bdcpcomments

From: JLucas1099@aol.com [JLucas1099@aol.com] **Sent:** Thu 5/14/2009 4:40 PM
To: bdcpcomments
Cc:
Subject: BDCP - Bay Delta Conservation Plan comments 5-14-09
Attachments:

Ms. Delores Brown
Office of Environmental Compliance
Department of Water Resources
P.O. Box 942836, Sacramento, CA 94236

May 14, 2009

Dear Ms. Brown,

In regards the Bay Delta Conservation Plan and extension of a water supply diversion system in the Delta, I would like to submit the following comments for consideration:

~ One of the basic resource components of river systems in the Bay Delta is the sediment carrying capacity of their flows. This sediment not only replenishes riverbank vegetation, floodplain and intertidal marsh, but is essential for migratory fisheries in providing benthic nutrients as well as cover from predators. The sediment load delivered to the Delta from Sacramento and San Joaquin River system watersheds is well documented in a 1992 report prepared for the San Francisco District Corps of Enginers titled "Sediment Budget Study for San Francisco Bay". The data on Delta river flows from 1922 to 1991 is essential for any modeling of delta diversions and for assessment of minimum flows that are necessary to sustain beneficial in-delta resources, as well as carry sufficient sediment loads through San Francisco Bay and out to the Pacific Ocean.

~ In reviewing the range of flows that are recorded for the Sacramento River it appears that a diversion of 15,000 cfs, as is proposed is unsustainable in consideration of flows that are diverted just upstream for the Yolo Bypass, or shipping channel, historically between 4000 and 5000 cfs (plans to deepen this channel to 35 feet may require more cfs.). In last recorded year, 1991, total annual flow in Sacramento River at Sacramento was recorded as 7,276 thousand acre feet which could not accomodate any further diversion than that 4000 cfs allocated for the shipping channel. A modeling of historic flows is essential to this plan.

~ Since a diversion of 15,000 cfs from the Sacramento River is not feasible, it would appear that a diversion channel should be sized to accomodate a quarter of that amount (say 10' X 125') which would reduce impact to Delta marshes, and lower water loss to evaporation, cost of construction and cost of wetlands mitigation. If more water is needed it needs to be be obtained from another river system.

~ A formula needs to be scientifically arrived at that will define minimum flows needed to retain the integrity of the rivers that flow through the delta marshes and provide critical spawning and rearing habitat for resident and migratory fish, and birds, as well as sustain habitat biodiversity by overflow into marshes and wetlands. The Uplands Habitat Goals report and studies such as the 1985-86 Interagency Ecological Studies Program for the Sacramento-San Joaquin Estuary should provide sufficient data without commissioning new research. Elements of shallow benches, overhanging shade and instream woody materials will have top consideration, while entrainment and water diversion operations which contribute to such critical loss of fish and organisms need an entirely new design, preferably making most of gravity flow. Clifton Court pumps are rather medieval.

~ Before any consideration can be given to this or any other modification of Delta diversions, a successful recovery plan must be instituted to reverse this collapse of Delta Smelt and salmon populations in the Bay.A plan needs incorporate all recipients of Sierra water supplies, to contribute fish friendly streams or financially. Rather than construct bigger reservoirs with thermal pollution and rampant algae growth, smaller underground containment must be encouraged and groundwater reserves returned to some semblance of historic levels. Agriculture needs subsidy, but here again, farmers could rotate with dry farming crops in drought years.

~ Please establish appropriate conservative base flows for rivers of the Bay Delta Estuary that can sustain historic uses and resources, and in particular restore a West Coast fishery to support the Pacific Flyway, and California's dedicated band of fishermen. Fishing, if anything, has more tenure in our state than farming.

~ Thank you for all consideration that you can give to these concerns. If I run across any engineer who can devise a formula for sustaining Delta flows, I will forward it on. One last thought, the de-sedimentation plant planned at

the diversion point from the Sacramento River mainstem is a poor concept. Might I suggest that a Colorado hydrologist and sediment specialist, Dave Rosgen, be consulted before any such plant is built.

Libby Lucas, Conservation, CNPS Santa Clara Valley Chapter, 174 Yerba Santa Ave., Los Altos, Ca 94022

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