Friends of the River
Sacramento River Preservation Trust
Reply to: Friends of the River, 915 20th Street, Sacramento, CA 95814, (916) 442-3155, Ext. 221

January 11, 1999

Naser J. Bateni
Northern District Chief
Department of Water Resources
2440 Main Street
Red Bluff, CA 96080-2398

Re: Comments on Offstream Storage Investigation Status Report (10/19/98)

Dear Naser:

Friends of the River and the Sacramento River Preservation Trust are taking this opportunity to comment on the Offstream Storage Investigation Status Report, which investigates the feasibility of the proposed Red Bank, Thomes-Newville, and Sites-Colusa projects in the western Sacramento Valley. The report indicates that current environmental studies "focus on identifying major issues which could potentially stop a project from being constructed." Our comments are intended to facilitate this process.

Red Bank

Although technically an "offstream" storage project, we don't believe that the Red Bank project meets the definition of "offstream" storage as it is used in the CALFED process. CALFED has a clear policy that it will pursue offstream storage and enlargement of existing dams in order to reduce the obvious environmental impacts of its storage component. However, the Red Bank project requires the construction of the 250 foot-high Dippingvat dam, creating a 104,000 acre-foot reservoir on the South Fork Cottonwood Creek. The water stored behind the dam would then be diverted from the Cottonwood drainage into an offstream storage reservoir located in the adjacent Red Bank drainage.

The Dippingvat dam and reservoir would block access by migrating fish to approximately 100 square miles of the Cottonwood drainage, as well as drown and/or block access to more than 15 miles of critical spawning and holding habitat for threatened and endangered spring run chinook salmon and steelhead in the South Fork. Cottonwood Creek is the largest undammed tributary of the Sacramento River and is a key contributor of gravel to segments of the Sacramento which provide spawning habitat for threatened and endangered salmon and steelhead. The Dippingvat dam could also reduce downstream gravel recruitment into the Sacramento River. In addition, several other sensitive or protected wildlife species have been identified in the project area, including bald eagle, California red legged frog, foothill yellow legged frog, western pond turtle, and Yuma myotis bat. The project area also supports the second highest number of sensitive plant species than the other offstream projects considered in the investigation.

Approval and construction of the Red Bank project would directly conflict with CALFED's ecosystem restoration and endangered species recovery goals, as well as violate the state and federal Endangered Species Acts. Clearly, this is a major "project stopper." Furthermore, the status report clearly states that Red Bank must be considered in conjunction with other projects

because it is "not by itself a viable alternative...," raising the question of its economic feasibility. We therefore recommend that the Red Bank project be eliminated from any further investigation.

Thomes-Newville

We also have serious concerns about the Thomes-Newville project. The preliminary results of the investigation have identified significant environmental resources which could be adversely impacted by the project's diversion and storage components. These include salmon and steelhead populations in Thomes Creek; the largest acreage of high quality wetlands of any of the projects; the largest number of sensitive avian and plant species of any of the projects; and the presence of several protected and sensitive wildlife species including bald eagle, Swainson's hawk, valley elderberry longhorn beetle, bank swallow, willow fly catcher, western spade-foot toad, foothill yellow legged frog, western pond turtle, and ringtail.

Although we do not recommend that the Thomes-Newville project be eliminated from any further investigation at this time, we would expect that this project will likely be dropped if the final investigation results clearly indicate (as we believe it will) that there are other less environmentally damaging and more suitable projects that meet CALFED's water supply and restoration goals.

Sites-Colusa

The Sites or Sites-Colusa projects appear to have less site-specific environmental problems than the other projects under investigation. The amount of wetlands and sensitive habitats that could be destroyed by the project(s) is troubling, although we recognize that these habitats are currently in a largely degraded condition. However, there are significant concerns associated with water diversions to supply Sites-Colusa (as well as Thomes-Newville).

Both offstream reservoirs would require significant diversions from the Sacramento River. The river's aquatic and terrestrial habitats support a host of sensitive, threatened, and endangered fish and wildlife species and is the focus of intensive local, state, and federal restoration efforts. A key aspect of these efforts is the establishment of a naturally functioning "meanderbelt" along the river to allow natural erosion and deposition processes to restore and maintain the river's critical riparian and shaded riverine aquatic habitats.

Construction of new diversion and conveyance facilities to feed Sites-Colusa and Thomes-Newville would not only result in site-specific adverse impacts on aquatic and terrestrial resources, it would create new "hard points" on the river requiring possible bank protection. Since bank protection invariably results in loss of riparian and shaded riverine aquatic habitat, this would be contrary to CALFED's existing policy (also embodied in the state's 1086 program and the federal CVPIA) to establish an ecologically functioning meanderbelt along the Sacramento River.

Moreover, diversions from the Sacramento River to supply offstream reservoirs could significantly reduce the natural flood flows in the river. Restoring or at least mimicking natural flow regimes is a key CALFED restoration strategy. The average annual flood flow in the Sacramento River has already been reduced by more than 34 percent (CALFED Ecosystem Restoration Strategic Plan, Sept. 1998). At least one of the offstream investigation's flow model computer runs indicates that diversions from the Sacramento River to feed offstream reservoirs could reduce flows even further, from 12 percent during the month of January to 47 percent during the month of April. Significantly reduced flood flows in the Sacramento River could disrupt the ecological functions of the river, with subsequent adverse impacts on the river's critical habitat and endangered species.

Another focus of restoration efforts on the Sacramento River is to resolve fish mortality and passage problems at existing diversions along the river. Although important steps have been taken to resolve these problems, none of the existing diversions, including the Red Bluff diversion dam and GCID's diversion, can be certified at this time as 100 percent "salmon safe." Increasing the amount of water diverted at these facilities to supply new offstream reservoirs could increase the loss of endangered salmon and steelhead at the diversion points. In addition, the necessity of enlarging the capacity of existing canals connecting the diversions to the reservoirs also involves site-specific impacts.

We were surprised to discover that storage of Feather River water in westside Sacramento Valley offstream reservoirs is considered in the investigation. The engineering, fiscal, and environmental implications of moving water from Oroville reservoir to the west side of the Sacramento Valley seem extreme. More importantly, the consequences of mixing water from the Feather with water from the Sacramento could be catastrophic for the endangered salmon and steelhead of both rivers because of the "imprinting" that facilitates the migration of these species to their birth streams. Mixing of water could result in fish straying on a massive scale, as well as inter-breeding of hatchery-based and wild fish stocks. We therefore recommend that any further consideration of transferring Feather River water to the offstream storage reservoirs be eliminated from the investigation.

Similarly, the investigation's tentative consideration of transferring Stony Creek water to the Sites-Colusa project via a tunnel should be eliminated because this would make impracticable any attempt to restore Stony Creek's much degraded anadromous fisheries.

These various concerns must be addressed before any reasonable decision can be made concerning the ultimate feasibility of the Sites-Colusa and Thomes-Newville projects.

Miscellaneous Issues

Reservoir Yields -- As of the publication date of the status report, reservoir yield studies have not been completed. How much water these projects can reliably produce on an annual basis is obviously quite germane to their feasibility.

Flow Models -- We note that the computer modeling runs of potential Sacramento River flows under various diversion scenarios appear to be constrained by existing regulatory mechanisms such as the 1995 water quality plan, winter run salmon biological opinion, and AFRP minimum flow requirements for green and white sturgeon. These contraints do not take into account flow requirements to maintain the basic ecological functions of the river, nor do they apparently include minimum flows for fish species such as spring run chinook salmon and steelhead that have been recently listed or proposed for listing.

Cost Share -- Approximately $20 million of public money from Proposition 204 and the state's general fund has been allocated to fund the investigation. To date, no cost sharing has been required of private interests who would obviously benefit if one or more of the projects were to be ultimately constructed. This is contrary to CALFED's "beneficiaries pay" premise. We would expect that any project that proceeds into the environmental review and permitting phase be cost shared. We recommend that the standard federal guideline of 50-50 cost sharing for water resource feasibility studies be utilized. There are no circumstances that would justify any of the projects as being 100 percent to the public's benefit. Therefore, any cost share should be between public and private interests (as opposed to typical federal/state/local cost share schemes where public taxpayers at all levels pay 100 percent of the cost).

Multi-Year Studies -- Fish, wildlife, and plant populations are affected by a variety of seasonal and annual variables such as climate changes, precipitation, stream flows, and other external

factors. Resource inventories must be conducted over a period of several seasons and years in order to ensure that the presence and extent of sensitive, threatened, and endangered species are adequately assessed.

Recreation Values -- No assessment of the projects' impacts on recreation has been conducted. The Red Bank, Thomes-Newville, and Sites-Colusa projects could all impact recreation in their respective project areas as well as recreation along the Sacramento River. An analysis of recreational impacts should be included in the investigation.

Wild & Scenic Rivers -- No assessment of the projects' impacts on Wild & Scenic River values has been conducted. The Sacramento River and Cottonwood Creek are in the Nationwide Rivers Inventory (NRI). A presidential executive order requires that agencies contemplating water resource projects on NRI rivers consult the National Park Service. More importantly, segments of the Sacramento River, South Fork Cottonwood Creek, and Thomes Creek which could be directly or indirectly impacted by the projects have been determined eligible for National Wild & Scenic River status by the Bureau of Land Management and the U.S. Forest Service. Federal guidelines require these agencies to protect the free flowing character and outstanding values of the eligible rivers until a determination is made as to their suitability for inclusion in the national system and until a recommendation is submitted to and acted upon by Congress. These agencies must be consulted and included in the investigation.

Summary

- We recommend that the Red Bank project be eliminated from any further consideration due to its "project stopping" environmental impacts.
- We anticipate that the Thomes-Newville project will be eliminated in the future once the investigation confirms that there are less environmentally destructive alternative projects.
- Diversion impacts on the Sacramento River's threatened and endangered fisheries, as well as its ecological functions and critical habitats, must be fully investigated as part of the project(s) feasibility.
- Inter-basin water transfers between the Feather River and the Sacramento River, or between Stony Creek and the Sites-Colusa project, should be eliminated to ensure protection of anadromous species.
- The investigation should determine reservoir yields, identify flow constraints, assess impacts on recreational values and potential Wild & Scenic Rivers, establish a cost share formula with non-public beneficiaries, and conduct a multi-season/year resource inventory.

We appreciate the opportunity to participate in the offstream technical advisory group and to comment on the investigation's status report. We are looking forward to our continued participation in this program.

Thank you.

Sincerely,

Steven L. Evans
Conservation Director
Friends of the River

JOHN B MERZ/SLE
John B. Merz
Chairman
Sacramento River Preservation Trust