibility Study does not clearly nor fully address this matter. Based upon what I read in the Study it seems that the matter of recreational benefits appears limited to the Bouldin Island and Holland Island component of the Project. The Webb Tract and Bacon Island components of the Project seem to be entirely omitted on this matter all together.

Although the Delta is the definitive waterway in central California, I find nothing noted any where in the Study (not even on page 4 under “Recreational Benefits”) nor was it mentioned by staff at the briefing about recreational boating or – and more importantly - how this Project will

contribute toward it. Recreational boating needs to be identified and considered as an important component in all aspects of this Project.

Illustration: Boat ramps and accessibility with near by sanitation facilities is required at other reservoirs (example: PCWA's French Meadows Reservoir and Hell Hole Reservoirs) as well as State reservoirs (example: Oroville Reservoir) and Federal reservoirs (example: Folsom Reservoir).

One example for this Project: State highway 12 traverses Bouldin Island and accordingly public access to this location of the Project currently exists. Bouldin Island can easily accommodate public accesses to the adjacent waterways, boat ramps, docks, parking lots for both boat trailers and vehicles, sanitation facilities and day and overnight use areas at various locations on Bouldin Island.

Another example: Between the north-side of Bacon Island and the south-side of Mandeville Island is Connection Slough. There is a connecting bridge (known as Connection Slough Bridge) with one abutment affixed to Bacon Island and the other to Mandeville Island. The bridge is very low across the Slough presenting a problem for boats to travel beneath it and the hours of operation for this bridge to "open" for recreational boating purposes is limited. This Project includes the bridge (and the only vehicle access to Mandeville Island other than by ferry boat) and at this location the Project can help mitigate a recreational boating need by assisting in underwriting the cost for the bridge operator to tend the bridge on a schedule that better meets the needs of boaters.

I recommend that the entire matter of recreation at each of the individual four islands/tracts as well as for the over all Project be far more fully explored, identified and mitigated for "Recreational Benefits" and recreational boating in particular be accommodated before the Project advances any further.

I further recommend that staff include the Delta Protection Commission (DPC) and its Recreation Advisory Committee as well as representatives of the Recreational Boaters of California (RBOC) plus the California Delta Chamber of Commerce in all further discussions and meetings on any aspect of the recreational and boating component benefits for this Project.

Thank you for the opportunity to offer comments to you on this Project.

David Breninger