



December 16, 2015

The Honorable Sally Jewell
 Secretary, U.S. Department of Interior
 1849 C Street, NW
 Washington, DC 20240
 Email: feedback@ios.doi.gov

Re: California dam projects threaten potential Wild & Scenic Rivers

Dear Secretary Jewell:

The U.S. Bureau of Reclamation (USBR) is a lead or partner agency in the feasibility and environmental studies for three proposed surface water storage projects in California that will adversely affect Interior-managed public lands and harm potential Wild & Scenic Rivers. These proposed projects are expensive, controversial and would yield little new water for communities and farms in California, while harming free flowing rivers with nationally significant public lands that

possess outstandingly remarkable fish, wildlife, ecological, scenic, recreation, historical, and cultural resource values. In light of these facts, we believe a serious discussion about the true merits, costs, and environmental impacts of these projects is essential prior to their authorization by Congress.

The water projects and the public lands and rivers that will be affected by the projects include:

- **Temperance Flat Dam–San Joaquin River Gorge:** This multi-billion dollar dam will produce little new water for cities and farms and its environmental benefits have been grossly overestimated. The dam will flood the San Joaquin River Gorge, a river canyon recommended by the Bureau of Land Management (BLM) for National Wild & Scenic River protection. It will also drown public recreation lands and facilities (including trails, campgrounds, a museum, and environmental education center) and wildlife habitat that receive up to 84,000 visitors annually. The Gorge also possesses nationally significant Native American cultural resources. In addition, the dam will reduce flows needed downstream to restore spring Chinook salmon to the San Joaquin River. The California Water Resources Control Board (CWRCB) has determined that the river is fully appropriated and that there is no federal right for water to build the new dam.
- **Shasta Dam Enlargement–McCloud & Sacramento Rivers:** The proposed Shasta Dam and Reservoir enlargement will cost more than a billion dollars but produce little new water for cities and farms. The U.S. Fish and Wildlife Service (USFWS) found that the project would provide “negligible” environmental benefits. Enlarging the reservoir will violate state law protecting the McCloud River and flood segments of the McCloud and Sacramento Rivers identified by the U.S. Forest Service (USFS) as eligible for National Wild & Scenic River protection. It will also flood the cultural homeland of the Winnemem Wintu Tribe. In addition, the reservoir enlargement will modify downstream flows in a segment of the Sacramento River determined eligible by the BLM for Wild & Scenic protection and along segments of the river that encompass the Sacramento River National Wildlife Refuge.
- **Sites Reservoir–Sacramento River:** This multi-billion dollar proposed offstream storage reservoir would divert significant amounts of water from the Sacramento River, while producing only a modest amount of new water for cities and farms. The diversions will modify flows within the Sacramento River National Wildlife Refuge, potentially to the extent that the river’s natural “meander” is reduced. The river’s meander maintains and restores its healthy aquatic and riparian ecosystems and the numerous sensitive, threatened, and endangered species that depend on those ecosystems. The California Department of Water Resources (CDWR) is the lead agency on this project and the USBR is a partner agency. To date no formal draft feasibility or environmental studies for Sites have been released for public review and comment.

We provide a more detailed summary of these controversial projects and their environmental impacts as an appendix to this letter. The bottom line is that the construction and operation of these projects will only improve California’s overall water supply by about one percent, while costing the taxpayers billions of dollars, and harming nationally significant rivers that provide outstanding habitat for fish and wildlife, important opportunities for outdoor recreation, and nationally significant cultural values.

The USBR’s assertions that these dams will provide significant environmental benefits are questionable. It seems intended to simply foist project costs onto the taxpayers while providing additional subsidies to the direct beneficiaries (i.e. water contractors). Further, the USBR’s track record of operating existing water projects to benefit the environment is quite poor. We cannot afford to allow the USBR to return to the days of building large, destructive, and costly dams without regard to the environment. All the most effective dam sites are already developed in California and we don’t have enough free flowing rivers remaining to sacrifice for costly, ineffective, and destructive new surface storage.

In light of the controversy surrounding these projects, we urge you to bring relevant state and federal agencies to the table in a public forum to fully discuss and identify the real implications of building and operating these projects on the environment. This includes the USBR, BLM, USFWS, USFS, CWRCB, CDWR, and the California Department of Fish and Wildlife (CDFW).

Several "drought relief" bills considered in Congress pre-authorize these projects, and at least one authorizes the Interior Secretary to spend as much as \$600 million on water projects. These projects lack the rigorous financial and environmental analysis provided in past federal projects under rules established by President Ronald Reagan. We believe the public deserves a serious discussion about the true merits, costs, and environmental impacts of these projects.

California doesn't need new river-destroying dams to meet our water supply needs. From June through August 2015 (our highest water use months), urban water users in California reduced consumption by 611,566 acre-feet of water. That's nearly 30% more water than the Temperance Flat Dam, Shasta Dam Raise, and Sites Reservoir combined would reliably provide on average *in a year*.

We would appreciate the opportunity to meet with you and further discuss these important issues. Please ask your staff to contact me at (916) 442-3155 x218 or via email at eric@friendsoftheriver.org to arrange a meeting with members of our coalition. Thank you for your attention to our concerns.

Sincerely,



Eric Wesselman
Executive Director
Friends of the River

Signing for and with the approval of:

Kathryn Phillips, Director, Sierra Club California
Caleen Sisk, Chief, Winnemem Wintu Tribe
Tim Sloan, Executive Director, Pacific Coast Federation of Fishmen's Associations
Bill Jennings, Executive Director, California Sportfishing Protection Alliance
Barbara Barrigan-Parilla, Executive Director, Restore the Delta
Lucas Ross-Merz, Executive Director, Sacramento River Preservation Trust
Lowell Ashbaugh, Conservation Vice President, N. Calif. Council Federation of Fly Fishers
Katherine Evatt, President, Foothill Conservancy
Dave Steindorf, California Stewardship Director, American Whitewater
Jonas Minton, Water Policy Advisor, Planning and Conservation League
Miriam Gordon, California Director, Clean Water Action
Patrick Koepele, Executive Director, Tuolumne River Trust
Carolee Krieger, Executive Director, California Water Impact Network
Larry Glass, President, Northcoast Environmental Center
Scott Graecen, Executive Director, Friends of the Eel River
Doug Linney, Executive Director, California Wilderness Coalition
Carol Perkins, Water Policy Advocate, Butte Environmental Council
Mark Rockwell, Pacific Coast Director, Endangered Species Coalition
Conner Evert, Executive Director, Southern California Watershed Alliance
Jeff Miller, Conservation Advocate, Center for Biological Diversity
Natalynne DeLapp, Executive Director, Environmental Protection Information Center
Alan Levine, Director, Coast Action Group
Colin Bailey, Executive Director, Environmental Justice Water Coalition

Cc: BLM Director Neil Kornze
BLM California Acting Director Joe Stout
BLM Redding Field Manager Jennifer Mata
BLM Bakersfield Field Manager Gabe Garcia
USFWS Field Supervisor Jennifer Norris
USBR Mid-Pacific Region Director David Murillo
USFS Regional Forester Randy Moore
USFS Forest Supervisor Dave Myers
Senator Dianne Feinstein
Senator Barbara Boxer
Rep. Jared Huffman
Rep. Jerry McNerny

Attachment (pgs. 5-7): Summary of USBR Water Projects In California & Environmental Impacts

Summary of USBR Water Projects In California & Environmental Impacts

Temperance Flat Dam vs. San Joaquin River Gorge –

According to USBR's draft feasibility report and environmental impact statement, the 665 foot-high proposed Temperance Flat Dam will cost \$3.36 billion to build and \$129 million annually to operate. Although the dam will have a water storage capacity of 1.33 million acre-feet, it will reliably produce on average only 61,000 to 87,000 acre-feet of new water for cities and farms annually (depending on the project alternative chosen).

The USBR estimates that 50% of the dam's "benefits" include ecosystem and fish and wildlife enhancement – primarily associated with improving conditions downstream in the San Joaquin River for salmon. This claim is disputed by other agencies involved in the San Joaquin River Restoration Program. The CDFW and the National Marine Fisheries Service identified adverse impacts to the lower San Joaquin River in their comments on the draft EIS. An independent economic analysis of the USBR's draft feasibility study identified "extremely exaggerated" ecosystem and water supply benefits and determined that the dam's actual costs far outweigh its hypothesized benefits.

The dam will also be a net energy loser because it will flood two existing powerhouses owned and operated by the Pacific Gas and Electric Company. In addition, the CWRCB has determined the San Joaquin River to be fully appropriated and formally notified the USBR that it owns insufficient water rights to construct the project.

The Temperance Flat Dam will flood thousands of acres of public land managed for recreation and wildlife habitat by the BLM in the San Joaquin River Gorge. Providing outstanding opportunities for hiking, mountain biking, horseback riding, whitewater kayaking, camping, hunting, fishing, wildlife viewing, and environmental education, these lands attract 84,000 visitors annually. The area offers 22 miles of multi-use trails, including the San Joaquin River National Recreation Trail, and more than 2,300 acres of undeveloped lands identified by the BLM as possessing wilderness characteristics. The gorge is also rich in the cultural heritage of local Native American tribes, with several sites eligible for listing in the National Register.

Eight miles of the river gorge were recommended by the BLM for National Wild & Scenic River protection, in recognition of the river's free flowing character and outstandingly remarkable scenic, recreation, cultural, and wildlife values. The Temperance Flat Dam would flood the segment recommended by the BLM, as well as much of the trail system and an irreplaceable trail bridge, and other public facilities managed by the BLM (including three campgrounds, a museum, and environmental education center).

The dam would also flood diverse foothill habitat supporting a wide range of wildlife and flora, as well as the Millerton Caves, a unique granite cave system with an underground year round flowing stream. In its DEIS, the USBR admits that the dam will cause significant and unavoidable adverse impacts on riverine fish habitat, downstream water temperatures for juvenile salmon and steelhead, riparian habitat and other sensitive plant communities, special status raptors (hawks, falcons, eagles, owls, osprey), historic and prehistoric cultural sites, traditional Native American cultural properties and sacred sites, recreation lands and facilities, scenic values, and air quality.

In its draft feasibility report, the USBR identified numerous risks and uncertainties associated with the Temperance Flat Dam project, including "varying levels of uncertainty" associated with predicting anadromous fish survival and enhancement – which represents 50% of the alleged "benefits" from the dam. Other USBR-identified risks and uncertainties include effects on hydrology from climate change, variables in water supply reliability and demand, future operations of state and federal water systems, and project cost estimates.

Shasta Dam & Reservoir Enlargement vs. McCloud & Sacramento Rivers –

According to the USBR's final feasibility report and environmental impact statement, a proposed 18.5-foot raise of Shasta Dam will add 634,000 acre feet of capacity to its reservoir but reliably produce annually only about 51,300 acre feet of new water for urban and agricultural use. The dam raise and reservoir enlargement will cost up to \$1.3 billion to construct (not counting interest) and cost \$64 million annually to operate. Expanding the reservoir will require the expensive relocation of up to 33,100 feet of existing roads and two bridges, the relocation of two railroad bridges and realignment of tracks, and the modification or replacement of numerous existing recreational facilities and structures.

The USBR estimates that 49% of the project's "benefits" are to improve downstream conditions for threatened and endangered salmon and steelhead. But a USFWS Coordination Act Report found that the project will provide "negligible" benefits to anadromous fish and that most of the fish and wildlife benefits associated with the project are derived from actions that could occur without raising the dam. The expanded reservoir will flood more than 5,100 acres and disturb another 3,300 upland acres of Forest Service-managed public lands in the Shasta-Trinity National Recreation Area, including undisturbed lands in the Devil's Rock and Backbone roadless areas. The USBR admits that the project will have significant and unavoidable impacts on rare plants and numerous sensitive, threatened, and endangered wildlife species.

Enlarging the reservoir will violate state law protecting the free flowing character and extraordinary wild trout fishery of the McCloud River. This means that no state entity may partner with the USBR to construct and operate this project. The reservoir enlargement will also flood short segments of the McCloud and upper Sacramento Rivers determined eligible by the Forest Service for federal protection in the National Wild & Scenic Rivers System. It would also flood segments of these rivers that provide popular opportunities for whitewater boating and fishing.

The project will modify downstream flows through a 25-mile segment of the Sacramento River determined eligible by the BLM for National Wild & Scenic River protection and 17,000 acres of public lands in the BLM's Sacramento River Bend Area. This area was proposed for National Recreation Area designation in past legislation introduced by Senator Barbara Boxer. It will also modify flows within the 10,350-acre Sacramento River National Wildlife Refuge further downstream. USBR's "less than significant" estimate of impacts on these nationally significant public lands and the Sacramento River's riparian and aquatic ecosystems and the fish and wildlife that depend on these ecosystems is disputed by the USFWS and the CDFW. Both agencies have identified impacts on the Sacramento River's riparian and aquatic ecosystems from dam raise induced flow modifications as potentially significant.

Enlarging the reservoir will also flood cultural sites used by the Winnemem Wintu Tribe. The federal government, without compensation of any kind, took much of the Tribe's original homeland along the McCloud River to drown beneath the still waters of the existing reservoir. The Tribe will lose much of what is left of its cultural heritage if Shasta Reservoir is enlarged, perpetuating a more than 164 year-old violation of treaty rights.

In its final feasibility report, the USBR identified a number of unresolved issues with the Shasta Dam raise project, include funding concerns (USBR has insufficient funds to build the dam without a non-federal sponsor), violation of state law (flooding of the state-protected McCloud River makes it illegal for the state or any entity established under state law to participate in this project), federal water contractor concerns (the project doesn't provide enough water to federal water contractors), significant and unavoidable impacts on several federal and state protected wildlife and plant species, and resolution of these issues prior to a project recommendation by the Interior Secretary.

Sites Reservoir vs. Sacramento River –

This proposed offstream storage reservoir will cost up to \$4.1 billion, while only providing up to 246,000 acre feet of water for cities and farms. The reservoir will be created by 2 large dams and up to 9 smaller “wing” dams and will require the use of two existing river diversions and canals and possibly the construction of a new Sacramento River diversion and canal. The reservoir will flood several existing roads, at least one bridge, and the small but historic community of Sites.

More than 14,000 acres of habitat will be lost under the reservoir, canals, facilities, and developed recreation areas. Loss of grasslands and rare alkaline wetlands, protected golden eagle habitat, rare plants, air quality, and scenic quality have been preliminarily identified as significant and unavoidable or potentially so. Operating the project will use more electricity than the project can generate in replacement power.

To fill the reservoir, significant amounts of water will be diverted from the Sacramento River. The diversions will modify flows within the 10,350-acre Sacramento River National Wildlife Refuge. The extent of the impact of these diversions is a matter of debate. Dam-caused modification of river flow has been identified by the USFWS and CDFW as potentially significant. The diversions could reduce the natural meander of the river, which is the primary maintenance and restoration mechanism for the river’s healthy aquatic and riparian ecosystems and the numerous sensitive, threatened, and endangered species that depend on those ecosystems.

About 40% of the projected “benefits” from the reservoir purportedly will be for environmental purposes, but water projects typically have been operated to maximize water deliveries to the detriment of fulfilling environmental obligations (as underscored by numerous exemptions from environmental and water quality regulations in response to the current four-year drought). Because there is no feasibility report or environmental study available for this project, its alleged environmental benefits are entirely speculative and hypothetical.

The CDWR is the lead agency on this project and the USBR is a partner agency. To date no formal draft feasibility or environmental studies for Sites have been released for public review and comment. Despite the establishment of a local Joint Powers Authority for the project, no local partners have yet offered to share in the cost of the project.