RECLAMATION DISTRICT No. 830

JERSEY ISLAND
450 Walnut Meadows Drive
Oakley, CA 94561

Phone: (925) 625-2279 Fax: (925) 625-0169

March 17, 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/MND for Emergency Drought Barriers Project.

Dear Mr. McQuirk:

Reclamation District 830 (RD 830) 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).

Comment One, page 3-46, Mitigation Measure BIO-8: Implement Adaptive Management Program. Local agencies should be included on the weekly call with USFWS, NMFS, and CDFW during construction, operation and removal of the barriers.

Comment Two, page 3-47, PLANTS, The Project does not discuss the potential of exacerbating the water hyacinth, Egeria densa and arundo problem in the Delta. It is highly probable that since the barriers are restricting flow, hyacinth and other invasive weed species will flourish in the barrier vicinity. The proliferation of hyacinth and other invasive weed species in the vicinity of the barriers will impede boating traffic (including the Delta Ferry that runs between Jersey Island, Webb Tract, and Bradford Island), impede levee waterside inspection, and will potentially interfere (significantly) with the land owner's and RD 830's ability to access their water rights, and deliver water via its syphons located near the False River Barrier and around the island. The amount of exotic and invasive weeds around Jersey Island has dramatically increased over the past several years. Infestations of

water hyacinth, and Egeria densa has impacted the land owner's (Ironhouse Sanitary District - ISD) ability to irrigate its agricultural lands on Jersey Island and to keep the Island dry. The weeds, under the current no barrier scenario, pile up around the levee and ISD's syphons, and clog the syphons. At other times, when the weeds get through the syphons, they end up in the island drainage system and clog the drainage ditches and the can adversely impact the island dewatering pump station. Unfortunately, with the barrier project in place in False River, the exotic and invasive problem will only become worse, and will cause further damage to on-island syphons and drainage systems. The IS/PMND needs to adequately address the water hyacinth issue and other exotic and invasive plant species, and provide acceptable mitigation measures to control hyacinth and other aquatic invasive species so as to not adversely impact safe navigation, water rights, the proliferation of on-island aquatic weed problem, and the ability for RD 830 to properly inspect the waterside condition of its levee.

Comment Three, Throughout the document, there is a lack of clarity on many of the mitigation measures. Specific thresholds, triggers and more detailed mitigation measures should be identified and agreed upon. In addition, specified water quality impacts related to electrical conductivity (EC) and potential erosion due to increased flows and/or flow velocities should be more clearly identified, and appropriate mitigation measures proposed. Examples of such mitigation measures include Mitigation Measure BIO-1 at page 3-43, and BIO-2 at page 3-44.

This concludes RD 830's comments on the IS/PMND. Please contact Jennifer Skrel, Secretary, Board of Trustees, RD 830, at (925) 625-2279 if you have any questions. Thank you for your attention to this letter.

Respectfully,
Reclamation District No. 830

Tom Williams

Thomas Williams, President,
Board of Trustees

Cc: ISD Board of Directors