DATE: February 12, 2002

TO: DWR - Scott Woodland (Senior Engineer)

FROM: Edward Owens

The Owens family have been around the Newville area since the 1850's. We are opposed to the Tomes-Newville reservoir.

FAXED: (916) 651-9289

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REDDING ELECTRIC UTILITY
CITY OF REDDING

530.245.7400
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777 Cypress Avenue
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Redding, California
96049 6071
www.ci.redding.ca.us

January 25, 2002
E-120-070

Mr. Scott D. Woodland, P.E.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236

Dear Mr. Woodland:

The City of Redding (Redding) appreciates the opportunity to provide comments on the preparation of the North of the Delta Offstream Storage environmental impact report/environmental impact statement (EIR/EIS). These comments are prepared from the perspective that Redding is both a Central Valley Project (CVP) water customer and a CVP power customer.

Our comments and concerns are as follows:

Impacts on CVP Operations

The scope of the EIS/EIR needs to include detailed operation scenarios for all storage alternatives being evaluated. These various operating scenarios need to provide substantial information of the impacts on all facilities (proposed and existing). For example, the proposed Sites Project as a stand-alone project could still have measurable impacts on the existing CVP system. The study of impacts needs to delineate as much as practicable the full scope of burdens and benefits of the Sites Project. The EIS/EIR has to provide decision makers with the ability to identify the costs and benefits of all alternatives studied, and provide a means for meaningful comparisons of the alternatives. Examples of specific items to include are as follows:

Changes in CVP hydro operation and storage requirements at existing reservoirs.
Changes to existing CVP pumping requirements.
Impacts to CVP power generation capabilities (both capacity {peaking} and energy).
Power delivery and cost impacts related to the existing CVPIA, EWA, etc.

Alternative Review

As part of the EIS/EIR process, alternatives (including the no-action alternative) to the Sites Project are expected to be evaluated. Redding has two areas of particular concern:

1. The criteria used to evaluate various alternatives needs to be shared with the affected users of the CVP from the beginning of the EIR/EIS process. A pro-active approach by the lead agency(s) addressing this issue will only strengthen the process and reduce the time required for completion of the EIR/EIS.

2. The analysis of all viable alternatives needs to be developed to a high enough level so as to ensure a meaningful and fair comparison between all alternatives. For example, the "Raise Shasta" alternative would potentially introduce additional power generation as an added benefit to the CVP system overall. Whereas the addition of Sites Project off-stream storage would likely not increase power generation but rather require pumping energy and have significantly different impacts on Sacramento river downstream operations than a "Raise Shasta" alternative.

Meeting these two criteria will enhance the compliance with the CALFED solution principles and help define specific and necessary mitigation approaches.

Guiding Principle

As the various alternatives are fully developed and evaluated, the underlying principle that a project should be affordable, equitable to all, and have no redirected impacts must be fully addressed. Costs should be distributed equitably among the beneficiaries in proportion to the benefits received. Therefore, the cost of any energy usage by a proposed project must be factored into the cost/benefit analysis at today's market-driven power costs, including any charges that may be imposed by the state's electricity restructuring process.

Redding looks forward to a cooperative effort and is supportive of the successful completion of the EIS/EIR.

If you have any comments or questions, please contact Lowell Watros at (530) 245-7403.

Sincerely,

James C. Feider
Electric Utility Director

c: Pat Kight, Mayor, City of Redding
Paul Olmstead, Resource Specialist - SMUD
Phillip A. Perry, Assistant City Manager, City of Redding
Michael Warren, City Manager, City of Redding
Alan Zepp, Federal Legislative Analyst - NCPA

February 8, 2002

Attention: Scott Woodland
Senior Engineer

Scott Woodland:

I own and run a 600 cow winter cattle ranch at the end of Long Hollow Road. My property borders John Connley's Quiet Hills Ranch. I oppose proposed Thomes Newille Dam site because the proposed road through my property would disrupt the diverse wildlife habitat we currently manage and maintain. The road would also adversely impact cattle ranching.

I appreciate being able to voice my concerns regarding the proposed dam.

Sincerely,

Richard Riolo

Richard Riolo
(916) 771-0547

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SMUD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
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January 23, 2002

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

ET&C 02-018

Mr. Scott Woodland
Department of Water Resources
Division of Planning and Local Assistance
PO Box 94836
Sacramento, CA 94236-0001

Subject: Scoping Comments North of the Delta Offstream Storage

Dear Mr. Woodland,

The Sacramento Municipal Utility District (SMUD) is the largest Central Valley Project (CVP) Preference Power Customer, providing not only payments into the Restoration Fund but repayment of the CVP plant-in-service and Operations and Maintenance (O&M) costs allocated to power. We have a major financial interest in the prudent management of CVP facilities. SMUD has significant concerns regarding the policies and programs under development through the CALFED planning process to modify the operations, management and physical facilities of the CVP. To this end, SMUD submits the following scoping comments on the North of Delta Offstream Storage Project (NDOS).

The issues that concern SMUD are discussed below.

Purpose and Need

SMUD is unclear as to the timing of proceeding with the NDOS EIS/R when the purpose and need statement required in the *Sites Memorandum of Understanding* has not been agreed upon. SMUD requests a clear statement of the federal role in this project. In the EIS/R address the decision making process for this project include a schedule or milestones for the EIS/R review and decision processes. What are the roles of the respective agencies? What agency is the decision maker for each alternative? Please identify the major federal actions.

Alternative Selection

Selection criteria for evaluation of alternatives are not yet established. The criteria need to be concise and shared with the affected users of the CVP before an informed decision can be made. Impacts to net power production and repayment ability or inability should be part of the criteria.

All alternatives need to be brought to an acceptable level of analysis in order to provide for impartial comparisons. Those alternatives that have more work-to-date should not have an advantage. The Raise Shasta enlargement is an alternative that needs to be included as a viable alternative, and needs more analysis to receive equal consideration as the Sites Alternative.

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SMUD understands that the Raise Shasta Alternative would be an integrated feature of the CVP, and SMUD supports that approach. SMUD is less clear on what the federal role would be in a Sites Reservoir Alternative. As this is not an enlargement of a CVP facility, and it is authorized by CALFED, it is presumed that Sites Project would be a state/local water district project. SMUD requests confirmation of this understanding by the lead agencies.

SMUD, as a CVP power customer, would have serious concerns about Sites Reservoir if it were proposed as an integrated part of the CVP. The cost/benefit ratio and allocation of costs for the project are a concern to SMUD. Repayment and ability to pay cost shifting would be a serious concern. Pumping costs that exceed any power benefits would be a serious concern. SMUD requests all these issues be addressed in consultation with SMUD if Sites is proposed to be an integrated feature of the CVP. Alternatively, SMUD suggests that the lead agencies clarify that Sites Reservoir, if implemented, would not be a financially integrated part of the CVP, and would not qualify for CVP project use energy to meet its pumping requirements. Rather the project should be a state/local water agency project, responsible for its own power supply, and the reclamation role limited to one of operational coordination and design on a third-party services basis.

During the discussion of the no-action, please ensure that all proposed resource projects that could significantly reduce/improve the project benefits and impacts are discussed.

Impacts to CVP Power Resources

In the CALFED Programmatic Environmental Impact Statement / Programmatic Impact Report (PEIS/EIR), SMUD repeatedly stated that the amount of CVP hydroelectric energy available for sale would decrease substantially in nearly all CALFED scenarios. The greatest impacts to CVP operation and power sales involved the scenarios that include water storage facilities and/or the isolated conveyance facility. The primary impacts to power result from increased pumping energy consumed at proposed new water storage and conveyance facilities.

Please ensure that detailed operation scenarios for the NDOS alternatives are analyzed. Include where all facilities are to be located, their potential costs, their primary beneficiaries, and how the cost of such facilities will be recovered. Assure that the document does not lack meaningful appraisal or feasibility analysis of the costs and benefits of such new projects.

The CALFED program has not set specific objectives for hydropower generation. SMUD and the CVP preference customers agree that the NDOS Project should minimize negative effects on resources, such as hydropower generation, during and after implementation. Increases in net CVP hydro generation like that made possible by a Raise Shasta Alternative should be pursued where feasible.

Please assure that information is provided regarding storage and pumping load assumptions. The Final CALFED PEIS/R stated that both that program and project alternatives would be discussed in subsequent environmental documentation and that impacts would be addressed when specific projects were to be developed. In this EIS/R we would like to see an analysis of impacts by the

operation for each of the alternatives under consideration. To understand the impacts to the capacity, generation, pumping energy and energy available for sale that will impact on implementation of the NDOS, a variety of potential project allocations showing some real world options are appropriate and necessary.

New pumping and storage facilities may have adverse impacts to power sales to Preference Power Customers and would, therefore, threaten the repayment capability of the CVP. A large part of the CVP repayment to the U.S. Treasury of the cost of construction of the CVP comes from Preference Power sales. Please address in the Areas of Controversy section any impacts by the project to the CVP and State Water Project. Please ensure that the document adequately addresses the severity of impacts to CVP Preference Power Customers and addresses the long-term financial implications of the wholesale modification of CVP operations and the impact to all CVP customers. Please also explain how compliance the CALFED Record of Decision mandated to avoid redirected impacts would be achieved.

Operational changes to CVP

New storage facilities need to have operational flexibility. Implementation of NDOS may require re-operation of the CVP. Re-operation will affect the timing of energy generation, peak project capabilities, annual energy production, and the distribution of energy on a seasonal, monthly, and daily basis. A major concern is that the water modeling programs may not provide the data needed for an adequate power production analysis. Models based upon monthly averages cannot forecast energy output and power values. Assure that enough information is presented to determine what changes in revenues from power sales and power costs to CVP Power Customers would result from the implementation of the NDOS.

Impacts upon CVP Rates

The NDOS project may have numerous implications to the future of the CVP and Western Area Power Administration (Western) if they are integrated into the CVP. Rate increases may occur due to changed river operations, increased pumping loads, and increased mitigation costs assigned to CVP Preference Power Customers. SMUD has a concern that increased rates could affect power marketed by the Western to the point it will become unmarketable. Increasing rates will decrease the power customers' ability to compete in the restructured utility industry's competitive environment. It is in the best interest of all parties to ensure that Western remains viable and continues to market federally generated power. If Western's rates are pushed above the existing energy market, customers will buy elsewhere, resulting in an inability to repay CVP capital. CALFED policy requires that beneficiaries of any CALFED Program action must pay related costs, not redirect them to others. We concur with the philosophy of this approach and would like to see CALFED adopt this as a policy for any generation losses as a result of the NDOS. CALFED policy requires for reimbursement for lost power or to pay to construct replacement generation. CALFED has not recognized that rate impacts, being economic in nature, require mitigation. The CALFED philosophy states there will be no "redirected impacts" and "the beneficiary pays." For the CVP Preference Power Customers, this will require a

commitment to mitigate directly for rate impacts if a facility is integrated financially into the CVP. The project proponents must commit to this mitigation to the CVP Stakeholder group.

Assure that the NDOS EIS/R provides an analysis of what the project will do to the rates for energy that the CVP Preference Power customers will pay. Include if there will be rate increases on the Preference Power Customers and the severity of this impact.

SMUD will continue to support the NDOS as long as the users and benefactors of the project bring their own power for the pumping that will be required for operation purposes.

Financing / Program Cost Allocations

Please ensure that project funding is addressed. It is not possible to determine the full impact of the alternatives if project funding is not addressed. As a Preference Power Customer of the CVP, SMUD has been paying its equitable share of Central Valley Project Improvement Act (CVPIA) Restoration Fund costs. The CVPIA is a separate program with specific objectives and prearranged payment obligations established by Congress. The Restoration Fund is financed partially by the CVP Preference Power Customers and is intended for the mitigation of CVP and its impacts. Use of the Restoration Fund by other entities for non-CVP purposes is not allowed. The funding for this project should not anticipate that CVPIA money will be redirected to CALFED or that CVP Preference Power Customers are able to pay beyond current Restoration Fund costs. Allocating additional Program costs to CVP Preference Power Customers would exacerbate anticipated rate impacts, and make it more difficult for CVP Preference Customers to repay the Treasury. Inability to pay problems plagues some CVP water customers in the Sacramento Valley. Please provide analysis that a Sites Reservoir will not exacerbate this situation if financially integrated into the CVP.

While the EIS/R is not required to address the full range economic factors, future decisions to receive the authorization to proceed will require economic discussion. SMUD requests a cost-benefit ratio analysis for the Sites Project sites and comparison with Raise Shasta Alternative. Include with the analysis the repayment allocation of project capital and O&M costs between project beneficiaries and the source of the funds to proceed with the project.

The EIS/R should include a detailed cost estimate and a cost-benefit analysis of each alternative. A more important factor should be the ability of the preferred project alternative to meet the program objectives. Costs should be distributed equitably among the beneficiaries in proportion to the benefits received. Improvement to the environment benefits the general public and should be funded by the general public.

Cumulative Impacts

In the Cumulative Impacts Section elaborate upon how the alternatives may affect power production and energy to the CVP or SWP. Also identify the mitigation for these impacts.

Assure that the EIS/R includes discussion and analysis of the future operation of the Trinity River Unit. Include in the document, how the re-operation of the Trinity River Unit will impact the proposed NDOS alternatives.

Mitigation Strategies

Ensure that mitigation measures to reduce adverse impacts to power generation are included in the document. The CALFED PEIS/EIR stated that the CALFED Program has no specific objectives for hydropower generation. However, the Program does seek to minimize impacts on hydropower generation, during and after CALFED implementation. The Program also seeks to minimize redirected impacts and to maintain linkage between the beneficiaries of actions and the costs of those actions. Given this direction, mitigation measures, to reduce adverse impacts to power generation, should be part of the document.

SMUD supports mitigation that will positively influence the ability of Western to continue to sell power at reasonable rates to the CVP Preference Power customers. Increases in CVP energy use costs should be avoided. If incurred they should be covered by revenue from CVP water users, natural resource agencies, and other environmental beneficiaries. Additional pumping costs should be assigned to the beneficiaries of the pumping.

Other Issues

Please identify the linkages of NDOS to the CALFED to the Water acquisition program.

Conclusion

SMUD concurs with the philosophy that CALFED solution principles must reduce conflicts in the system, be equitable to all, be affordable, be long lasting, be implementable, and have no significant redirected impacts. Any new CALFED use of the CVP should be paid for by new generation or by the beneficiaries of the facilities at the current market rates, and not by depleting existing CVP resources.

SMUD desires that these comments are addressed so that the NDOS EIS/R is a legally sufficient document. The concerns of CVP Preference Power Customers need to be adequately addressed. To ensure that this occurs, a future meeting between this customer group and project proponents is requested.

If you have any comments or questions, please contact me at 916/732-5716.

Sincerely,

Paul Olmstead
Water & Power Resources Specialist

cc:

Nannette Engelbrite, WAPA
NCPA
Lowell Waltross, City of Redding

Bc:
Tom Ingwers
Brian Jobson
Ed Roman
Leslie Dunsworth

sacramento river preservation trust

January 24, 2002

Scott D. Woodland P.E.
Senior Engineer W. R.
Department of Water Resources (DWR)
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Woodland;

The Sacramento River Preservation Trust (Trust) would like to submit the following comments regarding the Notice of Preparation of an Environmental Impact Report/ Statement (EIR/S) for the development of offstream water storage north of the Sacramento/San Joaquin Delta:

- The Trust believes that any development of alternatives must include, in addition to the associated programs listed in your scoping meetings announcement, a review of the Integrated Resources Management Program for Flood Control in the Colusa Basin.
- As part of the development of the Sites Reservoir Alternative, the Trust would like to see included a discussion focused on the potential removal of or modification to Black Butte Dam and Reservoir.

The Trust appreciates having the opportunity to comment and hereby requests that we be kept informed of all future actions concerning this project.

Sincerely,

John Merz
Chair, Board of Directors

Cc: Interested Parties

P.O. Box 5366, Chico, CA 95927
(530) 345-1865

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Brent Shanahan
Orland, Ca. 95963

Scott Woodland
Senior Engineer
(916) 551-9289

Dear Mr. Woodland:

I live, work, and raise my family just under the proposed Thomes-Newville dam. I myself was raised in Elk Creek, not far from the proposed berm of that dam. That berm is located artificially in the middle of the valley due to serious concerns about the capability of the watershed to fill the dam and keep it full.

Construction of the dam would seriously distort every environmental and unique characteristic of this special area. The loss would be irreplaceable.

I strongly oppose the Thomes-Newville dam.

Sincerely,

Brent Shanahan

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SHASTA COUNTY

BOARD OF SUPERVISORS

1815 Yuba Street, Suite 1
Redding, California 96001
(530) 225-5557
(800) 479-8009
(530) 225-5189-FAX

January 16, 2002 FPA 040508

Scott Woodland
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: North-of-Delta Offstream Storage
Scoping Comments

Dear Mr. Woodland:

Thank you for hosting a Scoping Meeting for the Offstream Storage Investigation in Maxwell on January 9, 2002. It was well-attended, and the opportunity for community input on the scoping of the environmental documents was much appreciated. I was very pleased to see that we are taking tangible steps to improve the reliability of California's water supplies. In that same spirit of cooperation and progress, I would like to reiterate our key sentiments on this important issue.

Shasta County fully supports the Sites Reservoir Project. The last major improvements to the CVP and SWP were built forty years ago. A few reservoirs have since been built by individual water districts. However, overall resource development has been insufficient to meet California's new needs for water, power, flood protection and recreation. Additional storage will address this imbalance. Offstream storage can solve our water supply problems, with minimal environmental impacts. Clearly, this is a proposal whose time has come.

Decisions will be made and resources expended, based upon the environmental document. Consequently, it is imperative that we maintain an objective and scientific focus. All too often, the analyses of the 'No Action' and 'No Project' alternatives are too rosy. It is implied that somehow all of the people, animals, and ecosystems that would benefit from a proposed project will somehow manage without the project, and without redirecting impacts elsewhere. Conversely, every potential shortcoming that can be associated with a proposed project is overstated in elaborate detail. Such anti-action bias taints many an environmental document. Such documents lack credibility, and are of little use to decisionmakers. This pitfall should be avoided. The Sites Reservoir

Project should be fairly evaluated. The No Action alternative should be fairly evaluated. The two should be objectively compared. And then we should built the Sites Reservoir.

Again, thank you for the opportunity to comment. I look forward to further opportunities to champion this worthwhile project, as it moves forward.

Very truly yours,

Patricia A. "Trish" Clarke
Supervisor District 5

PAC/EBW/jmg

State Water Contractors

455 Capitol Mall, Suite 220 • Sacramento, CA 95814-4409
John C. Coburn General Manager (916) 447-7357 • FAX 447-2734

February 8, 2002

Mr. Scott D. Woodland P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Woodland:

This letter is to provide you with the comments of the State Water Contractors (SWC) on the scope of issues to be addressed in the Environmental Impact Report (EIR) on the North of Delta Offstream Storage (NODOS) project. The SWC represents 27 public agencies, which contract with the State Water Project for their water supplies, with a maximum collective Annual Table A Amounts of nearly 4.2 million acre-feet per year.

The SWC has been working with Sacramento Valley interests on a regional water management program that would help meet in-Valley needs as well as help the state and federal projects meet the requirements of the Bay-Delta Water Quality Control Plan ("Phase 8" negotiations). As part of our Settlement Agreement with the Sacramento Valley interests, we recognized that new offstream surface storage is an essential element of the program and can increase the reliability of water supplies for export water users as well as upstream interests.

In looking at the future water supply and demands of California's ever increasing population, the SWC believe:

- Additional surface storage is needed in the Sacramento Valley to serve both environmental and water supply purposes:

- The State's existing network of reservoirs and aqueducts is outdated, undersized, and inadequate to support the State's basic water needs in a sustained drought.

- Conservation and recycling programs alone cannot by themselves meet the growing needs of a population that has more than doubled since the system's major features were built 40 to 60 years ago.

  Additional storage is also needed to address new environmental protection measures, which have increased demands on the system and reduced operational flexibility.

  Scientists are predicting a reduced snowpack due to global warming, suggesting that augmented surface storage capacity is necessary in order to offset the reduced natural storage in the snowpack.

For all these reasons, the CALFED Record of Decision properly found the need to expand surface storage capacity in the state's system, and committed to study the Sites Reservoir in the Sacramento Valley as one possible location for new offstream storage.

Alternatives to be Considered

The NODOS EIR should accordingly limit its scope and alternatives considered to the Sites location and any other feasible offstream storage sites in the Sacramento Valley.

Definition of Future Conditions Without Offstream Storage

Last year, the first dry year after a string of six wet or above normal years, the State Water Project contractors received a water supply allocation of only 39 percent. If not addressed soon, this low level of supply reliability will begin to have serious adverse economic consequences up and down the State. The No Action Alternative must analyze the economic consequences of continued water supply shortages in the absence of new surface storage.

Focus of Impact Assessment

New offstream storage in the Sacramento Valley will provide considerable environmental benefits. The Sites Reservoir could provide the following environmental benefits:

- Improved water temperatures for fisheries in the Sacramento River below Shasta Lake

- Increased supplies and system flexibility in support of state and federal efforts to improve fisheries of the Sacramento River, including the Environmental Water Account

  Reduced exposure of juvenile fish to diversions

- Greater ability to emulate the natural flow regime of the Sacramento River

The EIR must analyze these environmental benefits as well as the water supply benefits likely to result from Sites Reservoir or any other Sacramento Valley offstream storage project.

Thank you for considering these comments. Please add us to your mailing list to receive future announcements and information pertaining to this project.

Sincerely yours,

John C. Coburn
General Manager

Xc: SWC Member Agencies
Thomas Hannigan, Director, Department of Water Resources

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United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

Scott D. Woodland P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

FEB 0 5 2002

Dear Mr. Woodland:

We are responding to your Notice of Preparation (NOP) on the North of the Delta Offstream Storage Project. We have also reviewed the North of Delta Offstream Storage Investigation (NDOSI) Progress Report. We are using this opportunity to participate in the scoping process for this project on three significant issues: (1) significant environmental issues which should be addressed in the document (2) alternatives that should be considered in the document (3) parties who should participate as cooperating agencies in the development of the document.

Indian lands held in trust, whether for tribes or individual Indians, are a trust asset. The United States must protect and manage those resources in a manner consistent with their highest and best use. Such fiduciary responsibilities of the trustee include management of the land in an income producing manner. Under most circumstances, such management would include the delivery of sufficient water to implement those uses. We note that the proposed EIR/EIS tiers from the original CALFED EIS/EIR. During the original CALFED EIS/EIR, we repeatedly voiced concerns over the extent to which proposed actions would significantly impact resources held in trust for Indians by the United States and the extent to which the Bureau of Reclamation was fulfilling its fiduciary responsibilities to American Indians.

Consistent with the President's April 29, 1994, Memorandum, Government-to-Government Relations with Native American Tribal Governments, CALFED Agencies committed to assess the impact of CALFED project-specific plans and activities on tribal trust resources and tribal government rights and concerns. Consistent with the Presidential Memorandum, CALFED Agencies committed to consulting with tribes on a government-to-government basis prior to taking actions that affect such tribal governments. We anticipate following the government-to-government tribal consultation process for the NDOSI EIR/EIS with great interest.

We have the following specific comments:

(1) Review of the CALFED EIS – Indian Trust Assets 7.15.4 Assessment Methods provided the following quotation "Identifying specific Indian trust assets is the first action to determine whether an undertaking will affect trust assets. Project planners will examine

areas of potential effect for possible conflict with Indian land and Indian Trust Assets." Enclosed is a recently prepared map showing project areas and trust lands to aid in this assessment.

We believe that the proposed document should determine Indian water supply needs for trust lands as a more accurate means of determining effects to trust resources. With a determination of Indian needs for the trust lands, decision makers may more easily make a determination as to whether aspects of the project will have an effect, whether beneficial or adverse. Additionally, such a document will be essential to a meaningful tribal consultation process.

(2) Review of NDOSI Progress Report, Appendix H: Water Exchange Element – Short and Long Term Relationships raised the issue of the effects of water contracts on trust resources. The EIR/EIS should address the critical element of whether commitment of water to purveyors would hinder the ability of Tribes to acquire water or participate in contractual arrangements, and therefore diminish the value of the land or potential uses of the land held in trust.

(3) Review of NDOSI Progress Report, Appendix I, Water Supply Operations Studies raised the following issue with regard to potential water supply diversion. Determinations regarding instream flow requirements and diversion schemes should include consideration of tribal trust resources. We question whether regulatory instream flow or irrigation delivery requirements are predicted to change within the next 50 years. These potential changes in instream flow would affect Indian trust riparian and reserved water rights. In particular, future water needs for Indian lands may not be met due to regulatory instream flow requirements. We recommend that the proposed EIR/EIS include development of a water supply investigation for the Indian lands and that this water supply investigation be based on an assessment of agricultural lands and potential beneficial uses.

(4) We are also concerned that actions that alter or decrease flows within riverine systems and their tributaries, may adversely affect trust resources. Further, out-of-basin transfers or diversions may contribute to reduction in groundwater recharge with associated water level drops and supply decreases. We therefore believe it is critical to conduct baseline studies to assess current hydrologic and geohydrologic conditions for all tribal trust lands in the northern Sacramento Valley. Conducting water assessments such as these are positive actions toward responsible protection and preservation of the trust.

Regarding alternatives to be considered, we note that the Sites Reservoir Alternative explicitly includes the possibility of enlarged capacity for the Glenn-Colusa and Tehama-Colusa Canals. We are requesting that the enlarged capacity alternative incorporate irrigation outlets that will enable Indian trust lands to acquire water from these canals.

Finally, we are interested in participating as a cooperating agency in the development of the North of Delta Offstream Storage Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). We also believe that the commitment to a government-to-government consultation process would appear to provide for tribal cooperating agency status, at tribal request.

Questions on our comments can be directed to Mr. William Allan, Regional Environmental Protection Specialist, at (916) 978-6043 or Mr. Dale Morris, Natural Resources Officer, at (916) 978-6051.

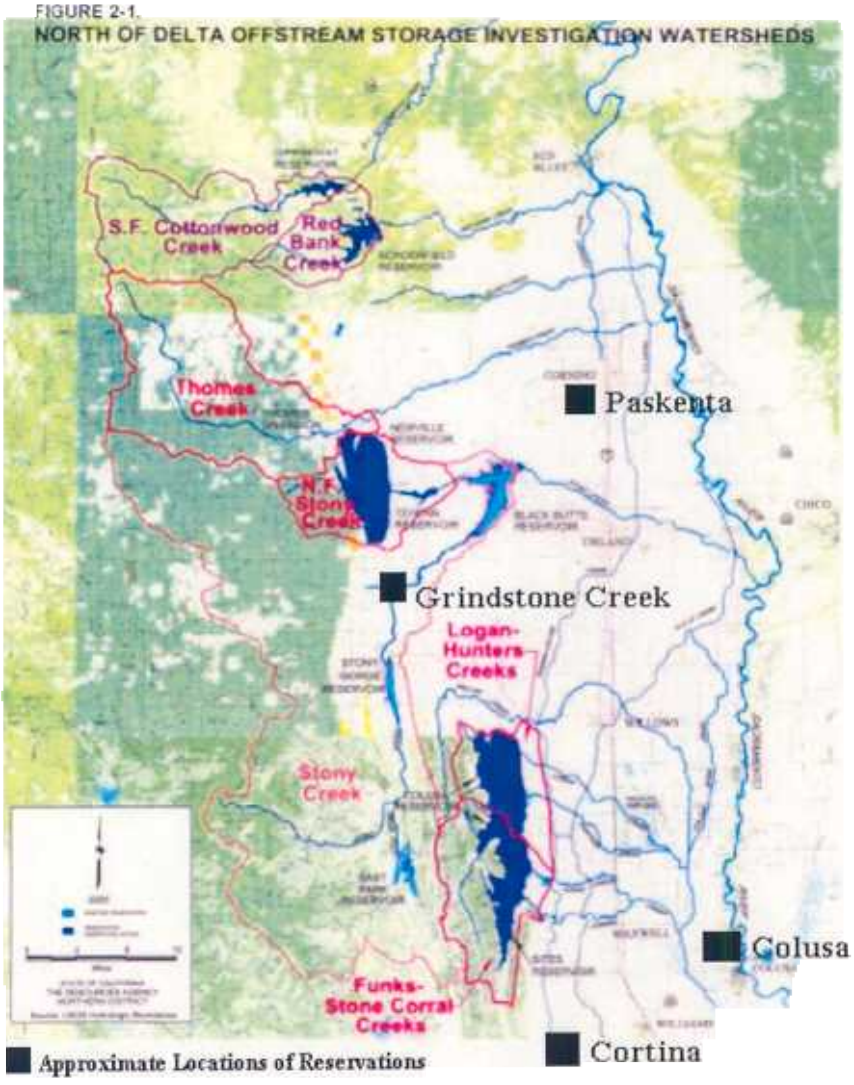
Sincerely,

Acting Regional Director

Enclosure

cc: Superintendent, Central California Agency
Regional Director, Bureau of Reclamation
Director, Office of Trust Responsibilities, BIA
Director. Land and Water Resources. BIA

FIGURE 2-1.


NORTH OF DELTA OFFSTREAM STORAGE INVESTIGATION WATERSHEDS
S.F. Cottonwood Creek
Red Bank Creek
Thomes Creek
N.F. Stony Creek
Paskenta
Grindstone Creek
Logan-Hunters Creeks
Stony Creek
Colusa
Funks-Stone Corral Creeks
Cortina
Approximate Locations of Reservations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 15, 2002

Frank Michny
Regional Environmental Officer
Bureau of Reclamation
Mid-Pacific Regional Office
Attn: Donna Garcia
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Michny:

The Environmental Protection Agency (EPA) has reviewed the Notice of Intent to prepare an environmental impact statement for **North of the Delta Offstream Storage, California.** Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Bureau of Reclamation (Reclamation) and California Department of Water Resources (DWR) propose to prepare a joint environmental impact statement/environmental impact report (EIS) for the North of the Delta Offstream Storage project (NDOS). The NDOS will evaluate potential surface storage projects north of the Delta in the Sacramento Valley watershed. Possible NDOS alternatives include No Action (present condition), No Action (future condition), Sites Reservoir, Newville Reservoir, conjunctive use, and enlarged Shasta Dam.

Roughly three-quarters of California's runoff occurs north of Sacramento, while about three-quarters of California's water is used south of Sacramento. This imbalance in the location of water supply and demand has placed continual pressure on Sacramento Valley watersheds. The CALFED Bay-Delta Program, a cooperative, interagency effort, included expanding water storage capacity as an aspect of the Preferred Program Alternative. The objectives for north of the Delta offstream storage include enhanced water management flexibility, reduced Sacramento River diversions during critical fish migration periods, increased supply reliability, and storage and operational benefits for other CALFED programs such as Delta water quality and the Environmental Water Account. North of Delta offstream storage (Sites Reservoir, or alternatives) is one of two offstream storage proposals identified in the CALFED Record of Decision (ROD) for further study before a decision can be made to implement the project as part of CALFED. The ROD explains that this determination would hinge on technical studies, environmental review, and developing cost share agreements (ROD, pages 43 and 45). We anticipate that the documentation developed through this EIS will substantially contribute to making a determination on whether the proposed project will be implemented as part of CALFED.

EPA advocates an approach to water supply allocation and project operations which can adjust to changing conditions and help balance available water supplies, ecosystem health (e.g., in-stream beneficial uses), and user requirements. We firmly believe that in the long term, water supply actions should focus on sustainable management of developed supplies to meet these objectives.

Efficient use of existing water supplies should be maximized through conservation, reuse, and pollution prevention as construction of new storage is being considered. To minimize conflict and potential water shortages, we urge Reclamation and DWR to employ all available tools for enhancing water management flexibility, supply reliability, environmental conditions, and water quality. These tools could include not only storage but water transfers and exchanges, pricing, operational flexibility, market-based incentives for efficient water use, water acquisition, conjunctive use, voluntary land fallowing, and wastewater reclamation and recycling. Alternatives considered in the EIS should evaluate an integrated range of these tools, taking into account actions which are, or can be, implemented through other programs. Consistent with CALFED water management principles, we believe that any new storage should enhance the commitment to, and effectiveness of, environmentally beneficial and "efficient" use of existing and new water supplies.

As our detailed scoping comments (enclosed) indicate, the EIS should provide a full evaluation of the potential direct, indirect and cumulative impacts of water storage and conveyance operations, and major diversions from the Sacramento River and affected tributaries. Among other topics, the EIS should include potential impacts to riverine and Bay-Delta beneficial uses, riverine geofluvial processes, drinking water sources and systems (e.g., Contra Costa Water District's use of Delta water), groundwater, water quality, and sensitive resources such as endangered species.

Allocation of any new water supply among users is another critical matter which should be considered in the EIS. We believe the evaluation should discuss who might receive the supply improvements; how, when, and at what cost, using a calculation which discloses and incorporates full mitigation costs. Explain any gains in supply reliability for users. As described in our detailed scoping comments, we recommend that the EIS include an economic analysis showing willingness-to-pay for water priced on a "beneficiaries pay" basis. The EIS should also document potential multiple uses and benefits of water use, such as agricultural water use which supports valuable wildlife habitat.

As stated in the Notice of Intent, there are a number of associated programs underway in the Sacramento Valley. The EIS should clearly describe the history, chronology, and relationship of these various planning efforts and associated programs. In particular, explain relationships to activities such as the Phase 8 Settlement Agreement in which some north of Delta offstream storage partners have key involvement. Also describe relationships to programs with which CALFED is coordinating, such as the Sacramento and San Joaquin River Comprehensive Study.

We appreciate the opportunity to review this NOI. Detailed scoping comments are enclosed for your use. Please send three (3) copies of the Draft EIS to this office at the same time it is officially filed with our HQ Office of Federal Activities. If you have any questions, please call me at 415-972-3852, or Carolyn Yale at 415-972-3482.

Sincerely,

Laura Fujii

Laura Fujii
Federal Activities Office
Region 9 EPA

File: northdeltanoi
Main ID# 003822
Enclosure: Detailed Comments

cc: Scott Woodland, DWR
Steve Thompson and Wayne White, USFWS, Sacramento
US COE, Sacramento
Pat Port, DOI
Jim Bybee, NMFS
Mary Nichols, California Resources Agency
RWQCB, Central Valley Region, Sacramento and Redding Offices
Patrick Wright, CALFED
Jim White, CDFG

Detailed Scoping Comments

Water Management

1. As the Notice of Intent (NOI) acknowledges, the proposed project is being planned in the context of the CALFED Program (Programmatic EIS and Record of Decision (ROD)), which identified potential beneficial functions of north of Delta offstream storage. At the same time, the CALFED Program is premised on balanced implementation of all Program elements; including ecosystem restoration, expanded storage and conveyance, and water use efficiency. Thus, from the perspective of the CALFED Program, additional diversions and storage should be built only in the context of, and consistent with, efficient and environmentally protective use of developed and new supplies.

The EIS for the proposed north of Delta offstream storage should explain in detail the relationships between expanded storage and the objectives cited in the NOI, which were derived from the CALFED Program ROD. Explain, for example, how the alternatives under consideration would improve water supply reliability, management flexibility, and storage and operational benefits for purposes such as water quality and fish protection. Further, provide information on the post-ROD implementation of other CALFED programs addressing these objectives, particularly programs related to water supply management (water use efficiency, the conjunctive use program, water transfers). Document involvement of potential north of Delta storage participants in these related programs.

2. Describe potential operational relationships of the north of Delta offstream storage alternatives to other storage and conveyance facilities in the system. Characterize the objectives of operational changes that might be introduced with additional storage and describe anticipated impacts (beneficial and adverse).

3. Describe potential changes (and associated impacts) in the amount and reliability of Delta exports, relative to clearly defined "without project" conditions in the South Delta. With reference to the NEPA "without project" (no action) scenario for future conditions, clearly state assumptions regarding CALFED implementation, particularly "South Delta Improvements" and related regulatory compliance.

4. It is unclear from the NOI what the potential scope of project participants, or beneficiaries, within the Sacramento Valley, and beyond, may be. Within the Sacramento Valley, determining the geographic extent of participants in the proposed project is important, as water rights, surface and ground water sources, and supply reliability vary substantially. The EIS should describe the potential project participants both north and south of the Delta, and explain the basis for their involvement (for example, existing water rights, groundwater management authority, facilities operation, existing contractual arrangements with the SWP or CVP, market-based participation, and so forth).

Explain if some supplies made available through the proposed project might go to users under pre-project terms (for example, to CVP or SWP contractors under existing contract terms regarding contract quantity, price, and so forth).

5. We recommend the EIS contain a section that clearly describes the water rights law applicable to the proposed project and parties potentially involved in the project. For example, provide background information on existing water rights and allocation within the Sacramento Valley project area, including area of origin issues. Also explain the current State Water Resources Control Board requirements for meeting Bay-Delta water quality standards under D1641 and the issues associated with Condition 20. Clarify how implementation of D1641 affects CVP and SWP water contractors, with particular reference to Condition 20, and the recent Phase 8 Settlement Agreement.

Water Pricing

1. The CALFED Program ROD endorses a general principle that beneficiaries should pay the costs of Program activities such as water supply improvements. This reinforces fairness and recognizes the need to encourage water use efficiency and reflect the true cost of developing new supplies. Thus, project water-- particularly any newly developed supplies-- should not be underpriced. For the north of Delta offstream storage proposal, the EIS should document the full cost (including environmental and other mitigation) of providing water benefits and explain how these costs can be allocated among parties, according to explicit criteria. Explain if any CVP contractors may receive "ability-to-pay" relief for water made available through the project. If applicable, the EIS should also fully evaluate application of the Bureau of Reclamation's ability-to-pay policy and the Reclamation's ability to ensure full project repayment.

It has been demonstrated over the last decade that variable pricing of water can significantly influence water demand and supply. The EIS should include an in-depth discussion of how pricing can be used in allocation of the new water supply and management of user's demands.

2. The EIS should provide comparative information on the costs of producing benefits under the various alternatives, distinguishing discrete features of an alternative (such as surface versus ground water supplies, and conveyance facilities costs) where possible. Identify the total cost and costs allocated to water users under the various alternatives. Also provide comparative information on the costs and benefits of non-storage measures which serve water management objectives, including conservation and water acquired through transfers. With respect to environmental benefits and costs, such as environmental water, document benefits and clearly identify the magnitude and allocation (or incidence) of the costs for all alternatives, including no action.

Water Conservation

1. Provide background on the CALFED Water Use Efficiency Program as it applies to the Sacramento Valley project area and others who may participate in the proposed project, identifying the quantifiable objectives which CALFED has identified for these areas. Also identify the current status of water conservation planning and practices in beneficiary areas, using the CALFED Program ROD commitments and subsequent implementation activities as a frame of reference.

2. Identify current practices in the project area(s) for measuring surface and ground water use. Proposed project alternatives should evaluate one or more methods of measurement that will provide comprehensive and suitably accurate tracking of water use and efficiencies.

Groundwater

1. The EIS should fully document groundwater conditions and describe how, when, and by whom groundwater is used throughout the project area. Include information on groundwater levels and quality, identifying any long-term changes for with-project and without-project conditions. Identify information gaps, such as lack of direct groundwater measurements. Identify any existing conjunctive use of groundwater and surface water. Where applicable, the EIS should document in alternatives the relationship between current surface supplies, the proposed project surface supply, and groundwater. Explain if there is potential for additional managed conjunctive use of groundwater and surface supplies in the area in two contexts: with, and without, additional surface storage.

2. In considering conjunctive use of groundwater and surface water supplies in the project alternatives, the EIS should describe the specific objectives, requirements, and suitable locations for conjunctive use so that potential impacts can be fully evaluated. Analyze any water quality impacts to surface or groundwater associated with a proposed conjunctive use program. Document any changes in basin water balance, including amounts of seepage and return flows, and possible effects on the quantity, timing, and quality of water available. Analyze the potential for third party impacts under a conjunctive use program and, if impacts could occur, evaluate ways of avoiding or mitigating them.

Biological Resources

1. The EIS should evaluate direct, indirect, and cumulative impacts to fish and wildlife at the proposed new storage locations, in association with diversions and conveyance facilities, and in affected rivers and the Delta. This evaluation should "follow the impacts" and examine the impacts that may extend beyond the immediate location of the new storage facilities. Describe the potential timing and magnitude of diversions to offstream storage. What are the effects of diversions on instream flows from the perspective of aquatic life and geo-fluvial processes?

What changes in quantity, timing, and quality of instream flows might occur under the alternatives?

2. The EIS should evaluate environmental requirements which affect flows - notably the Endangered Species Act and Clean Water Act. As implemented through the SWRCB, consider flows, temperature needs, seasonality, and other water quality components and factors of critical importance to threatened and endangered species or other sensitive beneficial uses. Identify any ways in which water managed through the proposed project might be used for environmental compliance.

3. We also recommend the EIS evaluate the ability of the project to restore or enhance fish and wildlife habitat and wetlands which may have been affected by water diversions and by changes in flows, timing, and water quality as a result of earlier water supply development.

4. Describe the potential relationships of the proposed project to CALFED efforts to secure environmental water to enhance instream flows upstream of the Delta and improve conditions in the Delta for fish. Identify any supplies or operational measures stemming from the proposed project that would serve these environmental purposes. Identify the degree of improvement under the various action alternatives relative to the existing and future "without project" conditions. Also document environmental conditions with the proposed storage features, but absent measures to provide environmental water. Estimate the cost of the environmental water increment and discuss which parties might pay this cost.

5. Describe the relationship between the proposed project and other programs supporting restoration of Central Valley and Bay-Delta ecosystems. This includes CVPIA water dedication; environmental water purchases; pro-fisheries operations in the Delta and on affected rivers, notably the Sacramento; implementation of CALFED Ecosystem Restoration Program actions; and activities of nongovernment organizations such as the Central Valley Habitat Joint Venture, which targets protection and restoration of waterfowl habitat.

Water Quality

1. Potential impacts of the proposed alternatives on surface and groundwater quality should be fully evaluated in the EIS. Discuss water quality currently documented for waters within the project area, including agricultural drainage and return flows. Identify conditions which impair beneficial water use, such as pesticides and salinity. Evaluate the alternatives with respect to their impacts (beneficial or adverse) on designated beneficial uses. [Contact the Central Valley Regional Water Quality Control Board or U.S. EPA for additional guidance on these topics.]

2. Identify sensitive aquatic sites such as wetlands which are currently present and disclose potential impacts from the proposed action.

3. Discuss specific monitoring programs that are in place or will be implemented to determine potential impacts on surface, groundwater, and drinking water quality and beneficial uses. Identify responses to remedy detected impacts so that adequate water quality can be guaranteed.

Wetlands: Section 404 of the CWA

The EIS should identify impacts to water, flood plains, and wetlands, including identification of Section 404 Clean Water Act (CWA) requirements, and management and mitigation proposals to ensure compliance with these requirements.

EPA will review proposed new water storage facilities for compliance with the Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230) [hereafter referred to as the Guidelines], promulgated pursuant to Section 404(b)(1) of the Clean Water Act (CWA). To comply with the Guidelines, the proposed actions must meet all of the following criteria:

- There is no practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem (40 CFR 230.10(a)).

- The proposed action does not violate State water quality standards, toxic effluent standards, or jeopardize the continued existence of federally listed species or their critical habitat (40 CFR 230.10(b)).

- The proposed action will not cause or contribute to significant degradation of waters of the United States, including wetlands (40 CFR 230.10(c)). Significant degradation includes loss of fish and wildlife habitat, including cumulative losses.

- All appropriate and practicable steps are taken to minimize adverse impacts on the aquatic ecosystem (i.e., mitigation) (40 CFR 230.10(d)). This includes incorporation of all appropriate and practicable compensation measures for unavoidable losses to waters of the United States, including wetlands. The EIS should fully address the feasibility of "in-kind" habitat mitigation measures.

Air Quality

1. The EIS should provide a detailed discussion of air quality standards, ambient conditions, and potential air quality impacts, for the region. Include a description of current and proposed activities and their impacts on air quality. Cumulative and indirect impacts should be fully evaluated. For instance, development or modified use of surrounding lands (e.g., conversion to urban, different cropping patterns) could influence sources of PM10.

2. Federal agencies are required by the Clean Air Act to assure that actions conform to an approved air quality implementation plan. If the proposed project area is in a nonattainment area, Reclamation may need to demonstrate compliance with general conformity requirements of the Clean Air Act [Section 176(c)]. General Conformity Regulations can be found in 40 CFR Parts 51 and 93 (58 Federal Register, page 63214, November 30, 1993). These regulations should be examined for applicability to the proposed actions.

3. EPA issued revised standards for ozone and small particulate matter (PM2.5)(smog and soot) in July 1997. Implementation of these standards are pending the designation of nonattainment areas and development of specific regulatory requirements. The adverse health effects of ozone and PM2.5 are well known. Thus, we believe the EIS should evaluate the extent that the proposed project may release significant amounts of these pollutants. We recommend the Air Quality section of the "Affected Environment" chapter, include a description of the new ozone and PM2.5 standards, their health effects, and disclose what, if any, monitoring has been done in the project area for these pollutants. Possible sources that may contribute to high levels of ozone and PM2.5 emissions include construction equipment, mobile sources, and high volumes of diesel truck traffic.

General NEPA Comments

1. We recommend the EIS include a clear description of the basic project purpose and need, project alternatives, potential impacts to the environment, and mitigation for these impacts. Particular attention should focus on an evaluation of the environmental impacts of the proposal and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options for the decision maker and the public (40 CFR 1502.14). The EIS should clearly describe existing resource conditions in the "affected environment" and the policy and institutional context for the "no action" (without project) and with project alternatives. For example, the EIS should describe current and historical litigation, tentative agreements, and the underlying assumptions, water rights, and legal mandates (if any) of the proposed new water supply and alternatives.

2. Full disclosure of cumulative and indirect impacts is of specific concern. NEPA requires evaluation of indirect impacts which are caused by the action (40 CFR 1508.8(b)). Indirect effects may include "growth-inducing effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." (40 CFR 1508.9(b)). CEQ regulations also state that the EIS should include the "means to mitigate adverse environmental effects." (40 CFR 1502.16(h)). This provision applies to indirect effects as well as direct effects. Increased rates of growth for residential, commercial and industrial purposes, indirectly caused by the project, constitute indirect effects and should be evaluated in the EIS. Induced residential, commercial, and industrial growth can adversely affect water quality, wetlands, and other natural resources. These types of indirect effects and appropriate mitigation measures should be fully disclosed in the EIS.

3. The EIS should adequately document cumulative impacts; including past, present and reasonably foreseeable actions. Past cumulative effects may have greatly influenced the "existing conditions" which should be documented in the EIS and adverse impacts which may be perpetuated under the no action and action alternatives.

4. NEPA requires evaluation of reasonable alternatives not within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). Furthermore, there should be a clear discussion of the reasons for the elimination of alternatives which were not evaluated in detail.

5. The selection of the No Action alternative is a critical step in the environmental analysis since it provides the baseline for comparison with other action alternatives. It is EPA's position that "no action" does not equate with "no impact." Continuation of the existing management situation would constitute a discretionary commitment of resources that is, effectively, an action affecting the environment. The alternatives analysis of the EIS should portray the environmental consequences of every alternative...." in comparative form, thus sharply defining the issues and providing a clear basis for choice among options for the decision maker and the public." (40 CFR Part 1502.14).

6. The relationship of the proposed alternatives to previous or parallel environmental review actions (e.g., the CALFED PEIS and supporting technical documents; other proposals from the Bureau of Reclamation or Department of Water Resources, or other entities) should be clearly described.

7. In keeping with Executive Order 12898, **Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations** (EO 12898), the EIS should describe the measures taken by Reclamation to: 1) fully analyze the environmental effects of the proposed Federal action on minority communities, e.g. low-income populations, and 2) present opportunities for affected communities to provide input into the NEPA process. The intent and requirements of EO 12898 are clearly illustrated in the President's February 11, 1994 Memorandum for the Heads of all Departments and Agencies.

8. If references to previous documents are used, the EIS should provide a summary of critical issues, assumptions, and decisions complete enough to stand alone without depending upon continued referencing of the other documents.

2-8-02
Chrome

did not have enough notification to write al the reasons I oppose the Thomes-Newville dam,

I have faxed you this copy of a short book my mother wrote in 1981. It covers a variety of those reasons I oppose. I realize that the State needs more water storage but feel there must be a better choice than Thomes-Newville.

The very old historic cemetaries, Indian burial grounds, old pioneer one room School houses are important parts of our heritage and past. As is the vanishing way of life of the cowboy.

My children are the seventh generation to live on our family ranch just North of Chrome

Please consider these points as you examine the choices.

Thank You

Lynne Wolatt

Spring is almost over. The last of the wild flowers, the most treasured of all, the blue Larkspur, and yellow Mariposa Lilies, nod above the now almost dry grass. They are thick above the graves in the cemetery, a natural memorial to our past.

THE SEASONS HAVE PASSED

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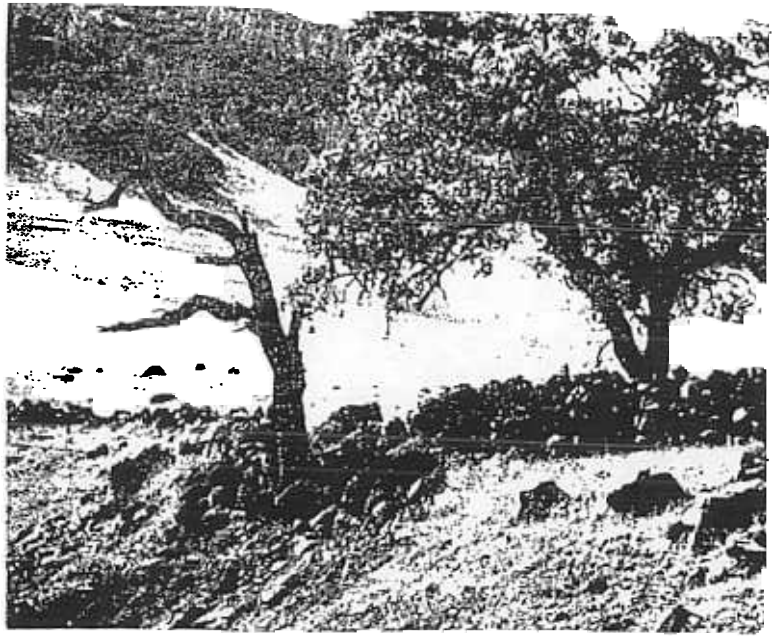
Author

CAROL FAY
April 1981



It's summer in the Chrome region. To the stranger passing through, it might look to be a hot, desolate, unpopulated area. Look again, stranger; look at one of the few clear blue skies left in our state. Watch the lazy hawk as he circles and dips above the banks of "Heifercamp Creek." Maybe this afternoon his dinner will be a fat shiny squirrel, sitting in front of his borough, or perhaps silver minnows swimming in a squadron up the clear waters of this stream. If he is brave, it could be a rattlesnake, stretched in the shade of a lone Buckeye Tree. He is lonely, yes, like we of this community seem to the stranger, but he has freedom, which it seems we are soon to relinquish.

While you are on the banks of "Heifercamp" on this hot, summer afternoon, take a deep breath. There is nothing but clean, clear air, with the mingled scents of the pungant tarweed, a native summer plant, and the moist creek smell of moss, oak leaves, and dry grasses. A gentle breeze carries the sound of the Mourning Dove, which is native to this area. Killdeers, in their black, tan, and white uniforms, march along the banks, and deer are standing in the dense shade of the many oaks surrounding the area.

Quietly travel on up the trail past the picturesque old house nestled beside the stream. This is where one of the great, great uncles lived and raised his family. We try to imagine the pride he must have felt when the home, surrounded by abundant grassland for his livestock, was completed.

Now we move on up to the cool, deep, shadowed canyon where the stream begins. If we are extremely quiet, we might catch a glimpse of a Mountain Lion, or Bob-Cat, and since Bear sign is all around in this area, perhaps even a Bear. Then, soaring high above the canyon walls, the Bald Eagle.

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Feb. 8, 2002

We respectfully request that you consider the loss in ecological, archeological, and historical treasure that would occur should the Thomes-Newville reservoir be built. Also the aesthetic value of that area. There are too few places untouched in our state.

As your studies have revealed this area is rich in both wildlife such as mountain lion, bear, deer migration, bobcat, coyote, wild turkey, wild pig, and many smaller species. Bird life is abundant including ducks and geese. There are many endangered plants among one of the most beautiful wild flower tours imaginable. In this age of stress I believe there is great value in simple spots of beauty and there are many sight seers traveling through that area particularly in the spring.

My great grandmother told me many stories of the Native Americans that lived in that region when she was a child. There are many "Indian Mounds" as we called them in that area. What would happen to these?

Sentimentally, words cannot describe how devastating it would be to see the land where seven generations of my family have been raised be put under water along with the Millsaps and Newville cemeteries where all of our families are buried.

Thank you,

Carol Lederer

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