



Shasta Dam Raise Project
c/o: Stantec
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Sent via Email to: shastadameir@stantec.com

January 14, 2018

RE: Shasta Dam Raise Project Environmental Impact Report (EIR) Scoping Comment

To whom it may concern:

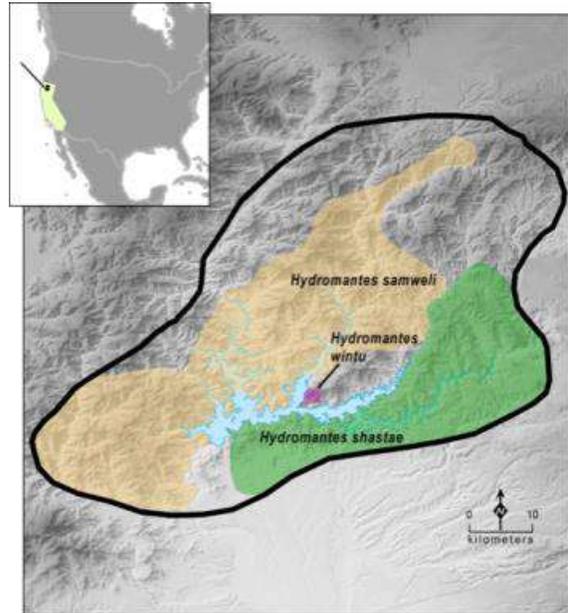
Please consider these concerns in the development of the EIR Shasta Dam Raise Project on behalf of the Environmental Protection Information Center, Klamath Forest Alliance, Nature Rights Council, Mount Shasta Bioregional Ecology Center and Klamath-Siskiyou Wildlands Center. Our organizations work to protect and restore the mature forests, watersheds and native species in northwestern California. Our members and supporters deeply value the public lands and water bodies of the Shasta-Trinity National Forest, specifically the Shasta Unit of the Whiskeytown-Shasta-Trinity National Recreation Area (NRA) for its scenic, biological and cultural values.

The proposed project would increase the height of the Shasta Dam by 18.5 feet. Shasta Dam is already the largest reservoir in the state and the proposed project would expand the capacity of Shasta Lake by up to 634,000 acre feet, which would inundate National Forest Lands that are within habitat of the imperiled Shasta salamander, the Shasta snow-wreath and other endemic species. The area that is proposed to be flooded also includes the ancestral territory of the Winnemem Wintu Tribe, and increasing the water capacity of the reservoir would put new demands for water on Northern California's already strained watersheds and the communities that depend on them.

The area surrounding Shasta Lake and Shasta-Trinity National Forest is rich in biodiversity and is home to many rare and endemic species such as the Shasta salamander (*Hydromantes shastae*), Shasta snow-wreath (*Neviusia cliftonii*), Shasta eupatory (*Eupatorium shastense*), Vieny arnica (*Arnica venosa*), Shasta Huckleberry (*Vaccinium shastense*), Shasta limestone monkeyflower (*Erythranthe taylorii*), Shasta fawn lily (*Erythronium shastense*) the Shasta Chaparral snail (*Trilobopsis roperi*), Wintu Sideband snail (*Monadenia troglodytes wintu*) and the Shasta Hesperian (*Vespericola shasta*). The EIR must analyze how the project would impact these species. The EIR must also disclose how the project would comply with all applicable laws including the National Forest Management Act, the Northwest Forest Plan and the Shasta-Trinity Land Resource Management Plan.

The Shasta snow-wreath is a rare native shrub that is only known to exist near the shores and canyons around Shasta Lake. At least six populations were lost when the Shasta dam was originally constructed. Fewer than twenty known populations exist today, most of them small.

The Shasta Salamander (*Hydromantes shastae*) is extremely rare and endemic only to a very small range in the vicinity of the Shasta Reservoir. It has the smallest known range of any Pacific Northwest amphibian. Recent research shows that the Shasta salamander is actually three separate *Hydromantes* species and also includes Samwel Shasta (*H. samweli*) and the Wintu Shasta (*H. wintu*) salamanders.¹ These highly restricted *Hydromantes* species consists of small, isolated, genetically distinct populations (see map). The Shasta salamander has been recommended for consideration as a USFS Sensitive species and is *on the International Union for Conservation of Nature (IUCN) Red List of Threatened*



Phylogeography and Species Boundaries In the *Hydromantes shastae* Complex, With Description of Two New Species

Species. There are current efforts to list the Shasta salamander under the federal Endangered Species Act (ESA). Litigation is pending as the US Fish and Wildlife Service failed to act on listing petitions that were filed 2012. If the salamanders warrant protection, the Bureau of Reclamation has to abide by the ESA as well as other applicable laws to maintain the viability of this endemic amphibian.

We are concerned that the project may harm multiple other wildlife species in the Shasta Lake area including the Pacific fisher, threatened northern spotted owl, sharp-shinned hawk, Cooper’s hawk, northern goshawk, peregrine falcon, flammulated owl, long-eared owl, black swift, Vaux’s swift, Lewis’s woodpecker, red-breasted sapsucker, olive-sided flycatcher, special-status bat species and ringtail. The EIR must analyze and disclose how the project would affect these species and comply with the National Forest Management Act, the Northwest Forest Plan, the Shasta-Trinity National Forest Land Resource Management Plan and the Migratory Bird Treaty Act.

The project as proposed is contrary to the spirit and intent of the National Historic Preservation Act. Raising the Shasta Dam would flood new parts of the McCloud River, which is 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 overstated. Raising the Shasta Dam would destroy 39 of their 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 Kaibai Creek Massacre. This is of

¹ Robert E. Bingham, Robert E. Bingham, Theodore J. Papenfuss, Theodore J. Papenfuss, Len Lindstrand, Len Lindstrand, David B. Wake, David B. Wake, "Phylogeography and Species Boundaries In the *Hydromantes shastae* Complex, With Description of Two New Species (Amphibia; Caudata; Plethodontidae)," *Bulletin of the Museum of Comparative Zoology* 161(10), (4 April 2018).

significant cultural value to the already displaced Winnemem Wintu people, who have been seeking federal recognition for over a century.

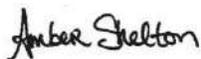
Shasta Dam raise project operations would have long-term impacts to flow and water temperatures in the lower Sacramento River and tributaries and Trinity River, including impacts to fish species of primary management concern. Project operations would impact the Trinity River, which contributes cold water flows to the main stem of the Klamath River below their confluence. Steelhead, coho and Chinook salmon depend on these cold water flows from the Trinity River into the Lower Klamath watershed, and increased demand on Trinity River water flows to supply additional Shasta reservoir capacity, would harm the salmon fisheries that depend on the Trinity's cold water flows during dry months. Diverting Trinity River flows away from the Klamath would result in lower flows and higher water temperatures that cause fish disease and lethal conditions for the salmon fisheries that depend on clean cold water flows to survive. Coho salmon are already listed as Endangered, and the Karuk Tribe recently submitted a petition to list the Klamath's spring-run Chinook salmon under the Endangered Species Act. Shasta Dam raise operations would cause irreparable harm to these ecologically, culturally, and economically important fisheries, which would impact the entire North Coast community, and would result in significant harm to the Yurok, Hoopa and Karuk Tribes that have subsisted on salmon since time immemorial. The collapse of salmon fisheries and the loss of primary food sources for indigenous peoples of the North Coast has been linked to diabetes, depression, and even high suicide rates among tribal members who have evolved with salmon in their culture and diets for thousands of years.

The current regulatory framework that dictates flows on the Trinity River is not adequate to protect the salmon fisheries of the North Coast. Nearly every year, lawsuits have to be filed to request emergency flow releases to avoid catastrophic fish kills. Therefore, the mitigation measures that are listed in the BOR's Shasta Lake Water Resources Investigation EIS: "Mitigation Measure Aqua-15: Maintain Flows in the Feather River, American River, and Trinity River Consistent with Existing Regulatory and Operational Requirements and Agreements" is not sufficient to bring project impact levels down to less than significant after the incorporation of mitigation measures.

The above issues are of great concern and need to be included in the EIR analysis and decision-making process of the proposed Shasta Dam Raise project. Based on the significant impacts that the proposed project would have on Northern California's environment, wildlife, community and economy, I request that the project be rescinded and denied to avoid irreparable harm to the region.

Thank you for the opportunity to provide input on the proposed Shasta Dam Raise Project and please ensure that we receive electronic public notices related to the proposed project in the future and please send a hard copy of the Draft EIR to the EPIC Arcata office.

Respectfully,



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