BOR

Comments on Corrections to the CalFed PEIS/PEIR

Page 1-13, Sacramento River Region– The distinction between the northern and eastern regions doesn't reflect the hydrology well. I suggest line four of the correction read"...Shasta, Siskiyou, Trinity, Modoc, and Lassen counties." Each of these counties is primarily connected to the Delta by releases from Keswick Dam, the first of the impassible dams on the Sacramento River. In addition, add "Shasta County" to the lists of both the east side and the west side streams. Shasta County contains all or part of the watersheds of Cottonwood, Clear, and Battle Creek, each of which has or could have spring run Chinook as well steelhead and fall run Chinook.

Page 1-20, Water Rights Process- The next to last sentence can easily be misread as implying that water transfers *would* decrease. Therefore, I suggest the sentence read "Any additional demand on water right holders, above that now borne by the CVP and SWP, would ...". Unless the totatl amount committed to the Delta changes the amount available for transfer remains unchanged. It just becomes a matter of equitable sharing of the burden.

Page 5.1, Watershed Program- Delete the added "previously" from the second sentence. Runoff is at a max from "previously forested" (i.e. clear cut lands) as evapotranspiration is minimal. Overall this paragraph has an anti-logging bias that leads to half-truths. It is true that shade would extend the period of retention of snow on the ground, but the amount of precipitation intercepted by the canopy would also go up. The optimal amount of thinning to maximize water yields while preserving other values will require case by case assessment. It should also be noted that complete exclusion of logging, unless replaced with frequent controlled burns, will lead to defacto clear cuts commonly known as wildfires. We lost about 150,000 acres that way this summer in the vicinity of the Shasta and Trinity Reservoirs. Increased sedimentation/in-filling of the reservoirs can be expected, although the increments from any one fire are likely to be small relative to the massive sizes of those reservoirs. The conclusion that the impacts are expected to be "small" are true per unit area but the areas involved are massive and the value of appropriate forest management may be seriously underestimated by this statement, especially in an era in which even incremental additions to supply are quite valuable. The statement also is silent with respect to water quality. Increased run-off from forested lands would tend to be relatively cool, clean water— both qualities of great value to salmonid fisheries.

Page 5.1-7, Sacramento River Region– There was not a previous comment on this subject, but the account of river flows needs clarification. The first paragraph mentions 22 MAF, the third paragraph mentions 17.9 MAF and the text on the next page mentions 11 MAF upstream of the Feather, which suggests a total on the order of 20 MAF. So the number appears to be in the range of 18-22 MAF, but it is unclear just what it is and why these numbers vary. It may be that evapotranspiration accounts for some of the apparent discrepancies. In any event a sentence or so explaining the variations would be helpful.

Page 5.1-7, Sacramento River - Add "electric power," to the list of functions of in the last

sentence on this page.

Page 5.1-8, Sacramento River - Is "average basin runoff of 1.2 MAF" referring only to the area upstream of Trinity Dam or does it refer to the whole watershed? Please clarify.

Page 5.1-9, Sacramento River, para. 3- It is true that the volume of in-stream flow has little to do with reservoir releases, but the quality of those flows, particularly temperature, plays a major role. Indeed , releases from Shasta/Keswick are generally dominated by temperature requirements for the winter-run Chinook and water quality requirements in the Delta.

Section 5.3.3.1, page 5.3-1.3, second para. under Salinity, etc.- The text seemed to read more smoothly before the"also" was struck, but the more important item is the meaning of "recycling" in the last sentence is unclear. This may be a function of the text fragment presented but how water is recycled should be clearly laid out when this word is first used.

Section 5.3.6, page 5.3-22- There clearly is an error in the correction at the top of page 6 of 19. One of the "Criterion B" citations in the second complete sentence should be "Criterion A".

Section 5.3.7.2. page 5.3-25- The wording of the second sentence of the new paragraph implies that water quality improvement in the Delta will improve water quality upstream. This is not literally true. The actions taken to improve water quality in the Delta will also improve water in the Sacramento and San Joaquin Rivers.

Section 5.3.7.3, page 5.3-26- This material on the potential use of Bay sediments for levee work caught my attention as I just read a newsletter article addressing the potential impacts of dredging Bay muds to expand the runways at SFO. Concerns were expresssed for that possibility re the potential impacts on waterbirds, marshes, and listed anadromous fish using the South Bay streams. Those same concerns would surely apply here and if true would violate the no redirected impacts principle. In any event there may be need to address the SFO plans in the cumulative impacts discussion of this EIS/EIR.

Section 5.3.8.1, page 5.3-35, second para. under Other SWP, etc.-

Connecting the TCC to the NBA would not cause problems if there were enough storage to allow the needs fo the cities to be met for modest periods. The canal now operates near capacity for brief periods in July and August, but relatively modest reservoirs might enable it to serve both the farmers and the cities. It may be that the Colusa Basin Drainage District's proposals for small reservoirs in the foothills west of the Colusa Basin could be economically enlarged to provide off-stream storage for the North Bay cities as well as flood protection for the Colusa Basin. The TCCA would benefit in such a case by acquiring more customers without having to short anyone.

Section 5.4.3.3, page 5.4-14 and subsequent comments- San Joaquin County may be in the Sacramento Valley groundwater region but certainly is not in the Sacramento Valley as commonly conceived. Checking out this discussion in the PEIS/PEIR led me to led note that Figure 5.4-1 can be easily misread as implying the boundary between Sacramento and San Joaquin Valleys is the line which actually depicts the aquifer/hyporheoric zone along the American River. It would be handy to add lines showing the boundaries of the areas depicted.

Section 6.1.3.3, page 6.1-12- The suggested addition make the warm water fisheries of the reservoirs sound like a bad thing. That is not likely to be the position taken by the marina operators and the sponsors of the bass fishing tournaments on Shasta Lake. I suggest replacing "In addition to adverse effects of reservoirs described above" with "However". I also question the immediately preceding text re turbidity and productivity. The recent limnological studies on Lake Shasta indicate it is a mesotrophic lake whose productivity is nutrient, not light, limited. It is the absence of minerals , not their presence that causes modest to low productivity levels. (See USGS Open File Report 98-251 and the 12/98 progress report on phytoplankton bloom dynamics by Brett, et al.)

Section 7.2, Ecosystem Restoration Program- The last sentence of the third paragraph vague speaks of potential increases in cultivated acreage as though the economically cultivatable land were not already in use. I suggest it be stricken. While it is true that vineyards might be expanded onto new ground, and that they apparently are expanding in the San Joaquin Valley, one doesn't get irrigable land just by wishing it so. The TC canal for example follows the outer edge of the flat lands on the west side of the Sacto Valley and the land between the canal and the river is fully developed. There is no virgin land to be developed. Similarly, on the east side of the Sacto Valley, the local irrigation projects service the flat lands that have drainage properties conducive to cultivation. There are extensive areas of flat ground north of Chico, but there is no water for this range land. If a statement like this is to be made, it should be backed up with some data.

Section 7.15.4, page 7.15-2- I suggest the new sentence be changed to read "Tribal resources may be affected should CalFed actions lead to reallocation of water rights in the vicinity of reservations and rancherias, but any such reallocations would require government-to-government consultations with the affected tribes."

Water Transfer Program Plan, Attachment C- There is some outstandingly clear, simple wording in portions of the water transfer section but other portions, even though they are well written are not easy to follow. Use of some hypothetical examples might help a great deal by making these principles discussed more concrete.