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NORTH DELTA WATER AGENCY

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September 22, 1999

Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow;

Subject: CAL-FED Flood Control Alternatives for the North Delta.

The North Delta Water Agency comprises over 300,000 acres in the northern portion of the statutory Sacramento-San Joaquin Delta. Thirty reclamation districts lie within it's boundary.

The Board of Directors with assistance from knowledgeable engineers who are directly involved in the area's flood control issues has prepared the following comments. These comments are limited to issues raised by CALFED in regard to the Mokelumne River as shown in the North Delta Flood Control Alternative 4. Please recognize there are a number of other issues proposed by CALFED that warrant this agency's concern and we do not want these comments to prejudice our position on other aspects of the CALFED program.

The basic underlying issue is the need for current channel surveys to determine actual capacities and run models to explore options and verify the ability to make improvements. A careful analysis of the sediment loads and movement in the Mokelumne River and adjacent channels needs to be a part of such a study. Coordination with the Corps of Engineers and East Bay MUD study of the Mokelumne River should be included. There should be a more active role for the North Delta interests in the Corps study. Staten, Tyler, Bouldin, Brannan-Andrus, Dead Horse, Canal Ranch, Brack Tract, Terminous and New Hope islands and possibly others should be included.

Any solution for flood control capacity should be compatible with the conveyance program goal of maintaining the common pool concept for water quality.

The operation of McCormack-Williamson Tract as a tidal wetland could have critical adverse impacts to down stream flood control. This needs to be carefully analyzed. The conversion of these lands to tidal wetlands should be contingent on increased downstream channel capacities to accommodate

anticipated increased flows. Changes in the use of the McCormack-Williamson Tract that increase anticipated peak flood flows should follow increases in down stream channel capacity to avoid increasing flood risks. Specific ongoing operating and maintenance criteria need to be developed and utilized to avoid adverse impacts.

Channel constrictions and encroachments such as bridges and marinas at the head of the South and North Forks of the Mokelumne River need to be reviewed. Their impact on sediment accumulation should also be analyzed.

The CAL-FED proposed alternative 4C shows dredging of the North and South Forks of the Mokelumne River. The South Fork dredging terminates at Hog Slough. It is strongly believed the need for dredging should be evaluated all the way to the San Joaquin River on both Forks. The dredging is expected to be a multi-year project and in any event should be begun at the lower end and proceed upstream. An ongoing regularly scheduled channel capacity monitoring and maintenance dredging program would be required to avoid future loss of channel capacity. The above recommended channel surveys and analysis should be used to determine the extent of the dredging needed after careful modeling is completed.

It is important to recognize concerns in regard to adverse impacts on habitat from such a flood control project. The possible use of the western portion of Canal Ranch as a dredge disposal site and ultimately shallow water habitat and the conversion of McCormack-Williamson Tract must be available as an offset to any adverse habitat impacts from flood control and conveyance improvements in the North Delta.

The Delta Protection Commission and CAL-FED have called for all Delta levees to be improved to the level of U. S. Army Corps of Engineers PL 84-99 standards. This effort should be applicable as well to the levees after channel improvements are made.

With these conditions met the North Delta Water Agency will strongly support a CALFED North Delta Flood Control Alternative 4C.

Sincerely,

Dennis Leary

Dennis Leary,
Chairman

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Cc: Interior Secretary Bruce Babbit
Governor Gray Davis
Resources Secretary Mary Nichols
DWR Director Tom Hannigan
USBR Regional Director Kirk Rogers
USFWS Regional Director Mike Spears
DFG Director Robert Hight
Senator Diane Feinstein
Senator Barbara Boxer
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