

**RECLAMATION DISTRICT NO. 2026
(WEBB TRACT)**

343 East Main Street, Suite 815
Stockton, CA 95202
Office (209) 943-5551
Fax (209) 943-0251

Board of Trustees
JOHN L. WINTHER
DAVID A. FORKEL
KRISTOPHER E. KAISER

District Engineer
GILBERT COSIO, MBK Engineers
Secretary
AL WARREN HOSLETT

March 17, 2015

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

**Subject: Reclamation District No. 2026
Comments on the IS/PMND, Emergency Drought Barriers Project**

Dear Mr. McQuirk:

Reclamation District No. 2026 (RD 2026) is pleased to submit the following comments on the Initial Study/Proposed Mitigated Negative Declaration (IS/PMND) for the Emergency Drought Barriers Project sponsored by the Department of Water Resources (DWR).

1. Section 2.8 PROJECT CONSTRUCTION
 - a. The construction, operation, and removal of the West False River barrier have the potential to impact RD 2026 operations. Local agencies should be included on the weekly call with USFWS, NMFS, and CDFW during construction, operation and removal of the barriers. See Mitigation Measure BIO-8: Implement Adaptive Management Program, Page 3-46.
2. Section 3.15 HYDROLOGY AND WATER QUALITY
 - a. The document fails to include discussion of increased levee erosion resulting from a significant increase in maximum tidal velocities in Fisherman's Cut. Page 3-89: Item 3.9.2.c states, "maximum tidal velocities in Fisherman's Cut would increase from 0.4-0.5 feet per second with no barriers to about 2.0-2.3 feet per second with the barriers." This represents a five-fold increase in tidal velocity that may result in increased erosion of levees along Fisherman's Cut; however, there is no mitigation measure specified to address such erosion. Mitigation measures need to be implemented to address increased levee erosion after barrier installation.
 - b. There is a lack of information on salinity in the San Joaquin River. Page 3-88 states, "However, the West False River barrier could slightly increase seawater intrusion in the San Joaquin River (e.g., San Andreas Landing) and adjacent channels located upstream of False River." No data is provided

indicating what the EC will be and when these changes will occur; specifically for the output data locations shown in Figure C-1, including Fisherman's Cut, False River (Upstream of Barrier), and San Joaquin River at San Andreas (RSAN032). This data needs to be provided to fully disclose impacts of the barriers.

- c. The document fails to include discussion of agricultural impacts resulting from increases in salinity in the San Joaquin River upstream of the West False River barrier. There is a potential for increases in salinity intrusion up the San Joaquin River with the barrier in place. The document does not address this potential increase in channel salinity and the consequences to agriculture on the north side of Webb Tract. Water quality impacts in the San Joaquin River should be addressed and a mitigation measure proposed for properties near the West False River barrier.

3. Section 3.16 TRANSPORTATION AND TRAFFIC

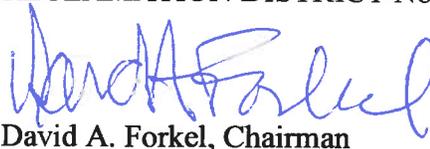
- a. The document fails to include any discussion of the potential for exacerbating the hyacinth problem in the Delta. It is highly probable that with the barrier in place, flow restrictions will allow hyacinth and other aquatic invasive species to flourish in False River upstream of the barrier. This body of water provides sole access to traffic to and from Webb Tract and Bradford Island, which are served by the Victory II ferry from Jersey Island. Navigation across False River and access to the ferry landings will be impacted if hyacinth is allowed to flourish in the vicinity. The document needs to address this issue and provide acceptable mitigation measures to control hyacinth and other aquatic invasive species necessary for the safe and timely operation of the Victory II ferry.
- b. The document fails to include any discussion of the potential navigational hazards associated with increased tidal velocities at the south end of Fisherman's Cut. Page 3-89 states, "maximum tidal velocities in Fisherman's Cut would increase from 0.4-0.5 feet per second with no barriers to about 2.0-2.3 feet per second with the barriers." This represents a five-fold increase in tidal velocity that may result in increased safety and operational concerns at the ferry landings on Bradford Island and Webb Tract, which are the sole points of access for traffic to and from the property. Impacts to ferry operability and safety are not analyzed in the document. Mitigation measures should be developed to address potential safety and operational issues. Navigational aids such as strengthened wing walls and installing dolphins should be considered at the ferry slips prior to barrier installation.
- c. The document fails to include discussion of increased navigational hazards resulting from a significant increase in maximum tidal velocities at the mouth of Old River. Page 3-87 states, "large changes in tidal flows that would be caused by the West False River barrier" would be observed at the mouth of Old River. Figure C-4a shows increase that are double or even triple with the barrier in place. A boat slip on the east end of Webb is used on a daily basis to transport personnel to and from Webb Tract. This increase in tidal velocity may result in safety and operational concerns at the boat slip. Mitigation measures should be developed to address potential safety and operational

issues such as wing walls, dolphins, or strengthening of the boat slip prior to barrier installation.

- d. The document fails to include any discussion of the potential for increased levee erosion in Fisherman's Cut resulting from increased boat traffic with the barrier in place. Page 3-123 states, "boat traffic that normally uses Sutter Slough and West False River would use detours while the barriers are in place" including Fisherman's Cut. Increases in new boat traffic in Fisherman's Cut, especially larger vessels that would not normally use this small channel, have the potential to significantly increase levee erosion due to boat wakes. Mitigation measures should be developed to address increased levee erosion along Fisherman's Cut after barrier installation.

This concludes RD 2026's comments on the IS/PMND. Please contact me at (925) 932-0251 if you have any questions.

Respectfully submitted,
RECLAMATION DISTRICT No. 2026



David A. Forkel, Chairman

cc: MBK Engineers