

33.10 Comments from Special Interest Groups and Responses

This section contains copies of comment letters (and any attachments) from the special interest groups listed in Table 33.10-1. As noted previously, each comment in the comment letters was assigned a number, in sequential order (note that some letters may have more than one comment). The numbers were then combined with an abbreviation for the organization (example: AQUA-1).

Responses to the comments follow the comment letters, and are also numbered, corresponding to the numbers assigned in the letters. The letters and associated responses are sorted alphabetically by abbreviation and appear in the chapter in that order.

Table 33.10-1. Special Interest Groups Providing Comments on Draft Environmental Impact Statement

Abbreviation	Special Interest Group
AQUA	AquAlliance
BEC	Butte Environmental Council
CALT	CalTrout
CCHOA	Campbell Creek Homeowners Association
CFBF	California Farm Bureau Federation
CFCA1	Citizens for Clean Air
CFCA2	Citizens for Clean Air
CFCA3	Citizens for Clean Air
CWC	California Wilderness Coalition and Friends of the River
EMAI	EMA, Inc.
EPIC	Environmental Protection Information Center
EWC	Environmental Water Caucus
FOTDW1	Friends of the Delta Watershed
FOTDW2	Friends of the Delta Watershed
FOTDW3	Friends of the Delta Watershed
FOTDW4	Friends of the Delta Watershed
FOTR1	Friends of the River
FOTR2	Friends of the River
IOSDE	International Organization for Self-Determination and Equality
LAFO	Dale La Forest & Associates
LCDA	Lakehead Community Development Association

Table 33.10-1. Special Interest Groups Providing Comments on Draft Environmental Impact Statement (contd.)

Abbreviation	Special Interest Group
LHMWC1	Lakeshore Heights Municipal Water Company
LHMWC2	Lakeshore Heights Municipal Water Company
NCPA	Northern California Power Agency
NRDC1	Natural Resources Defense Council
NRDC4	Natural Resources Defense Council
NWHN1	Northstate Women's Health Network
NWHN2	Northstate Women's Health Network
PFT1	Pacific Forest Trust
PFT2	Pacific Forest Trust
PGE1	Pacific Gas & Electric Company
PGE2	Pacific Gas & Electric Company
PGE3	Pacific Gas & Electric Company
PGE4	Pacific Gas & Electric Company
PGE5	Pacific Gas & Electric Company
PGE6	Pacific Gas & Electric Company
PORG	Porgans & Associates
PPLU	Plumbers and Pipefitters Local Union #228
RCOR	Rotary Club of Redding
RFC	Rivers for Change
SCCC	Shasta County Coordination Committee
SCSHA	Salt Creek Summer Homesites Association
SLBOA	Shasta Lake Business Owners Association
SLFP	Sacred Land Film Project
SRPT	Sacramento River Preservation Trust
STCDA	Save The California Delta Alliance
TCPC	The California Parks Company
TNC	The Nature Conservancy
TRE	The River Exchange

33.10.1 AquAlliance

10/24/13

DEPARTMENT OF THE INTERIOR Mail - Do not raise Shasta Dam

AQUA



Do not raise Shasta Dam

Jim Brobeck <jimb@aqualliance.net>
To: BOR-MPR-SLWRI@usbr.gov

Mon, Sep 30, 2013 at 9:46 AM

AQUA-1 There are many reasons why raising Shasta Dam is a terrible idea. One of the most important reasons is that the project would destroy important Winnemem Wintu homeland the must be preserved for the good of the tribe and all humans. The Winnemem need this land to continue their ceremony (which benefits us all) and to maintain/restore their way of life. The beauty and health of the land is destroyed when converted to eroding reservoir banks that are revealed every year when the water is drained and sent to businesses south of the Delta. These eroding banks are worse than severe burns in there impact on water quality, reservoir capacity, aesthetics and biodiversity. California must not sacrifice more precious riparian land to inspire unrealistic expectations of "reliable" water supply. Destroying more Winnemem land will accelerate the destabilization of the water supply and contribute to the long-term decay of the quality of life that humans need to survive in California.

AQUA-2

AQUA-3

AQUA-4

Jim Brobeck, water policy analyst, AquAlliance

Responses to Comments from AquAlliance

AQUA-1: Please refer to Master Comment Response CR-1, "Potential Effects to Cultural Resources."

AQUA-2: The EIS acknowledges that the banks of the reservoir (Shasta Lake) have been subjected to erosional processes resulting in the appearance of what Chapter 19, "Aesthetics and Visual Resources," describes as the "bathtub ring" effect. This effect is common to reservoirs used for water storage, hydropower purposes and flood control benefits. The vegetation clearing plan outlined in Chapter 2, "Alternatives," was developed to reduce the potential impacts of this process on newly exposed areas in the short-term. A number of the EIS chapters describe the current condition and potential environmental effects of expanding this effect; specifically Chapter 4, "Geology, Geomorphology, Minerals, and Soils," Chapter 7, "Water Quality," Chapter 13, "Wildlife Resources," Chapter 12, "Botanical Resources

and Wetlands,” Chapter 14 “Cultural Resources,” and Chapter 18, “Recreation and Public Access.”

AQUA-3: Please refer to Master Comment Response ALTR-1, “Range of Alternatives – General,” Master Comment Response P&N-1, “Purpose and Need and Objectives,” and Master Comment Response EI-1, “Intent of NEPA Process to Provide Fair and Full Discussion of Significant Environmental Impacts.”

AQUA-4: A response to this comment is not required under NEPA because the comment does not raise a significant environmental issue (NEPA Regulations 40 CFR 1503.4). Many comment authors expressed personal opinions, histories or experiences which are not appropriately addressed as part of the NEPA process. This comment will be included as part of the record and made available to decision makers before a final decision on the proposed project.

33.10.2 Butte Environmental Council

10/18/13

DEPARTMENT OF THE INTERIOR Mail - Comments on Draft Environmental Impact Statement

BEC



Comments on Draft Environmental Impact Statement

Carol Perkins <cuestageo@live.com> Mon, Sep 30, 2013 at 9:42 PM
To: "BOR-MPR-SLWRI@usbr.gov" <bor-mpr-slwri@usbr.gov>
Cc: Robyn DiFalco <robynd@becprotects.org>

Comments are embedded as well as attached.

Sincerely,
Carol Perkins
Water Policy Advocate
Butte Environmental Council

Shasta Lake Water Resources Investigation
Environmental Impact Statement

10/18/13

DEPARTMENT OF THE INTERIOR Mail - Comments on Draft Environmental Impact Statement

September 30, 2013

Katrina Chow, Project Manager

Shasta Lake Water Resources Investigation

United States Department of the Interior

Bureau of Reclamation, Mid-Pacific Region

2800 Cottage Way, MP-700

Sacramento, CA 95825

By email to: BOR-MPR-SLWRI@usbr.gov

**Subject: Comments on Draft Environmental Impact Statement dated
June 2013**

Butte Environmental Council (BEC) submits the following response letter to the U.S. Bureau of Reclamation (USBR) regarding the Shasta Lake Water Resources Investigation Draft Environmental Impact Statement (DEIS). Concerned citizens of the northern Sacramento Valley recognize that the federal government's proposal to raise Shasta Dam, funded by U.S. taxpayers, is part and parcel to a water grab that will socialize the costs of water and its delivery for the 'profitable' benefit of a few. The proposal is flawed, environmentally destructive, and will fail to meet intended objectives. California (and the USBR) must recognize the natural limits of the state's water supply and learn to live within these boundaries. There exists no 'new water' nor will the process of pouring more concrete guarantee the delivery of more water.

BEC's policy statement regarding water identifies our concerns for Northern Sacramento Valley water resources. Specifically, we believe that citizens should have control over local resources; that Northern California's watersheds must be protected for future generations; and that its ground and surface water must not be exported out of the area to address misuse, waste, and over-allocation elsewhere in the state. These comments focus on the flaws, environmental impacts, and objective failures documented throughout the DEIS surrounding the proposed action of raising Shasta Dam.

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10/18/13

DEPARTMENT OF THE INTERIOR Mail - Comments on Draft Environmental Impact Statement

According to the Bureau, the objectives of the dam raise echo the co-equal goals of the BDCP to an extent. These goals fall into two operational categories: (1) export operations – or, “increase water supply and water supply reliability,” and (2) conservation operations – or more specifically, “increase survival of anadromous fish populations in the upper Sacramento River ” and “maintain or improve water quality conditions in the Sacramento River downstream from Shasta Dam and in the Sacramento-San Joaquin Delta.”

Local control over local resources

This project is costly and may provide, theoretically, an insignificantly small amount of water. [1] Recent stakeholder meetings in the area have provided evidence that it is a universally unpopular project, which places financial backing on U.S. taxpayers that are and will remain unaware of both their obligation and the regional impacts to the environment and interests of local

residents. The U.S. Fish and Wildlife Service states this proposal will have “negligible benefits” for threatened and endangered salmon and steelhead in the Sacramento River. And it could drown the remaining homeland of the Winnemen Wintu Tribe, including traditional cultural sites on the McCloud River still in use today. The interests and benefits of residents north of the Delta must not be suppressed by the greedy demands of south of Delta entities.

Protection for future generations

An 18.5-foot raise of Shasta Dam could, theoretically and periodically, flood nearly 1.5 miles of the McCloud and upper Sacramento Rivers. Both streams were identified by the Forest Service as potential National Wild & Scenic Rivers and the McCloud is protected under state law from dams and reservoirs. At stake are the rivers’ nationally significant wild trout fisheries, as well as outstandingly remarkable scenic, geological, and Native American cultural values (particularly for the McCloud). In addition, enlarging the reservoir could further effect downstream flows in the Sacramento River to the detriment of the river’s riparian and aquatic habitats and the many threatened and endangered fish and wildlife species that depend on these habitats. These flow modifications will adversely affect a segment of the Sacramento River upstream of Red Bluff identified by the BLM as eligible for Wild & Scenic protection and that has been proposed for National Recreation Area designation. [2]

Eliminate operational conundrums that result in

10/18/13

DEPARTMENT OF THE INTERIOR Mail - Comments on Draft Environmental Impact Statement

(SOD) interests. The firm water supply would only be achievable without dedicated storage for carryover or cold pool supplies.

Operational Effects of the Biological Opinions Using Planning Models.
September 7, 2001. Walter Bourez. MBK Engineers; and, *SLWRI DEIS*. July
2013. USBR.

[2] The U.S. Bureau of Reclamation (Reclamation) and the National Marine Fisheries Service (NMFS) conducted a Landowner and Stakeholder Workshop on August 27, 2013 concerning a pilot 'reintroduction' project for Chinook salmon and steelhead to tributaries above Shasta Lake. Alice Berg (NMFS) described that approximately 80 to 90 percent of the historic spring-run Chinook salmon habitat and nearly 100 percent of the historic winter-run Chinook salmon habitat has been lost. Raising the dam could, theoretically, exacerbate these conditions by further inundating upstream habitat and increasing the extent of warm water.

[3] "The project Plan documents make it clear that operations of the CVP and SWP reservoirs are governed by BiOps or FERC licenses, and not BDCP. In addition, they note limited flexibility in reservoir operation due to cold water pool management, particularly on Shasta and Folsom Reservoirs. In this way, the reservoirs are in effect another constraint on BDCP (Chapter 3), rather than an asset for management.

Yet operations of these reservoirs greatly impact winter- and spring-run Chinook habitat downstream. As Shown above, these operations contribute to the significant impairment of flows of the Sacramento River and its major tributaries and are a challenge when trying to meet the biological objectives of BDCP. Additionally, these dams block access to holding, spawning and rearing habitat that has far-reaching effects on winter- and spring-run Chinook salmon populations (Williams, 2006, 2009). These Dams also support mitigation hatcheries whose operations may be contributing to harm of native salmon (Moyle et al., 2011)."

"... all three reservoirs are at or near dead pool for the last two years of the drought cycle. Had water-year 1989 been closer in runoff to the other drought years, dead pool conditions would have occurred for the last three years of the six-year drought. Although a statement of the obvious, dead pool limits flexibility in managing water supply and ecosystem needs, both immediately downstream and in the Delta. This is likely to be of greatest concern for managing flow and temperature needs of winter- and spring-run Chinook salmon, particularly under

<mailto:conrole.com@mailb3131dV2ic28kic2ha8E1c188i0me18.com/checkboxofthe141759273-6885>

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Shasta Lake Water Resources Investigation
Environmental Impact Statement

10/18/13

DEPARTMENT OF THE INTERIOR Mail - Comments on Draft Environmental Impact Statement

warming climate conditions. Changes in flow releases to meet the needs of listed salmon are highly likely to impact export operations during dry periods."

Panel Review of the Draft Bay Delta Conservation Plan: Prepared for the Nature Conservancy and American Rivers. September 2013. Mount, Jeffrey; Fleenor, W.; Gray, B.; Herbold, B.; Kimmerer, W. Saracino & Mount, LLC.

[4] It's a balance of two issues, Mr. Wilson explained: "The amount of flow required to be released from Shasta Reservoir to meet salinity standards versus this need to retain a sufficient cold water pool at Shasta for protection of salmon, meeting water quality standards, and also having carryover storage for next year."

Delta Watermaster Craig Wilson, June 27, 2013 meeting of the Delta Stewardship Council,

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Activities and Events

- Environmental Advocacy
- Environmental Groundwater P. **BEC-1**
- Endangered Species Fair
- Oldwell Park C. **BEC-2**
- Orinda Area Creek
- Wetlands Preservation **BEC-3**

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- Teresa Di
- Maggi Barry
- Office Coordinator
- Julia Murphy
- Communications/Project Assistant
- Carol Perkins
- Advisory Committee
- Nanti Te **BEC-7**
- Advisory Co.
- Tanya Parish
- WAFI Coordinator **BEC-8**

September 30, 2013

Katrina Chow, Project Manager
Shasta Lake Water Resources Investigation
United States Department of the Interior
Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way, MP-700
Sacramento, CA 95825

By email to: BOR-MPR-SL.WRI@usbr.gov

Subject: Comments on Draft Environmental Impact Statement dated June 2013

Butte Environmental Council (BEC) submits the following response letter to the U.S. Bureau of Reclamation (USBR) regarding the Shasta Lake Water Resources Investigation Draft Environmental Impact Statement (DEIS).

Concerned citizens of the northern Sacramento Valley recognize that the federal government's proposal to raise Shasta Dam, funded by U.S. taxpayers, is part and parcel to a water grab that will socialize the costs of water and its delivery for the 'profitable' benefit of a few. The proposal is flawed, environmentally destructive, and will fail to meet intended objectives. California (and the USBR) must recognize the natural limits of the state's water supply and learn to live within these boundaries. There exists no 'new water' nor will the process of pouring more concrete guarantee the delivery of more water.

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According to the Bureau, the objectives of the dam raise echo the co-equal goals of the BDCP to an extent. These goals fall into two operational categories: (1) export operations – or, "increase water supply and water supply reliability," and (2) conservation operations – or more specifically, "increase survival of anadromous fish populations in the upper Sacramento River " and "maintain or improve water quality conditions in the Sacramento River downstream from Shasta Dam and in the Sacramento-San Joaquin Delta."

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Shasta Lake Water Resources Investigation
Environmental Impact Statement

BEC-8 ↑
 CONTD
 BEC-9
 BEC-10
 BEC-11

residents. The U.S. Fish and Wildlife Service states this proposal will have "negligible benefits" for threatened and endangered salmon and steelhead in the Sacramento River. And it could drown the remaining homeland of the Winnemen Wintu Tribe, including traditional cultural sites on the McCloud River still in use today. The interests and benefits of residents north of the Delta must not be suppressed by the greedy demands of south of Delta entities.

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Eliminate operational conundrums that result in more water exported out of the hydrologic region
 The Sacramento River hydrologic region is the headwaters of the state providing on average 74% of the flow into the Delta. Building a higher dam will not guarantee more water. Getting more water through the Delta is constrained: DWR and independent experts have recognized and documented this fact.² Regulatory, operational and infrastructure constraints limit the ability to adaptively manage operations to support co-equal objectives regardless of construction changes in and surrounding the Delta. 2013 was not a critical dry year and Shasta releases for flood control did not occur early in the year. However, there was concern in June that enough cold-water storage remained in Shasta for fall- and winter-run Chinook.⁴

BEC-12
 BEC-13
 BEC-14
 BEC-15
 BEC-16
 BEC-17
 BEC-18

In addition, significant water transfers to SOD interests occurred, while NOD water users were left with unmet needs.

BEC requests that the federal government abandon this ill-conceived project now and into perpetuity. The right decision to eliminate this project will save dollars for real projects with real benefits for all citizens and the environment; will lessen the environmental damage already wreaked by California's poorly designed water projects; and will uphold Native American interests and the rights of the environment.

If you have questions please contact me or Carol Perkins, Water Policy Advocate, Butte Environmental Council.

Sincerely,



Robyn DiFalco, Executive Director
 rbfynd@becnet.org

cc:

Dianne Feinstein, U.S. Senator for California
Barbara Boxer, U.S. Senator for California

¹ Biological opinions (BiOps) for salmon and smelt have reduced average carryover in Shasta by 80TAF, which *Operational Effects of the Biological Opinions Using Planning Models*. September 7, 2001. Walter Bourez. MBK Engineers; and, *SLWRI DEIS*. July 2013. USBR.

² The U.S. Bureau of Reclamation (Reclamation) and the National Marine Fisheries Service (NMFS) conducted a Landowner and Stakeholder Workshop on August 27, 2013 concerning a pilot 'reintroduction' project for Chinook salmon and steelhead to tributaries above Shasta Lake. Alice Berg (NMFS) described that approximately 80 to 90 percent of the historic spring-run Chinook salmon habitat and nearly 100 percent of the historic winter-run Chinook salmon habitat has been lost. Raising the dam could, theoretically, exacerbate these conditions by further inundating upstream habitat and increasing the extent of warm water.

³ "The project Plan documents make it clear that operations of the CVP and SWP reservoirs are governed by BiOps or FERC licenses, and not BDCP. In addition, they note limited flexibility in reservoir operation due to cold water pool management, particularly on Shasta and Folsom Reservoirs. In this way, the reservoirs are in effect another constraint on BDCP (Chapter 3), rather than an asset for management.

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Panel Review of the Draft Bay Delta Conservation Plan: Prepared for the Nature Conservancy and American Rivers. September 2013. Mount, Jeffrey; Fleenor, W.; Gray, B.; Herbold, B.; Kimmerer, W. Saracino & Mount, LLC.

⁴ It's a balance of two issues, Mr. Wilson explained: "The amount of flow required to be released from Shasta Reservoir to meet salinity standards versus this need to retain a sufficient cold water pool at Shasta for protection of salmon, meeting water quality standards, and also having carryover storage for next year." Delta Watermaster Craig Wilson, June 27, 2013 meeting of the Delta Stewardship Council.

Responses to Comments from Butte Environmental Council
BEC-1: Please refer to Master Comment Response WSR-1, "Water Supply Demands, Supplies, and Project Benefits."

BEC-2: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

BEC-3: Please refer to Master Comment Response GEN-4, “Best Available Information,” and Master Comment Response GEN-1, “Comment Included as Part of the Record.”

BEC-4: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

BEC-5: Please refer to Master Comment Response NEPA-1, “Sufficiency of the EIS,” and Master Comment Response EI-1, “Intent of NEPA Process to Provide Fair and Full Discussion of Significant Environmental Impacts.”

BEC-6: The comment appears to reference the coequal goals of the 2009 Delta Reform Act, which are referenced in BDCP documentation. SLWRI project objectives, which are described in EIS Chapter 2, “Alternatives,” Section 2.1.2, “Project Objectives,” are generally consistent with coequal goals of the 2009 Delta Reform Act of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem.

BEC-7: Please refer to Master Comment Response Gen-1 “Comment Included as Part of the Record.”

BEC-8: Please refer to Master Comment Response EI-1, “Intent of NEPA Process to Provide Fair and Full Discussion of Significant Environmental Impacts,” Master Comment Response P&N-1, “Purpose and Need and Objectives,” Master Comment Response ALTS-1, “Alternative Selection,” and Master Comment Response COST/BEN-1, “Intent of EIS and Process to Determine Federal Interest.”

BEC-9: Please refer to Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

BEC-10: Please refer to Master Comment Response CR-1, “Potential Effects to Cultural Resources.”

BEC-11: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

BEC-12: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542,” and Master Comment Response WASR-8, “Effects

to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

BEC-13: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River.”

BEC-14: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

BEC-15: Please refer to Master Comment Response RAH-1, “Available Water to Fill an Enlarged Reservoir,” and Master Comment Response RAH-3, “Dry Year Effects to Reservoir Storage,”

BEC-16: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

BEC-17: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

BEC-18: Please refer to Master Comment Response GEN-5, “Some People Support Dam Raise and Others Oppose Dam Raise.”

33.10.3 CalTrout

10/18/13

DEPARTMENT OF THE INTERIOR Mail - CalTrout comments on Shasta Dam Raise DEIS

CALT



CalTrout comments on Shasta Dam Raise DEIS

Curtis Knight <cknight@caltrout.org>

Mon, Sep 30, 2013 at 2:12 PM

To: "BOR-MPR-SLWRI@usbr.gov" <BOR-MPR-SLWRI@usbr.gov>

Dear Ms. Chow,

Thanks for the opportunity to comment.

Curtis



Curtis Knight

Conservation Director

(530)868-1872

www.caltrout.org

2 attachments



image001.png
14K

10/18/13

DEPARTMENT OF THE INTERIOR Mail - CalTrout comments on Shasta Dam Raise DEIS

DEIS Shasta Dam CalTrout_Sept_2013.pdf
401K



September 30, 2013

Ms. Katrina Chow
United States Department of the Interior Bureau of Reclamation
Mid-Pacific Region 2800 Cottage Way, MP-700
Sacramento, CA 95825

Sent via email to: BOR-MPR-SLWRI@usbr.gov

RE: Comments on Draft Environmental Impact Statement Shasta Lake Water Resources Investigation

Ms. Chow,

CalTrout appreciates the opportunity to comment on the Bureau of Reclamation's Draft Environmental Impact Statement (DEIS) Shasta Lake Water Resources Investigation and the potential raising of Shasta Dam.

CalTrout is primarily concerned about:

CALT-1

- The raising of Shasta Dam would further inundate up to three miles of blue ribbon wild trout fisheries on the Upper Sacramento and McCloud Rivers. The McCloud River has given enough. Two dams on the river block access for anadromous fish, divert over 80% of its flow and flood miles of habitat.

CALT-2

- The McCloud River is protected under the state Wild and Scenic Rivers Act. The CA Legislature has found and declared that the McCloud River 'possesses extraordinary resources in that it supports one of the finest wild trout fisheries in the state'. The free flowing waters of the McCloud are legally protected--rolling back these protections sets a dangerous legal precedent.

CALT-3

- Central Valley salmon recovery requires a comprehensive approach. The Draft Feasibility Report focuses on a single species (winter-run Chinook salmon) and one of many stressors to this species (water temperature below Shasta Dam). It's telling that NMFS Draft Recovery Plan does not identify Shasta Dam raise as a preferred action to improve Central Valley salmon and steelhead.

Further Inundation of Blue Ribbon Waters

A Shasta Dam Raise would inundate miles of wild trout habitat in two of the states most popular and pristine trout fishing destinations--the Upper Sacramento and McCloud Rivers.

The McCloud River ranks as one of the most famous and revered trout streams in the world and is one of the few remaining great wild trout rivers in California. The McCloud is a designated Wild Trout Stream by the California Department of Fish and Game and is home to the renowned rainbow trout that was stocked around the world and continues to be notable for its beauty. Anglers come from around the world to fish in the pristine waters and remote, rugged canyon of the McCloud and its world famous fishery is of great economic benefit to the local economy. Surveys estimate that between 7,000-14,000 visitors come to the lower McCloud River, primarily to fish and camp.

CALT-4

In the late 1800's, fisheries experts and anglers from around the world looked to the McCloud River as the quintessential trout, steelhead and salmon river. Almost 200 miles from the ocean, this 77 mile long river had the biggest, toughest most hard fighting steelhead and resident rainbow trout. It contained a unique species of trout - the redband trout, the only California occurrence of the aggressive bull trout, a spring-run, fall-run Chinook salmon and a salmon with a life history developed nowhere else in the world - the winter -run Chinook salmon. The fish from the McCloud are the seed stock for trout and salmon around the world.

A Shasta Dam raise would inundate approximately another 3,550 of the McCloud River--or about 3% of the remaining free flowing river between McCloud Dam and Shasta Reservoir. During high pool miles of habitat would be flooded, sediment deposition would destroy spawning habitat and slack water habitat would favor non-native fish predators from Shasta Lake at the expense of native trout. During low pool an ugly bath tub ring would replace what is now healthy riparian habitat and scenic river canyon.

The BOR acknowledges the McCloud's special status in their "Major Topics of Interest" section, but offers almost no mention of the loss of up to two miles of the Upper Sacramento River, and dances around discussions of the effects flooding would have on the McCloud River:

CALT-5

Specific information is lacking concerning the river reach that could periodically be inundated if Shasta Dam and Shasta Lake were enlarged because the lands along this part of the river are privately owned and access for biological and other surveys has been limited; therefore, general information concerning the lower McCloud River as a whole is provided for some resource areas. This section also includes a brief description of the current transition reach (see Figure 25-1) because the reach of the river that would be newly inundated would likely take on the characteristics of the existing transition reach.

Given the owners of that "private stretch" of the McCloud River are none other than Westlands Irrigation District -- who bought the property specifically to eliminate one barrier to dam raising -- it's hard to imagine what the barriers to discovery are.

A Protected River

CALT-6

The free-flowing sections of the McCloud River are protected under state law. The proposed raising of Shasta Dam is in clear violation of the California Wild and Scenic Rivers Act for the McCloud River (Wild and Scenic Rivers Chapter, CA Public Resources Code §5093.542¹). Under the act the state legislature makes the finding that "maintaining the McCloud River in its free-flowing conditions to protect its fishery is the highest and most beneficial use of the water" under the state constitution. The act prohibits the construction of additional dams, reservoirs, diversions and other water impoundment facilities on the McCloud River.

In the late 1980s, the CA Resources Agency assessed the suitability of the McCloud River inclusion for State Wild and Scenic River designation and protection. The McCloud was found eligible, but the California legislature declined to add the river to the California wild and scenic river system. The legislature instead passed an amendment to the California Wild and Scenic Rivers Act to protect the river's free-flowing condition and the river's fishery from McCloud Dam to Shasta Reservoir resulting in the existing protection under CA Public Resources Code §5093.542.

CALT-7

The McCloud River has also been found to be eligible federal Wild and Scenic status under the Wild and Scenic Rivers Act. However, the river was not formally designated due to an alternative protection strategy proposed by landowners and agencies. In 1991, the McCloud River Coordinated Resource Management and Planning (CRMP) group was formed and a protection plan was adopted in 1994. The CRMP requires its signatories to protect the values that make it eligible for Federal designation as wild and scenic and contains a provision stating that the USFS reserves the right to pursue designation if the CRMP is terminated or fails to protect these values.

CALT-8

The raising of Shasta Dam would violate both the Public Resources Code and McCloud River CRMP Plan protections. Attempts to rescind these laws set a dangerous precedent of scaling back protection when it is inconvenient. Moreover, the PRC Code and CRMP plan protection underscore the desires of the state legislature, the public and the local landowners that the McCloud remain in its. The PRC code states 'the continued management of river resources in their existing natural condition represents the best way to protect the unique fishery of the McCloud River.' Continued management does not include flooding more of the river by raising Shasta Dam.

CALT-9

Salmon Recovery

With a majority of cost of the dam raise being attributed to the need to improve Central Valley steelhead and salmon, the rationale for spending over half-billion dollars on salmon recovery needs to be reviewed in a comprehensive way, not a single species and single dam approach.

For example, there are multiple stressors to Central Valley salmon and steelhead. According NMFS' Draft Recovery Plan these stressors include:

CALT-6
CONTD

¹ See Attachment 1.

CALT-9 CONTD	<ul style="list-style-type: none"> • The barriers of Keswick and Shasta dams, which block access to historic staging and spawning habitat • Flow fluctuations, water pollution, water temperature impacts in the upper Sacramento River during embryo incubation • Loss of juvenile rearing habitat in the form of lost natural river morphology and function, and lost riparian habitat and instream cover • Predation during juvenile rearing and outmigration • Ocean harvest • Entrainment of juveniles at the C.W. Jones and Harvey O. Banks pumping plants
CALT-10	<p>A more comprehensive approach is needed to coordinate actions to ensure the long-term sustainability of Central Valley salmon and steelhead. Dam reoperation, improvements to tributaries, increased access to floodplain habitats and many other strategies are being implemented now to improve all runs Central Valley steelhead and salmon. NMFS Draft Recovery Plan highlights many of these efforts. The Draft Feasibility Report falls does not recognize these efforts and instead focuses on winter-run Chinook and how a Shasta Dam raise would affect this single species.</p>
CALT-11	<p>The most obvious impact to the winter-run Chinook salmon was the construction of Shasta dam blocking access to historic spawning grounds. NMFS Draft Recovery Plan identifies at least four independent winter-run Chinook salmon populations with a stronghold in the McCloud and other populations in Fall River, Hat Creek and Upper Sacramento River. The construction of Shasta Dam mixed these runs into a single population below Shasta Dam resulting in a population bottleneck.</p>
CALT-12	<p>The Draft Feasibility Report mischaracterizes the NMFS Draft Recovery Plan identified stressors to winter-run Chinook and solutions to address them. NMFS is clear that a key strategy for securing the long-term viability of winter-run Chinook salmon is establishing 'at least on other viable independent population' in the Battle Creek and/or tributaries above Shasta Reservoir. There is no mention of a Shasta Dam raise. These is clear focused priority by NMFS that the best way to ensure the long term survival of winter-run Chinook is to establish a population above Shasta Dam. But they do not mention the need to raise Shasta Dam.</p>
	<p><u>Best Allocation of Resources?</u></p>
CALT-13	<p>As the scientists at the UC Davis Center for Watershed Sciences California Water Blog noted, if we're asking taxpayers to cough up \$655 million to benefit fish, then it's fair to ask if fish wouldn't better benefit from spending that \$655 million some other way:</p> <p style="padding-left: 40px;">New major water projects are increasingly justified based on recovering fish and environmental benefits lost through construction of previous projects. Yet we are not seriously studying what would be the best investment portfolio for fish and the environment. We are still trying to justify individual projects rather than trying to find the best portfolio of activities to accomplish objectives, particularly environmental objectives. This approach is backwards, and ineffective.</p>

CALT-13
CONTD ¹Independent single-facility studies of improvements to a complex system are expensive and time-consuming, and distract us from addressing greater system-wide problems. If we continue to study this complex system incrementally, money and time will be spent without substantial improvements or strategic direction.²

CALT-14 As further noted in the California Water blog, the increased water capacity in the lake will result in very expensive water, while added water deliveries aren't significant on a state-wide scale:

1. The study found that the most economical expansion was about 14% (634,000 acre-ft), costing \$1.1 billion dollars, roughly \$1,700 per acre-ft of storage capacity. This would expand statewide surface storage capacity by 1.5%, although water storage capacity is not equal to water deliveries.
2. This expansion produces an additional 76,000 acre-ft of firm yield (dry year deliveries). This is less than 0.2% of agricultural and urban water use in California. (Modern water engineers will wonder why the antiquated firm yield is still the main water supply indicator.) Average annual deliveries increase by only 63,000 acre-ft. Other traditional benefits (hydropower, recreation, flood reduction) were small.

CALT-15 We remain unconvinced of any increased recreational opportunity accruing to the project should more flat water be created; blue ribbon trout streams are far more rare than stillwater recreational opportunities.

CALT-16 On the issue of climate change and the need to expand reservoirs in California the scientists at UC Davis warn that expanding reservoirs is not necessarily useful for climate change.

CALT-16 Climate warming will reduce seasonal snowpack, but with some changes in reservoir management, existing large reservoirs on most of California's rivers can largely accommodate seasonal shifts in runoff (Connell-Buck et al. 2011). Climate warming will be somewhat costly, but not catastrophic for most conventional water storage operations (Willis et al. 2010; Madani and Lund 2010). Change in total precipitation is more important than warming alone. The physical, economic and ecological instability of the Sacramento-San Joaquin Delta probably poses more risk to California's water supply than climate warming (Lund et al. 2010).³

Cultural Impacts

CALT-17 And while our objections focus on resources, there is a large cultural cost to dam raising; raising Shasta Dam would submerge 43 of the remaining Winnemem Wintu's sacred sites under the lake's waters. This follows the inundation of most of the tribal lands that were lost when the lake was originally flooded.

CALT-13
CONTD ² See <http://californiawaterblog.com/2012/02/22/expanding-water-storage-capacity-in-california/>

CALT-16 ³ See California Water Blog at <http://californiawaterblog.com/>

CALT-16
CONTD *CalTrout Comments on Shasta Dam Raise DEIS*

Shasta Lake Water Resources Investigation
Environmental Impact Statement

Recommendations

CALT-18	<ul style="list-style-type: none"> Mitigation: We are concerned about the description of possible mitigation for <i>Impacts WASR 1-4</i> for the McCloud River. WASR-1 addresses the eligibility of the McCloud River for federal Wild and Scenic River status and that 'no feasible mitigation measures available to reduce impact'. We believe consideration of funding to the McCloud River Coordinated Resource and Management Planning (CRMP) group be considered mitigation as this group is tasked with maintaining the attributes that make the McCloud River eligible for federal Wild and Scenic status. WASR-3 addresses impacts to fisheries from further inundating the
CALT-19	<p>McCloud River. We would like to highlight the impact Shasta Dam had on the extirpation of bull trout in the McCloud River and that fishery mitigation measures should require feasibility studies on the reintroduction of bull trout. We are also concerned about WASR-4 regarding the statement that there is 'no feasible mitigation measures available to reduce</p>
CALT-20	<p>the impact' of further inundation of state protected free flowing condition of the McCloud River. We believe the mitigation measures for the inundation of free flow waters should be identified. One possible way to mitigate the impact of inundating free flowing waters would be to identify where in the McCloud watershed inundated waters could be returned to free flowing water. Lakin Dam on the upper McCloud River and McCloud Reservoir offer two opportunities. In the case of McCloud Reservoir consideration could be given to modifying the McCloud intake to divert water to the Pit River. Moving the diversion structure upstream may allow for a lower or reduced dam height and could possibly allow for fish passage. There is also no mention of mitigation for further inundation of the lower portion</p>
CALT-21	<p>of the Upper Sacramento River.</p>
CALT-22	<ul style="list-style-type: none"> Comprehensive Salmon Recovery: The rationale to raise Shasta Dam to benefit a single run of Central Valley salmon is flawed and counter to the way fish scientists have been thinking about salmon recovery in California. Assessing reservoir reoperation, expanding floodplains, addressing Delta issues, removing dams on Battle Creek are all positive steps. Hatchery reform is important too. These fish management, habitat restoration and water management activities must be assessed and implemented in a coordinated way to address salmon and steelhead recovery needs. The Draft Feasibility Study falls short of this by focusing on a single run of salmon and on the effects of only one action.
CALT-23	<ul style="list-style-type: none"> Redesign the Spillway Capacity: Shasta Reservoir is presently drawn way down by November each year to provide enough room for storage of a series of potential storm events as flood protection. A reasonable alternative could be to redesign the spillway for increased carrying capacity in the event of that type of flood event. The protection against an uncontrolled release over the dam would be achieved by a greater capacity for controlled releases through a larger capacity spillway, rather than by building the dam higher to contain that type of a storm event. This could be an effective, cost efficient and environmentally superior solution.

CALT-24

- **Downstream Floodplain Expansion:** Most of the attempts to bolster wild salmon and steelhead populations have focused on improving riverine spawning and rearing habitat and increasing flow releases from dams to manage temperature and move juveniles to the sea. However, research has shown that floodplains may be an important missing ingredient in the efforts to restore these fishes. Salmon have evolved to take advantage of the historically abundant floodplains in California. During outmigration, juvenile salmonids follow increased flows from an annual spring snowmelt from the channel out onto the floodplain. The abundant food resources, relatively low velocities and warmer temperatures on the floodplain make for ideal rearing conditions, producing growth rates that are up to three times those of juveniles that remain in the channels. Reconnecting floodplains to the Sacramento River through levees setbacks and improved water management is an important factor in addressing Central Valley salmon and steelhead recovery needs.

CALT-25

- **Improve Hydrologic Models for Shasta Reservoir Tributaries:** Currently hydrologic models, used to predict the amount of winter and spring inflow to Shasta Reservoir from major tributaries (Upper Sacramento, McCloud and Pit Rivers), are outdated and unsophisticated. By updating the models to more accurately predict runoff, Shasta Reservoir could be better managed to ensure full capacity at the beginning of each dry season. Currently, the reservoir rarely fills partly because of over draw down in the fall months in anticipation of heavy winter inflows. More accurate models predicting the timing and amount of inflow would allow a less conservative approach to managing Shasta Reservoir water levels and would result in increased water yield in most years.

Conclusion

CALT-26

Raising Shasta Dam will come at the expense of a river the California Legislature acknowledges as one of the most beautiful and valuable in the state. While CalTrout remains committed to protecting and restoring Central Valley anadromous fisheries, the benefits of raising Shasta Dam to Central Valley steelhead and salmon need to be done in a more coordinated and comprehensive way. We remain unwilling to sacrifice irreplaceable river habitat for benefits that are uncertain and costly.

Sincerely,



Curtis Knight
Conservation Director

Attachment 1

CA Public Resources Code §5093.542

The Legislature finds and declares that the McCloud River possesses extraordinary resources in that it supports one of the finest wild trout fisheries in the state. Portions of the river have been appropriately designated by the Fish and Game Commission, pursuant to Chapter 7.2 (commencing with Section 1725) of Division 2 of the Fish and Game Code, as wild trout waters, with restrictions on the taking, or method of taking, of fish. The Legislature has determined, based upon a review of comprehensive technical data evaluating resources and potential beneficial uses, that potential beneficial uses must be balanced, in order to achieve protection of the unique fishery resources of the McCloud River, as follows:

(a) The continued management of river resources in their existing natural condition represents the best way to protect the unique fishery of the McCloud River. The Legislature further finds and declares that maintaining the McCloud River in its free-flowing condition to protect its fishery is the highest and most beneficial use of the waters of the McCloud River within the segments designated in subdivision (b), and is a reasonable use of water within the meaning of Section 2 of Article X of the California Constitution.

(b) No dam, reservoir, diversion, or other water impoundment facility shall be constructed on the McCloud River from Algoma to the confluence with Huckleberry Creek, and 0.25 mile downstream from the McCloud Dam to the McCloud River Bridge; nor shall any such facility be constructed on Squaw Valley Creek from the confluence with Cabin Creek to the confluence with the McCloud River.

(c) Except for participation by the Department of Water Resources in studies involving the technical and economic feasibility of enlargement of Shasta Dam, no department or agency of the state shall assist or cooperate with, whether by loan, grant, license, or otherwise, any agency of the federal, state, or local government in the planning or construction of any dam, reservoir, diversion, or other water impoundment facility that could have an adverse effect on the free-flowing condition of the McCloud River, or on its wild trout fishery.

(d) All state agencies exercising powers under any other provision of law with respect to the protection and restoration of fishery resources shall continue to exercise those powers in a manner to protect and enhance the fishery of those segments designated in subdivision (b). In carrying out this subdivision, any exercise of powers shall be consistent with Section 5093.58.

(e) Nothing in this section shall prejudice, alter, affect in any way, or interfere with the construction, maintenance, repair, or operation by the Pacific Gas and Electric Company of the existing McCloud-Pit development (FERC 2106) under its license, or prevent Pacific Gas and Electric from constructing a hydroelectric generating facility by retrofitting the existing McCloud Dam if the operation of the facility does not alter the existing flow regime below the dam.

CALT-6
CONTD

CalTrout Comments on Shasta Dam Raise DEIS

8

Responses to Comments from CalTrout

CALT-1: Chapter 11, “Fisheries and Aquatic Ecosystems,” of the EIS has been revised to include additional information on impacts to tributaries to Shasta Lake, including the Sacramento River and McCloud River upstream from Shasta Lake. Under CP3, about 2,189 feet of the Upper Sacramento River would be subject to inundation. Under CP3, about 3,550 feet of the McCloud River would be subject to inundation.

While the commenter is correct in the statement regarding anadromous fish that is part of the existing condition and not an impact of any alternatives evaluated in the EIS.

Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CALT-2: Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CALT-3: Please refer to Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-4: Chapter 11, “Fisheries and Aquatic Ecosystems,” of the EIS has been revised to include additional information on impacts to tributaries to Shasta Lake, including the Sacramento River and McCloud River upstream from Shasta Lake. Under CP3, about 2,189 feet of the Upper Sacramento River would be subject to inundation. Under CP3, about 3,550 feet of the McCloud River would be subject to inundation.

While the commenter provides interesting commentary on the socio-economic and ecologic historical conditions associated with the McCloud River, it does not provide information relevant to the analysis provided in this EIS.

Chapter 25, “Wild and Scenic River Considerations for McCloud River,” of the EIS discloses the impacts to the McCloud River and the relevant outstandingly remarkable values (e.g., wild trout fishery). The commenter is incorrect in stating “during high pool miles of habitat would be flooded.”

Please refer to Master Comment Response NEPA-1 “Sufficiency of EIS,” and Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River.”

CALT-5: Based on comments on the DEIS, the EIS has been revised to include a discussion of the Sacramento River in the context of the Wild and Scenic Rivers Act. Specifically, Chapter 17, “Land Use,” has been revised to include this topic.

Reclamation has worked closely with private landowners throughout the planning process to collect information and use the best available science to support the NEPA process. Information included in both Chapter 11, “Fisheries and Aquatic Ecosystem,” Chapter 12, “Botanical Resources and Wetlands,” Chapter 13, “Wildlife Resources,” and

Chapter 25, “Wild and Scenic River Considerations for McCloud River,” is based on surveys and investigations performed on private lands, including property currently owned by Westlands Water District.

Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CALT-6: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” and Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CALT-7: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” and Master Comment Response WASR-4, “CRMP’s Responsibilities to Maintain the Outstandingly Remarkable Values of the McCloud River.”

CALT-8: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” and Master Comment Response WASR-4, “CRMP’s Responsibilities to Maintain the Outstandingly Remarkable Values of the McCloud River.”

CALT-9: Please refer to Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-10: This comment is based on the Draft Feasibility Report. However, the DEIS evaluated the effects of the SLWRI on all four runs of Chinook salmon, as well as steelhead, green sturgeon and other species found in the Sacramento River and Delta.

Please refer to Master Comment Response DSFISH-3, “Fish Habitat Restoration,” and Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-11: Please refer to Master Comment Response DSFISH-6, “Historic Dam Effects on Fisheries.”

CALT-12: Please refer to Master Comment Response FISHPASS-1, “Fish Passage Above Shasta Dam,” and Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-13: Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” Master Comment Response DSFISH-3, “Fish Habitat Restoration,” and Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-14: The SLWRI DEIS does not include evaluations related to economic feasibility because it is not required under NEPA. Accordingly, the DEIS does not identify a “most economical” alternative. As described in Master Comment Response COST/BEN-2, “Comments Related to the SLWRI Feasibility Report,” updated evaluations related to economic feasibility was included in the SLWRI Final Feasibility Report.

Please refer to Master Comment Response COST/BEN-1, “Intent of EIS and Process to Determine Federal Interest,” Master Comment Response COST/BEN-3, “Estimated Increased Water Supply Reliability under Action Alternatives,” and Master Comment Response COST/BEN-4, “Non-monetary Benefits of Action Alternatives.”

CALT-15: As stated in the DEIS Chapter 18, “Recreation and Public Access,” Section 18.1.1, “Recreation,” the different types of recreation activities are discussed for the Shasta Lake area. Reclamation did not designate a relative value for any one type of recreation over another for the impact analysis. As discussed in the DEIS Modeling Appendix, Chapter 10, “Recreational Visitation,” an increase in number of visitor days is expected to increase for each of the action alternatives.

Please refer to Master Comment Response REC-1, “Effects to Recreation at Shasta Lake.”

CALT-16: The primary goals of enlarging Shasta reservoir are to improve water supply reliability and to enhance anadromous fish survival conditions in the Sacramento River.

Please refer to Master Comment Response RAH-1, “Available Water to Fill an Enlarged Reservoir,” providing an explanation on how an enlarged reservoir would allow more storage of water by reducing flood releases. Chapters 6, “Hydrology, Hydraulics, and Water Management,” and Chapter 11, “Fisheries and Aquatic Ecosystems,” contain results showing the beneficial impacts of reservoir enlargement on water supply reliability and anadromous fish survival conditions in the Sacramento River. A detailed sensitivity analysis was conducted to assess the potential impacts of project alternatives under various future climate change scenarios and the results are summarized in the Climate Change Modeling Appendix. Model results show that the proposed enlarged

Shasta operation would result in both increased May and September reservoir storage in both drier and wetter climates than during the historical baseline period. Please refer to Figures 3-120 through 3-122 in the Climate Change Modeling Appendix for more information on changes in reservoir storages under climate change scenarios. Please refer to Master Comment Response CC-1, “Climate Change Uncertainty and Related Evaluations,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

CALT-17: Please refer to Master Comment Response CR-1, “Potential Effects to Cultural Resources,” and Master Comment Response CR-3, “Current Effects to Cultural Resources.”

CALT-18: Mitigation Measure WASR-3, “Develop and Implement a Comprehensive Multi-scale Wild Trout Fishery Protection, Restoration and Improvement Program Within the Lower McCloud River Watershed,” in Chapter 25, Wild and Scenic River Considerations for McCloud River was revised for the Final EIS. WASR-3 requires Reclamation to work with the watershed stakeholders (e.g., CRMP members) to include funding for the development a basin plan that identifies deficient areas where riparian and watershed improvements can be made and work with landowners to improve those areas.

CALT-19: WASR-3 requires Reclamation to protect, restore, and improve aquatic habitat in the lower McCloud River watershed.

CALT-20: Comments received on the DEIS related to Impact WASR-4 resulted in developing a mitigation measure intended to evaluate opportunities available to Reclamation that could potentially mitigate, to some degree this impact if the SLWRI is authorized.

Currently, there is no authority available to Reclamation to consider the types of mitigation proposed by the commenter.

CALT-21: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System,” and Master Comment Response WASR-3 “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River .”

CALT-22: This comment is based on a flawed assumption that the DEIS focuses on a single run of Chinook salmon. All runs of Chinook salmon are evaluated in the DEIS, as well as all other species within the Sacramento River and Delta (See Chapter 11, “Fisheries and Aquatic Ecosystems,” Section 11.3.3, “Direct and Indirect Effects”). Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” Master Comment Response ALTR-1,

“Range of Alternatives – General,” Master Comment Response DSFISH-3 “Fish Habitat Restoration,” and Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CALT-23: Reducing flood damage along the Sacramento River is a secondary objective of the project. Reclamation did not formulate alternatives to address secondary objectives, but secondary objectives were considered to the extent possible through pursuit of the primary project objectives.

As described in Chapter 2, “Alternatives,” Section 2.3.1, “Management Measures Common to All Action Alternatives,” of the DEIS, eight of the management measures retained during the alternatives development process are included, to some degree, in all of the action alternatives. One of those is:

Modify Flood Operations – Potential modification of flood operations would be considered for all action alternatives. Enlargement of Shasta Reservoir would require alterations to existing flood operation guidelines or rule curves, to reflect physical modifications, such as an increase in dam/spillway elevation. The rule curves would be revised with the goal of reducing flood damage and enhancing other objectives to the extent possible.

The ability to pass the probable maximum flood (PMF) was a consideration in the design of the SLWRI dam raise alternatives. As summarized in Chapter 2 “Alternatives,” Section 2.3, “Action Alternatives,” of the DEIS and described in detail in Chapter 2, “Dam and Reservoir Raise Options,” of the Draft Engineering Summary Appendix to the DEIS, the total discharge capacity of the existing spillway is 186,000 cubic feet per second (cfs) at reservoir water surface (RWS) elevation 1,065 (NGVD29). All action alternatives include an additional 2-foot increase in the height of the full pool above the dam raise height resulting from spillway modifications, including replacing the three drum gates with six sloping, fixed-wheel gates. The total discharge capacity of the raised spillway included in the action alternatives is estimated to be 266,300 cfs.

CALT-24: Please refer to Master Comment Response DSFISH-9, “Flow-Related Effects on Fish Species of Concern.”

CALT-25: Please refer to Master Comment Response GEN-4, “Best Available Information,” and Master Comment Response RAH-1, “Available Water to Fill an Enlarged Reservoir.”

CALT-26: Please refer to Master Comment Response GEN-1,
“Comment Included as Part of the Record.”

33.10.4 Campbell Creek Homeowners Association

CCHOA



PUBLIC COMMENT CARD

Name: Amy Vogt Organization: Campbell Creek Homeowners Assoc.
Address: 8200 Placer Rd - Redding CA 96001
Email: Cervad.vogt@sbcglobal.net

CCHOA-1 How will you verify the information that will be used to determine which cabins are affected? ie elevation, location etc

CCHOA-2 How will the determination be made on cabins? will it be on a cabin by cabin basis or on the tract as a whole?

CCHOA-3 if cabins are to be removed - what compensation will be allowed? who will be responsible for removal? what time frame?

CCHOA-4 When will final decision be made regarding cabins? (Forest Service tent)

CCHOA-5 Is the Bureau also looking into alternative options downriver?

CCHOA-6 What role, if any, will the Forest Service have in the decision making process regarding cabins on leased land?

CCHOA-7 Will cabin owners be allowed to rebuild higher up?

CCHOA-8 Will cabins not affected by water level being raised be able to grandfather in with existing septic tanks?

CCHOA-9 if cabins are allowed to stay will BIR rules and decisions be accepted and supported by the Forest Service?

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Responses to Comments from Campbell Creek Homeowners Association

CCHOA-1: If the project is authorized by Congress, formal verification of site-specific impacts to structures affected by enlargement of the reservoir would occur. In addition to guidance provided by Congress, structures subject to Reclamation action will be verified consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and its associated amendments. Information collected through this process for Recreational Residence Tracts cabins will be provided to the USFS for its use in applying special use permit terms to cabins under its jurisdiction. These terms are described in the Real Estate Appendix of the DEIS and are as follows: “If during the term of this permit the authorized officer determines that specific and compelling reasons in the public interest require revocation of this permit, this permit shall be revoked after 180 days written notice to the holder, provided that the authorized officer may prescribe a shorter notice period if justified by the public interest. The USFS shall then have the right to relocate the holder’s improvements to another lot, to remove them, or to require the holder to relocate or remove them, and the USFS shall be obligated to pay an equitable amount for the

improvements or for their relocation and damages resulting from their relocation that are caused by the USFS.”

CCHOA-2: Please refer to Master Comment Response FSCABINS-2, “USFS’s Authority over Privately Owned Cabins on USFS Lands.”

CCHOA-3: Please refer to Master Comment Response FSCABINS-2, “USFS’s Authority over Privately Owned Cabins on USFS Lands.”

CCHOA-4: Please refer to Master Comment Response FSCABINS-2, “USFS’s Authority over Privately Owned Cabins on USFS Lands.”

CCHOA-5: Please refer to Master Comment Response ALTD-1, “Alternative Development – Water Supply Reliability.”

CCHOA-6: Please refer to Master Comment Response FSCABINS-2, “USFS’s Authority over Privately Owned Cabins on USFS Lands.”

CCHOA-7: Please refer to Master Comment Response FSCABINS-3, “Relocation of Privately Owned Cabins on USFS Lands.”

CCHOA-8: As stated in Chapter 21, “Utilities Service,” Section 21.3.4, “Direct and Indirect Effects,” of the DEIS, septic systems within the project area are governed by Shasta County Development Standards. Consistent with these standards, all septic system within 200 feet of the new full pool waterline or 100 feet downslope of the new full pool waterline would be demolished. Wastewater pipes, septic tanks, vaults/pits, and leach fields would be abandoned in place. Relocation of septic systems on private property would be done in one of two ways: (1) construct new septic systems on the property of the affected home or facility, where feasible; or (2) define a possible localized WWTP alternative for homes that do not meet Shasta County requirements for septic system separation from the lake. The general WWTP would include a pressurized sewer collection system to transport wastewater flows to several centralized package WWTPs. The EIS identifies the likely construction of localized WWTPs for the areas of Salt Creek, Sugarloaf/Tsadi Resort, Lakeshore (possibly several plants), Antlers Campground, Campbell Creek Cove, Bridge Bay Marina, Silverthorn Resort, and Jones Valley. Additional localized WWTPs for cabins on land held in USFS Special Use Permit will be evaluated following any Congressional authorization of an action alternative and subject to USFS permit terms and conditions.

CCHOA-9: Please refer to Master Comment Response FSCABINS-2, “USFS’s Authority over Privately Owned Cabins on USFS Lands.”

33.10.5 California Farm Bureau Federation

CFBF



CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

2300 RIVER PLAZA DRIVE SACRAMENTO CA 95833-3293 - PHONE (916) 561-5665 - FAX (916) 561-5691

September 27, 2013

Via U.S. Mail and Electronic Mail
(BOR-MPR-SLWRI@usbr.gov)

OCT 22 2013

Ms. Katrina Chow
Project Manager
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

710 AKDuncan
22 Oct 13
to: KChow

Re: Comments on Draft EIS for the Shasta Lake Water Resources Investigation

Dear Ms. Chow:

The California Farm Bureau Federation ("Farm Bureau") appreciates the opportunity to review and comment upon the Draft Environmental Impact Statement ("DEIS") for the Shasta Lake Water Resources Investigation ("SLWRI").

CFBF-1

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 74,000 agricultural, associate and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. A key component of Farm Bureau's advocacy is the protection of affordable and reliable water supplies for California's farmers and ranchers.

CFBF-2

Farm Bureau strongly supports all cost-efficient means of increasing California's water supply, including the construction of additional storage facilities. As California's population surpasses 38 million people, demand-side pressures on established agricultural water supplies continue to grow. Compounding these pressures is the overlay of environmental requirements for water, much of which has been implemented on the back of a water supply system that was not originally designed for the same. It seems to us that the only sensible solution set for addressing the growing supply/demand imbalance for water in California simply must include additional storage options for surface water supplies.

NANCY N. McDONOUGH, General Counsel
ASSOCIATE COUNSEL

CAROL BERLIN, KAREN NORRIS-MILLER, CHRISTIAN CONCHUENI

SCANNED

Project	214
Control No.	1-044120
Folder ID	1230427
Date Input & initials	10-23-13 RW
Agency	FISHB

Ms. Katrina Chow

Re: **Comments on Draft EIS for the Shasta Lake Water Resources Investigation**

September 27, 2013

Page 2

CFBF-3

Farm Bureau believes that the expansion of Shasta Dam and Reservoir is an intelligent option for such additional storage. We understand that the DEIS is the ultimate product of the 2000 CALFED Bay-Delta Programmatic Record of Decision, and that primary planning objectives include the improvement of anadromous fish survival in the upper Sacramento River, as well as increasing water supplies and water supply reliability for the Central Valley Project and related water users. Secondary planning objectives include, among others, increased flood protection downstream on the Sacramento River, additional hydropower generation capabilities, and the maintenance or improvement of water quality conditions downstream through the Delta.

CFBF-4

Several of the alternative comprehensive plans considered in the DEIS – in particular, those based upon an 18.5-foot dam raise – appear to provide substantial and potentially cost-effective benefits in improved management of cold-water resources for the protection of fish, as well as a restored reliability for CVP and other water supplies to agriculture. We appreciated the DEIS's careful examination of the project purpose and need, the project alternatives, and the no-action alternative. The DEIS also presented a thorough examination of project-related environmental impacts and feasible mitigation measures. We especially appreciated the recognition of the indirect adverse impacts of the no-action alternative on agricultural lands and production. Farm Bureau also noted the incorporation of analysis based upon projected climate change, which we believe is a clarion call for additional surface storage in California.

CFBF-5

Farm Bureau urges the Bureau of Reclamation to move forward with additional steps in this process, including circulation of a Final EIS and issuance of a record of decision. In addition, as the preferred alternative is identified for the Shasta Dam and Reservoir enlargement, Farm Bureau looks forward to a detailed cost-accounting for the public benefits of the enlargement, including those accruing to lost reliability of CVP water supplies that has resulted from the application of species-related public laws in the Bay-Delta watershed and their consequences for the movement of water supplies.

Thank you for the opportunity to provide our views and comments on the DEIS. If you have any questions in relation to this letter, please do not hesitate to contact me directly.

Very truly yours,



Christian C. Schetling
Managing Counsel

CCS/dk

Responses to Comments from California Farm Bureau Federation
CFBF-1: Comment noted.

CFBF-2: Please refer to Master Comment Response GEN-5, “Some People Support Dam Raise and Others Oppose Dam Raise.”

CFBF-3: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CFBF-4: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CFBF-5: Thank you for your comment. This comment will be included as part of the record and made available to decision makers before a final decision on the proposed project.

33.10.6 Citizens for Clean Air

September 22nd, 2013

Page 1

CFCA1

Katrina Chow, Project Manager
Bureau of Reclamation, Planning Division
2800 Cottage Way
Sacramento, CA 95825-1893
email: kchow@usbr.gov

Citizens For Clean Air's Public Comments: Shasta Lake Water Resource Investigation,
Draft EIS (Shasta Dam Raising Project)

Our community is overwhelmingly opposed to this project.

- CFCA1-1 Citizens For Clean Air formally requests that the public comment period be extended until January 15, 2014.
- CFCA1-2 Shasta County, a federally recognized Environmental Justice (EJ) community is being asked to review an approximately 6000 page document. It is unreasonable to expect average citizens, to meaningful participate as stakeholders in the review process under the Bureau's current time line.
- CFCA1-3 The available evidence demonstrates this project is an attempted water grab by the Westlands and Metropolitan Water Districts. These two water districts are rich and powerful south state water companies, posing as public agencies.
- CFCA1-4 The raising of Shasta Dam is being advocated as a benefit for North State farmers and endangered fish species. Yet nowhere in the massive 6000 page Draft EIS has the Bureau demonstrated any valid scientific evidence to prove such claims.
- CFCA1-5 The raising of Shasta Dam will flood sacred native sites, destroy existing resorts and marinas, dislocate the town of Lakehead and impact our local economy in a negative manner.
- CFCA1-6 If the Westlands and Metropolitan Water Districts want to raise the dam for their personal profits, they (and not the public) should pay for it. By allowing the use of eminent domain for private gain, the Bureau of Reclamation is complicit in activities that are legally indefensible.
- CFCA1-7 Many Winnemem Wintu were left homeless when the government forcibly removed them from their ancestral lands, flooding their villages and sacred sites.
- CFCA1-8 All these years later, the Winnemem Wintu have yet to receive the "like lands" that were promised in the 1941 Indian Lands Acquisition Act, which authorized the stealing and subsequent destruction of their homeland.
- CFCA1-9 "Like lands" for a tribe who lived along the McCloud River for over six thousand years, would be along the McCloud River. This land along the McCloud would still be considered their ancestral land.

CFCA1-7	<p>The 3,000 acre Bollibokka Fishing Club on the McCloud River was sold to Westlands Water District for nearly \$35 million. Why does the nation's largest water district, located in Southern California (Fresno) want this land?</p> <p>"We did not want to see the use of this land to be changed to impede the potential of raising the dam." Tom Birmingham, general manager, Westlands. ~Record Searchlight 2/19/2007</p>
	<p>It is the very property that would protect the Winnemem Wintu's remaining sacred sites. This is the land that Westlands has recently purchased in their efforts to "de-list" the McCloud River and thereby remove a major impediment to the Shasta Dam raising project.</p> <p>The Bureau of Reclamation knew the Winnemem were entitled to "like land" for their land the federal government removed them from in the late 1930's. Why didn't the Bureau stop the sale of the Bollibokka fishing club to Westlands?</p> <p>Your agency's duty to honor your legal commitment to the Winnemem is much older and more important than appeasing special interests in Southern California.</p> <p>In 1851, the Winnemem (represented by the signature of Numterareman), along with other Wintu bands signed the [congressional] Treaty at Cottonwood Creek which ceded to the United States a vast territory.</p> <p>In 1914, the U.S. government took steps to purchase land from the Winnemem Wintu.</p>
CFCA1-8	<p>Congress recognized the Winnemem Wintu in the 1941 Indian Lands Acquisition Act.</p> <p>For decades the Winnemem received scholarships, health care and permits to gather eagle feathers from the federal government. They had federal tribal recognition.</p> <p>In the 1980's, the Bureau of Indian Affairs reorganized their Agency and established a Federal Recognition List. The Winnemem Wintu were wrongfully (and secretly) left off of that list. The Bureau of Indian Affairs has not corrected it's own error to this day. The tribe's medical care, scholarships and permits were canceled without notification.</p> <p>However, the most grievous harm by the Bureau of Indian Affairs is the tribe's loss of sovereign status. Without the Winnemem's rightful status, their fight to save ancestral and sacred sites from permanent destruction is severely compromised.</p> <p>Until the Winnemem receive 'like lands' for the land Congress acknowledges they took and Congress declared they would compensate the Winnemem for, this project is without moral or legal grounds to proceed. The original deal has never been completed.</p>
CFCA1-9	<p>Is this the reason for the Bureau of Reclamation's formal "no response" to the theft of the Winnemem Wintu's lands?</p>
CFCA1-10	<p>The Westlands Water District and the Metropolitan Water District are behind legislation to de-list the McCloud River from current protection under the California Wild & Scenic Rivers Act.</p>

↑ It is the policy of the State of California that certain rivers which possess extraordinary scenic, recreational, fishery, or wildlife values shall be preserved in their free-flowing state, together with their immediate environments, for the benefit and enjoyment of the people of this state. The Legislature declares that such use of these rivers is the highest and most beneficial use and is a reasonable and beneficial use of water within the meaning of Section 2 of Article X of the California Constitution. - The California Wild & Scenic Rivers Act (Public Resources Code Sec. 5093.50 et seq.)

The upper McCloud River offers spectacular waterfalls, great fishing, and shady camping and picnicking spots under towering pine trees. With easy access from Highway 89, the upper McCloud offers a wide variety of outdoor recreation opportunities. The Forest Service acquired 13 miles of this river in 1989 through a land exchange with the Champion timber company. The 2,600 acre river corridor had long been a Forest Service priority for acquisition because of its exceptional recreational and scenic qualities. This segment of the river is considered eligible by the Forest Service for National Wild & Scenic River status due to its free flowing character and outstanding scenic, geological, and fishery values.

CFCA1-10
CONTD.

According to Friends of the River, the upper McCloud is perhaps best known for its three spectacular waterfalls. They provide an exhilarating sight for hikers and anglers. A short trail extends upstream and downstream from Fowler Campground and provides easy access to the waterfalls. This segment of the river is also popular with anglers, although upstream of the falls, the river provides habitat for the rare McCloud redband trout in two small tributaries closed to fishing.

Included is the following excerpt from a February 2, 2013 Record Searchlight article:

"McCloud River takes central role in the dam-raising proposal" ~By Damon Arthur Saturday,

The Westlands Water District and Metropolitan Water District, two rich and powerful south state water agencies interested in raising the height of Shasta Dam have the McCloud River in its sights.

The law governing the river' s status forbids any state agency from planning for or building anything that would affect the river. The law also specifically says the state can' t spend money on proposals to raise Shasta Dam.

A U.S. Bureau of Reclamation draft report released last year said it would be economically feasible to raise the dam, but two issues were unresolved: the McCloud' s wild and scenic status and the numerous Winnemem Wintu sacred sites along the river."

CFCA1-11

The land acquired by Westlands would be sold to the federal government and inundated if officials and lawmakers decided to raise the dam. Will Westlands set the price the federal government, i.e. the people pay for this land?

CFCA1-12

√ Where are the Environmental Assessments for flooding 3,000 acres of pristine land?

Shasta Lake Water Resources Investigation
Environmental Impact Statement

CFCA1-12 CONTD.	<p>We urge you to visit this amazing wilderness yourself and after it wins your heart, apply for National Wild and Scenic Status protection.</p>
CFCA1-13	<p>Shasta County was recognized by the federal Environmental Appeals Board, <i>In Re Knauf Fiber Glass</i>, as an Environmental Justice community, requiring EJ guidelines to be addressed.</p>
CFCA1-14	<p>We want to point out that in a Bureau of Reclamation press release dated December 7th, 2012, the Bureau claimed "Reclamation initially released the Draft Feasibility Report in February 2012..." Yet, the first time the Winnemem and Citizens for Clean Air realized the report had been 'released for public comment' was when citizens happened upon your press release on December 9th.</p> <p>This does not qualify as "Early and sustained involvement with the effected community"</p> <p>After public outcry, the comment period was extended until January 28. We were never notified of this time extension. Citizens discovered the extension while scrolling through press releases on the Bureau's website.</p> <p>We attended the September 10, 2013 Bureau meeting held in Redding, CA regarding the SLWRI project. Several times the Bureau's staff mentioned (with humorous groans) that the new Environmental Impact Report was over 1,000 pages. Some people have estimates it to be around 6,000 pages. It is not conveniently numbered. On-line, it is divided into many sections which makes it very time consuming and confusing.</p> <p>In legal circles, if you want to overwhelm and bog down your opponents, you "blizzard" them with thousands of pages of mostly unnecessary information they have to pick through to find what they need.</p>
CFCA1-15	<p>"However, for perspective, it relies on the reader being familiar with the massive, 10 year-old EISs for the implementation of the Central Valley Project Improvement Act and the CalFed program. Both documents were about two feet thick; organized for those looking for specific subjects, not overall perspective; and probably hard to find by now. It would be most useful for the revised DEIS, to include an account of the major water problems facing California, each of which is potentially budget-busting in a slow economy. Otherwise EISs for enormous, but still small, billion-dollar parts of the overall picture come across as examples of piece mealing..."</p> <p>~Sept. 13, 2013 Letter to the Editor, Buford Holt, U.S. Bureau of Rec. (retired.)</p> <p>1,000's of pages of documents (in an unfriendly format) is a highly unreasonable burden to place on an Environmental Justice community. This is a low income community, with lower than average education rates.</p> <p>Are citizens supposed to read thousands of pages, analyze the information and compose a comprehensive response in three months? In their spare time?!</p>

CFCA1-16

Citizens For Clean Air has had volunteers skim through the plethora of sections. We did not find answers regarding the direct and cumulative impacts to this community. These impacts are not being seriously considered.

For example, the Bureau did not appear to think it was appropriate to include new inundation levels for the proposed raising of Shasta Dam. If the dam breaks, I guess we are just out of luck?

The Bureau still claims they do not need to consider the 3M quarry's impact as part of the dam raising project. Isn't a potential "take" site identified in the preliminary EIS the proposed 3M Quarry?

Wouldn't the quarrying of Turtle Bay be considered a related impact on the environment if an EIS was done on the original Shasta Dam project?

Eric Cassano finally received the map he has been requesting for our group, Citizens For Clean Air, on September 15, 2013.

This newly released map is critical for our community's public comments.

Our greatest concern, besides the Winnemem's sacred sites, is the devastation that will come to the residents of Shasta Lake and Shasta County from the proposed 3M Moody Flats Quarry.

CFCA1-17

The importance of the "Shasta Dam Enlargement Sand and Aggregate Sources" report can not be underestimated. It is only weeks before all public comments are due.

In response to repeated Freedom of Information Act (FOIA) requests, the Bureau claims they have had no communication with the proposed 3M Quarry.

However, it is our understanding that in February of 2012, during a conference call, including Katrina Chow, and community activist Eric Cassano, Ms. Chow informed Mr. Cassano that the Bureau had a geologist who was the contact liaison for the proposed 3M quarry.

At the Bureau's previous July SLWRI workshop in Redding, Bureau representatives told Eric Cassano that the Bureau plans to acquire all the aggregate for the project on site. If that is accurate, then the specific site needs to be identified and the impacts considered in the Draft EIS.

If the Bureau intends to purchase the aggregate from the 3M Quarry, then the Bureau needs to state that now to produce a legally defensible document.

If the 3M Quarry is going to supply aggregate for the project, the City of Shasta Lake is the rightful lead agency. All the impacts of the 3M Quarry must be considered in the Bureau's Draft EIS.

If the Bureau is planning to build a Construction Depot within the City of Shasta Lake borders, then the City of Shasta Lake is the correct lead agency, not Shasta County.

Also, the full impact of the Construction Depot must be included in this Draft EIS.

Shasta Lake Water Resources Investigation
 Environmental Impact Statement

CFCA1-17 CONTD.	<p>↑</p> <p>"Pacific Constructors, the main company building Shasta Dam, set up its own camp near the base of the Shasta Dam site, called "Contractor's Camp" or "Shasta Dam Village". The company built an enormous 2,000-man mess hall, hospital, recreational center and other venues at the dam site. Three other makeshift camps nearby, called "Central Valley", "Project City", and "Summit City", soon filled with men from all over the state hoping to get jobs at the Shasta Dam as drillers, crane operators, mechanics, truck drivers, carpenters, welders, among others." ~ wikipedia.org/wiki/Shasta Dam</p> <p>The 3M Quarry project includes several acres inside the limits of the City of Shasta Lake.</p> <p>A road within city limits was identified by the facilitator of the 3M Scoping Meeting as being used by the proposed 3M project to bring in fuel and explosives as part of their planned operation. This is not addressed in the Bureau's Draft EIS.</p> <p>If the Bureau intends to ever use aggregate or cement from the 3M Quarry, they must include the quarry and all its impacts as part of the Bureau's Draft EIS. The Bureau must also go through the Draft EIS certification process with the correct local lead agency - the City of Shasta Lake.</p>	
CFCA1-18 CFCA1-19 CFCA1-21 CFCA1-22	<p>In the Bureau's latest Draft EIS, the document skims over compensation for the residents/businesses if their property is flooded. Bureau representatives left critical questions unanswered. How much would these residents be given for their properties? Which homes will be flooded? Which business will be flooded? How much will they be paid for their businesses? How are the business owners and employees being compensated for years of lost income?</p>	CFCA-20
CFCA1-23	<p>The Westlands Water District, already the largest agricultural user of Northern California water, has purchased 3,000 acres along the McCloud River to "make it easier to one day raise Shasta Dam."</p> <p>Westlands is also aggressively pushing legislation to remove the existing state law that protects the McCloud River from development or flooding. WWD is privately owned by 'farmers' that don't grow anything. They buy the water at a cheap 'agricultural' rate and resell the water further south at a profit.</p>	
CFCA1-24	<p>Records obtained under the Public Records Act, revealed a "Secret Society" organized in 2009 to influence water rates (and other decisions) at California's largest public water district - The Metropolitan Water District. MWD has an annual budget of \$1.8 billion and serves a six-county region with an annual economy valued at greater than \$1 trillion.</p>	
CFCA1-25	<p>The Delta Watershed acts as a natural limit to how much water can be diverted south. Each year, California pumps about 4.9 million acre feet of freshwater out of the Delta. The proposed Peripheral Tunnels, two giant water tunnels, would have the capacity to carry up to 11 million acre-feet annually. The proponents of the project say they would "never use the tunnels at full capacity."</p> <p>Why then build them so large? Why not build <i>one</i> tunnel?</p> <p>↓</p>	

CFCA1-25
CONTD.

It is indisputable that the additional 6 million acre-feet of water yearly would come from the Sacramento River and other North State Rivers. Therefore, the full impact of the Peripheral Tunnels must be part of a valid and legally defensible EIS.

According to the Sacramento Bee, Sacramento Mayor Kevin Johnson and City Manager John Shirey have expressed opposition to Governor Jerry Brown's proposal to build these giant tunnels. Johnson expressed concerns over the impact to the region's water supply and habitat. "For us, we want to be good stewards," the mayor said. "I'm going to speak out any chance I get." Shirey said the plan is moving "without any collaboration with the city of Sacramento."

This master plan to ship the North State's water south hinges on the Peripheral Tunnels. If the tunnels are not built, not enough water can get through to make the project viable.

No tunnels means no raising of Shasta Dam. The remaining Winnemem Wintu's sacred sites would not be flooded, businesses and homes in Lakehead would not be destroyed. The resorts on the Lake would not be ruined. The beautiful McCloud River would still be enjoyed by everyone. The City of Shasta Lake would not be devastated by an enormous quarry.

The full impacts of constructing the water tunnels under the Delta as a direct impact of the Shasta Dam raising project must be included.

Sincerely,

Celeste Draisner
Heidi Strand
Citizens for Clean Air
P.O. Box 1544,
Shasta lake City, Ca 96019
(530) 223-0197

Responses to Comments from Citizens for Clean Air

CFCA1-1: Please refer to Master Comment Response COMMENTPERIOD-1, "Comment Period."

CFCA1-2: Please refer to Master Comment Response GEN-1, "Comment Included as Part of the Record."

CFCA1-3: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CFCA1-4: Please refer to Master Comment Response CR-1, “Potential Effects to Cultural Resources,” Master Comment Response REC-1 “Effects to Recreation at Shasta Lake,” and Master Comment Response SOCIOECON-1, “Socioeconomic Effects to Shasta Lake Vicinity.”

CFCA1-5: Please refer to Master Comment Response GEN-5, “Some People Support Dam Raise and Others Oppose Dam Raise.”

CFCA1-6: Please refer to Master Comment Response CR-2, “Federal Recognition,” and Master Comment Response CR-3 “Current Effects to Cultural Resources.”

CFCA1-7: Reclamation does not control the activities of individual CVP Contractors. Reclamation did not participate in the purchase of the club on the McCloud River.

CFCA1-8: Please refer to Master Comment Response CR-2, “Federal Recognition.”

CFCA1-9: A response to this comment is not required under NEPA because the comment does not raise a significant environmental issue (NEPA Regulations 40 CFR 1503.4). Many comment authors expressed personal opinions, histories or experiences which are not appropriately addressed as part of the NEPA process. This comment will be included as part of the record and made available to decision makers before a final decision on the proposed project.

CFCA1-10: Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CFCA1-11: Please refer to Master Comment Response PLAR-11, “Inundation Zone/Reservoir Buffer.”

CFCA1-12: Please refer to Master Comment Response GEN-1 “Comment Included as Part of the Record.”

CFCA1-13: We have reviewed the federal Environmental Appeals Board rulings in the Knauf air quality rulings and have not found a definite response related to whether Shasta County has been recognized as an environmental justice community.

Please refer to Master Comment Response EJ-1, “Potential Effects to Disadvantaged Communities.”

CFCA1-14: This comment appears to be related to the Draft Feasibility Report and not the DEIS, which is the subject of these responses. No further response is required related to this NEPA document.

CFCA1-15: The Executive Summary for the DEIS summarizes the pertinent information from the document in one location to make the key findings more accessible to readers. The DEIS is also written in plain language and uses appropriate graphics so that decision makers and the public can readily understand them consistent with NEPA Regulations 40 CFR 1502.8. The purpose and need for the project is discussed in Chapter 1, “Introduction,” which is two pages long. This section provides a discussion of the water resources problems that the proposed action addresses. The environmental justice chapter of the DEIS is 31 pages long and addresses the environmental justice community and issues. Information on other related major water resources projects in California is included in Section 3.2.9, “Cumulative Effects,” and is 34 pages long. While an effort was made to present information clearly and concisely throughout the DEIS, NEPA and other regulatory requirements dictate that a major project such as proposed in the DEIS is thoroughly evaluated.

CFCA1-16: Potential impacts related to hydrology and flooding are discussed in the EIS Chapter 6, “Hydrology, Hydraulics, and Water Management.”

Please refer to Master Comment Response SOCIOECON-1, “Socioeconomic Effects to Shasta Lake Vicinity,” and Master Comment Response RAH-1, “Available Water to Fill an Enlarged Reservoir.”

CFCA1-17: As displayed in the Engineering Summary Appendix Plate 25, “Potential Borrow Sites,” currently operational commercial borrow sources are listed as well as potential borrow sites around the reservoir that are on federal land. The figure has been updated in the Final EIS to include the names of the commercial borrow sites.

The proposed Moody Flats Quarry is not on Federal lands and is still in the preliminary phases of environmental documentation (EIR is under development), and accordingly, it was not identified as a borrow source for the project. However, in response to public comment and information recently made available by the quarry project proponents, the Moody Flats Quarry is included in the cumulative effects analysis and is described in Final EIS Chapter 3, “Considerations for Describing Affected Environment and Environmental Consequences, Section 3.2.9, “Cumulative Effects.” Further, Moody Flats Quarry is included in the cumulative effects analysis within related resources chapters of the Final EIS (Chapters 4 through 25), as appropriate.

There are currently no plans for the creation of a “construction depot” or temporary construction housing within the City of Shasta Lake. As stated in the EIS Chapter 16, “Socioeconomics, Population, and Housing,” a total labor force of 300 to 360 construction workers would be needed depending on the chosen action alternative. It is also expected that the labor force can come from within the primary study area.

CFCA1-18: Please refer to Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CFCA1-19: Please refer to Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CFCA1-20: Please refer to Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CFCA1-21: Please refer to Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CFCA1-22: Please refer to Master Comment Response PLAR-1 “Effects to Private Residences and Businesses.”

CFCA1-23: Reclamation does not control the activities of individual CVP Contractors. Reclamation did not participate in the purchase of the club on the McCloud River. Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CFCA1-24: Please refer to Master Comment Response GEN-2, “Unsubstantiated Information.”

CFCA1-25: Water released from Shasta Reservoir does flow into the Sacramento River where it is delivered to CVP contractors in the Sacramento Valley and also pumped from the South Delta for CVP contractors south of the Delta. It is reasonable to assume that if the BDCP were to be implemented, some water released from Shasta Dam would be conveyed through the Delta conveyance facilities to contractors south of the Delta. As described in Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan,” the BDCP is considered for the purposes of evaluating potential cumulative impacts of the SLWRI. Further speculation on implementation of the BDCP or similar programs is not required by NEPA.

Please refer to Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan,” Master Comment Response WSR-1, “Water Supply Demands, Supplies, and Project Benefits,” Master Comment Response EI-1, “Intent of NEPA Process to

Provide Fair and Full Discussion of Significant Environmental Impacts,” Master Comment Response CR-1, “Potential Effects to Cultural Resources,” Master Comment Response SOCIOECON-1, “Socioeconomic Effects to Shasta Lake Vicinity,” Master Comment Response REC-1, “Effects to Recreation at Shasta Lake,” Master Comment Response REC-3, “Effects to Tourism at Shasta Lake,” Master Comment Response ENG-2, “Borrow Materials,” and Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River.”

33.10.7 Citizens for Clean Air

3/30/13

DEPARTMENT OF THE INTERIOR Mail - official comment_shasta dam raising EIS

CFCA2



official comment, shasta dam raising EIS

hswriter@frontiernet.net <hswriter@frontiernet.net>
Reply-To: "hswriter@frontiernet.net" <hswriter@frontiernet.net>
To: "kchow@usbr.gov" <kchow@usbr.gov>

Sat, Sep 28, 2013 at 9:02 PM

Sept 28th, 2013

Dear Bureau of Reclamation Project Manager Katrina Chow,

CFCA2-1

Please add this comment to the official record of the current preliminary Environmental Impact Statement being reviewed for the raising of Shasta Dam.

CFCA2-2

The current EIS being circulated is incomplete. The Coleman Fish hatchery was built as mitigation to protect the salmon when Shasta Dam was built. The Battle Creek watershed is critical to the salmon's survival. This watershed has been and continues to be devastated by Sierra Pacific's clear-cutting.

CFCA2-3

CFCA2-4

The Federal Fish and wildlife Agency must take a lead role in this EIS process. The endangered salmon and their critical habitat in the Battle Creek watershed must be adequately considered and protected for this EIS to be sufficient.

CFCA2-5

CFCA2-6

The following is a letter to John Laird, Secretary of California Natural Resources regarding the Battle Creek watershed. Please include this as part of my comments.

Sincerely,
Heidi Strand, Co-chair
Citizens for Clean Air

August 20th, 2013

John Laird, Secretary

California Natural Resources Agency

9/30/13

DEPARTMENT OF THE INTERIOR Mail - official comment, shasta dam raising EIS

1416 Ninth Street, Suite 1311

Sacramento, CA 95814

(916) 653-5656

RE: Immediate halt of *pre-fire approved* Sierra Pacific Industries (SPI) logging in the Battle Creek Watershed

Dear Mr. Laird;

I am requesting your immediate response because of potential irreparable harm to watersheds of the U.S. and recognized endangered species.

In our previous letter to you, we noted how Sierra Pacific's *own experts* expressed concern for the Battle Creek Watershed.

"The soil is now exposed to much more damage from the rain because the forest canopy is not there to shelter it." ~ Dr. Cajun James, Sierra Pacific scientist

Recently, a memo from William E. Snyder, Deputy Director, Resource Management, Department of Forestry and Fire Protection, dated March 11, 2013 has come to our attention:

"At a February 7, 2013 hearing, the Court [San Francisco Superior court] clarified that the Pacific Fisher should be given candidacy status...Code s/s 2080 will apply to [the] fisher as a candidate species...CAL FIRE must ensure that adequate measures to avoid take of Pacific fisher are included in each plan it approves....so long as the Pacific fisher remains a candidate species...RPF's will be expected to adequately scope and consider the possibility of take, significant adverse impacts, and cumulative impacts in their Plan lies within the current range of species. "

The California Natural Resources Agency and Cal Fire have the authority to re-evaluate this protected species habitat in order to *prevent irreparable harm*.

Sierra Pacific is logging in the Battle Creek Watershed, using non-sustainable practices.

<https://mail.google.com/mail/u/0/?ui=2&ik=9dde2c7cc7&view=cl&search=inbox&th=14167e1a2d1ahsh>

2/6

Shasta Lake Water Resources Investigation
Environmental Impact Statement

9/30/13

DEPARTMENT OF THE INTERIOR Mail - official comment, shasta dam raising EIS

Last year in Shasta County, the Battle Creek Watershed was devastated by the Ponderosa Fire. The Ponderosa Fire occurred *after* Sierra Pacific's Timber Harvest Plan (THP) was approved.

Does your agency intend to comply with the endangered species act and protect animals?

The Pacific Fishers' current habitat must be evaluated before clear-cutting is allowed to continue.

Page 1

The Battle Creek Alliance hired renowned Hydrologist Tom Myers, PhD to evaluate THP 2-12-026 in the Battle Creek watershed. With a Ph.D and M.S. In hydrology/hydrogeology (and more than 28 years experience as a consultant, government planner, academic researcher, etc.), Mr. Myers expertise in this situation should have been considered.

It is our understanding that this esteemed Hydrologists detailed analysis was largely ignored. In fact, it was left out of your agency's "Rapid Assessment of Sediment from Clearcut Timber Harvest Activities in the Battle Creek Watershed, Shasta and Tehama County, California" study.

Was this done at Sierra Pacific's request? Please forgive us if our sources have misinformed us.

However, if this information is accurate and Sierra Pacific can change the accuracy of your studies *behind closed doors*, then this grievous error must be corrected by your agency in the new assessment. Here are some of the important issues Hydrologist Tom Myers raised, before the impacts of last year's devastating Ponderosa Fire in Shasta County occurred:

"The THP [timber harvest plan] provides insufficient information to assure that the Water Drafting Plan has been designed to minimize damage to watershed and stream...This is the driest period of the year throughout the watershed...SPI does not provide flow measurements or estimate flow for this period at any of the proposed drafting sites so that the impacts to the stream could be determined; it is unknown from the data in this THP whether 200 gpm will remove a small fraction of the flow or all of it. The following recommendations should be implemented to improve the protection of the Battle Creek and Bailey Creek watershed.

. There should be specific passby flow requirement established, designed to minimize the loss of habitat, even if temporary.

. Drafting from the stream should not cause the flow to drop below the specified passby flow requirement. . The THP should include an estimate of average and 2- and 10-year, 7-day low flows at each of the [8] sites for comparison with the drafting rate.

. There should be a specific time interval required between subsequent water drafts or a total number of drafts allowed per day. Requirements that simultaneous drafting not occur are insufficient because drafts that are closely spaced in time can drain the stream for a long period. . The THP should not allow any substantial channel damming to create a head for pumping. If the stream level is too low to get the pump into, it is too low for a diversion.

<https://www.fws.gov/battle-creek-watershed/>

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[SPI states] the "majority of the precipitation...will occur in the form of snow." the THP provides no data or references to support this assertion.

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. The ITF report should be relied on only sparingly until the work can be repeated during a wetter period so that sediment movement and erosion processes can actually be observed.

. SPI should complete watershed modeling that would consider the complete realm of flow and sediment delivery changes in the watershed.

The cumulative analysis of sediment is...with a primary reliance on studies of other watersheds...without a map [of] the new clearcuts with the old, there is no way to assess even qualitatively the potential for sediment movement among cuts. A similar review applies to the discussion provided regarding peak flows.

. The cumulative impacts analysis should be redone with a complete flow and sediment model created for the watershed. It could be used to assess the changes caused by past and potentially to be caused by future cuts. It will help to assess whether the watershed is approaching a threshold where rapid changes could begin to occur (Myers 2012)."

why was this information ignored? Could you, Mr. Laird, and your agency have at least considered some of the questions brought up in the above expert's detailed report?

are calling for an immediate halt to Sierra Pacific's unsustainable logging practices in the Battle Creek Watershed, until the impacts of the Ponderosa Fire can be evaluated.

Every day we do not hear from you and your agency, we feel disenfranchised from the decision-making process.

Irreparable harm may occur if action is not taken.

who will the public hold accountable if the Pacific Fisher disappears forever? what will you tell your grandchildren?

sincerely,

Marily Woodhouse, www.thebattlecreekalliance.org (530) 474-5803

<https://mail.google.com/mail/u/0/?ui=2&ik=9dde2c7cc7&view=pt&search=inbox&th=14167e1a2f10ahah?>

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Shasta Lake Water Resources Investigation
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Celeste Draiser, Secretary, Protectors of Anderson Health

Sharon Young, President, Protectors of North State Wetlands

Arnold Erickson, Co-chair, Citizens for Clean Air

CC: Kamala Harris, California Attorney General CC: Mr. Jared Blumenfeld, Region 9 Administrator CC: Matt Weiser, the Sacramento Bee CC: Gina McCarthy, EPA Administrator CC: Forests forever CC: Earthjustice CC: Bruce Ross, Record Searchlight CC: Townsend Raimundo Besler & Usher CC: John Mancasola, McConnell Foundation CC: Centerville Water District CC: Pedro Lucero, David Murillo, Bureau of Reclamation CC: Earth Island Institute CC: Kevin Bundy, Center for Biological Diversity CC: Ebbetts Pass Forest Watch CC: Epic CC: Joseph Snook, US - Observer CC: Dr. Kathryn Sullivan, National Oceanic and Atmospheric Admin. CC: Chief Counsel, Liane Randolph, California Resource Agency CC: Bill Jennings, executive director California Sportfishing Protection Alliance CC: Brenda Haynes, Anderson-Cottonwood Irrigation District

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<https://mail.google.com/mail/u/0/?ui=2&ik=9&itd=2c7c7&ui=account&search=inbox&th=14187e1a2d10shah?>

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**Responses to Comments from Citizens for Clean Air
CFCA2-1:** Comment noted.

CFCA2-2: Please refer to Master Comment Response NEPA-1, "Sufficiency of the EIS."

CFCA2-3: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CFCA2-4: Please refer to Master Comment Response ESA-1, “Compliance with the Endangered Species Act,” and Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

CFCA2-5: The SLWRI does not alter critical habitat in the Battle Creek watershed, and therefore does not include an assessment of the salmon or habitat in Battle Creek.

CFCA2-6: Comment noted.

33.10.8 Citizens for Clean Air

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CFCA3

A friendly feline reminder that Public Comments are due on the raising of Shasta Dam Sep 30, 2013

Rose Flame <mysecretfires@gmail.com>

Mon, Sep 23, 2013 at 1:18 PM

To: info@packersbay.com, admin@silverthornresort.com, info@philprop.com, Donna Smith <managersaltcreekresort@gmail.com>, antlersnpark@campingshastalake.com, info@bassholebarandgrill.com, Lesa@lakeshasta.com, office@fawndaleoaks.com, info@shastatackle.com, joyce@shastarv.com, houseboats dotcom <admin@houseboats.com>, info@shastacamping.com, info@mt-gaterypark.com, tsasdl2@snowcrest.net, robert@shastalakehb.com, "hswriter@frontiemet.net" <hswriter@frontiemet.net>, "fantompenguin@fantompenguin.com" <FantomPenguin@fantompenguin.com>, "Frank J. Strazzarino, Jr." <info@reddingchamber.com>, news@khsaltv.com, news <news@krctv.com>, S Young <mahalo3366@yahoo.com>, Charles Alexander <sushibar007@hotmail.com>, Seabrook Leaf <seabrook@frogwood.org>, John Laird <secretary@resources.ca.gov>, Damon Arthur <darthur@redding.com>, organizations@moveon.org, "gomauro ." <mauro@signaloflove.org>, Marily Woodhouse <trees@thebattlecreekalliance.org>, Tom Stokely <tstokely@att.net>, Mark Lathrop <MLathrop@spi-ind.com>, Gracious A Palmer <graciouspalmer2009@yahoo.com>, Peter Griggs <pgriggs@shastacollege.edu>, Gypsy Perry <gypsyperry03@gmail.com>, Carla Thompson <clthompson@cityofshastalake.org>, Carole Ferguson <cferguson@redding.com>, Jeff <jkiser@ci.anderson.ca.us>, Gary Cadd <white.bear@sbglobal.net>
Cc: BOR-MPR-SLWRI@usbr.gov, Katrina Chow <kchow@usbr.gov>, "Wsloan@mofa.com" <wsloan@mofa.com>, Pete Lucero <plucero@usbr.gov>

Helllo Everyone,
CFCA3-1

Citizens For Clean Air has formally submitted public comments on the proposal to raising Shasta Dam. As you may have guessed, we came out on the side of our friends and neighbors. Thanks to everyone who made the July 16,th and September 10th Bureau of Reclamation meetings a success.

What an an amazing turnout!

We are asking for even more help from our community. Especially ... we need experts to ask detailed environmental questions on the cumulative impacts of the project.

Written comments on the Draft EIS may be provided before midnight

Monday, September 30, and should be mailed to

Katrina Chow, Project Manager, Reclamation, Planning Division, 2800 Cottage Way, Sacramento, CA 95825-1893, 916-978-506 or
email BOR-MPR-SLWRI@usbr.gov

Personally... I recommend email. It leaves a permanent record. Go ask Enron.

Best Regards,

Celeste Draisner

Citizens For Clean Air

330-223-0197

P.O. Box 1544

Shasta Lake, CA 96019

https://mail.google.com/mail/u/0/?ui=2&ik=99de2c7cc7&www=pt&cat=Draft_EIS_Public_Comments&saarct=cat&th=1414c7a0367860d


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P.S.

Here is a link showing why emails are really the way to go:

[http://yosemite.epa.gov/oa/eab_web_docket.nsf/Filings%20By%20Appeal%20Number/2303451E3FD9594B85257B5500684B63/\\$File/EAB%20Celeste%20Qmer%20email...30.pdf](http://yosemite.epa.gov/oa/eab_web_docket.nsf/Filings%20By%20Appeal%20Number/2303451E3FD9594B85257B5500684B63/$File/EAB%20Celeste%20Qmer%20email...30.pdf)

 Bureau of Rec. Sept. 2013 comments .odt
30K

https://mail.google.com/mail/u/0/?ui=2&ik=9dde2c7cc7&view=pt&cat=Draft_EIS_Public_Comments&search=cat&th=1414c7af3676fe0d

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Responses to Comments from Citizens for Clean Air

CFCA3-1: Please refer to Master Comment Response GEN-5, “Some People Support Dam Raise and Others Oppose Dam Raise.”

33.10.9 California Wilderness Coalition and Friends of the River

CWC



Comments of
Friends of the River
California Wilderness Coalition
Shasta Lake Water Resources
Investigation Draft Environmental Impact
Statement



September 30, 2013

Ms. Katrina Chow
SLWRI Project Manager
Bureau of Reclamation Planning Division
2800 Cottage Way
Sacramento, CA 95825-1893
Fax: (916) 978-5094
Email: BOR-MPR-SLWRI@usbr.gov

Dear Ms. Chow:

Thank you for soliciting public comments in response to the Shasta Lake Water Resources Investigation (SLWRI) Draft Environmental Impact Report (DEIS). Below are the joint comments of Friends of the River and the California Wilderness Coalition. Friends of the River's Executive Director, Bob Center, will be submitting separate comments before the deadline. In addition, Friends of the River contributed to and hereby incorporate by reference the joint comments to be submitted by the California Environmental Water Caucus. We also hereby incorporate by reference the joint comments of Friends of the River and the California Wilderness Coalition to the SLWRI Draft Feasibility Study and Preliminary DEIS, dated January 28, 2013. We also hereby incorporate by reference verbal comments made for Friends of the River by Steven Evans at the public hearings held in Redding and Sacramento on September 10 and 11, 2013.

CWC-1

1. Unavailability Of Hard Copies Of The DEIS Made Public Review Of This Massive And Complicated Document Difficult.

CWC-2

Friends of the River must protest the failure of the Bureau of Reclamation to provide hard copies of the SLWRI DEIS to the interested public. It is almost impossible to thoroughly review such a massive document online or via disc. Failing to provide printed copies of this document to those interested in conducting a thorough public review is a "penny wise, but pound foolish" approach to NEPA. We believe that a revised DEIS will be necessary and hereby request a hard copy of any future SLWRI documents.

CWC-3

CWC-4

2. The DEIS Fails To Admit The Connection Between The SLWRI And The Bay Delta Conservation Plan.

- CWC-5 The SLWRI draft Feasibility Report clearly documents that every additional drop of water stored by a raised dam and expanded reservoir will be sold to federal water contractors. This not only refutes the Bureau's claim that the primary benefit of the dam raise is improved fisheries, it also underscores a direct connection to the SLWRI with the Bay-Delta Conservation Plan (BDCP). The current version of the BDCP proposes construction of two giant tunnels beneath the Delta to facilitate export of Sacramento River water south. The DEIS's and Feasibility Study's summary of benefits from the dam raise clearly show that 77% of the water stored behind a raised Shasta Dam will be sold to water contractors south of the Delta (the remainder will be sold to north of Delta contractors). The DEIS fails to document this important connection and is violation of the public disclosure mandate of the National Environmental Policy Act.
- CWC-6
- CWC-7 A revised DEIS must clearly document the connection between the SLWRI and BDCP and fully disclose the role this connection plays in the cost-benefits of the SLWRI.

3. Raising Shasta Dam Will Not Significantly Increase Anadromous Fish Survival As Claimed In The DEIS.

- CWC-8 The DEIS predicts that the dam raise alternatives will increase juvenile anadromous fish survival by 61,000 to 813,000 fish annually. (DEIS Table S-2, pg. ES-26) This is a misleading way to present the alleged benefits of the proposed dam raise. Although increasing juvenile salmon survival by up to 813,000 fish sounds significant, the less than 1% return rate of juveniles as adults three years later means that this billion dollar or more project may produce fewer than 813 additional adult salmon in any one year, and in most years, considerably less than that number.
- CWC-9 It is questionable as to whether the Bureau will operate the raised dam and expanded reservoir in a way that guarantees that the cold water pool will be available during the dry and critically dry years when water temperatures are a major factor in juvenile salmon survival. Sadly, there are no hard or firm standards that the Bureau is apparently required to follow. When the Bureau finds it inconvenient to meet temperature standards for juvenile salmon survival, it simply "coordinates" (a polite way of saying it pressures) state and federal regulatory agencies to agree to move the temperature control point on the Sacramento River to a spot more convenient for the Bureau's dam and reservoir operations. The Sacramento Basin Water Quality Control Plan unequivocally sets the salmon temperature control point at Red Bluff. Over the years, the Bureau has found it convenient to move this control point further upstream to Bend, Balls Ferry, and in 2013, even further upstream to a point near Anderson.
- CWC-10 In its draft Fish and Wildlife Coordination Report (June 2013), the U.S. Fish and Wildlife Service (USFWS) found the dam raise/expanded reservoir benefits of the

↓

CWC-10 CONTD	<p>dam raise to be "negligible". According to the USFWS, in 90% of the years, the dam raise/expanded reservoir will provide no benefits for juvenile salmon. In addition, the USFWS found that most of the fish benefits identified in the SLWRI are from spawning gravel augmentation and side channel rearing habitat restoration – mitigation measures that are not dependent on the dam raise/reservoir expansion and that can be implemented regardless whether the dam is raised.</p> <p>It is important to recognize that the existing dam and reservoir can be operated to maintain an abundant population of endangered winter-run Chinook salmon. The completion of Shasta Dam in 1945 should have doomed this fish to quick extinction since access to its primary spawning grounds on the McCloud and upper Sacramento Rivers were permanently blocked by the dam. But once the reservoir was filled, operations of the dam in its first two decades "provided in-river conditions that sustained the winter-run Chinook population. Abundance estimates for winter-run Chinook in the 1960s ranged from a high of 125,000 in 1962 to a low of 49,000 in 1965." [National Marine Fisheries Service 1997 Proposed Winter-Run Recovery Plan, pg. II-12] Essentially, the winter-run became dependent on cold water releases from Shasta Dam for its survival. But since 1970 to the present, dam operations have consistently failed to provide cold water to the river in order to meet federal water contract commitments in the Sacramento-San Joaquin Delta.</p> <p>The question is: If the existing dam and reservoir can be operated in a manner that can provide the needed cold water for improved juvenile salmon survival, why is this not an alternative under serious consideration in the SLWRI? The answer is found on DEIS page 2-49, where the Bureau states:</p> <p style="padding-left: 40px;">The adaptive management plan (for the proposed cold water pool created by the raised dam/enlarged reservoir) may include operational changes to the timing and magnitude of releases from Shasta Dam to benefit anadromous fish, as long as there are no conflicts with operational guidelines or adverse impacts on water supply reliability. (Emphasis ours)</p> <p>This simple statement clearly demonstrates the Bureau's lack of commitment to operate Shasta Dam and Reservoir to benefit endangered salmon regardless of whether the SLWRI is implemented or not. It reveals that the true purpose of the SLWRI is to increase the water supply for water contractors.</p> <p>4. Key Recovery Actions In The 2009 Central Valley Salmon and Steelhead Recovery Plan Are Not Considered In the SLWRI DEIS.</p> <p>The National Marine Fisheries Service's (NMFS) 2009 Central Valley Salmon and Steelhead Recovery Plan proposed a number of actions to protect and restore all runs of salmon and steelhead in the Sacramento River and its tributaries. Just a few of these actions include regulating pollution discharges from agricultural and urban sources, setting back and maintaining riparian vegetation on flood control levees,</p>
CWC-11	
CWC-12	
CWC-13	
CWC-14	
CWC-15	

CWC-15 CONTD	restoring 185 miles of continuous riparian habitat between Red Bluff and Sacramento, screening water diversions that have substantial fishery impacts, curtailing development in flood plains, negotiating additional instream flows or purchasing water rights, remediating acid mine pollution, and restoring the former footprint of Lake Red Bluff to riparian habitat.
CWC-16	<p>The DEIS ignores most of these actions and only obliquely refers to others. For example, it is unclear that adaptive management flows mentioned in the DEIS are the same thing as this specific recovery action proposed by the NMFS:</p> <p>Implement a river flow management plan that balances carryover storage needs with instream flow needs for winter-run Chinook salmon based on runoff and storage conditions, including flow fluctuation and ramping criteria (USFWS 2001).</p>
CWC-17	A revised SLWRI DEIS should include sufficient detail and information to make it clear whether adaptive management flows proposed in the DEIS meet the intent of the recovery action proposed in the Recovery Plan.
CWC-18	The Recovery Plan also calls for the restoration of 185 miles of continuous riparian habitat along the Sacramento River between Red Bluff and Sacramento. It is important to note that the USFWS clearly believes that "the reduction in winter flows with the raising of Shasta Dam would result in adverse effects to riparian habitat along the Sacramento River..." (USFWS Coordination Report pg. 176) The SLWRI proposes as a specific restoration measure to restore riparian habitat in the upper and lower Sacramento Rivers (upstream and downstream of Red Bluff respectively) the development and implementation of a Riverine Ecosystem Mitigation and Adaptive Management Plan (REMAMP). The plan will supposedly avoid and compensate for the impact of altered flow regimes on the river's riparian and wetland communities. But little information is provided in regard to the
CWC-19	REMAMP, which apparently does not exist even in draft or outline form, nor does it seem to apply to the Delta (as recommended in the Recovery Plan). There is no assurance that the REMAMP will actually meet the riparian habitat restoration objective found in the Recovery Plan.
CWC-20	In addition, some impacts identified in the DEIS imply that conditions for fish populations targeted for recovery may worsen. For example, remediation efforts at Iron Mountain Mine now controls 95% of the mine pollution that formerly flowed into the river. But the USFWS in its coordination report notes that the SLWRI reservoir expansion may exacerbate acid mine pollution by inundating additional abandoned mines and mine tailings that could leach additional metals into the river.
CWC-21	The DEIS notes that "In addition to runoff from the historic workings (i.e., adits and portals), a number of large mine tailing deposits are currently leaching various metals into tributaries of Shasta Lake." (DEIS pg. 7-15) The Bureau apparently eliminated reducing acid mine and metal pollution as a recovery objective from the SLWRI "due to numerous implementation issues." It proposes to prepare and implement a site-specific Remediation Plan for historic mine features subject to

Shasta Lake Water Resources Investigation
 Environmental Impact Statement

CWC-21 CONTD	Inundation but its not clear if this will be completed in time to allow for the completion of the dam raise and filling of the enlarged reservoir, nor is it clear whether this mitigation meets the intent of the Recovery Plan.
CWC-22	The Recovery Plan recommends minimum instream flows and ramping rates to benefit salmon. The DEIS notes that the 1993 NMFS Biological Opinion (BO) set minimum flows in the river, but it is unclear whether these are the same minimum flows recommended in the Recovery Plan, nor does the BO address ramping rates.
CWC-23	Interestingly, the primary fish recovery goal of SLWRI alternative CP4 is to provide a more "fish-friendly" environment with "reservoir storage dedicated to fish, to either improve flows or water temperatures." (DEIS pg. 11-54, <i>emphasis ours</i>) This is hardly the firm recovery objective outlined in the Recovery Plan. Apparently, the Bureau believes it can either improve flows or temperatures but not both. The primary constraint is the reservation of much of the existing storage, as well as the additional water provided by the raise, to meet water contract commitments.
CWC-24	Another recovery action virtually ignored in the DEIS is the reduction of agricultural and urban pollution into the Sacramento River and Delta. Although there are a number of mitigation measures in the DEIS to reduce pollution from construction and other upland activities into Shasta Reservoir, there is little assessment of the need to reduce agricultural, municipal, and industrial pollution into the Sacramento River downstream of the Dam, in order to reduce adverse impacts on salmon. For example, one of the specific recovery actions outlined by NMFS in its original 1997 winter run recovery plan is to control contaminant input from the Colusa Basin Drain, which visibly degrades the water quality of the Sacramento River. The Drain is the largest source of agricultural pollution to the river and is a major source of pesticides, turbidity, sediments, nutrients, dissolved solids, trace metals, and warm water into the river. Exposure of juvenile salmon to this kind of pollution is suspected to be detrimental. And yet, there is no effort in the SLWRI to consider pollution remediation in the river downstream of Shasta Dam as yet another action that could be taken to improve juvenile salmon survival.
CWC-25	
CWC-26	
CWC-27	In addition, the Recovery Plan proposes to restore key populations to former habitat that has become inaccessible due to dams, including Shasta Dam. The DEIS pays short shrift to this proposal, which is particularly inexcusable given the alleged focus of the SLWRI.
CWC-28	If the Bureau is truly serious about improving salmon survival, a revised SLWRI should incorporate more of the Recovery Actions outlined in the NMFS Recovery Plan. In addition, the SLWRI should seriously consider an alternative that re- operates the existing dam/reservoir in order to fully meet downstream temperature needs and flow requirements (for salmon as well as riparian habitat). A revised DEIS must connect the key objectives and recovery actions in the 2009 Recovery Plan to the mitigation measures proposed in the SLWRI DEIS. Further, the revised DEIS should evaluate and determine the feasibility and role of the Bureau in
CWC-29	
CWC-30	
CWC-31	

CWC-31 CONTD	<p>↑ Implementing all recovery actions, particularly in restoring populations upstream of Shasta Dam.</p>
CWC-32	<p>A revised SLWRI should include an alternative that focuses on the salmon improvement measures recommended in the USFWS Coordination Report, including restoration of spawning and rearing habitat, improving fish passage, increasing minimum flows, and screening water diversions. (USFWS Coordination Report pg. v), as well as other specific management measures initially considered in the SLWRI but removed from further analysis (as outlined in the USFWS Report pg. vi).</p>
CWC-33	<p>5. The Project's Impacts On Sensitive, Threatened, And Endangered Species Are Underestimated In The DEIS.</p> <p>The DEIS admits that there will be significant and unavoidable impacts on a number of sensitive, threatened, and endangered wildlife species and their habitat, including the Shasta salamander, foothill yellow-legged frog, tailed frog, northwestern pond turtle, bald eagle, northern spotted owl, purple martin, willow flycatcher, Vaux's swift, yellow warbler, yellow-breasted chat, long-eared owl, northern goshawk, Cooper's hawk, great blue heron, osprey, red-tailed hawk, red-shouldered hawk, American robin, Anna's hummingbird, Pacific fisher, American marten, ringtails, eight special status bat species, and four special status mollusks.</p> <p>The DEIS also admits to significant and unavoidable permanent loss of general wildlife habitat and critical deer winter and fawning range. According to the DEIS, impacts associated with the take and loss of the endangered California red-tailed frog are still to be determined. And also according to the DEIS, impacts on riparian associated special status wildlife species may be potentially significant but are supposedly reduced to less than significant by the development and implementation of the previously mentioned but amorphous Riverine Ecosystem Mitigation and Adaptive Management Plan.</p>
CWC-34	<p>Despite the fact these significant and unavoidable impacts on these many sensitive and special status wildlife species are documented in the DEIS, the document fails to adequately reveal the serious nature of these impacts, particularly on the seven rare but not federally listed species endemic (found nowhere else) to the Shasta Reservoir vicinity, including the Shasta salamander, two rare plant species, and three rare snails (mollusks).</p>
CWC-35	<p>Some species are particularly susceptible to inundation by the expanded reservoir. For example, tree snags in the Pit River Arm of Shasta Reservoir appear to support a stable population of 18 breeding pairs of purple martin, a migratory bird that is generally uncommon in California and is considered by the California Department of Fish and Wildlife to be a species of special concern. The Pacific Coast population of purple martin has substantially declined in the last 50 years. Raising Shasta Dam will completely submerge the martin's existing nesting habitat and it would take decades for new nesting snags to become available to replace the lost habitat.</p>

CWC-36	<p>A revised DEIS should better document significant and unavoidable impacts on endemic and other special status species and more fully consider alternatives that reduce the impacts to insignificant levels.</p>
<p>6. The DEIS Underestimates Impacts Of Modified Flows From A Raised Shasta Dam On The Sacramento River And The Proposed Mitigation Measure Is Too Vague And Incomplete.</p>	
CWC-37	<p>The DEIS claims that potentially significant impacts on riparian associated aquatic and terrestrial special status wildlife due to modifications of the existing flow regime caused by the dam raise will be reduced to less than significant levels by the development and implementation of a Riverine Ecosystem Mitigation and Adaptive Management Plan (REMAMP). The DEIS also recognizes that the impacts of flow modification on riparian habitat and ecosystem processes is inconsistent with local and regional plans and goals promoting riparian habitat on the Sacramento River.</p>
CWC-38	<p>The DEIS notes that these are potentially significant impacts reduced to less than significant levels by the proposed REMAMP.</p>
CWC-39	<p>The USFWS unequivocally states that reduced winter flows caused by the raising of Shasta Dam will result in adverse effects to riparian habitat along the Sacramento River. So these are real issues but unfortunately, the proposed mitigation (the REMAMP) does not yet exist, so there is no way for the public to understand just how the proposed mitigation will truly reduce these impacts to insignificance.</p>
CWC-40	<p>Flow modification impacts to the Sacramento River's riparian and aquatic ecosystems, and the many sensitive, threatened, and endangered fish and wildlife species that depend on these dynamic ecosystems, are generally given short shrift throughout the DEIS. These impacts were well documented in Sacramento River Ecological Flows Study Final Report (CALFED Ecosystem Restoration Program, March 2008). Just a few of the more pertinent facts from this report include:</p>
CWC-41	<ul style="list-style-type: none"> • Dam-related alterations of river flow regimes have been identified as one of the three leading causes of declines in imperiled aquatic ecosystems.
CWC-42	<ul style="list-style-type: none"> • Available data support the hypothesis that the reduced frequency and duration of floodplain inundation in the post-dam era may have contributed to the decline of the winter-run Chinook population.
CWC-43	<ul style="list-style-type: none"> • The Shasta Dam raise will reduce the "stream power" of the Sac by 16% and reduce the amount of floodplain area reworked by high flows by 8%. Diversions from the river to fill the proposed Sites Offstream Storage Reservoir (another CALFED water storage project under study) will further reduce the river's stream power by up to 15%.
CWC-44	<ul style="list-style-type: none"> • Fremont cottonwood initiation success, Chinook and steelhead rearing WUA

CWC-44 CONTD	(weighted useable area), and Chinook and steelhead redd scour risk are the indicators most sensitive to flows.
CWC-45	<ul style="list-style-type: none"> The altered hydrograph of the Sac River appears to limit cottonwood seedling survival.
CWC-46	<ul style="list-style-type: none"> Maintaining natural channel migration and cutoff processes is necessary for providing new patches for seedling recruitment and for periodical resetting of riparian vegetation succession, which are both critical for maintaining the diverse, dynamic, and functional riparian-floodplain ecosystem.
CWC-47	<ul style="list-style-type: none"> Reductions in peak flow magnitude will likely reduce bank erosion and thus have potential impacts on spawning gravel availability, and might also affect lateral channel migration, which is essential for creating off-channel habitats important to many Sacramento River species.
CWC-48	<ul style="list-style-type: none"> The flow impacts of the Shasta Raise and Sites combined are expected to reduce progressive channel migration by approximately 10%.
CWC-49	<ul style="list-style-type: none"> As flows recede below 8,500 cfs, the inlets of secondary channels (which provide crucial habitat for juvenile salmon) become increasingly disconnected from the main stem.
CWC-50	<ul style="list-style-type: none"> Removing rip-rap (bank revetment) may mitigate the floodplain impacts of the Shasta Raise (note: this is not a proposed mitigation in the DEIS).
CWC-51	<ul style="list-style-type: none"> Revetment removal plus flow management that allows occasional high flows are both necessary and sufficient for habitat creation and persistence.
CWC-52	<ul style="list-style-type: none"> The importance of fish passage improvements is strongly suggested by past studies; assessment of benefits only possible through implementation and monitoring.
CWC-53	<ul style="list-style-type: none"> The CALSIM II model, which is used in the DEIS to assess the flow impacts of the dam raise, functions at a monthly time-step, which is a recognized shortcoming. Daily flow disaggregations below Red Bluff used in our study are known to be flawed and do not remain consistent with monthly time-step totals. (Note: Development and use of a true daily flow model is also a NMFS recommended recovery action).
CWC-54	These findings clearly underscore the potential severity of flow modification impacts on the Sacramento River ecosystems, the sensitivity of the river to multiple impacts caused by current projects under study (SLWRI and Sites), and the need for a well defined, detailed, and permanent plan that assures true mitigation of these impacts.
CWC-55	A revised DEIS should fully assess flow modification impacts on the river, its ecosystems, and fish and wildlife species, and include at least a draft Riverine

CWC-55 CONTD	↑ Ecosystem Mitigation and Adaptive Management Plan for review and comment by the public. In addition, this plan should fulfill the role of the Sacramento River and Delta Riparian Habitat Restoration and Management Plan outlined in the NMFS Recovery Plan and noted as a needed mitigation measure in the USFWS Coordination Report. The Adaptive Management Plan should also fully comply with all local and regional plans to protect and restore riparian habitat along the river.
CWC-56 CWC-57	
CWC-58	It is even more important that this Adaptive Management Plan be completed and available for public review in the revised DEIS because it will determine the future health of riparian and aquatic ecosystems on more than 31,000 acres of federal, state, and other public lands that support some of the most important riparian and aquatic habitat on the Sacramento River (including the BLM's Sacramento River Bend Outstanding Natural Area, the USFWS' Sacramento River National Wildlife Refuge, State Wildlife Areas managed by the California Department of Fish and Game, four State Parks and Recreation Areas, and several local parks and recreation areas).
CWC-59	It is unclear whether the adaptive management plan intended to benefit salmon is the same adaptive management plan intended to benefit the downstream riparian and aquatic ecosystems. The term "adaptive management plan" seems to be interchangeable throughout the DEIS. If they are the same plan, then we assume that the Bureau's qualification about the timing and magnitude of releases from Shasta Dam to benefit downstream ecosystems will be applied – "as long as there are no conflicts with operational guidelines or adverse impacts on water supply reliability." (DEIS pg. 2-49) If this is the case, it is clear that this proposed Adaptive Management Plan will not reduce the flow modification impacts on riparian and aquatic ecosystems to less than significant levels simply because water contracts will always trump well meaning but relatively toothless mitigation measures.
CWC-60	
	7. Impacts Of Reservoir Enlargement On Potential Wild & Scenic Rivers
CWC-61	Enlarging Shasta Reservoir by raising the dam from 6.5 to 18.5 feet will flood public lands managed by the Forest Service encompassing segments of the upper Sacramento, McCloud, and Pit Rivers, Salt Creek, and several small tributary streams. This flooding, however minor it may seem to the Bureau, triggers several requirements and mandates in the National Wild & Scenic Rivers Act. Although the DEIS attempts to address Wild & Scenic River issues in Chapter 25, it fails to recognize the actual requirements of the Act and the true implications of the reservoir enlargement in regard to previous Forest Service studies and commitments made in the 1994 Shasta-Trinity National Forests Plan. Nor does the DEIS adequately address the impacts of reservoir enlargement and the legal implications of violating the California Public Resources Code.
	8. The National Wild & Scenic Rivers Act requires consideration by all federal agencies of federal Wild & Scenic River protection for the McCloud, upper

Sacramento, and Pit Rivers, and other reservoir tributaries as an alternative to the federal proposal to raise the dam and expand the reservoir.

CWC-62	<p>Section 5(d)(1) of the National Wild & Scenic Rivers Act states:</p> <p>In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic, and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic, and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved.</p> <p>This section of federal law clearly requires the Bureau of Reclamation to go beyond the simple reporting of past state and federal considerations of Wild & Scenic protection for the river segments affected by the SLWRI. It specifically requires consideration of Wild & Scenic protection in the context of and as an alternative to the proposed dam raise and reservoir enlargement, not only for the McCloud, but also for the upper Sacramento and Pit Rivers, and all other streams on public lands tributary to Shasta Reservoir. No such comprehensive assessment of Wild & Scenic Rivers is provided in the DEIS.</p>
CWC-63	<p>The Bureau should work with the Forest Service to include in a revised DEIS a comprehensive assessment specifically addressing the impacts of the dam raise and reservoir enlargement on the free flowing character and outstanding values of all rivers and streams tributary to the reservoir and include a range of alternatives that proposes Wild & Scenic protection with and without various reservoir enlargement alternatives.</p>
CWC-64	<p>For example, the Forest Service in the 1994 Shasta-Trinity National Forests Draft Plan found the upper Sacramento River from Box Canyon Dam to the Whiskeytown-Shasta-Trinity National Recreation Area to be eligible for federal protection, but the agency did not recommend it because of land ownership patterns along the river. But the river was also not actively threatened by reservoir expansion at that time. The Wild & Scenic Rivers Act requires the Forest Service and the Bureau to revisit potential Wild & Scenic protection of the upper Sacramento River in the context of the project outlined in the revised DEIS, as well as for other rivers and streams that may be affected by reservoir expansion.</p>
CWC-65	<p>The Bureau of Reclamation has previously recognized the clear mandate of the National Wild & Scenic Rivers Act to consider and evaluate potential Wild & Scenic Rivers as potential alternative uses to water and related land resources in the planning for water development. As part of its planning and study of the Auburn</p>

CWC-65
 CONTD

↑ Dam project on the North and Middle Forks of the American River, the Bureau convened a multi-agency interdisciplinary team that determined segments of the river that would be flooded by the dam proposal to be eligible for Wild & Scenic protection in 1993 (letter dated March 17, 1993 from Susan E. Hoffman, Division of Planning and Technical Services Chief, U.S. Bureau of Reclamation Mid-Pacific Region). The study to determine if the eligible segments were suitable for designation was scheduled for Phase II and III of the American River Water Resources Investigation. This part of the study was never completed because soon after the eligibility finding, Congress rejected authorization of the Auburn Dam project.

9. The National Wild & Scenic Rivers Act requires consideration of federal Wild & Scenic River protection for the segments of the lower Sacramento River with significant federal lands downstream of Shasta Dam as an alternative to the federal proposal to raise the dam and expand the reservoir.

CWC-66

The lower Sacramento River between Anderson and Colusa has several segments with substantial federal public lands managed by the Bureau of Land Management (BLM) and the U.S. Fish and Wildlife service (USFWS). In its draft Fish and Wildlife Coordination Report, the USFWS stated "Riparian and floodplain habitat along the Sacramento River and in the Yolo and Sutter Bypasses would be adversely affected by further changes in the timing, duration, and frequency of flood flows due to an enlarged Shasta Dam." (USFWS Draft Coordination Report, pg. viii, June 2013) Even the SLWRI DEIS admits that flow modification from the dam raise may have potentially significant impacts on the river's riparian and aquatic ecosystems and fish and wildlife. These agency findings clearly trigger the section 5(d)(1) requirement that the federal segments of the lower river be studied and considered for potential federal protection as an alternative to the proposed water resources project.

CWC-67

The BLM manages nearly 18,000 acres of federal public lands as the Sacramento River Bend Outstanding Natural Area (SRBONA), which encompasses a 25-mile stretch of the Sacramento River between Balls Ferry and Red Bluff. The BLM found the federal portions of this segment to be eligible for National Wild & Scenic River protection in recognition of its free flowing character and outstandingly remarkable scenic quality, recreation opportunities, cultural/historic values, anadromous and resident trout fisheries, and vegetation. The outstandingly remarkable vegetation value was specifically defined as the river's Great Valley oak riparian forests. (BLM Redding Resource Management Plan and ROD, and BLM Redding RMP FEIS, June 1993 and July 1992 respectively)

CWC-68

In addition to the Wild & Scenic finding, BLM management direction designated the river as an Outstanding Natural Area and requires protection and enhancement of the river's riparian vegetation, wetlands, and anadromous fisheries. BLM management direction for the SRBONA also included the long-term survival of special status species, maintenance and improvement (if feasible) of scenic quality.

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CWC-68 CONTD	<p>conserving archeological resources, and providing for semi-primitive recreation opportunities. In addition, general policy and program direction in the BLM Manual and the Redding RMP require the BLM to protect the free flowing character and specific outstandingly remarkable values of all eligible rivers.</p> <p>Determining the suitability of the eligible Sacramento River segment was deferred by BLM due to budgetary and personnel constraints (BLM Redding RMP pg. 28, June 1993) The BLM Manual specifically states in regard to water resources projects that may affect eligible or suitable Wild & Scenic Rivers:</p> <p style="padding-left: 40px;">The BLM should, within its authority, consider protecting the river values that make the river eligible or suitable through the land use plan and activity-level NEPA analysis. If a river is listed in the Nationwide Rivers Inventory, the Federal agency involved with the proposed action must consult with the land-management agency in an attempt to avoid or mitigate adverse effects. (BLM Manual 6400-WILD AND SCENIC RIVERS—POLICY AND PROGRAM DIRECTION FOR THE IDENTIFICATION, EVALUATION, PLANNING, AND MANAGEMENT, Sec. 3.8(D), pg. 3-14 7/13/2012)</p>
CWC-69	<p>The SLWRI DEIS mentions BLM management responsibility for public lands along the Sacramento River in several sections. It also mentions the BLM's Wild & Scenic eligibility finding for the Sacramento River between Balls Ferry and Iron Canyon and notes that BLM management direction requires its public lands along the river to be "managed to protect the outstandingly remarkable values and free-flowing character..." However, the documentation of BLM's responsibilities ends there in the SLWRI. There is no connection made between the Sec. 5(d)(1) mandate to consider potential Wild & Scenic protection of the river as an alternative to the SLWRI nor is there any substantive discussion about how the dam raise could modify flows and adversely affect the river's outstandingly remarkable anadromous fisheries and riparian forests, which make the river eligible for Wild & Scenic protection.</p>
CWC-70	<p>The SLWRI DEIS fails to connect the Bureau's proposed alternatives with the BLM's mandate to protect the river's eligible segment. The SLWRI is also inconsistent with the BLM's current management direction for this part of the Sacramento River.</p>
CWC-71	<p>As part of a revised DEIS, the Bureau must consult with the BLM and pursuant to Sec. 5(d)(1) of the Act the BLM must initiate a Wild & Scenic River suitability study for the segment of the Sacramento River identified as eligible by the BLM as an alternative to the SLWRI.</p>
	<p>10. The DEIS fails to recognize that Sec. 5(d)(1) of the National Wild & Scenic Rivers Act also applies to federal public lands that comprise the Sacramento River National Wildlife Refuge.</p>

CWC-72	<p>The USFWS manages more than 10,300 acres of federal public lands along the Sacramento River between Red Bluff and Colusa as the Sacramento River National Wildlife Refuge. These lands were acquired by the USFWS and incorporated in the Refuge in order to protect and restore riparian and aquatic habitats and the many sensitive, threatened and endangered species that depend on these habitats. As far as we know, none of the Refuge lands along the river have been studied for their Wild & Scenic eligibility or suitability per sec. 5(D)(1) of the Act. Nor does the DEIS make any mention of potential Wild & Scenic eligibility and suitability of these segments.</p>
CWC-73	<p>A revised DEIS, the Bureau must consult with the USFWS and pursuant to Sec. 5(d)(1) of the Act, the USFWS must initiate a Wild & Scenic River suitability study for the Refuge segments of the Sacramento River as an alternative to the SLWRI.</p>
CWC-74	<p>11. The DEIS admits that all alternatives to raise the Shasta Dam and expand its reservoir will adversely affect the McCloud River's eligibility as a National Wild & Scenic River and will specifically harm the river's free flowing character, water quality, and outstandingly remarkable values.</p> <p>In Chapter 25, the DEIS documents that raising Shasta Day by 6.5-18.5 feet will flood from 1,470 feet to 3,550 feet of the segment of the McCloud River eligible for National Wild & Scenic River protection. The DEIS also admits that this flooding will adversely affect the McCloud's free flowing character, water quality, and outstandingly remarkable Native American cultural, wild trout fishery, and scenic values.</p>
CWC-75	<p>Conservationists believe that even more of the eligible segment of the McCloud River will be harmed by the dam raise alternatives because the Bureau incorrectly identifies elevation 1,070 feet as the terminus of the McCloud segment identified by the Forest Service. In fact, the terminus of the eligible McCloud segment is simply defined by the Forest Service as "Shasta Lake". (LRMP FEIS, Appendix pgs. E-4, E-13) The Forest Service's map depicting the eligible segment of the McCloud shows that eligible segment ends at the McCloud River Bridge (FEIS Appendix E pg. 3-36). There is no mention of elevation 1,070 as the terminus of the eligible segment and there is no reference in the LRMP to the McCloud's so called "transition reach". Hence, the impact of the dam raise and reservoir expansion is greater than what is documented in the DEIS.</p> <p>12. Flooding the McCloud River violates the 1995 Shasta-Trinity National Forests Land and Resource Management Plan and Record of Decision in regard to protecting the McCloud River's eligibility as a potential National Wild & Scenic River.</p>
CWC-76	<p>The Forest Service recommended Wild & Scenic River protection for the McCloud River in its 1990 draft of the Shasta-Trinity National Forests Land and Resource Management Plan (LRMP). In response to concerns expressed by river-side</p>

CWC-76 CONTD	<p>landowners, the Forest Service chose to pursue protection of the McCloud River's free flowing character and outstandingly remarkable values through a Coordinated Resource Management Plan (CRMP) developed by the Forest Service and other federal and state agencies and the riverside landowners. This decision is reflected in the 1995 final Shasta-Trinity National Forests LRMP and Record of Decision (ROD), which state:</p> <p>A Coordinated Resource Management Plan (CRMP) has been adopted for long term management of the Lower and Upper McCloud River and Squaw Valley Creek. This agreement is between private land owners, the Forest Service, Pacific Gas & Electric, Nature Conservancy, CalTrout, and the DFG. This plan will effectively maintain the outstandingly remarkable values of this potential wild and scenic river. If for any reason the terms of the CRMP are not followed and the wild and scenic river eligibility is threatened, the Forest Service will recommend these segments for Federal Wild and Scenic designation. (1995 Final LRMP, page 3-23)</p> <p>If, after a period of good faith effort at implementation, the CRMP fails to protect the values which render the river suitable for designation then the Forest Service will consider recommendation to the national Wild and Scenic River System. (1995 ROD page 17)</p>
CWC-77	<p>The DEIS admits that raising the dam will periodically flood 1,470 feet of the eligible segment of the McCloud River, which would make the flooded segment ineligible for federal Wild & Scenic protection. (DEIS pg. 25-26) Conservation groups believe that more of the eligible river would be flooded (see discussion below about the actual terminus of the eligible McCloud). Regardless, it is clear that the Bureau's proposal to raise Shasta Dam and expand its reservoir directly violates the intent and constitutes failure of the CRMP, and it also violates the protective management proposed in the LRMP. Therefore, the Forest Service is bound by its own ROD to consider and recommend federal protection for the river. This requirement is not reflected in the DEIS and it should be included in the revised DEIS.</p>
CWC-78	<p>The Bureau is misleading the public when it claims that raising the dam and expanding the reservoir will not conflict with the Shasta-Trinity National Forests LRMP because the portion of the McCloud that would be flooded is private land and not National Forest land. The Forest Service has the authority to study and recommend the river within its reservation boundary, as it did so in the 1990 draft LRMP. It has the authority to determine that reservoir expansion and flooding of the eligible segment of the McCloud reflect a de-facto failure of the CRMP and therefore triggers Forest Service reconsideration of its Wild & Scenic River recommendation for the McCloud. This important protection is a fundamental component of the LRMP, which means that the Bureau's proposal violates the LRMP.</p>

13. All dam raise/reservoir enlargement alternatives violate the California Public Resources Code 5093.542 prohibiting the construction of a reservoir that would harm the McCloud's free flowing condition and extraordinary wild trout fishery upstream of the McCloud River Bridge.

CWC-80	<p>In 1989, the California Legislature passed and the Governor signed legislation declaring that the McCloud River possesses extraordinary resources, including one of the finest wild trout fisheries in the state, and that continued management of river resources in their existing natural condition represents the best way to protect the unique fishery of the McCloud, and that maintaining the McCloud in its free-flowing condition to protect its fishery is the highest and most beneficial use of the waters of the river.</p> <p>The legislation specifically prohibited any dam, reservoir, diversion, or other water impoundment on the McCloud River upstream of the McCloud River Bridge. It also prohibited any state agency cooperation, participation, or support for any dam, reservoir, diversion, or other water impoundment facility that could have an adverse effect on the free flowing condition of the McCloud River or on its wild trout fishery. These prohibitions and conditions are now memorialized in the California Public Resources Code (PRC) 5093.542.</p>
CWC-81	<p>The DEIS admits that all dam raise alternatives will have a significant unmitigated impact on the McCloud's free flowing condition and will have a potentially significant impact on the river's wild trout fishery (DEIS pg. 25-40). The DEIS suggests that the wild trout fishery impacts could be mitigated to less than significant levels but these mitigations have yet to be identified. Regardless, all the dam alternatives in the DEIS clearly violate state law. To ensure compliance with PRC 5093.542, the California Legislature and the Governor passed and signed statewide water bond legislation prohibiting use of the bond funds to raise Shasta Dam.</p>
CWC-82	<p>Clearly, the SLWRI's proposal to raise Shasta Dam and expand its reservoir violates state law. <u>So why is the Bureau continuing to study this illegal project?</u> Does the</p>
CWC-83	<p>Bureau intend to cite federal preemption over state law in regard to this matter? If so, the DEIS should admit this.</p>
CWC-84	<p>14. The DEIS fails to mention that the Sacramento River between Anderson and Colusa is in the Nationwide Rivers Inventory and is protected by Presidential Directive.</p> <p>A segment of the Sacramento River from the I-5 bridge crossing in Anderson to Arnold Bend upstream of Colusa was included in the National Park Service's 1982 Nationwide Rivers Inventory (NRI). The NRI was created by a directive from President Carter. The directive requires each federal agency, as part of its normal planning and environmental review process, to take care to avoid or mitigate adverse effects on rivers identified in the NRI. Further, all agencies are required to</p>

CWC-84 CONTD	<p>consult with the National Park Service prior to taking actions which could effectively foreclose wild, scenic or recreational status for rivers on the inventory.</p>
CWC-85	<p>The NRI describes this segment of the Sacramento River as a swift moving river isolated from surrounding civilization by a narrow band of dense riparian vegetation that meanders over a wide area with numerous islands and oxbow lakes. It also notes that the river flows through scenic Iron Canyon with a stretch of rapids, supports important anadromous fish populations and the state's most important salmon spawning grounds, includes outstanding riparian habitat for the yellow-billed cuckoo and giant garter snake, provides excellent rafting and boating opportunities, receives intense recreational use with fishing as the most popular activity, and is an important popular recreation resource for nearby urban areas.</p>
CWC-86	<p>There is no mention in the SLWRI of the NRI segment of the Sacramento River, the mandate to avoid or mitigate adverse effects on the NRI segment and its specific outstanding values, or the requirement to consult with the National Park Service. A revised DEIS should substantively address these issues.</p> <p>15. The DEIS fails to adequately identify potential project effects on protected National Forest roadless areas and the Whiskeytown-Shasta-Trinity National Recreation Area.</p>
CWC-87	<p>A portion of the boundaries of the Backbone and Devil's Rock roadless areas on the Shasta-Trinity National Forests parallel the existing reservoir's high water line. The action alternatives could flood a portion of the roadless areas, which are protected under the Roadless Area Conservation Rule. While the DEIS admits to significant unavoidable impacts on National Forest lands and resources, as well as non-compliance with existing Forest Service management, it fails to describe the adverse impacts on federally protected roadless areas. The revised DEIS should include consideration of these impacts.</p>
CWC-88	<p>The DEIS fails to adequately consider the impacts of the dam raise alternatives on the Whiskeytown-Shasta-Trinity National Recreation Area (WSTNRA). The WSTNRA was established by Congress and President Kennedy in 1963 to:</p>
CWC-89	<p style="padding-left: 40px;">...provide, in a manner coordinated with the other purposes of the Central Valley project, for the public outdoor recreation use and enjoyment of the Whiskeytown, Shasta, Clair Engle, and Lewiston reservoirs and surrounding lands in the State of California by present and future generations and the conservation of scenic, scientific, historic, and other values contributing to public enjoyment of such lands and waters... (16 USC Sec. 460q)</p> <p>The DEIS documents the impact on recreation facilities, but fails to adequately identify the impacts on scenic, scientific, historic and other public land values the WSTNRA was established to conserve. Further, it is not clear that the impacts on</p>

CWC-89
CONTD

↑ recreation and recreation infrastructure will be fully mitigated. Although owners of private resorts and other recreation facilities will be reimbursed for the fair market values of their property, they will not be reimbursed for the loss of income nor is there any guarantee that these owners will be able to replace their facilities to provide comparable services in the future.

CWC-90

CWC-91

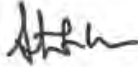
In addition, the DEIS fails to assess the impacts of moving existing facilities elsewhere on undeveloped National Forest lands. A revised DEIS must fully assess the impacts of the proposed dam raise on the all the purposes of the WSTNRA, as well as the actual impacts on private recreation facilities, and the impacts of proposed relocation of public and private facilities.

16. Summary

CWC-92

In summary, there are numerous deficiencies in the SLWRI DEIS. Friends of the River and the California Wilderness Coalition believe that a revised DEIS is required to correct these deficiencies and to allow for full disclosure to the public.

Sincerely,



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Responses to Comments from California Wilderness Coalition and Friends of the River

CWC-1: Comment noted.

CWC-2: Chapter 28, “DEIS Distribution List,” lists the ten public libraries which have hard copies of the DEIS available for the public, including the following locations in the study area:

Bureau of Reclamation, Northern California Area Office
16349 Shasta Dam Boulevard
Shasta Lake, CA 96019

Dunsmuir Branch Library
5714 Dunsmuir Avenue
Dunsmuir, CA 96025

Shasta County Public Library,
Redding Library
1100 Parkview Avenue
Redding, CA 96001

In addition, as described in Chapter 28, “DEIS Distribution List,” over 1,530 individuals, non-governmental organization, and private interested parties received an electronic version of the DEIS in the form of a DVD.

CWC-3: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-4: Due to the considerable costs of reproduction, electronic copies are provided to everyone on the mailing list. The CWC and FOTR have been added to the mailing list.

Chapter 28, “DEIS Distribution List,” lists the ten public libraries which have hard copies of the DEIS available for the public, including the following locations in the study area:

Bureau of Reclamation, Northern California Area Office
16349 Shasta Dam Boulevard
Shasta Lake, CA 96019

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Redding Library
1100 Parkview Avenue
Redding, CA 96001

In addition, as described in Chapter 28, “DEIS Distribution List,” over 1,530 individuals, non-governmental organization, and private interested parties received an electronic version of the DEIS in the form of a DVD.

CWC-5: Please refer to Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan.”

CWC-6: Please refer to Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan.” **CWC-7:** Please refer to Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan.”

CWC-8: Modeling results show that there are significant project benefits to anadromous fish in critical and dry years under CP4, when Chinook populations are at greatest risk. By increasing production in these years, relative to the base conditions, the risk of extirpation of listed species is greatly reduced, and therefore provides a significant benefit to the run.

While the juvenile to adult return rates for all runs but winter-run Chinook salmon run in the Sacramento River are unknown, the increase in juvenile production during critical and dry water years would increase the likelihood of increased adult returns. This shows a significant benefit of the project because these are the years in which the Chinook salmon populations, as well as steelhead, are at the greatest risk, as described by NMFS in both their Draft and Final Recovery Plans (2009 and 2014).

Please refer to Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

CWC-9: Please refer to Master Comment Response DSFISH-4, “Maintaining Sacramento River Flows to Meet Fish Needs and Regulatory Requirements,” and Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CWC-10: Please refer to Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

CWC-11: The USFWS Coordination Act Report referenced by the commenter was based on outdated CalSim-II modeling that does not include the 2008 USFWS BO and 2009 NMFS BO operation Reasonable and Prudent Alternative requirements. Additionally, USFWS does not separate the benefits that the SLWRI provides, and specifically targets, for water years in which cold water would otherwise not be available - critical and dry years - particularly when these years follow other critical, dry and/or below normal water years. Combining all water years minimizes the benefits by including years in which Shasta Lake would be operated as it would without the project.

The riparian, floodplain and side channel restoration components are not mitigation for the SLWRI, but are restoration projects. While these can be conducted without raising the dam, fish will benefit significantly

more by having restored habitat, as well as a more reliable source of cold water when cold water would otherwise not be available.

Please refer to Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

CWC-12: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-13: The purpose of the project, as described in Chapter 1, “Introduction,” Section 1.2.1, “Project Purpose and Objectives,” of the Final EIS, is to improve operational flexibility of the Delta watershed system to meet specified primary and secondary project objectives. The two primary project objectives are to (1) increase the survival of anadromous fish populations in the Sacramento River, primarily upstream from the RBPP, and (2) increase water supply and water supply reliability for agricultural, M&I, and environmental purposes, to help meet current and future water demands, with a focus on enlarging Shasta Dam and Reservoir.

Primary project objectives are those which specific alternatives are formulated to address. The two primary project objectives are considered to have coequal priority, with each pursued to the maximum practicable extent without adversely affecting the other. The most efficient way to meet both primary objectives is to enlarge Shasta Reservoir. The existing Shasta Reservoir cannot be reoperated to benefit anadromous fisheries without impacting water supply reliability.

Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival.”

CWC-14: The SLWRI has two primary coequal objectives that must be met, and neither must impede or harm the other objective. While the SLWRI is not the only way to improve anadromous fish survival, the best way and most efficient way to meet both primary objectives is to implement the SLWRI.

CWC-15: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-16: Please refer to Master Comment Response DSFISH-4, “Maintaining Sacramento River Flows to Meet Fish Needs and Regulatory Requirements,” Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CWC-17: Shasta will continue to be operated under the required guidelines, as defined in the 2009 NMFS BO that includes working with

the four Fisheries and Operation Technical Teams (including the Sacramento River Temperature Technical Group) responsible for adjusting operations to meet contractual obligations for water deliveries and to minimize adverse effects on listed anadromous fish species. These groups provide recommendations to the Water Operations Management Team (WOMT), which then considers recommendations from multiple work teams to inform changes in water operations. Also see Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CWC-18: Mitigation Measure Bot-7 in Chapter 12, “Botanical Resources and Wetlands,” requires implementation of a riverine ecosystem mitigation and adaptive management plan to avoid and compensate for the impact of altered flow regimes on riparian and wetland communities. This adaptive management plan has been described in the Final EIS. See Master Comment Response CMS-1, “EIS Mitigation Plan.”

CWC-19: Mitigation Measure Bot-7 in Chapter 12, “Botanical Resources and Wetlands,” requires implementation of a riverine ecosystem mitigation and adaptive management plan to avoid and compensate for the impact of altered flow regimes on riparian and wetland communities. This adaptive management plan has been described in the Final EIS. See Master Comment Response CMS-1, “EIS Mitigation Plan.”

CWC-20: The discussion of fisheries impacts in Chapter 11, “Fisheries and Aquatic Ecosystems,” referenced by the commenter is specific to impacts to cold water habitat. Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-21: Chapter 7, “Water Quality,” and the associated Water Quality Technical Report provide a comprehensive discussion of the nature and location of historic mining activities and existing features as they relate to heavy metals and other water quality constituents. Under the No-Action Alternative, the existing mine drainage issues will continue consistent with abatement efforts of land owners and managers. With the exception of an isolated area near the Bully Hill mine complex, there are no abandoned or active mines that would be subject to inundation or disturbance if the SLWRI project is implemented.

Discussion of water quality impacts on beneficial uses (e.g., cold water habitat) is provided in Chapter 7, “Water Quality,” specifically Impacts WQ-3 and WQ-6. Also refer to Master Comment Response DSFISH-5 “Fish and Wildlife Coordination Act Report.”

CWC-22: The NMFS Final Recovery Plan states on page 151 of Table 5.5 “Mainstem Sacramento River Recovery Actions,” “Develop and implement a river flow management plan for the Sacramento River downstream from Shasta and Keswick dams that considers the effects of climate change and balances beneficial uses with the flow and water temperature” (NMFS 2014). The Recovery Plan does not provide specific minimum flow requirements, but recommends the development of a new plan, and Reclamation must, until such time as a new plan is developed, follow the requirements established under the current BO.

CWC-23: During the planning stages (development of the Plan Formulation Report), it was identified that the biggest benefits were shown to Chinook salmon came when water temperatures were lowered rather than when flows were adjusted to meet the Anadromous Fish Restoration Program flow goals. Therefore, the CP4 was developed specifically to establish a cold water pool for fish benefits. This proved, through the SALMOD results, to have the highest juvenile production.

Under CP4, the additional 378,000 acre-feet of water in storage every year will essentially act as a buffer against rising temperatures in the spring and summer, allowing for colder releases from Shasta Reservoir during critical periods when anadromous fish are most at risk. The 378,000 acre-feet of additional storage will be reserved for the cold water pool alone, and cannot be accessed to meet contract demands, regardless of water year type or contractor demand. While releasing some of this stored water to improve flow conditions may be warranted at certain times, the resulting drawdown in storage would decrease the effectiveness of the cold water pool to act as a temperature buffer. Therefore, it is important to recognize the tradeoffs between using the additional storage to improve flow conditions or to improve temperature conditions. Modeling of CP4 for the DEIS focused on maintaining cold water storage as the highest priority, rather than on modifying flows alone, because according to NMFS, one of the key risks to Chinook Salmon populations is a “prolonged drought which depletes the cold water pool in Shasta Reservoir or some related failure to manage cold water storage” (NMFS 2009).

Please refer to Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions.”

CWC-24: SLWRI action alternatives are anticipated to benefit anadromous fish in the Sacramento River downstream from Shasta Dam.

Please see Chapter 11, “Fisheries and Aquatic Ecosystems.” Please refer to Master Comment Response ALTD-2, “Alternative Development –

Anadromous Fish Survival,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

CWC-25: SLWRI action alternatives are anticipated to benefit anadromous fish in the Sacramento River downstream from Shasta Dam. Please see Chapter 11, “Fisheries and Aquatic Ecosystems.” Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

CWC-26: Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

CWC-27: Please refer to Master Comment Response FISHPASS-1, “Fish Passage Above Shasta Dam.”

CWC-28: Please refer to Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions,” and Master Comment Response DSFISH-3, “Fish Habitat Restoration.”

CWC-29: The purpose of the project, as described in Chapter 1, “Introduction,” Section 1.2.1, “Project Purpose Objectives,” of the Final EIS, is to improve operational flexibility of the Delta watershed system to meet specified primary and secondary project objectives. The two primary project objectives are to (1) increase the survival of anadromous fish populations in the Sacramento River, primarily upstream from the RBPP, and (2) increase water supply and water supply reliability for agricultural, M&I, and environmental purposes, to help meet current and future water demands, with a focus on enlarging Shasta Dam and Reservoir.

Primary project objectives are those which specific alternatives are formulated to address. The two primary project objectives are considered to have coequal priority, with each pursued to the maximum practicable extent without adversely affecting the other. The most efficient way to meet both primary objectives is to enlarge Shasta Reservoir. The existing Shasta Reservoir cannot be reoperated to benefit anadromous fisheries without impacting water supply reliability.

Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival.”

CWC-30: Please refer to Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions,” and Master Comment Response DSFISH-3, “Fish Habitat Restoration.”

CWC-31: Please refer to Master Comment Response DSFISH-3 “Fish Habitat Restoration,” Master Comment Response DSFISH-8, “National Marine Fisheries Service Recovery Plan, Anadromous Fish Restoration Program, Doubling Goals and Biological Opinions,” and Master Comment Response FISHPASS-1, “Fish Passage Above Shasta Dam.”

CWC-32: Please refer to Master Comment Response DSFISH-5, “Fish and Wildlife Coordination Act Report.”

CWC-33: A response to this comment is not required under NEPA because the comment does not raise a significant environmental issue (NEPA Regulations 40 CFR 1503.4). Many comment authors expressed personal opinions, histories or experiences which are not appropriately addressed as part of the NEPA process. This comment will be included as part of the record and made available to decision makers before final decision on the proposed project.

CWC-34: Chapter 12, “Botanical Resources and Wetlands,” and Chapter 13, “Wildlife Resources,” of the Final EIS were revised to enhance the discussion of sensitive and special status species, including impacts and mitigation measures.

CWC-35: These impacts were addressed in Chapter 13, “Wildlife Resources,” Section 13.3.4, “Direct and Indirect Effects,” of the EIS under Impact Wild-7, “Impacts on the Purple Martin and Its Nesting Habitat includes the analysis of impacts to purple martin.” The Wildlife Resources Technical Report – Attachment 3 (Breeding Bird Survey Results – Breeding Bird Surveys 2007-2014) includes information on purple martin surveys and the Wildlife Resources Technical Report has been revised for the Final EIS to enhance the discussion of purple martin and its nesting habitat. Revisions were also made to Impact Wild-7 and Mitigation Measure Wild-7 in Chapter 13 of the Final EIS.

CWC-36: Reclamation does not intend to revise the DEIS. Chapter 12, “Botanical Resources and Wetlands,” and Chapter 13, “Wildlife Resources,” of the Final EIS were revised to enhance the discussion of sensitive and special status species, including impacts and mitigation measures. **CWC-37:** Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-38: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-39: As fully described in Chapter 12, “Botany,” the riverine ecosystem mitigation and adaptive management plan would, “mitigate to the extent feasible any identified impacts of an altered Sacramento River flow regime on existing riparian and wetland communities, and

associated instream, riparian, and wetland habitat values for aquatic and terrestrial special-status species along the Sacramento River from Shasta Dam to Colusa (River Mile 144).” The goals of the plan, which will also serve as performance standards, will be to result in no net reduction in the average amount of any of the following along the Sacramento River from Shasta Dam to Colusa: (1) Channel migration in selected areas of natural vegetation dominated by native species, (2) Overbank inundation of natural vegetation dominated by native species in selected areas, and (3) Regeneration of early-successional riparian vegetation (e.g., cottonwood regeneration) in selected areas. The plan will reduce impacts to riparian habitat to less than significant through modeling or monitoring at representative locations to quantify impacts, evaluating feasible modifications to the procedures for operating Shasta Dam to reduce or eliminate adverse impacts and facilitate riparian habitat establishment, and implementing mitigation actions that would expand and improve riparian habitat.

CWC-40: The analysis in the DEIS was informed by the CALFED Ecosystem Restoration Program study from March 2008.

CWC-41: Comment noted.

CWC-42: Comment noted.

CWC-43: Comment noted.

CWC-44: Comment noted.

CWC-45: Comment noted.

CWC-46: Comment noted.

CWC-47: Comment noted.

CWC-48: Comment noted.

CWC-49: Comment noted.

CWC-50: Comment noted.

CWC-51: Comment noted.

CWC-52: Comment noted.

CWC-53: Comment noted.

CWC-54: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-55: The Mitigation and Adaptive Management Plan will be developed in detail if an alternative is selected and a project is authorized by Congress. The Final EIS includes additional information related to many proposed mitigation measures, see the Preliminary Environmental Commitments and Mitigation Plan Appendix.

CWC-56: Mitigation Measure Bot-7 in Chapter 12, “Botanical Resources and Wetlands,” requires implementation of a riverine ecosystem mitigation and adaptive management plan to avoid and compensate for the impact of altered flow regimes on riparian and wetland communities. This adaptive management plan has been described in the Final EIS. See Master Comment Response CMS-1, “EIS Mitigation Plan.”

CWC-57: As discussed in Mitigation Measure Bot-7, the plan will be consistent with and will support implementation of the Senate Bill 1086 program, and will be developed in coordination with USFWS, NMFS, CDFW, and the Sacramento River Conservation Area Forum.

CWC-58: As discussed in Mitigation Measure Bot-7, the plan will be consistent with and will support implementation of the Senate Bill 1086 program, and will be developed in coordination with USFWS, NMFS, CDFW, and the Sacramento River Conservation Area Forum.

CWC-59: Mitigation Measure Bot-7 in Chapter 12, “Botanical Resources and Wetlands,” requires implementation of a riverine ecosystem mitigation and adaptive management plan to avoid and compensate for the impact of altered flow regimes on riparian and wetland communities. This adaptive management plan has been described in the Final EIS. See Master Comment Response, CMS-1 “EIS Mitigation Plan.”

CWC-60: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

CWC-61: Please refer to Master Comment Response WASR-3, “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River,” Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542,” and Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-62: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-63: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-64: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-65: Comment noted.

CWC-66: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-67: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-68: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-69: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-70: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-71: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-72: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-73: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-74: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River.”

CWC-75: The impact analysis under Impact WASR-1 in Chapter 25, “Wild and Scenic River Considerations for McCloud River,” Section 25.4.3, “Direct and Indirect Effects,” is sufficient; this impact analysis

was developed in close coordination with USFS, in its role as a cooperating agency.

Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River.”

CWC-76: Please refer to Master Comment Response WASR-3, “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River,” and Master Comment Response WASR-4, “CRMP’s Responsibilities to Maintain the Outstandingly Remarkable Values of the McCloud River.”

CWC-77: Please refer to Master Comment Response GEN-4, “Best Available Information,” Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” Master Comment Response WASR-3, “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River,” and Master Comment Response WASR-4, “CRMP’s Responsibilities to Maintain the Outstandingly Remarkable Values of the McCloud River.”

CWC-78: Please refer to Master Comment Response WASR-3, “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River.”

CWC-79: Please refer to Master Comment Response WASR-3, “The Shasta-Trinity National Forest LRMP and Protection of the Eligibility of the McCloud River as a Wild and Scenic River,” and Master Comment Response WASR-4, “CRMP’s Responsibilities to Maintain the Outstandingly Remarkable Values of the McCloud River.”

CWC-80: Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CWC-81: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542,” and Master Comment Response CMS-1, “EIS Mitigation Plan.”

CWC-82: Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CWC-83: Please refer to Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

CWC-84: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-85: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-86: Please refer to Master Comment Response WASR-8, “Effects to the Eligibility of Rivers for Inclusion in the Federal Wild and Scenic River System.”

CWC-87: The affected environment and impacts sections of Chapter 17, “Land Use and Planning,” of the EIS has been revised to include a discussion of Forest Service roadless areas adjacent to Shasta Lake.

CWC-88: The affected environment and impacts sections of Chapter 17, “Land Use and Planning,” of the EIS has been revised to include a discussion of Forest Service roadless areas adjacent to Shasta Lake.

CWC-89: The DEIS Chapter 19, “Aesthetics and Visual Resources,” describes the visual impact on scenic land values throughout the primary study area which contains the Whiskeytown -Shasta-Trinity National Recreation Area (NRA). Chapter 17, “Land Use and Planning,” considers the impacts on land use within the primary study area with consideration to the impacts on the NRA.

Please refer to Master Comment Response REC-1, “Effects to Recreation at Shasta Lake.”

CWC-90: Please refer to Master Comment Response REC-4, “Relocation of Recreation Facilities,” Master Comment Response REC-5, “Relocation of Private Recreation Facilities onto Federal Lands,” and Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CWC-91: Please refer to Master Comment Response REC-4, “Relocation of Recreation Facilities,” Master Comment Response REC-5, “Relocation of Private Recreation Facilities onto Federal Lands,” and Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

CWC-92: Please refer to Master Comment Response NEPA-1 “Sufficiency of EIS.”

33.10.10 EMA, Inc.

EMAI

EMAI-1

On Mon, Jul 15, 2013 at 10:51 AM, Terry R. Thomas <trthomas@emacorp.com> wrote:
Name=Terry R. Thomas
[e-mail=tandmthomas@gmail.com](mailto:tandmthomas@gmail.com)
title=Principal
Organization=EMA, Inc.
address=2520 Snow Lane
city=Redding
state=CA
zip=96003
comments=Please add to your mailing list and provide electronic format of all documents on CD/DVD if possible

--

Terry R. Thomas, D.Env.

Telephone: (530) 246-8117

Environmental Management Associates, Inc.

Facsimile: (530) 246-8117

2520 Snow Lane

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Redding, CA 96003-3419 USA

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Response to Comment from EMA, Inc.

EMAI-1: Please refer to Master Comment Response MAILINGLIST-1, "Addition to the Mailing List."

33.10.11 Environmental Protection Information Center

10/23/13

DEPARTMENT OF THE INTERIOR Mail - Fwd: EPIC comments on the Shasta Lake Water Resources Investigation EIS



EPIC

Fwd: EPIC comments on the Shasta Lake Water Resources Investigation EIS

KATRINA CHOW <kchow@usbr.gov>
To: KATHLEEN DUNCAN <kduncan@usbr.gov>

Wed, Oct 23, 2013 at 1:07 PM

Sent from my iPhone

Begin forwarded message:

From: Amber Shelton <amber@wildcalifornia.org>
Date: September 30, 2013, 3:54:32 PM PDT
To: <kchow@usbr.gov>
Cc: Gary Hughes <gary@wildcalifornia.org>
Subject: EPIC comments on the Shasta Lake Water Resources Investigation EIS

Hi Katrina,
Thank you for returning my call to verify the correct email address for submitting comments on the Environmental Impact Statement for the Shasta Lake Water Resources Investigation. Please find our comments attached.

Feel free to contact me at 707-822-7711 if you have any questions.
Thank you,
Amber

--

Amber Shelton
Environmental Protection Information Center
Office: (707) 822-7711
Cell: (707) 834-2523
145 G Street, Suite A

<https://mail.google.com/mail/u/0/?ui=2&ik=20581cb21c&view=pt&search=imbox&in=141e6ee006664c6a>

1/3

10/23/13

DEPARTMENT OF THE INTERIOR Mail - Fwd: EPIC comments on the Shasta Lake Water Resources Investigation EIS

Arcata, CA 95521
amber@wildcalifornia.org

 **EPIC_ShastaLakeWRI-EIS_FINAL.pdf**
306K

Shasta Lake Water Resources Investigation
Environmental Impact Statement



Keeping Northwest California wild since 1977

September 30, 2013

Katrina Chow - Project Manager
US Bureau of Reclamation
Planning Division,
2800 Cottage Way
Sacramento, CA 95825-1893
kehow@usbr.gov.us

Sent via email transmission

RE: Shasta Lake Water Resources Investigation Environmental Impact Statement

Dear Ms. Chow,

- EPIC-1

The Environmental Protection Information Center (EPIC) works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in Northern California. EPIC uses an integrated, science-based approach, combining public education, citizen advocacy and strategic litigation. On behalf of the 2,500 EPIC members, we respectfully request that the Bureau of Reclamation (BOR) abandon the proposal to raise the height of the Shasta Dam.
- EPIC-2

The primary project objective of the Shasta Lake Water Resources Investigation is purported to be the increased survival of anadromous fish populations in the Sacramento River, but the Shasta Dam itself prevents Chinook salmon from entering cold water breeding streams that are on the other side of the dam, and the proposed action alternatives would inundate many prime fish spawning grounds. Instead of investing in a larger dam which will be counterproductive to salmon conservation objectives, the BOR should consider investing in a salmon ladder to allow the salmon to access their natural breeding habitat instead of inundating and destroying more spawning habitat.
- EPIC-3
- EPIC-4

Flood damage in the Sacramento River will not be reduced by proposed action alternatives. The BOR will still only have 1.3 million acre-feet to buffer flooding, which is the same as the current capacity. The difference is that the water will be at a higher elevation. The proposed alternatives will not conserve, restore, or enhance ecosystem resources in the Shasta Lake area. Instead, it will result in "take" of many threatened and endangered plants and animals, will flood riparian areas, will facilitate more wasteful use patterns, and will result in water quality violations from construction operations.
- EPIC-5
- EPIC-6

Multiple historical mining sites would be inundated and release toxics into the water. Furthermore, the proposed action alternatives will destroy existing recreational
- EPIC-7

Environmental Protection Information Center
145 G Street, Suite A, Arcata, California 95521
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www.wildcalifornia.org

EPIC RE: Shasta Lake WRI Environmental Impact Statement

EPIC-7 CONTD	↑	opportunities and displace many established businesses and developments around Shasta Lake.
EPIC-8		Based on these findings alone, <u>the proposed action alternatives do not meet most of the secondary project objectives, and the EIR should therefore be reevaluated.</u>
EPIC-9		An additional 76,000 acre-feet of storage capacity would only provide less than 0.2% of statewide agricultural and urban water use in California. The proposed project will not satisfy the growing demand for additional water from Southern California under current use patterns. <u>The BOR needs to consider alternatives that encourage conservation, not provide more incentives to abuse a scarce resource.</u>
EPIC-10		The proposed action alternatives would result in significant environmental impacts to the McCloud, Pit and Sacramento Rivers. The McCloud River, which is one of the best trout fisheries in the state, is of particular concern, because inundating significant reaches of the McCloud would destroy key fish habitat, again demonstrating that the proposed project is a threat to salmonid conservation objectives in Northern California watersheds.
EPIC-11		Furthermore, under the proposed action alternatives, the McCloud River would lose its eligibility to be listed as a Federal Wild and Scenic River, and the project would be in direct violation with the California Wild and Scenic Rivers Act, Public Resources Code, Section 5093.542, which states that <i>"the continued management of river resources in their existing natural condition represents the best way to protect the unique fishery of the McCloud River [and] maintaining the McCloud River in its free-flowing condition to protect its fishery is the highest and most beneficial use of the waters of the McCloud River..."</i>
EPIC-12		The McCloud River is also home to many sacred Native American sites belonging to the Winnemem Wintu tribe, who have already lost more than 90 percent of their lands when the Shasta Dam was constructed. The cultural considerations describing the inadequacies of this project cannot be understated: Raising the Shasta Dam would destroy 39 of their remaining sacred sites, and almost all of their remaining lands, including Children's Rock and Puberty Rock, which is used in coming-of-age ceremonies, and a burial place for victims of the <u>Kaibai Creek Massacre</u> . This is of significant cultural value to the already displaced Tribe, which has been seeking federal recognition for over a century.
EPIC-13		In an effort to facilitate the Shasta Dam expansion, the Westlands Irrigation District has purchased over 3,000 acres of land along the McCloud River to help the Bureau gain rights to expand the dam. Westlands has demonstrated a lack of environmental responsibility by supporting industrial agriculture techniques that depend on using high levels of pesticides, substances that eventually run off their farmlands and contaminate watercourses. Regardless of the outcome of the Shasta Dam expansion project, environmental standards should be put into place and waterways monitored for toxic runoff from adjacent farmlands to reduce cumulative impacts to water quality, aquatic habitat and wildlife. Additionally, these land-purchasing efforts should also be considered as part of the full scope and cumulative effects of the project.
EPIC-14	↓	The Bureau of Reclamation is not providing the public with information that describes how the Shasta Dam raising project is related to other statewide water infrastructure projects that are connected with the intention of sending water from Northern California to Southern California.

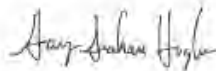
EPIC RE: Shasta Lake WRI Environmental Impact Statement

- ↑
- EPIC-14
CONTD
- EPIC-15
- EPIC-16
- EPIC-17
- EPIC-18
- EPIC-19
- EPIC-20
- EPIC-21
- EPIC-22
- Of particular concern is the proposal by California Governor Jerry Brown and the State of California, along with the Bureau of Reclamation, to build the Twin Tunnels Project that would construct two large tunnels in order to divert large amounts of water to supply corporate agricultural farms and fracking operations in the Southern region of the state, at the expense of California taxpayers. The National Environmental Policy Act requires that cumulative impacts from the related projects should be evaluated, considered and disclosed to the general public. The current Draft Environmental Impact Statement does not reflect this mandatory process and is therefore inadequate. The EIR must be revised to show the full scope of the project and the cumulative impacts relating to the multiple related projects.
- According to the BOR, the current infrastructure capacity is only being utilized about once every three years. Increased storage capacity will not achieve the project objectives or goals and will not create additional water. In fact, the dam raise will result in evaporation and loss of water. A brutal fact is that the water supply has been over-allocated. There is not enough water to satisfy the demands of Southern California and central valley demands, and still meet the needs of river ecosystems and Northern California residents. Current drought conditions are expected to worsen with the effects of global warming. The BOR needs to focus efforts on conservation, restoration, and climate change adaptation instead of investing in antiquated infrastructure projects.
- Freshwater ecosystems are the most endangered ecosystem type on the planet, and a growing body of science has determined that dams are one of the largest threats to these ecosystems, and the human communities that depend on them. The proposal to raise the Shasta dam goes against the best available science relating to conservation of the freshwater river ecosystems that the proposed project would affect.
- In summary, the Environmental Impact Statement is inadequate, and should be withdrawn. This costly, unnecessary development would cause more environmental, cultural and economic problems than it would solve, benefiting few farmers at the cost of California taxpayers, Northern California residents, and indigenous communities.
- Please consider the above comments and make an educated decision to withdraw the proposal to raise the height of the Shasta Dam.

Respectfully,



Amber Shelton
Online Organizer and Program Assistant



Gary Graham Hughes
Executive Director

**Responses to Comments from Environmental Protection
Information Center**

EPIC-1: Please refer to Master Comment Response GEN-5, “Some People Support Dam Raise and Others Oppose Dam Raise.”

EPIC-2: Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

EPIC-3: Please refer to Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” and Master Comment Response FISHPASS-1, “Fish Passage Above Shasta Dam.”

EPIC-4: Please refer to Master Comment Response FM-6, “Effects to Downstream Flooding.”

EPIC-5: Please refer to Master Comment Response GEN-1, “Comment Included as Part of the Record.”

EPIC-6: The EIS, Chapter 7, “Water Quality,” includes a discussion of heavy metals and the associated impacts. Mitigation measures have been developed to ensure that the one known site (Bully Hill area) will be addressed. In addition Chapter 2, “Alternatives,” of the EIS includes a comprehensive list of environmental commitments, including preparation of a Storm Water Pollution Prevention Plan to ensure compliance with relevant water quality requirements.

EPIC-7: Please refer to Master Comment Response REC-1, “Effects to Recreation at Shasta Lake,” and Master Comment Response PLAR-1, “Effects to Private Residences and Businesses.”

EPIC-8: Reclamation is unaware of where the language referenced is used in the EIS.

Please refer to Master Comment Response ALTR-1, “Range of Alternatives – General.”

EPIC-9: As described in EIS Chapter 2, “Alternatives,” and summarized in Table 2-24, “Summary of Major Benefits of Action Alternatives,” under the various action alternatives total storage increases by 256,000 acre-feet (6.5 foot raise), 443,000 (12.5 foot raise), or 634,000 acre-feet (18.5 foot raise).

Please refer to Master Comment Response ALTD-1, “Alternative Development – Water Supply Reliability,” and Master Comment Response WSR-8, “Action Alternatives Don’t Meet All Water Demands.”

EPIC-10: Chapter 11, “Fisheries and Aquatic Ecosystems,” of the EIS has been revised to include additional information on impacts to tributaries to Shasta Lake, including the Sacramento River and McCloud River upstream from Shasta Lake. Under CP3, about 2,189 feet of the

Upper Sacramento River would be subject to inundation. Under CP3, about 3,550 feet of the McCloud River would be subject to inundation.

While the commenter suggest that the DEIS discloses significant environmental impacts to the McCloud, Pit and Sacramento Rivers, this statement is incorrect with respect to the Pit River.

Chapter 25, “Wild and Scenic River Considerations for McCloud River,” of the EIS discloses the impacts to the McCloud River and the relevant outstandingly remarkable values (e.g., wild trout fishery).

The commenter suggests that the SLWRI is a “threat to salmonid conservation objectives in Northern California watersheds.” This statement is inconsistent with one of the primary objectives of the SLWRI – Increase the survival of anadromous fish populations in the Sacramento River.

EPIC-11: Please refer to Master Comment Response WASR-1, “Eligibility of the McCloud River as a Federal Wild and Scenic River,” and Master Comment Response WASR-6, “Protections of the Lower McCloud River as Identified in the California Public Resources Code, Section 5093.542.”

EPIC-12: Please refer to Master Comment Response CR-1, “Potential Effects to Cultural Resources,” and Master Comment Response CR-2, “Federal Recognition.”

EPIC-13: Please refer to Master Comment Response GEN-2, “Unsubstantiated Information,” Master Comment Response GEN-4, “Best Available Information,” and Master Comment Response GEN-7, “Rules and Regulations for Water Operations under Action Alternatives.”

EPIC-14: Please refer to Master Comment Response BDCP-1, “Relationship of the SLWRI to the Bay Delta Conservation Plan,” and Master Comment Response FRACK-1, “Water Supply Used for Fracking.”

EPIC-15: Please refer to Master Comment Response NEPA-1, “Sufficiency of the EIS,” and Master Comment Response NEPA-2 “Cumulative Impacts.”

EPIC-16: Please refer to Master Comment Response RAH-1, “Available Water to Fill an Enlarged Reservoir.”

EPIC-17: Please refer to Master Comment Response RE-1, “Reservoir Evaporation.”

EPIC-18: Please refer to Master Comment Response WSR-1, “Water Supply Demands, Supplies, and Project Benefits.”

EPIC-19: The important issue is the severity of future drought conditions. Please refer to Figures 3-120 through 3-122 in the Climate Change Modeling Appendix where it is shown that an enlarged Shasta can potentially mitigate the severity of future droughts.

Please refer to Master Comment Response CC-1, “Climate Change Uncertainty and Related Evaluations.”

EPIC-20: Please refer to Master Comment Response ALTD-1, “Alternative Development – Water Supply Reliability,” Master Comment Response ALTD-2, “Alternative Development – Anadromous Fish Survival,” and Master Comment Response ALTR-1, “Range of Alternatives – General.”

EPIC-21: Please refer to Master Comment Response EI-1, “Intent of NEPA Process to Provide Fair and Full Discussion of Significant Environmental Impacts,” and Master Comment Response GEN-4, “Best Available Information.”

EPIC-22: The potential environmental consequences of the project alternatives as they relate to cultural resources, agriculture and important farmland and cultural resources are discussed in Chapter 14 “Cultural Resources,” Chapter 10, “Agriculture and Important Farmland,” and Chapter 24, “Environmental Justice.”

Please refer to Master Comment Response NEPA-1, “Sufficiency of the EIS,” and Master Comment Response COST/BEN-1, “Intent of EIS and Process to Determine Federal Interest.”