

To: CALFED Bay -Delta Program
1416 Ninth Street, Suite 1155
Sacramento. California 95814

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June 9, 1998

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From: Jim Edwards
13038 Highway 99E
Red Bluff, California, 96080

Attention: Mr. Rick Breitenbach

I am a farmer who uses water diverted from Antelope Creek in Tehama County.

I would like to address statements regarding Antelope Creek in the CalFed Ecosystem Restoration Program Plan, Volume II, page 221, draft dated 3/98.

Edwards Ranch uses water from both diversion points on Antelope Creek, not just one, and our water rights are riparian and pre-1914. It is incorrect to quantify our water rights.

It is incorrect to state that several diversions on Antelope Creek need to be screened. Both diversions have been screened for several years.

Since 1986, the California Department of Fish and Game has conducted intensive snorkel surveys on Antelope Creek. Over a period of 12 years, a total of only 19 spring-run salmon have been counted. No adult spring-run salmon were observed in 1997. No steelhead or rainbow trout over 16" were observed in 1997. The past twelve years of salmon counts suggest that Antelope Creek does not have a self-sustaining population of spring-run chinook salmon.

The potential for increasing fish populations on Antelope Creek is greatly exaggerated and without scientific basis. There is no scientific evidence to support the historical or potential anadromous population estimates for Antelope Creek. The population numbers were quoted from: "Restoring Central Valley Streams: A Plan for Action, Department of Fish & Game", November 1993, Pg. VII-25. They are not based on scientific evidence or study of the stream.

The Hayden petition to list Spring-run Chinook Salmon provides a map, Figure 4, "Historical Distribution of Chinook Spring-run in the Sacramento and San Joaquin River Systems" (CDFG, Inland Fisheries Division, Frank Fisher). Antelope Creek is not on this map, nor is it on the map provided in Figure 5 showing the current distribution of Spring-run Salmon.

The "Upper Sacramento River Fisheries and Riparian Habitat Management Plan " prepared for the Resource Agency, State of California, January 1989, did not even mention Antelope Creek.

The July 1992, U.S. Department of Interior, Bureau of Land Management "Proposed Redding Resource Management Plan and Final Environmental Impact Statement", page A3 states:

Antelope Creek "is not considered by fisheries experts to be an important spawning stream.."

The U.S. Forest Service "Wild and Scenic Rivers Evaluation", page E-9, states: The stream (Antelope Creek) gradient steepens above the Ponderosa Way crossings, making the stream reaches above there probably unsuitable for anadromous fish."

The 1994 Jones and Stokes Wild and Scenic Rivers Suitability Report quoted biologists as follows: "The decline of Spring-run Chinook Salmon in Mill Creek has occurred primarily in the last 20 years, during which the Mill Creek habitat conditions have been relatively stable, suggesting that excessive mortality is being incurred outside the Mill Creek drainage." The same is true of Antelope Creek. Water usage and habitat are little changed in the last 125 years on local streams, and as Jones and Stokes reported "No substantial changes in current land use are expected to occur within the study area in the foreseeable future."

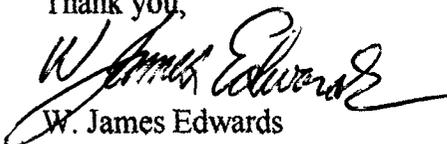
It is doubtful that pure (non hybrid) Spring-run Chinook exist in Antelope Creek. This stream is a low elevation, warm water creek unsuitable for the viable propagation of Spring-run. Water temperatures recorded far above the valley floor, at the Paynes Place Crossing, have often exceeded 70 degrees. This is the natural condition of the creek. The Hayden petition includes this quote from the June 1992 "Chinook Salmon, Growth and Occurrence in the Sacramento-San Joaquin River System, Inland Fisheries Division, California Department of Fish & Game, Redding, California, page 38: "The only remaining Spring-run populations in the Central Valley probably exist in Mill and Deer Creeks and possibly Butte and Big Chico Creeks. Moreover, CDFG has previously informed the State Water Resources Control Board that Mill and Deer Creeks are the key remaining areas where significant numbers of "genetically pure" strains of Spring-run Chinook continue to exist."

In addition to the steep gradient restricting access to the upper reaches of Antelope Creek, the stream fans out into several branches in the valley, reducing the flow to lower volumes and raising water temperature. It is ironic that meander belts are recommended on other streams, while it is suggested that the natural flow of Antelope Creek be put into one channel to improve the fishery. It would be misguided to accept the premise that Antelope Creek plays a significant role in the life of Spring-run Salmon.

Water has been diverted from Antelope Creek for about 125 years. Fish declines began when Shasta Dam eliminated the majority of the fish habitat in the upper Sacramento River. The Delta pumps are killing off the remaining populations.

Now state and federal agencies are using the Endangered Species Act to pressure landowners to give up their water rights and pump their ground water. I am opposed to solving Southern California's water problems with Northern California's ground water.

Thank you,



W. James Edwards

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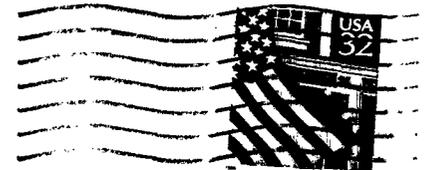
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