

Fax
(925) 625-0169



IRONHOUSE SANITARY DISTRICT

450 Walnut Meadows Drive . P.O. Box 1105 . Oakley, CA 94561

Telephone
(925) 625-2279

March 18, 2015

VIA: U.S. Mail and E-mail

Jacob McQuirk, Supervising Engineer, Bay-Delta Office
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236
Fax: (916) 653-6077
E-mail: DWREDBCOMMENTS@water.ca.gov

RE: Comments on the IS/PMND for Emergency Drought Barriers Project.

Dear Mr. McQuirk:

Ironhouse Sanitary District (ISD) is pleased to submit the following comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/PMND) for Emergency Drought Barriers Project (Project) sponsored by the Department of Water Resources (DWR). The page references below are to pages in the IS/PMND.

Comment One, page 3-47, **PLANTS**

The IS/PMND does not adequately analyze the interactions of the Project with invasive, exotic and nonnative plant species in the Delta such as the water hyacinth and *Egeria densa*. Specifically, the interaction of the rock barrier in False River with the water hyacinth which grows in the western portion of the Sacramento-San Joaquin Delta (Delta), is not addressed. Please see:

http://www.dbw.ca.gov/PDF/WHCP/FAQ_Water_Hyacinth_2015_FINAL_02-17-15.pdf

When the rock barrier is installed across False River in accordance with the Project, that portion of False River will become a very large collection point or funnel for all water borne material upstream (east) of the barrier, including all of the water hyacinth that grows in the western portion of the Delta during the growing season. First, the water hyacinth will grow in the warm water protected portions of the Delta, such as Little Franks Tract. Next, as the bio mass grows beyond its nursery area, it will then drift with the current to the rock barrier dam area. Finally, once all of False River above the dam is impacted by water hyacinth, then the water hyacinth will impact the ferry slip(s) on Jersey Island, Bradford Island, and Webb Tract as well. See attached Exhibit A. The ferry slip on Bradford Island is out of the main force of the current; therefore, under a no flow condition the ferry slip is exceptionally well suited to capture and harbor drifting water hyacinth. This will adversely impact the ability of the ferries to make a landing at the ferry slip.

It is unknown at this time whether or not there will be increased or decreased water flows in False River due to the barrier dam. If river flow increases in False River, then there will be a need to install an outboard “dolphin” system to aid the ferry in making landings at the Jersey Island ferry slip. Increased water flows could push the ferry off the current spring line bulkhead system that is used by the ferry to make landings. If there are increased water flows in False River, then that corner of Jersey Island where the Ferry Slip is located will be more heavily impacted by current under cutting of the outboard toe of the Jersey Island levee system. This could result in increased levee erosion.

The north end of Fisherman’s Cut, where it designated as a landing on a NOAA chart for Bradford Island, is very narrow. Depending on the altered water flows in False River due to installation of the rock barrier, this narrow area could be “necked down” or reduced in width by water hyacinth in late September and all of October. If the barrier dam is installed, it is likely that it would be impossible to navigate Fisherman’s Cut by boat. Since traveling by boat through False River to Fisherman’s Cut is a short cut to get out to the San Joaquin River from parts of Bethel Island, it is important to keep Fisherman’s Cut open to all boaters.

Due to a change in water flows due to the installation of the rock barrier in False River, an area in Piper Slough known as Horse Shoe Bend on the north end of Bethel Island could be heavily impacted by water hyacinth. This would adversely impact boaters trying to navigate Piper Slough to False River to Fisherman's Cut to the San Joaquin River.

If the rock barrier in False River is installed, all of the river water above the rock barrier will be much warmer than it is now which will help prolong the growing cycle of the water hyacinth. Currently in False River, the water temperature is in the 57.67 – 58.99 – degree range. Ambient air temperature is some 10 – 15 degrees above normal temperature for this time of year. The water temperature is some 5 degrees or more above normal temperature range for this time of year. Consequently, the 2015 water hyacinth season has already started.

The Department of Boating and Waterways has commenced its herbicide spraying season a little earlier this year. Nonetheless, the False River rock barrier will be severely impacted by water hyacinth no matter what actions the Department of Boating and Waterways undertakes.

In sum, the ISD/PMND fails to adequately analyze the interaction of water hyacinth growth in the western Delta with the installed rock barrier, and their combined impact on boating and safe navigation in the western Delta.

Comment Two, pages 3-83 through 3-94: **3.9 HYDROLOGY AND WATER QUALITY.**

ISD owns all of Jersey Island. On July 2, 2013, ISD filed a STATEMENT OF WATER DIVERSION AND USE (SO23983) FOR DIVERSION FROM SAN JOAQUIN AND FALSE RIVERS; PIPER, TAYLOR AND DUTCH SLOUGHS, IN CONTRA COSTA COUNTY. Pursuant to this STATEMENT, ISD maintains and operates an extensive system of 48 siphons on Jersey Island, as shown on the attached Exhibit B. The siphons draw water from the Delta which is used to irrigate crops, pasture, and provide drinking water to the ISD cattle herd on Jersey Island. The drought conditions are impacting and increasing the salinity of the water in the rivers surrounding Jersey Island.

The IS/MND does not adequately analyze the impacts of the Project on SO23983 and it does not analyze the Project's impacts on ISD's operations on Jersey Island, as they relate to ISD's cattle operation and ISD's ability to draft water from the San Joaquin River during severe salt conditions in the near and long term future.

It is useful to review the history of the western Delta. Some thirty years ago, land owners on the west end of Sherman Island grew asparagus. DWR was unwilling to release enough water to keep the salt water away from Sherman Island and the farmers could not continue to grow asparagus. As a result, it was simpler for DWR to buy the property rights than it was to release the water so farmers/land owners could continue to grow their asparagus. So, DWR ended up buying much of the property on Sherman Island.

While ISD understands the need to protect local water supply intakes in the western Delta with the possible repeated installations of the three barriers project, ISD also understands that as a major land owner in the western Delta, ISD could be permanently impacted by a degradation of water quality (increased salinity) in the western Delta. While the IS/PMND asserts that water quality impacts in the San Joaquin River, and at other areas around Jersey Island, will improve slightly with the barriers in place, there are no guarantees. Should DWR's modeling be incorrect, water quality impacts in and around Jersey Island could become significantly adverse to ISD as a land owner. Under a scenario where water quality impacts become adverse, ISD could lose the use of its water rights for irrigating its agricultural lands, as well as for sustaining its cattle operation; resulting in significant harm to ISD's operations, ownership rights, and its rate payers.

In the bigger picture, DWR should be analyzing this project via a full Environmental Impact Report, with more detailed overall analysis of all aspects of short and long-term water supply, water management in California, the future of the X-2 line (fresh water/saltwater mix line), the potential long-term water quality impacts in the western Delta, and address more detailed and specific mitigation measures to address identified impacts. Again, ISD can envision a time, given the current delicate state of water supply in California, and bigger statewide interests beyond ISD's control, where ISD is impacted to the point where it loses the use of

its water rights, loses significant value in its land, and must abandon, or significantly modify, its current operations.

The ISD Board of Directors respectfully requests DWR to explain how it will mitigate this potential significant impact so as to make ISD whole. If ISD must feed its cattle year around with its own hay in its recycled water irrigated fields because there is not enough feed in the pasture areas, then the question becomes whether ISD is able to grow enough hay to keep the cattle operation going in a profitable manner?

In sum, the IS/PMND does not adequately analyze the impacts of the Project on SO23983, nor does it analyze the Project's impacts on ISD's operations on Jersey Island. The IS/PMND is not the appropriate CEQA document to analyze these potentially significant issues and ISD requests a full Environmental Impact Report be undertaken to fully analyze, and appropriately address necessary mitigation measures related to the three barriers project.

Comment Three, page 3-117, Bradford Island Ferry. The ferry slip is located on the southeast tip of Bradford Island, not the southwest tip as is stated in the IS/PMND. Please see the attached Exhibit A.

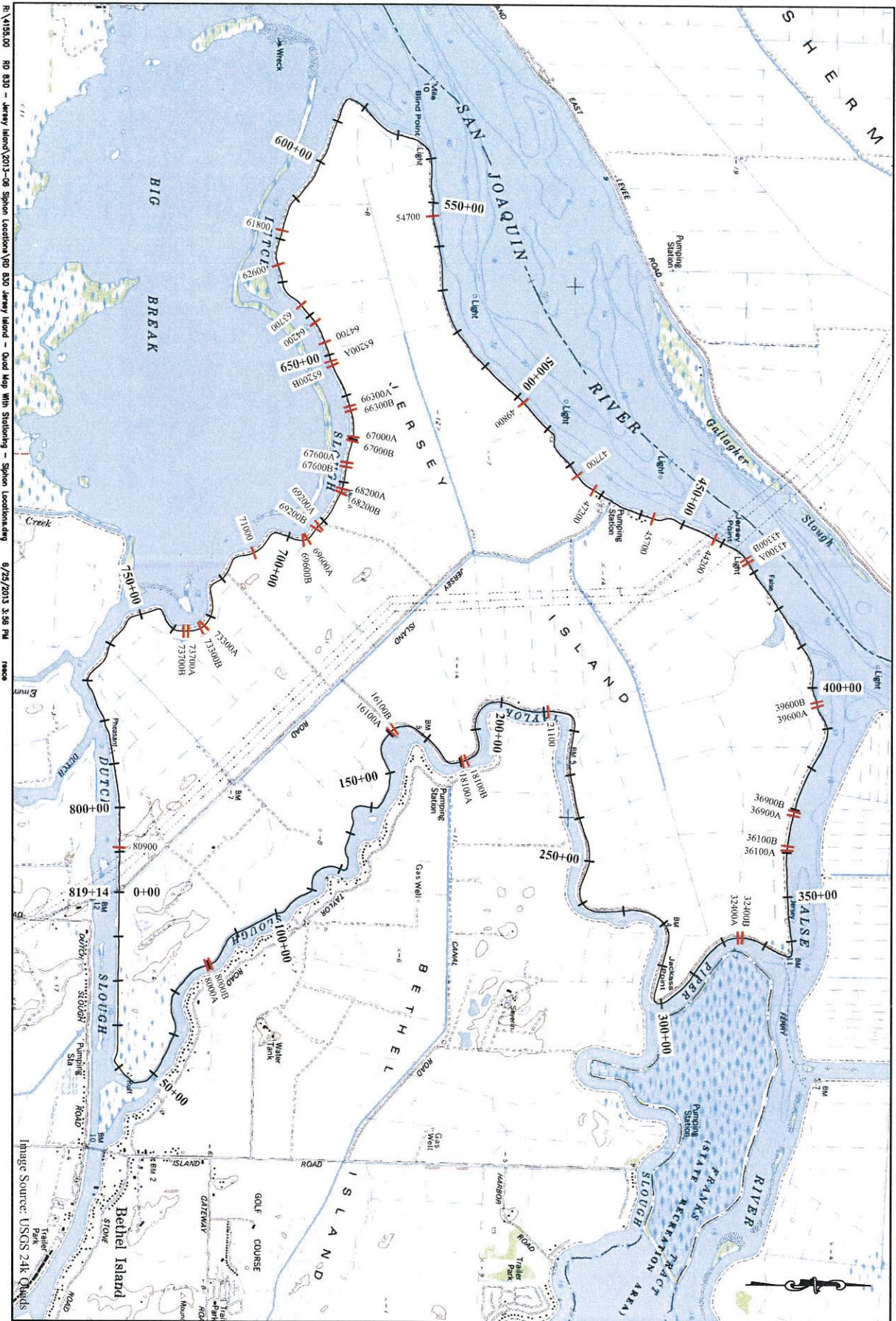
This concludes ISD's comments on the DEIR/DEIS. Please contact Jennifer Skrel, ISD's District Engineer, if you have any questions. Thank you for your attention to this letter.

Respectfully,



David Contreras, President,
Board of Directors

Cc: RD 830 Board of Trustees



R:\1155.00 10 830 - Jersey Island\2013-08 Siphon Location\10 830 Jersey Island - Grid Map With Stationing - Siphon Locations.dwg 6/25/2013 3:58 PM

SCALE: AS SHOWN	DATE: 6/25/2013
DRAWN BY: [Name]	CHECKED BY: [Name]
DESIGNED BY: [Name]	APPROVED BY: [Name]
PROJECT NO. 10 830	SHEET NO. 1
SHEET 1 OF 1	

Reclamation District No. 830 - Jersey Island

SIPHON LOCATIONS


 2450 Alhambra Boulevard, 2nd Floor
 Sacramento, California 95817
 Phone: (916) 456-4400 • Fax: (916) 456-0253

Map 11-1 RD 2059 Boundary and Coterminous SOI

