

Shasta Tehama Bioregional Council

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April 1, 1996

Victoria Whitney
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812

Re: Bay Delta Water Rights

Dear Ms. Whitney:

In response to the State Water Resources Control Board hearings on the Bay Delta Water Rights issue, the Shasta Tehama Bioregional Council offers the following comments on the potentially significant environmental and economic effects of this water rights decision.

We are particularly concerned with the health of our watersheds which supply much of the water that flows into the Sacramento River. The water supply of California is a single, tightly-coupled system in which events in one segment impact all segments. Thus one must, at a minimum, consider the whole of a drainage, in this case, the Sacramento River and its tributaries. We believe, therefore, that the alternatives considered in the Bay Delta proceedings should consider land management in the catchment basins of the Sacramento River and its tributaries as an integral cost-effective means of protecting resources in the Delta. There is little attention given to fishery and habitat restoration in the North State, where the greatest potential benefits to fisheries lie, but a great deal of attention given to the San Joaquin. Virtually all alternatives, however, involve heavier reliance on conjunctive use, added storage, and water transfers, all of which could have major impacts on the North State.

Due to 100 years of forest fire exclusion management plus 8 years of drought, many of our forests are overgrown and choked with vegetation. When combined with our hot, dry, windy conditions, fires too often turn into uncontrollable, catastrophic, stand-destroying wildfires. Both state and federal fire prevention and control agencies have said at this point we will have major, highly destructive fires which cannot be controlled. Massive fires in these forests would be followed by massive episodes of erosion and accelerated run-off with consequent increases in flood hazards and sedimentation of salmon spawning beds. The resulting impacts to fisheries, reservoir storage capacities, downstream flooding and erosion would complicate water management in the Delta, given the guidelines for protection of endangered species. In addition, at risk are air quality, recreation, and thousands of homes in hundreds of communities built in the wild lands.

Fishery enhancement measures should also include fuels management and other restoration efforts in the watersheds that contain the remaining spawning grounds of the Spring-run Chinook because these are the undammed streams (small diversion structures excepted) where a few big fires could cause locally massive sedimentation, offsetting significant restoration efforts elsewhere. Protection of this particular run has major significance for efforts in the Delta and would have benefits for the north state as well.

While the immediate impacts of degradation of the catchment basins are unlikely to match the massive sedimentation and flood events that accompanied gold mining in the 1800's, the problems would be exceedingly severe in this arena of tight tolerances.

In particular, heavy erosional impacts in the northern Sierras, which contain the spawning grounds of the spring-run Chinook would significantly increase the potential for listing of that run as threatened or endangered. This would immediately lengthen the period of potential salmon-related pumping constraints to encompass the summer months when disruptions would be most costly. The problems with avoidance of impacts to the winter-run by curtailment of pumping would be exacerbated by the listing of the spring-run.

We have noticed that so far all of the analysis done in the SWRCB and CALFED processes ignore the catchments in which the water originates. Those catchments in the Cascades, Klamath, and the north/central Sierra Nevada, are blanketed with fire-prone forest with excessive fuel loadings and highly erodible soils.

Healthy watersheds produce better quality and increased quantities of water. The impacts of the water rights decision could have major impacts on these areas of origin. For this reason, we feel the SWRCB must address the above issues and others which include:

- 1) the impact of reallocation on other alternative actions such as user fees on Delta export water for watershed enhancement
- 2) the impact on the availability of habitat for waterfowl and wildlife provided by irrigated agriculture as surface water supplies are reduced
- 3) the impact of ground water basins, including the creation and/or exacerbation of problems of overdraft, well interference and/or land subsidence
- 4) primary and secondary economic dislocation associated with the involuntary fallowing of lands due to reductions in water supplies resulting from this decision
- 5) growth inducement in urban areas receiving increased water supplies as a result of any reallocations
- 6) impairing the productivity of prime agricultural lands by reduced water supplies
- 7) increased air pollution through greater levels of wind erosion from involuntarily fallowed lands
- 8) conversion of prime agricultural land in the upper Sacramento Valley to urban use as a result of the reduction in reliable agriculture water supplies.
- 9) impact of new reservoir operations on our recreation industry and upon anadromous fish production in the North Valley especially operations that increase the frequency and magnitude of reservoir draw downs which dramatically affect water temperature and quality and greatly reduce flexibility of releases to improve and maintain fisheries.
- 10) transfer of fishery impacts from the Delta to the rivers and reservoirs upstream
- 11) river and reservoir operations that decrease the effectiveness of fishery restoration efforts in the North Valley and/or increase the pressure to provide even further restoration activities above the Delta
- 12) any alternative that bypasses the river to deliver water to the Delta will have tremendous impacts upon water quality by increasing the concentrations of pollutants from agricultural runoff, Iron Mountain Mine and municipal and industrial water pollution control facilities from the North Valley down through Sacramento. This could dictate costly measures to reduce concentrations and could dramatically affect if not shut down development.

Any re-operation needs to establish minimum draw down levels on Whiskeytown and Shasta Reservoirs to protect against major impacts on the upper river, fisheries, recreation, and upon our economy.

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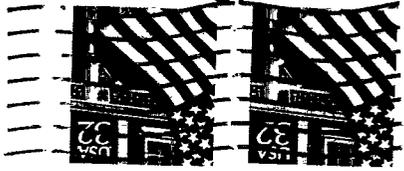
Re-operation can have a disproportionate impact upon the different regional economies in our state. Our North Valley economy is small and dramatically dependent upon recreation fisheries and water quality by comparison to regions in the Bay area and Southern California. A policy of regional economic equity should be a factor in guiding restoration activities. Similarly, a disproportionate burden to improve fisheries placed upon the upper river accompanied by less restoration activities in the Delta would not be supportable when populations are at critical levels.

Therefore, the Shasta Tehama Bioregional Council feels the plans to date are inadequate without a more thorough analysis of the costs and benefits of preserving the integrity our our economy and environment in northern California. We look forward to being involved in the process of shaping a water rights decision that will solve the problems of the Delta and serve the interests of all who benefit from the watersheds in our counties.


Melinda Brown
Co-Chair

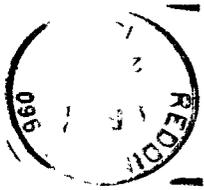

Mary Schroeder
Co-Chair

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