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JUL 01 1998

June 26, 1998

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

Re: Draft EIS/EIR Comments - Shasta Reservoir

Dear Mr. Snow:

It is my understanding that CALFED is currently considering the increase in storage capacity of Shasta Reservoir by increasing the height of Shasta Dam as one of the alternatives to supply additional water for California's needs. I am certainly well aware that a problem exists in the satisfaction of those needs. My family commenced farming in California approximately one-hundred forty years ago, in partnership with the Hollister and Dibblee families after driving the first band of sheep across the plains into California. We have farmed here continuously ever since. Therefore I am familiar with agriculture's need for water. Added to this background is a substantial knowledge of the McCloud River, as I was privileged to spend a considerable amount of time on it as a member of the Bollibokka Club from 1977 to 1995. However I bring to my consideration of the current problem no personal interest in the McCloud (other than an appreciation of its unique characteristics) as I do not anticipate ever fishing its waters again (due to my age).

Certainly I share the desire of CALFED to increase the sustained supply of water as part of the solution but I must register my objection to increased Shasta Reservoir storage as an option.

I have been advised that three alternative plans are being considered: raising the height of Shasta Dam 200', 63' or 17', and I consider these three, first from the point of view of direct economic cost. On this basis the two higher proposals involve such huge peripheral costs in the relocation of the highway and railroad and the construction of a new bridge that, in the interest of brevity, I shall restrict my comments to the 17' proposal. In passing however I would point out that the effect of inadequacy of the watershed capacity to fill such an enormous reservoir would be substantially more severe in the larger options.

The 17' option would also appear unattractive financially, and there should be more effective alternatives for the following reasons:

1. The steep gradient of the area restricts the amount of water it would make available, and
2. of even greater importance, the extra water which would be provided by this proposal is limited to the amount of water available from flow of the watershed feeding the reservoir and this will be unchanged by any increase in the height of the dam. The additional amount of water the proposal will produce will be only the amount of watershed product exceeding the present capacity of the reservoir. Undoubtedly data will be available respecting such flow but my nineteen years of observation would indicate it is severely limited. Rarely during that period did I observe that the reservoir was filled near capacity at the start of the season. The total amount of water which the proposal could generate is limited in each year to the lesser of (1) the total excess capacity provided or (2) the amount of flow provided by the watershed in excess of present capacity. Storage of such water has limitations involving evaporation and the consequent increase in dissolved salts. The cost of the proposal therefor must be factored against the lesser amount of water provided under this formula rather than the amount of extra reservoir capacity.

The very years when the water provided by increased reservoir capacity would be needed (years of a dry cycle) are exactly the years when the flow limitation would take effect. This could cause the proposal to be counter productive in allowing expansion of usage in wet cycles on the basis of an unreliable water supply which would have to be restricted in that dry cycle.

Apart from the direct economic costs of the proposal are the indirect costs including reparation for property destroyed around the entire perimeter of the reservoir (precisely the area where a substantial number of property improvements have been located).

Passing from economic costs to those not as easily measured, there is the effect upon the enjoyment of the reservoir by the increase of barren land at its edge during the periods of increased under utilization already mentioned.

Moving on to costs even less easily measured we come to the environmental damage inherent in the proposal. This may constitute the greatest impact of all, and conceivably (through adverse public reaction) provide a threat to the entire CALFED additional water portion of the

the McCloud but I would point out that similar problems exist with respect to the Sacramento and Pit Rivers (and that the Sacramento is also classed as a river of wild and scenic stature).

The McCloud River watershed was once the principal home of the Wintu Indians.¹ Joaquin Miller (the "Poet of the Sierra") lived and hunted with them and they are the Indians depicted in his writing.² The McCloud housed the first government-sponsored effort to obtain rainbow trout ova for hatchery purposes in the USA,³ the hatchery started by Livingston Stone in 1872. The hatchery commenced with the propagation of salmon but soon shifted to rainbow trout; and established those trout throughout the USA and abroad, to the extent that "The McCloud Rainbow is still known as the rainbow of the fish culturist."⁴ The McCloud has long been famous for sport fishing, especially for the "Redband" trout, as attested by articles on fishing there in 1884;^{5,6} 1887;⁷ and prior to 1891;⁸ and was described in 1978 as "of considerable interest to both biologists and anglers because it contains the last virtually unexploited big-river trout population in California."⁹ It is home of two of the most famous fishing clubs in California (if not the country), the McCloud Fly Fishing Club, formed in 1900, and the Bollibokka Club, formed in 1904.⁶

While the history of the McCloud is impressive, its environmental significance may be even greater. Comments on the environment are contained in the CALFED Technical Report, Shasta Reservoir Enlargement document and where they refer to specific fish, wildlife and plants, they require no comment from me. Their number is impressive (although I do note one possible significant omission). In the late 1970's I thought my son and I might have witnessed the last wolverine on the McCloud; but I have since read of tracks being observed on The Nature Conservancy property in 1982.⁹ Moreover mere listing does not reflect the rare abundance of both flora and fauna. I have been privileged to spend a great deal of time in the Sierra, commencing in my youth (which was a long time ago). Over seventy years ago in the Sierra I never saw as many wild azaleas, leopard lilies, maiden hair fern, dog wood, redbud, river otter, black bear, bald eagle, and ospreys as still exist today in the vicinity of the McCloud.

The pristine quality of the McCloud has been continued to a unique extent due to the protection of private ownership and the fact that it was never mined (as were so many California rivers). And I point out again that not only would the area of the McCloud be affected, but so would the Pit and the Sacramento Rivers.

Any increase in the height of Shasta Lake imposes complete destruction to that portion of the area lying between the current and the potential high water mark. It also presents potential hazard in the increased

area of bare ground lying between high and low water mark and, if I am correct in my assumption as to inadequacy of available flow, that area will be substantially increased compared to the current band of bare ground. This will result in higher summer temperatures in the area and a higher upstream effect from fluctuating water level and higher temperature of reservoir water. The higher lake level can also remove stream barriers and permit passage of reservoir fish with a consequent effect upon existing stream population.

In fact the environmental effect of the proposal would seem a travesty of the very ecological purpose of the water sharing plan. The result would involve only a shifting of ecological harm from one area of the state to the other. At least this Shasta enlargement proposal might be delayed by its apparent illegality under the Wild and Scenic Rivers Act. It could delay all plans for additional water. Conceivably the Shasta Dam proposal could be ruled illegal after considerable expenditure of time and expense. And it does not seem impossible that it might blight other water supply plans.

Public opinion is a powerful force, and rightfully so in a democracy. I have voted Republican for over seventy years and have long deplored the unfortunate image which I think that party has acquired with respect to the environment – an image that has a definite effect upon election results. I think it would be unwise to discount the potential impact the Shasta enlargement proposal might have on public opinion. I have touched upon the McCloud but its not difficult to remember the outrage expressed over the recent chemical spill in the upper Sacramento River. Very few, if any, reservoir plans are universally popular. It would be a tragedy if the Shasta Reservoir proposal might jeopardize other much needed water storage projects.

Sincerely,



Joseph W. Cooper, Jr.

References:

¹ General Report of Investigations on the McCloud River Drainage in 1938 by J. H. Wales – California Fish and Game Conservation of Wild Life through Conservation, Vol. 25, #4.

² Joaquin Miller: Fact & Fiction by Margaret Guilford-Kardell – The Californians, Nov./Dec.1991.

³ The Origins of Rainbow Trout, *Salmo Gairdneri* Richardson, in New Zealand by D. Scott, J. Hewitson, and J. C. Fraser – Calif. Fish and Game 64(3) 210-218, 1978.

⁴ Livingston Stone – Pioneer Fisheries Scientist by Frank E. Raymond – The American Museum of Fly Fishing, Spring, 1990.

⁵ Sport and Travel by Sir Rose Lambert Price, Lippincott.

⁶ A History of the Bollibokka Club and the McCloud River by DeWitt Kinne Burnham.

⁷ Rainbow Trout of the McCloud by Gen. E. Miller – The American Museum of Fly Fishing The American Fly Fisher, issue unknown.

⁸ Biology of Rainbow Trout – by James A. Sturgess and Peter B. Moyle – Cal-Neva Wildlife, 1978 239-350.

⁹ McCloud River Preserve Friends of the McCloud, Vol. V, #2.

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