RECLAMATION DISTRICT
108

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May 10, 2002

VIA FACSIMILE AND U.S. MAIL

Mr. Dan Ray
CALFED Bay-Delta Program
1416 9th Street, Suite 630
Sacramento, California 95814

Subject: ERP Proposal #117 - Wilkins Slough Positive Barrier Fish Screen Sediment Removal System

Dear Mr. Ray:

This is to comment on the CALFED Proposal Review Teams' recommendation on RD108's request for CALFED funding to install the subject sediment removal facilities in order to complete the Wilkins Slough Positive Barrier Fish Screen Project.

We have evaluated the statements and comments set forth in the Proposal Reviews and find that there apparently are misunderstandings of the District's proposal for sediment removal. These misunderstandings are explained as follows:

1. The sediment removal system is not a separate project from the Wilkins Slough Positive Barrier Fish Screen but an integral component of the fish screen facilities. The inference that "the design firm did not consider sedimentation in the original design" is totally in error. The design firm, CH2M HILL, was well informed about the serious sediment transport problem throughout most of the Sacramento River system. CH2M Hill, in fact, considered possible alternatives to remove sediment that might impact the performance of the fish screens. However, there were a number of reasons why sediment removal facilities were not installed at the time the Fish Screen Facility was constructed. First, the hydraulic model study by the USBR, at its water Resources Research Laboratory in Denver, performed sediment deposition testing of the scale model and concluded in its report the following, **"that the positive barrier fish screen structure should not create a sedimentation problem greater than what already exists. The high sweeping velocities and uniform velocity distribution along the screen face should keep the majority of the bed material and suspended sediment moving downstream. The areas of greatest sedimentation can be expected to occur immediately inside the fish screen panels, and the sediment deposition may prevent the louvers from being rotated".** Thus the modeling study was inconclusive as to whether the sedimentation within the screen bays would impact the screen performance any more than preventing the louvers from being rotated. It was therefore decided by the District in consultation with USBR and CH2M HILL that the salutation problem would have to be evaluated during

several years of operation before a decision is made regarding the type of silt removal facilities that would be required in order to maintain the design performance and meet the operating criteria. Such evaluation was actually made during the second year of operation.

2. The suggestion that the District needs to participate substantially in funding does not give recognition to the fact that the District paid over $50,000 to perform the sediment removal pilot test in order to determine the proper design of the facilities. In addition, the District is committed to pay the costs of operation and maintenance of these facilities after they are installed.

3. The design of the sediment removal facilities was based upon a plan that would keep the capital and operation costs to a minimum and still accomplish the desired results. This included the use of lower cost lightweight plastic pipe that has proven to be effective in underwater operations.

4. It is incorrect to refer to this installation as an "adaptive management or large O & M project". The silt removal system is an essential component of the Wilkins Slough Positive Barrier Fish Screen. Design and installation of the system facilities was deferred until experience during actual operation of the screen could confirm the need and allow for testing of the type of facilities that would be effective in keeping the screened bays clear of accumulated silt. The District will continue to have the maintenance obligation to remove silt from the pumping plant forebay, which is an annual activity and a significant expense to the District.

Because of the continuing accumulation of silt in the screen bays and its impact on distortion of flows through the screens, the District has not been able to complete the performance testing required by the resource agencies. As a result, the agencies have placed an upper diversion flow limit of 660 c.f.s., or about 75 percent of the maximum design flow at Wilkins Slough. Final performance testing and completion of the Wilkins Slough Positive Barrier Fish Screen Project cannot be accomplished until the sediment removal system is installed and operating.

The District respectfully requests that the CALFED Proposal Review Team reconsider its recommendation in view of the above comments and provide the essential cost share funding for the completion of the Wilkins Slough Fish Screen Project. We would be pleased to provide further information if desired.

Very truly yours,

Luther Hintz
General Manager

C: Kevin O'Brien/Downey Brand & Seymour
Rich Jenness/Laugenour & Meikle Civil Engineers
Peter Rude/CH2M HILL

NCWA 10 Years
1992 - 2002

To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights and supplies of our members.

May 10, 2002

Mr. Patrick Wright
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: CALFED ERP 2002 PSP Selection Panel Recommendations

Dear Patrick:

The Northern California Water Association (NCWA) is very concerned with the CALFED Ecosystem Restoration Program 2002 PSP Selection Panel Recommendations. We are particularly concerned with the apparent disregard for local input from the Sacramento Valley.

As you know, NCWA represents 68 water suppliers and individual farmers who collectively irrigate 860,000 acres of fertile Northern California farmland. Several of our members also deliver water to state and federal wildlife refuges and a large portion of this land serves as important seasonal wetlands for migrating waterfowl, shorebirds and other wildlife.

We were generally pleased with your utilization of regional panels as part of the Ecosystem Restoration Program (ERP) project selection process, although we believe the earlier CALFED process, including the ecosystem roundtable, was a more meaningful process to assure local and regional input. For regional strategies to succeed in the CALFED process, CALFED must be diligent to assure that projects, including projects to benefit the ecosystem, are locally generated from within the region and have broad local support.

To start, we strongly endorse the selection panel's determination to fund the Meridian Farms Water Company's Positive Barrier Fish Screen Project and the Yuba County Water Agency (YCWA) Narrows 2 Powerplant Flow Bypass System, and partially fund the Sutter Mutual Water Company Tisdale Positive Barrier Fish Screen and Pumping Plant and YCWA's Yuba Goldfields Fish Barrier Replacement Project. These are examples of CALFED support for regional priorities. The regional panel identified each of these projects as "high" priority.

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On the other hand, our concerns arise from the full or partial funding totaling $2,216,447 for four projects ranked as "low" priorities by the Sacramento regional panel. Local interests determined that the projects would provide limited or no local value, did not reflect regional priorities, or were poorly written. But, this evaluation was overridden and the projects were nonetheless funded. The funding of these projects does not reflect the role local support should play in the CALFED process as directed in the Record of Decision (ROD).

Our frustration with the selection of these projects is compounded by the fact that there were 19 projects the regional panel determined to be "high" priorities that were not recommended for funding by the CALFED Selection Panel. There are six projects that were not recommended for funding that are of special concern to NCWA. These projects provide considerable regional benefits and, as a result, the Sacramento regional panel considered most of them "high" priorities. The projects include: Ducks Unlimited White Mallard Dam and Associated Diversions Phase III Construction, Orland Unit Water Users' Association Northside Diversion Dam Fish Passage Feasibility Study, Pleasant Grove-Verona Mutual Water Company Positive Barrier Fish Screen Design and Environmental Review, Reclamation District No. 108 Wilkins Slough Positive Barrier Fish Screen Sediment Removal Project, Tehama-Colusa Canal Authority Fish Passage Improvement Project at the Red Bluff Diversion Dam, Phase III, and YCWA Narrows 2 Powerplant Intake Extension.

The next step in the selection process--distributing the remaining ERP funding to "Considered as Directed Action" projects--provides CALFED with an opportunity to better incorporate regional panel recommendations in the decision-making process. NCWA is particularly interested in three projects that are "Considered as Directed Action," the M&T Chico Ranch/Llano Seco Fish Screen Facility Short-term/Long-term Protection Project, the Natomas Mutual Water Company American Basin Fish Screen and Habitat Improvement Project, and Reclamation District No. 108 Consolidated Pumping Facility and Fish Screen. Each of these projects received a "high" priority ranking by the Sacramento regional panel, and each is specifically designated as a priority in the Ecosystem Restoration Program Draft Stage 1 Implementation Plan (August 2001).

The "Consider as a Directed Action" category also includes three projects that received a "low" rating from the Sacramento regional panel. They are S.P. Cramer & Associated, Inc. Assessment of Life-History Characteristics and Genetic Composition of Oncorhynchus mikiss Throughout California, The Nature Conservancy's Implementing a Collaborative Approach to Quantifying Ecosystem Flow Regime Needs for the Sacramento River, and U.S. Geological Survey Assessing the hazards of mercury and selenium to the reproductive success of birds. As was the case with funded projects receiving a "low" priority rating from the Sacramento Regional Panel, these projects were determined to provide limited or no local value, did not

reflect regional priorities, were poorly written, or were already being performed through another CALFED program.

As CALFED moves forward with the remaining funding selections for the 2002 PSP and into future funding cycles, we hope that it will reexamine the regional panels and other local input from the Sacramento Valley and, as a result, regional priorities in the CALFED EPR will receive the appropriate consideration as part of the selection process.

Sincerely,

David J. Guy
Executive Director

cc: Dan Ray