



September 30, 2013

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Sent via email

Subject: Draft EIS, Shasta Lake Water Resources Investigation

This letter is to provide comments of the Sacramento River Preservation Trust on the above document. The Trust is correctly identified in the draft document as an important stakeholder group for the Sacramento River (see Botanical and Wetlands Technical Report, page 132). As such we are particularly interested in the potential impacts and proposed mitigation measures concerned with the upper and lower Sacramento River riparian-aquatic ecosystem.

The DEIS describes the resources of the Sacramento River riparian system and its interdependence with natural fluvial hydrologic and geomorphic processes. It correctly identifies the potential that all project alternatives (C1-C5) have for causing significant adverse effects on the riparian-aquatic ecosystem; for the upper river, Impact Aqua-14 and Impact Bot-7, and for the lower river, Impact Aqua-16 and Impact Bot-14. Each of these impacts, for each of the 5 alternatives, refer to the same mitigation measure, Bot-7.

Mitigation Measure Bot-7 is "**Develop and Implement a Riverine Ecosystem Mitigation and Adaptive Management Plan to Avoid and Compensate for the Impact of Altered Flow Regimes on Riparian and Wetland Communities**". A promise to develop mitigation in the future is not a mitigation measure. In order to meet the intent of a NEPA document to inform decision makers and the public, this measure needs to have much more specificity, a reasonable chance of being implemented, and clear commitments.

The measure as described is very troubling in light of the qualifying language found throughout mitigation measure Bot-7: For example, on page 12-164, lines 11 and 12 the phrase "to the extent feasible" should be defined in terms of this measure for the River. The SB1086 program and its successor, the Sacramento River Conservation Area Forum, have spent decades trying to suss out how to protect and restore natural river processes in the presence of substantial amounts of private property along the river, and with state and federal flood control works in many areas. What is "feasible" is not a trivial matter. Use of the term "feasible" throughout the measure (e.g. page 12-165, lines 1, 18, 22) leave the reader wondering what exactly this mitigation measure can accomplish.

The goals of the plan, which are also its performance standards, refer to "selected areas" (page 12-164, lines 25, 28, 30. Please define what this means.



Please describe what is meant by "Appropriate and feasible restoration actions *could* include", page 12-165, line 22. What criteria will be used to judge what is appropriate and feasible? Who will decide what is appropriate and feasible, and with what process? Would there be independent scientific peer review? Public input?

Measure Bot-7 has a good outline of what might go into riverine ecosystem plan, but it more or less just reiterates what many plans have said before (and which the DEIS cites, e.g SB 1086 and Sacramento River Conservation Area Handbook, CALFED Ecosystem Restoration Program). Unfortunately, without specific implementation details, this measure is only a plan for a plan, and not sufficient under the intents of the NEPA.

We appreciate the opportunity to comment.

A handwritten signature in black ink, appearing to read "Diana F Jacobs".

Diana F Jacobs, Ph.D.
Chair, Board of Directors
Sacramento River Preservation Trust