

Comments of the
Regional Council of Rural Counties
to the
Bay Delta Advisory Council

March 21, 1996

Introduction

These comments are submitted on behalf of the Regional Council of Rural Counties and its members, the Counties of Alpine, Amador, Calaveras, Colusa, Del Norte, El Dorado, Glenn, Inyo, Lake, Lassen, Madera, Mariposa, Merced, Modoc, Mono, Nevada, Placer, Plumas, San Benito, Shasta, Sierra, Siskiyou, Tehama, Trinity and Tuolumne, in response to the Overview of the 10 Draft Alternatives and the Phase One Bay Delta Program Progress Report for April 1996.

In general RCRC supports the efforts of BDAC and the CALFED Bay Delta Program. We have especially been pleased that you have elected to utilize an approach which provides for a broad examination both the problems within the Delta as well as the solutions to those problems. We wish to also note we appreciate your inclusive and open public process.

It has become clear to us that as you have attempted to solve the Delta's problems you have had to examine the interrelated nature of California's waterways and watersheds. Under either the name of either Ecosystem Management or Watershed Management, your efforts have broadened

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the perspective and the understanding of the Bay Delta problems. It is no longer possible to credibly discuss the Bay Delta's problems and not examine what is happening in those tributary watersheds of the Delta - below and above the dams.

Along with that recognition has also come the opportunity to solve the Delta problems from many mutually supportive approaches, heretofore unconsidered. RCRC believes that this is the only realistic way to provide for a long-term solution to not only the Bay Delta, but also to California's water problems in general.

We wish to make our comments with specific regard to an issue we feel should be a component of every alternative included for your consideration. In the Public Workshop Information Package of 12/4/95 a list of Action Categories and specific Actions was provided for review. As part of the category for actions to "Enhance Water Supplies" a line item of Watershed Management was included on page B-41. This action item focused on developing methods to increase water quantity as well as increase water quality through a complete watershed management approach to upper headwater areas. In the analysis of this action program within the same document there were NO negative impacts associated with this action item in Ecosystem Quality, Water Supply, Water Quality or system Vulnerability. It was clearly a win win action program.

Due to the nature of the issues related to watershed management as well as the varying conditions of the watersheds found within out various member Counties our comments at this time will be somewhat general in

nature. However, RCRC is prepared to remain engaged in this process and to work on behalf of our member Counties with regards to reaching our objective of comprehensive watershed management within this state.

Watershed Management Overview

RCRC believes that the benefits to be derived from comprehensive management can only be fully realized if such management is carried out in the entire watershed. We believe that the benefits from watershed management in both the lower and upper portions of the watershed are significant.

Watershed management consists of various land management activities and measures to improve water quality and increase water supplies produced within a watershed. In addition proper vegetation management and manipulation within the watershed may result in significantly reduced fire hazards as well as delays in the timing of a portion of spring runoff.

Watershed activities may include (but are not limited to); maintaining appropriate vegetation cover, protecting riparian zones from disturbance, modifying the vegetation removal patterns in commercial timber harvest operations, carrying out forest thinning operations, and avoiding soil disturbance that initiates significant levels of erosion.

Those areas of watersheds in the upper elevations which are subject to snowpack accumulation may have the ability through vegetation management to actually delay the melting of the snowpack and increase

overall watershed yield. The delayed runoff would more easily be stored in on or off stream storage facilities or be utilized for groundwater recharge during high runoff periods.

Many of these watersheds are within the management jurisdiction of the United States Department of Agriculture, Forest Service. These management areas offer unique opportunities to combine federal management initiatives with state and local efforts in a partnership effort. Coordinated watershed management efforts in these areas would provide benefits in the following areas:

- I. Reduce fire hazard and a corresponding significant reduction in fire severity through removal of dense forest understory vegetation. This could be accomplished through forest thinning operations as well as prescribed burning. A commensurate reduction in the intensity of fires could result in a lessening of impacts on watersheds from the severe conflagration type impacts which have been evident within the Sierra Nevada Mountain Range over the past 10 - 15 years. These fires have in many cases resulted in destruction of entire stream systems - fisheries, riparian habitat, and upland watershed areas. The results have been soils which were virtually sterilized by the intensity of the fire, failed revegetation efforts, and sedimentation of streams that significantly reduced the capacity of downstream reservoirs. Forest thinning operations to reduce fire hazard would be carried out in a manner which not only produced watershed benefits but also produced biomass fuels for electric generation facilities and employment in local economically depressed areas. Obviously, reducing the

V. Weather modifications through cloud seeding programs could be used to increase west slope watershed yields. This when combined with the above listed programs could increase water quality and quantity which would benefit all water users and could be utilized to help achieve Bay-Delta Program objectives as well. It should be noted that in watersheds south of the Delta storage reservoirs, watershed management efforts would primarily result in maintaining or enhancing water quality for urban and industrial uses. Watershed management in areas which are tributaries of the Delta would enhance water yields and water quality in the Delta. These efforts may be more cost effective, when total costs are measured verses all benefits, primary secondary and tertiary, than many of the "hard" technology programs currently being examined in the Bay Delta processes.

VI. Increase water yields and improved water quality within watersheds can contribute to ultimate restoration of upstream fisheries and to the overall improvement of downstream fisheries as well.

Summary

RCRC would like you to consider coordination of your activities - where ever possible - with other ongoing processes and sources of information. We would particularly encourage that the California Water Quality Control Board Watershed Management Initiative be coordinated where practical with the CALFED Bay-Delta Program. We also urge that the

CALFED Bay Delta Program include the Sierra Nevada Ecosystem Project (SNEP) report - which will be released during the upcoming months - as a key source of information in your EIR.

This report should contain significant new information regarding the relative health of the watersheds of the Sierra Nevada's and provide new insights into the natural and managed systems which effect watershed health in this state.

Finally, we wish to reiterate our support for the inclusion of Watershed Management in all alternatives to be considered as part of this program.

We thank you for your time and your consideration of our comments.

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