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September 22, 1999

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

RE: Comments on the Programmatic EIS/EIR
for the CALFED Bay-Delta Program

Dear Mr. Snow:

The Western Shasta Resource Conservation District (WSRCD) is an independent non-profit district of the State of California that specializes in resource conservation work. This RCD has been operating since 1957 and is a successful implementer of watershed restoration projects.

The WSRCD has worked with landowners and other stakeholders to organize Coordinated Resource Management Planning Groups and/or Conservancies in Upper Clear Creek, Lower Clear Creek, Middle Creek, Battle Creek, and now Cow Creek. Our experience throughout this process proves to us how important it is to involve local stakeholders with local knowledge in the decision making process. We are concerned that lack of involvement of watershed groups in the CALFED decision making process could lead to misdiagnosis of the restoration needs and priorities in watersheds. Our concern is reflected in several mis-statements in the CALFED document about what is actually going on in our watersheds.

Over the past three years a tremendous amount of time and energy has been focused by organizations such as our, on developing watershed groups and formulating watershed analysis, plans and projects. Again, we are concerned that the data used in the Programmatic EIS/EIR is 3 or more years old. In the world of watershed organizations and projects, this is a long time! Our concern is old data can lead to misdiagnosis of the restoration needs and priorities in watersheds. This is reflected in the outdated data in the CALFED document which is used to draw conclusions, priorities, and targets. For example:

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Pg 191, 206**Statements:**

1. The stream (Clear Creek) is nearly dry during summer and fall months of low rainfall years.
2. Flows in Clear Creek below Whiskeytown Lake are maintained at 50 cfs from January through October and 100 cfs in November and December, regardless of flow in the upper watershed.

Reality:

Releases from Whiskeytown Reservoir to Clear Creek were increased in 1995 from 70 to 100 cfs on October 1, and then to 150 cfs on October 5 and maintained until the end of April, 1996, when it was decreased to 125 cfs. Increased flows began from Whiskeytown Dam in 1996 for fall chinook and have already benefited late-fall chinook and spring chinook. "Benefits of Increased Minimum Instream Flows on Chinook Salmon and Steelhead in Clear Creek 1995-6, US Fish & Wildlife Service, June 1996."

The Bureau of Reclamation shows flows out of Whiskeytown at:

1998-99	10-1 thru 5-31	200 cfs
	6-1 thru 9-4	150 cfs
	9-4	250 cfs

This is significant, since the #2 Restoration Target and Programmatic Action on page 206 is to "Increase flow in Clear Creek to 150-200 cfs from October through May and to 100-150 cfs from June through September." This has already been accomplished and the results are very positive.

Page 192**Statement:**

In spite of improved conditions, there are no spring-run chinook salmon in Clear Creek and the status of the steelhead population is unknown.

Reality:

We have been told in May 1999 the US F&W Service reports studying the creek specifically for spring-run chinook salmon and identified six.

Pages 192, 207**Statements:**

1. Spawning gravel in the lower Clear Creek drainage has been significantly depleted by mining...recruitment of new gravel into (lower Clear Creek) is restricted by McCormick and Whiskeytown dams.
2. At this time there are two completed gravel injection projects and one in progress.
3. Target #2 ▲▲▲ Coarse Sediment Supply is to increase existing levels of erosion and gravel recruitment in Clear Creek by 25 to 50 tons per year.
4. Programmatic Action 2A: Develop a program to improve gravel quantity by evaluating the addition of 5,000 to 10,000 cubic yards annually. (At 1.25 tons per cubic yard, this would be 6,250 to 12,500 tons per year.)

Reality:

Through grants from the Bureau of Reclamation and Bureau of Land Management, the WSRCD has injected gravel into Clear Creek since 1996 at two locations, below Whiskeytown Dam and below Saeltzer Dam, at the following rates:

Below Whiskeytown Dam	December 1996	3,000 tons
	January 1998	4,500 tons
	June 1999	3,500 tons
	Spring 2000	<i>Planned</i>
Below Saeltzer Dam	July 1996	4,500 tons
	September 1997	3,500 tons
	December 1998	4,500 tons
	October 1999	4,500 tons <i>Planned</i>

Evaluations are being conducted on injecting these quantities of gravel and initial results show more is needed to achieve desired results.

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Statement:

The only formal watershed planning group in this Ecological Management Zone is the Clear Creek Coordinated Resources Management Program, fostered by the WSRCD. A Battle Creek watershed interest group is forming but has not developed a formal approach to watershed planning.

Reality:

The following watershed groups have been formed and involved in watershed planning:

Group	Involved With These Planning Documents
Lower Clear Creek CRMP	Watershed Analysis, January 1996 Watershed Management Plan, September 1998
Upper Clear Creek (WSRCD)	Watershed Analysis, April 1999
Middle Creek CRMP	Strategic Wildfire Defense Plan for the Middle Creek Watershed, September 1994
• Battle Creek Watershed Conservancy	Battle Creek Salmon & Steelhead Restoration Plan, October 1998 Watershed Management Strategy (to be completed by 12-31-99) Applied for a CALFED grant in May 1998 and was awarded \$224,628.

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Cow Creek

Interest in forming a CRMP is growing and an organizational meeting will be held in October.

We felt it was important to bring to your attention the need for the most up-to-date information when making decisions on funding watershed restoration projects. That information is best located in the watersheds. For instance, the #1 issue for landowners in the above watersheds is fire and fuels reduction. This issue is not well addressed in the EIR/EIS, yet the ramifications of continued high fuel loadings and wildfires jeopardize all of the fisheries and water quality projects that are completed.

Our RCD operates like a hub for watershed groups and coordinates projects with every interested federal and state agency. We urge you to tap these resources in order to assure the best and most economic decisions are made in restoring California watersheds. This in turn helps ensure success in resolving the Bay-Delta problems.

Sincerely,



Phil Schoefer, President
Board of Directors