D-STCDA Duplicate of O-STCDA



Comments on raising the Shasta Dam

Janet McCleery <jmccleery@duckpondsoftware.com> Sun, Sep 1, 2013 at 2:42 PM To: BOR-MPR-SLWRI@usbr.gov

Thank you for the opportunity to comment on the Shasta Dam project.

Raising the Shasta dam increases reliance on the Delta as a plumbing fixture instead of meeting the 2009 Delta Reform Act direction to reduce reliance on the Delta. In addition, since the water is claimed for Central Valley agriculture, raising the Dam must have as one of it's "assumptions" that the Bay Delta Conservation Plan will be approved and the tunnels will be built because currently exports are restricted due to lack of storage south.

Because of the environmental and economic/personal consequences of raising the dam, instead it makes much more sense to focus on in-ground storage or other storage south of the Delta, desalination and/or recycling, and conservation to meet the needs for the rest of the state. Those efforts meet the Delta Reform Act's direction to increase regional self-sufficiency.

Tan

Janet McCleery | STCDA | www.noDeltaGates.com 925.978.6563 (Cell) | 925.240.8501 (Home)

D-SLFP Duplicate of O-SLFP



DUNCAN, KATHLEEN skdunganigustr.gov>

Fwd: Shasta Dam Raise - Public Comments

T measains

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

Wed, Oct 23, 2013 at 1:08 PM

Sent from my iPhone

Begin forwarded message:

From: Toby McLeod <tm@sacredland.org>
Date: September 30, 2013, 4:47:11 PM PDT

To: <BOR-MPR-SLWRI@usbr.gov>, "Chow, Katrina C"

<KChow@usbr.gov>

Subject: Shasta Dam Raise - Public Comments

Katrina Chow, Project Manager, US Bureau of Reclamation, Planning Division, 2800 Cottage Way, Sacramento, CA 95825-1893 - See more at: http://www.sacredland.org/please-comment-on-shasta-dam-raise-deis/#sthash.ebNlxy6n.dpuf

Katrina Chow, Project Manager, US Bureau of Reclamation, Planning Division, 2800 Cottage Way, Sacramento, CA 95825-1893 - See more at: http://www.sacredland.org/please-comment-on-shasta-dam-raise-deis/#sthash.ebNlxy6n.dpuf

Katrina Chow

Project Manager

U.S. Bureau of Reclamation, Planning Division 2800 Cottage Way, Sacramento, CA 95825-1893

Katrina Chow, Project Manager, US Bureau of Reclamation, Planning Division, 2800 Cottage Way, Sacramento, CA 95825-1893 - See more at: http://www.sacredland.org/please-comment-on-shasta-dam-raise-deis/#sthash.ebNlxy6n.dpuf

10/23/13

DEPARTMENT OF THE INTERIOR Mail - Fwd: Shasta Dam Raise - Public Comments

Dear Ms. Chow.

Please accept 1,903 signatures in opposition to the proposal to raise the height of Shasta Dam and please add this document to the DEIR comment section. We will mail a copy of this petition as well. The petition was posted online on the CREDO Mobilize site at: http://www.credomobilize.com/petitions/stop-the-raise-of-shasta-damsupport-the-winnemem-wintu

Thank you, Christopher McLeod

Toby McLeod Sacred Land Film Project **David Brower Center** 2150 Allston Way, Suite 440 Berkeley, CA 94704

tel: 510-859-9190 http://www.sacredland.org

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To: Bureau of Reclamation

Abandon the proposal to raise the height of the Shasta Dam by 18.5 feet, and prevent cultural harm to the Winnemem Wintu's sacred lands and ecological damage to the McCloud and other rivers of northern California.

Signed by 1,903 people:

Name	Postcode	Address
Christopher McLeod	94708	980 Grizzly Peak Blvd
Helene Sisk	96003	7480 Dry Creek Rd, Redding, CA
Barbara A gill	96002	4343 Agnes May
Alex Hughes	94933	PO Box 805
Danita Herrera	97401	1489 Cal Young Rd, Eugene, Or
Richard Torres	95758	6801 Kilconnell Drive
caitlin mezgersieg	97520	ashland
Misa Joo	97405	2327 Jefferson Street
Chloe Say	97601	1215 Adams st
Nancy Willis	94662	PO Box 99684, Emeryville, CA
David Martinez	96096	Po Box 219 Whitmore Ca
Laura Ferrando	44124	lyndhurst, ohio
Lisa Guide	94608	1025 56th St
Teresa S	95826	Sacramento
Rebecca Guzman	95835	2124 Catherwood Way
adriana martinez	90201	5519 watcher street
Leslie F	96001	Redding
kristen brandt	97403	250 N Brooklyn Ave
gail lichtsinn	45231	9377 jericho dr.
Natasha Joseph	97477	496 1/2 West D Street
Donna Crispin	97401	780 Waverly St.
Ken Neubeck	97405	4915 W. Hillside Drive
Stefanie Messina	06612	170 bibbins rd easton ct
Jeanne France	96096	PO Box 219
Noah Schlager	94920-2602	116 Barn Road
Christine Hood	95928	1850 Humboldt Rd #68
Kathleen Kimberling	95670	2208 Wood Cliff Way

Name	Postcode	Address
Dianne Brennan	94110	1020 Florida Street
Robert Hughes	94571	147 N. 4th St
Rafael Rolon	95207	6112 glenbrook In
Ric Rudgers	95662	5484 plantain circle
Joanna Holmes	97031	4145 Dee Hwy
James Goetsch	33711	5201 41st Street South
Ara Johnson	95018	859 Brookside Way
David Bartz	94020	La Honda, CA
Tess H	97322	Albany Or
Susan Alexander	94114	319 Hill St.
Črystal Cameron	88007	Las Cruces
Bonnie Fontana	94521	5173 Sutherland Dr
Florence Unger	95267	PO Box 7864
Judy Blaisdell	81122	1013 CR 525
peggy carberry	01603	156 apricot st
Steve Lawler	94505	5315 willow lake ct
Leslie Story	95242	16 River Bend Dr., Lodi, CA
Eden Shlomi	33711	4200 54th ave south
Stina Va	95205-2649	3245 Belvedere Ave.
kathleen stark	95642	14 smalley ave
Debra Gaylord	12154	PO Box 314
Nordyn Anderson	94509	1219 C Street. Antioch Ca
Natalie Beaver	95641	P.o. Box 258
Michael Frost	94070	2223 Carmelita Drive, San Carlos, CA
Dawn Dyer	86001	2478 Katchina Tr.
Colleen Fay	95948	1746 Kofford Road, Gridley
Maria Lucia Pacheco	20005	1409 15th st nw #18
lucy pacheco	20008	2640 garfield st
Claire Cummings	94903	2000 Bayhills Drive
Susan Wyckoff	12866	10 Knollwood Drive
Allison Toomey	95521	670 9th St. Apt A
Frances Kieschnick	94301	1467 Hamilton Avenue, Palo Alto

Name	Postcode	Address
Ellen Grab	12866	183 Louden Rd
betsy fields	81433	1867 Greene st.
Andrea Cwynar	94117-1323	1660 grove street
Geoff Thompson	81328	POB 486, Mancos, CO
Will Doolittle	97405	po box 5265
Donna Zick	95822	1126 Sherburn Avenue, Sacramento CA
Annita Lucchesi	95524	4771 Jacoby Creek Rd
Raven Stevens	96067	724 Butte Ave, Mt. Shasta, CA
Whitney Youngman	66044	1740 Ohio St #27, Lawrence, KS
Reid YALOM	94960	713 SIR FRANCIS DRAKE BLVD, SAN ANSELMO
Lucy Geever- Conroy	95112	520 S 12th St
Anna Marie Stenberg	95437	254 Wall St
Sarada Tangirala	94605	2480 82nd Avenue
Erik Roper	95817	2940 39th Street Sacramento
Krista Eiber	95410	p.o. box 366
Laura Pearson	95819	231 San Miguel Way
Stephanie Velednitsky	94024	1273 Carmel Terrace
Kerin Gould PhD	95626	Artesia Rd
Marie Isenberg	63011	1239 De Noailles Dr
Britt Magadini	97520	518 Maple Way
Ilana Maletz	86341	PO Box 21300
Buck Ellingson	95825	518 pine garden lane apt h
David Wright	95819	Sacramento, CA
Greta Montagne	95524	2506 jacoby creek road
jennifer Schellack	95819	86 43rd Street
Marlin Kirby	95841	5415 College Oak Drive
Jessica Abbé	94708	980 Grizzly Peak Blvd
Mike Hudson	94702	1204 Cedar
Robert Leigh	94577	2228 Buena Vista Ave, San Leandro, CA
Carol Courtney	95519	1650 blackhawk lane #79

Name	Postcode	Address
Jenny Gonyer	99362	280 Boyer Ave
Mollie Brown	94122	1341 20th ave
William Herrold	95736	21060 Pineridge Ln:
Elizabeth Haapanen	95460	Box 77 Mendocino
Elisabeth Middleton	95618	1320 Nutmeg Ln., Davis, CA
Lorraine Kerwood	97405	2575 Friendly St
Kathleen Hansen	96067	514 Mill ST
jeannemarie coulter	95437	31251 hwy 20
Seabrook Leaf	96011	P.O. Box 161
Jennifer Lupton- Wood	96067	906 woodland park dr mt Shasta, Ca
Leila Sadeghi	95630	240 Natoma Station Dr.
Kile Ozier	94114	2261 market street, #404-a
Mary Drew	97071	1596 Thompson Road
India Bowers	94110	3425 23rd Street #24
John Bachellor	95126	1038 liebelt
Ellen Albright	94505	1130 discovery bay BI
mf schroyer	94110	1499 potrero
Donna Fairchild	95624	9478 Ranch Park Way, Elk Grove, CA
rene alvarez	94608	2340 Powell st
CG	94110	2425 24th st.
Angela Berry	94549	3739 highland rd
david brendel	11201	287 henry street
gabriela rasberry	95207	2737 birch ave
Joan Hansen	95690	14019 Islandview Way
Kayla Carpenter	95546	P.O. Box 878 Hoopa CA
Julie Larson	94577	958 Helen Avenue, San Leandro CA
Belinda Ramirez	91101	327 E Del Mar Blvd Apt 5
Jeff Mallory	93920	45955 Pfeiffer Ridge Road
Cara Lee-Shuff	94109	1855 Pacific Ave. #103 San Francisco, CA
Molly Brown	96067	722 Meadow Ave
Riikka Poulsen	00700	Tullirinne 2 i

Name	Postcode	Address
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Mia Brown	95546	hwy 96 #160
Jenny Lor	97405	651 E 32nd Avenue
Scott Petty	95621	6987 Brayton Ave
Bonnie Johnson	96025	449 MicanSt., Dunsmuir, CA
Roxanne Moger	95817	2340 42nd St., Sacramento, CA
Ryan neily	81007	441 W. Lookout dr. Pueblo West
Elena Gardella	94702	1256 Russell St.
steve messina	11375	110-45 queens blvd #910 forest hills, ny
Karen Rogers	96067	ро Вох
Diane Pizza	94949	224 montego key Novato ca
Suzanne Nathans	94901	424 Woodland Ave
Ariel Gimble	87048	1432 Camino Hermosa
Gary Hughes	95521	145 G St., Suite A
Darci D'Anna	93924	34 Paso Hondo
Thomas Cahill	94559	1439 E Street, Napa, CA
Connor Yiamkis	96087	2125 Shasta CA
Barbara Pannullo	11772	15 Sharon Drive, Patchogue NY
Diane Tenerelli- June	07086	588 Gregory Avenue, Weehawken, NJ
Shannon Brawley	02875	201A Shannock Village Road
Jacqueline Castillo	87455	PO Box 7914
Alex Fidelibus	07302	280 Marin Blvd, Apt 21E
Mark Lakeman	97202	8512 SE 8th, Portland, OR
Janet Cavallo	19018	1276 Providence Rd
Scott Mendelson	27705	922 Hale St, Durham NC
Barbi j Leach	95546	Po box361 Hoopa,cal
chris skyhawk	95410	PO Box 127
Giuseppe Laneve	94901	557 east Francisco blvd
Lisa Lopez	95833	301 West El Camino #3
Joseph Pettit	52246	441 Hawkeye Drive, Iowa City, IA
Catherine Cadden	27516	1601 Eco Drive
Lani Phillips	96097	551 N Main Street

Name	Postcode	Address
Bruce Greene	97214	1906 SE Elliott Ave.
Heidi Bourne	95518	P. O. box 4313
Elaine Hudson	95621	7641 poplar ave
Kristin Allen	96094	4942 Lake Shastina Dr
Cairn Rodrigues	95691	1616 Portsmouth St
cerridwen bunten	96067	smith st
Mari Shanta	96025	6418 Dunsmuir Av
SHAWNA BROWN	94571-1619	520 main st
Kathryn Jessup	96067	1234 Nixon
Carol Bloom	95444-9306	2705 S. Brush St.
sleven lucker	95519	1289 azalea ave
Wenda Vander Werf	95692	PO Box 154
Joshua Chambers	96011	PO Box 33
David Donnenfield	94960	113 Madrone Ave. San Anselmo, CA.
nathan Shwartz	98027	405 W Minster Ave
Luan Marks	49120	122 Silsbee Street
ELSIE JOHNSON	96089	shasta lake ca
Barry LeBeau	02909	84 Marshall St., Apt#1A
Morgan Stuart	12008	19 1st. Street, Alplaus, NY
Debie Rasmussen	95966	Oroville
Marlies Jansen	59757	Bosschekampstraat 71
Joan Kleban	97402	966 Jackson
Lydia Scott	97405	30764 Koinonia rd.
Matt Denner	50310	2819 Holcomb Ave
Erin Rowe	95521	1984 Leslie Ct
Kimberly Landis	43119	5463 Bentonhurst Ct.
Matthew Bueno	96003	13839 Creek Trail
Ted Sison	94597	31 San Luis court
michelle blackburn	90042	5672 1/2 york blvd
john cole meeker	94572	708 Gravenstein hwy N
Jim Brown	96067	722 Meadow Ave.
Amy Bumpus	43082	6316 Charmar dr
Katherine Falk	94611	62 Entrada Avenue

Name	Postcode	Address
Amy Parscal	96011	P.O.Box 225
Fred Joyce	95402	PO Box 15227, Santa Rosa, CA
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Leslie McCoy	94619	4261 35th Ave
Alicia Siu	95616	406 Scripps Dr, Davis, CA
Jane Hamby	96094	PO Box 651 Weed, CA
Justine Devoe	96002	1100 Echo Road
Lucy Elphick	95627	25944 Craig street
Tyler Gibson	97520	Hwy 66, Ashland, or
Ramon Montano	92105	4161 37st apt#8 San Diego California
Christina West	95454	Bix 1663
Kara Brinkman	97402	1300 Quaker St
George Cammarota	95129	4646 Corrida Circle, San Jose, CA
JOHN BRENNAN	96094	3715 Dale Creek Rd,
Nicole Woodruff	02809	23 Dolly Drive, Bristol, R.I.
Harmony Lambert	96087	PO box 403
Jennifer Wilks- Christian	96067	502 Berry Street
Vanity Willette	85637	12 Pinto Trail
Martha Perkins	91107	1443 Edgecliff Ln
Margret Wrennstad	41666	Borgaregatan 14
willie mitchell	07198	13 bunholvil
mary villa	94115	1040 Divisadero
resa sawyer	87712	box 59 buena vista nm
Tanja Lehmann	81245	Kaspar-Kerll-Str. 19
Jerry Gilreath	30223	II05 Lake Avenue
Dan Kegebein	98582	P.O.Box448
Gisela Pook	78467	Bismarcksteig 10
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Summer Szymanski	95690	PO Box 852
Ann Roach	73127	4600 NW 11TH ST
terri vandehey	97048	68370 Meisner Road

Duplicate DEIS Public Comments

Name	Postcode	Address
Ban the Dam - Unethical Raising and Dam No More	60001	
Therese Coupez	94110	2843 Harrison St, San Francisco CA, USA
Angela Rex	95563	Po BOX 501
david nathans	43119	5451 bentonhurst court
Mariamma Jones	97405	1971 garfield st
Christine Frisco RN	94301	649 University Avenue
Carol Luther	94960	21 Oak Ave.
Pat Shirley	87529	## Mirlo Dr
Brenda Andresen	97330	1705 NW Taylor St
belinda gould	33815	520 mathew rd.,lakeland,fl.
Darlene Lee	97633	135 N Elm Street, P.O.Box 532
MARY ODOM	39466	194ICHARDSON OZONA RD
george koch	95051-5604	2808 rebeiro
Kouslaa Kessler- Mata	93953	2807 Forest Lodge Road
Larry Rhodes	60041	26041 Marshall Avenue
fred rinne	94112	642 cayuga ave san francisco ca
Nancy W Gin	94109	923 Eddy St #107, San Francisco, CA
susan fanter	62024	502 Harper Court East Alton,IL.
Ashley Hall	95959	15169 Lewis Rd.
Claire Coupez	98070	P.O. Box 2176
Nicole Letscher- Bartholomay	96067	4115 Hummingbird Way
springwater ocoee	47112	1341 hillview dr,corydon,in
Peter Tennigkeit	95472	216 florence ave
Byron Roberts	95207	5234 Grouse Run Dr
Daniela Koromzay	94930	17 Redwood Rd, Fairfax, CA
laura beebe	95570	Po box 2057
roberta wagner	08051	731 Garrison Ct
deanna arnall	65256	7505 w stidham rd
Rose Madrone	95560	box 193
Allan Reaves	96067	General Delivery

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Elora Young	30276	437 McIntosh trail
Frank Putnam	97209	Portland, OR
kellie st. james	95519	1817 holly dr
Allie Coleman	96067	627 Everitt Memorial Hwy
Melinda Perlman	96037	Box117
Nichole Albright	97404	1201 Maxwell Road
E. Rodriguez	10963	Mountain RD
Marilee Bittner- Fawcett	98524	1541 E Treasure Is Dr
Deneen Peckinpah	97520	569 Clay St.
Holly Ducharme	34113	5697 Rattlesnake hammock rd Apt.C101
Thomas Lester	74434	PO Box 264 Ft. Gibson,Ok.
Robert Shearer	95521	Diamond Drive
Gaylord Hughes	95549	1980 Greenwood Hgts. Dr.
Samantha Langley	95503	3328 G Eureka, CA
Cynthia Russell	96067	1612 Holiday Lane Mount Shasta Ca
Rebecca Manion	95501	1336 A Street
Karen Hill	32667	PO Box 445
Christina Ahlstrand	94618	5816 Ocean View Drive
lynn duncan	47012	28734 maune rd
Stacie Meredith	95687	1084 Ruby dr
Clifford Delmar Leach Jr.	95316	4601 Swanson Rd.
John Brennan	97212	822 NE Hancock ST
Lisa Rowe	95960	26798 Wampum Way
Lynda Fullerton	98584	Shelton, WA
Ann Altstatt	95060	203 Cedar Street
Mark Motyka	96039	3334 Indian Creek Road
ginger cloud	97405	2930 Charnelton
Jennifer Parrish	95125	593 Dorothy Ave
maureen roche	95558	petrolia
Lynn Jenkinson	48198	2910 Stommel Rd

Duplicate DEIS Public Comments

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Kris Farquhar- Naeyaert	95677	6055 Placer West Dr. Rockin, CA
Lloyd Hauskins	95560	POB 665
Sebastian Vido	94547	133 Manzanita place
julie I. solarski	95821	3545 Edison ave #3 Sacramento ca
lynne nourse	94931	p.o. box 7643
Bob Williams	76272	2271 W FM 922
caroline downie	96025	306 riverwood lane, dunsmuir, ca
Melanie Clement	96003	705 Country Oak Dr.
Lucy Rodriguez	27514	145 Erwin rd
Rosemary Clement	96003	705 Country Oak Dr.
Jaya Clement	96003	705 Country Oak Dr.
Jim Lockhart	97266	4528 se 99th
Angela Parrinello	94118	318 12th Ave
susan wesley	86004	2024 n 2nd st
Rogene Reynolds	95206	4444 W. Undine Road
Lorraine Hersey	97801	4223 SW Broadlane Ave
Frank Riehemann	82467	Hauptstraße 48, Garmisch- Partenkirchen, Germany
Michelle Steinberg	94609	693 33rd Street
Cameron Baxter	94118	2325 Cabrillo
Michael Kavanaugh	95545	P.O.box 104
debra daniel	19335	35 kennedy drive
Tara Russo	87507	3740 Academy rd. St. D
Mitch Collins	18914	219 Cambridge Place
Rosemarie D'Ostilio	96067	206 E Hinckely St Mt. Shasta, CA
Karen Ratzlaff	95404	645 Carr Ave.
Kristy McCurry	95926	1315 Palm Avenue
James Baker	36804	2225 Lee Road 117
Donna Boyd	96067	314 Sheldon Ave
Kathaleen Reed	95812	PO Box 2144
Sara Pawulak	95519	1400 Underwood rd
Anthony Leach Sr	95603	141 Boardman Street

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Jeanine Ertl	95589	11000 Briceland Road
Leslie Craig	95503	4701 Crane Street Eureka CA
Jennifer Ayo	95521	2575, alliance rd 13-c
Paul Eggers	95942	PO Box 445, Forest Ranch, CA
L Shaw	96007	millville
Gordon Anderson	95521	1560 Peninsula Arcata, CA
Robert Billstrom	95521	988 9th st, Arcata, CA
Sean Sampanes	96092	1013 Layton rd
1 P	95521	355 Granite Ave
Joanna Welch	95501	2925 Lowell
Paul Cavanaugh	95971	345 Main Ranch Rd
Daniel Dempsey	95503	5087 Meyers Ave.
Sara Trechter	95926	736 Oaklawn Chico, CA
mason mckibben	95519	742 gross st
Courtney Scott	97232	2106 NE Flanders, Portland, OR
Joaquin estrada	95521	145 12th st
Adela Myers	95956	PO BOX 261
Julianna Elias	96080	16145 Red Bank Road
David Hurst	95926	1311 Fairway Alley
Darcia Slape	96002	20020 falcon drive redding, ca
Lisa Butterfield	95501	2440 Wood Street
karyn parker	83686	2903 laurel way
Bob Atwood	96003	248 Boulder Cr Dr #8
timothy may	96022	22366 river view dr, cottonwood, ca
Ron Kuhnel	95501	1604 G ST
Penny Garrett	96003	851 Mission De Oro Drive
Mary Able	96056	535-000 Little Valley Rd.
Juniper Hobson	95928	4722 Cable Bridge
Robert McCombs	95518	PO Box 4175
Michael Terry	96007	PO BOX 1019
Peggy Loe	95954	13516 Tufts Court
Steven Wadas	96067	416 N. Washington Drive

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Jessica Black	93265	40831 Balch Park Rd
Mary Thomas	96094	5018 Solus Place
Elaine Kane	95540	1751 Home Ave
michele stainback	96926	1628 spruce avenue
Orle Jackson	96080	19873 Hwy 36 W, Red Bluff CA
Karen Anderson	96058	P. O. Box 373, Macdoel, CA
Jeanne Ertir	95926	1552 Citrus Avenue
Jane Merkel	95503	833 Everding Street
April Wagner	96093	box 1336
Sue Lindgard	96050	P.O. Box 57
raymond eliggi	96080	1155 jefferson st.
Claire Robbins	95501	2542 Hubbard Lane, Apt B
Judith Benbrook	95490	2745 Coyote Road
Shilo Quetchenbach	95521	1351 H st #5
Lyssette Rodriguez	95521	335 Laurel dr.
Forrest Lamb	96025	5404 Shasta Avenjue
Ron Smith	95928	5332 Finnicum Rd
Lyn Walters	95956	P.O. Box 157
Juliet LaFleur	95928	955 Madison St
David Page	96003	4282 Baywood dr redding ca
Bayla Greenspoon	96067	724 Butte Ave, Mt. Shasta
Audrey Kapitan	95409	4 Quixote Court
Davin Peterson	95501	2846 Lowell Street, Eureka CA
Whitney Allen	96002	19731 Valley Lane
Jeff Gemutliche	96003	4470 Swallow Tail Ct.
Marilyn Shepherd	95570	PO Box 715
William Peace	95969	5228 Squire Ln Paradise Ca
Daniel Steward	95973	4 Elverta Circle, Chico CA
Virginia Jaquez	95947	P.O. Box 172
diana Nielsen	94525	419 vallejo st
Gura Lashlee	95519	2580 Central Av. #38
Lorenzo Durham	95969	1417 Andrea Ln, Paradise, CA

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Noel Phares	95969	1374 McCullough Dr
David Tamori	95966	111 Putman Dr
Terri Mattson	96086-0513	PO Box 513
Gerda Lydon	95973	2948 San Verbena Way
Carol Mone	95570	Box 223
Mark McCandlish	96002-0511	2205 Hilltop Dr. #158, Redding, CA
Samala Ray	95501	217 D st #310 Eureka Ca
Patricia Purcell	95969	5436 Clark Rd #44
Marietta Sheffield	96001	3705 Riverview Drive, Redding,
James Kirks	95973	11 Hemming Lane
carolyn galindo	95502-0488	p.o. box 488, eureka CA
Alan Sund	95926	1675 Manzanita Ave #82
Jody Bond	48864	Jody Bond
Carolyn Doty	96002	662 Estate St
Phil Reser	95926	1301 Sheridan Ave. #27, Chico, CA
Suzanne Simpson	95518	POB 309 Arcata, CA
Judy Haggard	95519	1237 Gross St.
Nat Childs	95553	PO Box 511
Karen Raskin	95549	970 greenwood heights drive kneeland, ca
Brien Brennan	96080	7200 South Fork Drive
Darrah Hopper	96020	PO Box 186
GeneAnna McMillan	95926	2040 Vallombrosa Ave.
matthew mckibben	95926	2311 holly ave
Mirislav Liska	95519	1240 Ian In
Lynette C	92128	1526 Esperanza Way
Ricky Pisanu	95602	5275 Morningside Ave, Auburn Ca
DANIEL MCELHERAN	96093	200 BUTTONS RD
Margaret Grossman	95521	2778 Buttermilk Lane
Marilyn Sanborn	96069-9506	27445 Lookout Mountain Lane, Oak Run, CA
Sandra Lee Childs	95553	Miranda, CA

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Wilma Dibelka	96094	5238 High Meadow, Weed, CA
Terry Ferguson	96137	304 Delwood Street
Holly Barnard	95490	P.O. Box 565
David Lee	95928	983 E 7TH ST
larry glass	95552	PO Box F
Kathleen Kelcey	95519	1090 Murray Rd space 45
jacek ernestowicz	78-100	walki mlodych
Luana Mauer	97426	84820 Cloverdale Road
Deborah Kvaka	95454	POB 1324, Laytonville, Ca
George Wilton	95965	1326 Grand Ave.
harriette searle	95983	5518 fir fork
Lynn Miller	95954	6277 Brevard Circle, Magalia, CA
Cynthia Husten	96001	2106 Butte Street
Robert White	95521	2750 Terrace Ave
Debbie Harrison	95519	2423 Bolier Ave.
Craig Olson	96003-3539	800 CHRISTINE AVE
Rick Boutin	96080	1364 Walbridge Street
Carol Lawrence	95519-3448	1090 Murray Rd #66
laurey morris	95501	1417nigellane
Mark Bailey	95549	7636 Kneeland Road
Jessie Ayani	96067	1431 Pine Grove Drive
Jon Behnke	95454	P.O. Box 631
Katherine Maxey	95503	6828 eggert rd
Ronald Goff	95954	6312 Shelton Ct.
Clarence Hagmeier	95558	POB 9
Anne Nicksic	95540	1104 Stewart Street
Elaine Nichols	59301	405 MISSISSIPPI AVE
Sandra John	95928	1420 Half Dome Way, Chico
Angela Gerard	47401	3259 East Will Sowders Road
Gale Swearinger	95939	3600-09 Phils Way
Susan Coffi	96137-1223	P.o. 1223
Rosa Rashall	95589	PO box 153

Name	Postcode	Address
George Dibelka	96094	5238 High Meadow Drive
Joan Martien	95521	1029 11th street
john crandell	95519	401 wagle lane
Timothy Hafner	95503	3800 Mitchell Rd
Michael Tonetti	95973	470 Chestnut Rose Ln
Virginia De Vries	95490	4260 Blackhawk Drive, Willits CA
Sherrie Gadreault	96002	2650 Bunker St. #1
Frank Letton	95589	POB 294
clare fisher	95926	477 e sacramento ave
cynthia olen	95501	2214 Fairfield St., Apt. 3
Sandra Bacon	95503-7608	4343 Walnut Dr
Wendy Crist	96025	5914 Mountain Ave
Ashalyn Ashalyn	96067	416B Alder St, Mt. Shasta, CA
pat pearson	96027	4320 shell gulch
John Scott	95965	4370 Tao Way, Butte Valley, CA
Alan Sanborn	95521	1491 H St
Sally Cooper	96067	304 S Mt Shadta Blvd
Larry Bailey	96099	P. O. Box 992480, Redding, CA
Tandra Froehlich	96022	3465 Brush St Cottonwood CA
Sandy Mitchell	96067	1020 Kingston Rd., Apt. 7B
Karen Mayer	95503	4552 Mitchell Rd. Eureka
Kathleen Faith	95928	2188 Honey Run Rd
Makere Aroha Chapman	98460	Whitecliffs, New Zealand
mike Evans	96007	2777 flagstone ct
Carrie Smith	95928	1660 Humboldt
Sandra O'Neill	95928	1232 B Oakdale St
donna espsoito	95528	box 288
Shereen Smith	95542	11815 Alderpoint Rd.
Marcia Fiamengo	95691	1969 Linden Road
Melissa Birch	95502	PO Box 6770
James Robinson	95560	pobox2382
Casey O'Neill	95546	p o box 20

Name	Postcode	Address
Deirdre Santaniello	95490	26590 Daphne Way
Shirley Fannin	95973	2601 Nord Ave.
JENNY ORCHID	95560	PO BOX 302
Valerie Fannin	95973	2601 Nord Ave.
Rick Underhill	30513	678 Ash Loop Road, Blue Ridge, GA
N Courtemanche	95536	1335 Rose Av.
Philip Lee	96059	31695 Forward Rd Manton CA
Cheryl Gravitt	30303	321 Lee Rd.
Dana Wullenwaber	96001	2442 California Street
David Grau	95926	773 Sierra View Way Chico CA
Jorge Arguello	96003	1550 Barbara Rd., Redding, CA
Terry Crary	96019	3304 Shasta Dam Blvd
Joyce Ballard	39567	922 Quail Meadow Drive
Barbara Small	95514	29191 Alderpoint Road,Blocksburg,California
Andra Stringer	95540	1668 Justice Ct
Delbert ONeill	95546	po box 20
Mary Benson	95973-0729	701 E Lassen Ave 116
Jennifer Marx	96014	424 Sugar Creek Road
Gary Pelton	96002	2040 Hilltop Drive Redding CA
Lydia Plaster	95965	22 Bob Way
Piers Strailey	95971	P O Box 3012
Philip Winkels	95454	46641 woodman cyn rd
Mikal Baker	95521	986 C St
Mary Stone	96064	11800 Hart Rd.
kimberly smalley	95502	po box 146 eureka ca
Mary Davis	27712	5301 Falkirk Drive
Cary Frazee	95503	499 Redmond Road
Kay Schaser	95501	2701 Erie Street, Eureka, Ca
Al Pantalone	96003	2173 Hope Ln.
Dr. Robert Bowman	95926	1220 Glenn Haven Dr
Karen Delangelo	95540	821 14th Street
victoria schanzle	95553	408 Thomas Rd

Name	Postcode	Address
William Skupowski	95966	105 Pinedale Ave
Ralph Privette	96088	30567 Thumper Dr
Betty Rowland	96013	20420 Poplar St
linda robinson	63114	9410 ridge overland mo.
christopher kirkland	60098	2563 Linden
Laura Rhoades	95476	Sonoma creek
sharon porter	95969	4827 Round Valley Ranch Rd.
Janice Stout	96055	24826 Taft St
Julie Haynes	96091	HC 1 Box 613
Sarah Morris	95926	518 W. 6th Ave.
Michael Celayeta	96039	P.O. Box 425 Happy Camp,Ca
Richard Hand	96035	7815 State Hwy 99 W
Kyle Drennen	96067	035 Davis Place Road
hugh liles	95519	2595 kelly
Jill Gardner	96067	POBox 473
Penny Schafer	96067	825 Aiello Road
Loren Madsen	95454	PO Box 1824, Laytonville
Karen Scarborough	96003	3546 Old Lantern Drive
carol rogan	96093	po box 1126
Ariel Graham	95521	1959 Ernest Way
J SpottedEagle	87413	80 Rd. 4992
Sandy Sweitzer	95521	2066 Mustang
Claudia Weber	95926	22 Williamsburg Lane, suite G Chico ca
Lloyd Downs	95954	14766 Pine Cone Way
Carolyn Grill	28411	1004 Potomac Dr., Wilmington, NC
Susan Cliff	96067	PO Box 1332, Mount Shasta, CA
Yvonne Redd	96130	479-395 Tako Nee St
Taylor Branson	95949	11810 lodestar dr grass valley ca
JuLeah Willson	98052	15920 NE 101st court
Peggy McGuire	96035	2351 Stone Ave. Gerber, CA
Donna Clark	96130	708 Plumas St., Susanville, CA
Sylvia De Rooy	95503	210 Pomeroy Hollow

Name	Postcode	Address
Frank Wilkens	96002	4050 Aspen Springs Ct
Beth Shipley	95521	1579 13th St., Arcata, CA
christine schlumpf	96003	19900 sunbeam circle
william malinowski	95589	1261 toth rd.
ROBERTA REPASZ	48822	P.O. Box 53, Eagle, Mi
Peter Norris	95490	27660 Poppy Drive
leo schlumpf	96003	19900 sunbeam circle
Justin Zakoren	95503	3220 Pine St.
Mickey Fernandez	95490	1448 Daphne Drive, Willits, CA
Coleen Marks	95555	PO Box 295
robin keehn	95926	273 e 3rd ave
Ja Miller	95973	146 Sleepy Valley road
Nancy Olson	96067	Mount Shasta
toni casto	95965	471 grand ave
Ken Miller	95519	1658 Ocean Drive
George Bates	96052	321 Clark Creek rd
Frank Toriello	96064	6635 Willow Creek Road, Montague, CA
Julie Cook	95490	28300 Skyview Rd
George Thorward	96039	4919 Indian Creek Rd
Jennifer Ferrini	95926	1890 Hooker Oak ave
karinajoy McAbee	95490	1517 casteel dr
Brian Humble	96003	1396 Minder Dr.
Monica Coyne	95560	p.o.box 1178
kendra guimaraes	95540	1955 scenic dr fortuna ca
Tom Patton	95928	11 Skymountain Circle
Chad Oliver	96067	705 Caroline ave
Cheryl Corcoran	96003	1290 Deodar Way
Joni Stellar	95965	2965 Madre De Oro PI
Vivian Garcia	78231	2935 Green Run Lane
Martha Walden	95524	po box 325, Bayside
William Cortez	96091	111 N. Lakeview Dr. Trinity Center
Gina Lindow	97540	113 N 3rd st. #2

Name	Postcode	Address
windwolf woods	97477	73 v street
Sue Mendez	95954	6475 Loyola Ct
Jerry Peavy	95926	2111 Algonkin Ave. Chico Ca.
shelley o'neil	96092	po box 259, vina, ca
michael mclaughlin	95967	po box 1232 paradise ca
Karin Anderson	96041	P.O Box 1183 Highway 3
joyce tierney	19904	8 freedom pl.
melinda willey	96067	517 Shasta Way, Mount Shasta, Ca.
kathleen McCovey	96039	PO Box 53 Happy Camp, Ca.
Gene Latimer	97214-4848	1704 SE 22nd Ave
Mark Vargas	96003	11912 Best Ln.
Steven Westbrook	95926	1321 palm ave
Agleska Cohen- Rencountre	97438	39701 Little Fall Creek Road
Allan Stellar	95965	2965 Madre de oro place
David Menefee	96041	PO Box 1183
Ada Ball	97457	P.O. Box 1916
DAWN FAZENDE	96067	POB 443
Serena Seidner	96067	3724 Summit Dr.
Tammy Robertson	96067	1339 Stellar
Glen Yonemura	95632	620-Third St.
TOM BRANSON	95949	11810 Lodestar Drive
Anita Brady	96003	12076 Fawn Dr.
Sean Payne	95501	601 W. Wabash Ave unit B
Susan Whitney	95570-0793	P.O. Box 793
Susie Foot	95519	1873 Cliff Ave
Jennifer Krause	96067	1934 Deetz road
Terri bradley	96002	1244 Heavenly Oak Ln # 1
Christina volanos	83642	132 w. broadway ave meridian id
ted lindsay	95501	2141 Tydd St #223
jerry batcheler	95965	703 Oro Dam Blvd W #205
Don Swall	95501	1140 E. St. Eureka
viola long	95546	p.o. box 1096

Name	Postcode	Address
Dylan Fuentes	92627	1124 Victoria St
Bonnie Daut	98030	10914 SE 240th PI D202, Kent, WA
Mark Trechter	20152	25483 Feltre Terrace
Bruce McKinley	96094	8936 Blue Jay Lane, Weed, CA
Ruth Lown	96021	6401 Santa Clara rd.
Joan Barrymore	96088	PO Box 227
Suzanne Guerra	95503	4771 West Wing Lane
T Beaulieu	96003	12171 Cinder
William Huber	96046	P. O. Box 1
Liam Humble	95405	2627 Lago Oaks Dr.
ann Souter	95519	1101 Silverado Ave
Wendy Harden	95542	P.O. Box 446
Troika Saint Germain	96067	PO Box 733
Carol Hanrahan	97470	812 Shadow Ranch, Roseburg
Mark Goodwin	95969	6217 Forgotten Way, Paradise, CA
pascal hudon	95959	10580 rimrock In
Christine Martin	95973	13 Discovery Way
Jenna yonemura	95660	3710 Bainbridge drive
Jean Nels	96067	240 Smith Street
Lisa McEntire	73401	3120 Carter
Vincent Kessinger	96001	1735 Wisconsin Avenue
Tom Handman	96035	7371McClure Ave
Jill Kane	96001	3620 ALTURA AVE, REDDING CA 96001
Marzanna Pietrowska	95524	3420 Old Arcata Rd Bayside Ca
Lawrence Williams	95570	P.O. Box 793, Trinidad, CA
Gregory Byers	95490	15000 Hearst Road
Sylvia Cardella	95547	4570 Bluff Top
Jacintha Stanley	86033	PO Box1906
Donna Bringenberg	96067	POB 669
Sunny Hawk	95521	2255 Alliance Road, Apt.26
Jean Cannon	96073	PO Box 426

Name	Postcode	Address
Manuel Mora	96067	PO Box 862
Patricia Beardsley	94118	566 Third Avenue, San Francisco
Jessica Shieman	95503	3223 E Street
Ladis Yrazusta	96097	15538 Valley View
Martaa Hutz	96067	1541 Frederick St.
Jon Spitz	95454	Laytonville, CA
Ralf Hahn	95966	Oroville
Jeffrey Stone	96097-9030	909 Bennett Dr
Samuel Lundeen	95570	597 Old Wagon Rd.
Pearl Brady	11217	444 Bergen St #2R
Vicki Brenner	96067	P.O. Box 1145
bob h0SKing	95988	426 4th st willows ca
susan Alexander	95560	P>O>Box 61
dorothea joyce	96067	404 N. Mt. Shasta Blvd. 131
Sam King	95519	2626 Elizabeth Road, McKinleyville, CA
Lorna Bartlett	95928	500 E 12th St
Greg Movsesyan	95519	282 Old Quarry Lane
Rena weiss	96067	pobox 671
Kate Yorke	96067	.O. Box 1383
Marc Williams	96027	POB 481 Etna, CA
Sylvie Matalon	97405	Eugene
Jerry Pruce	95560	P.O.Box 2349
Rev. Jisho Perry	96067	3724 Summit Dr.
stacy gilbert	97525	1538 rogue river hwy
Ethan Rogers	95926	838 Morninghome Ct
Suzanne Cook	95519	2584 Knox Cove Dr
Michael Deshler	95973	1456 Saratoga dr
Helen Young	95404	1073 Fulkerson St. Santa Rosa. Ca
Jeanne Thatcher	95926	P.O. Box 3204
Stephanie Hillman	95518	PO Box 4166
disa boracci	96003	21273 albatross way
ankush vimawala	97477	213 W D St

Name	Postcode	Address
KaNi Kido	94930	9 Pacheco Ave
margaret mehring	78006	9142 aqua dr
Ken Lawson	95973-9048	61 Mud Creek Road, Cohasset, CA
marianne williams	95549	greenwood hts. dr.
Gary Mantei	96002	2855 Henderson Rd, Redding
Lisa Brown	96058	13717 Tennant rd.
Mary Jean Watson	95531	1205 Dundas Rd. Crescent City, CA
Peter Childs	95553	CA
Kim Merlino	96067	1109 S Mt Shasta Bld
Cris Smyrnos	96067	330 Pony Trail
Alan Ernesto Phillips	96003	1111 Macs
Debbi Freeze	96067	525 Pine Street #8
Jere Bob Bowden	95536	Ferndale CA
Arthur F. Bravo	94559-1156	1439 " E " St. Napa
johnica love	95927	po box 266
Alba Miranda	95928	Lassen
Glen Sharp	96080	2040 Pebblestone Dr. Red Bluff, CA
Wendy Carney	95570	1030 Westhaven Dr S
Weston Ball	90210	1234 etmibalz ct
Ineke Wild	90210	Nonneveld 138
Mary Zellachild	95490	39 Mill Creek Dr.
George Wheeler	95519	1807 cliff ave
Robert Davis	95503	California Street, Eureka
Theresa Story	96003	821 St Marks Spc 33
Mary White	14850	114 Sears
John Hale	95969-4236	5921 Debbie Ln., Paradise, CA.
Kathryn Black	93265	40831 Balch Park Rd
Lanai Winter	95928	2050 Springfield Drive
Michelle Burris	95519	1336 Winchester Ave
Samad Najjar	95954	14188 Sherwood Circle
Eileen Brownell	95928	153 Picholine Way
Margaret Hollenbach	98382	Sequim, WA

Name	Postcode	Address
sophie cooper	94607	1933 Filbert St
chris dawes	95973	782 Lindo Lane
Michelle Strozier	74804	200 East Georgia
Sherry Watts	95558	36332 Mattole rd
Robert Astrue	95570	PO Box 1188 Trinidad, CA
James Paquin	95518	PO Box 573
Jeremy Jensen	95501	Po box 877 eureka, ca
Mercedes Koehly	95973	1588 Arch Way
M English	95969	Paradise
Peggy Elliott	97530	410 S. Oregon St.
Liz Zanze	96001	2726 Dawnridge Drive
Cameron James	96022	19643 Indian Creek Dr
Julie Nelson	96003	12825 Encanto Way, Redding CA
Hayley Peter- Contesse	95521	1875 Iverson Ave A
Abigail Den	96067	1571 Village Way
Evelyn McCahon	96019	2115 Montana Avenue
Yvonne Hatch	95490	23 Creekside drive
Lorena Cedergreen	95521	1395 Glendale Drive
Michael McLaughlin	95502	337 West Clark
Joel Hawthorne	95966	148 Spruce Parkway
Jeffrey Stewart	96047	PO BOX 294
Beth Bennion	95519	1594 Railroad Drive
Cyn Van Fleet	95527	PO Box 98
Barbara Orme	95973	139 Cohasset Loop
Wayne Swan	96049	PO Box 493159
James Ritchey	37920	4209 Coffey Street #5
Geneva Omann	96094	Weed, CA
Roger Osborne	96003	1095 Hilltop Drive
Susan Stauffer	95490	487b East Valley Street, Willits, CA.
Soren Nelson	96003	12825 Encanto Way
Sara Lyon	95490	PO Box 2077
Dawn Wells	96094	5116 Spear Pt

Name	Postcode	Address
Sean Corfield	94546	5124 Ray Ave
Robert Ward	95965	555 High Street
Loretta Adcox	44102	1887 W52nd street
Dennis Wickes	95969	295 keffer lane, paradise ca
Nicole Caputo	95503	295 Bacchetti Ct
Sara Crayne	96067-2715	214 Merritt Ave. Mt. Shasta
Jaime Yarbrough	95567	PO Box 556
Leland Whitlock	95938	9197 Goodspeed St Apt 6
Ornella Addonizio	96080	70 lindauer lane red bluff
Jourdyn Bossio	95476	192 Sierra PI
rochanah welssinger	95973	2910 morseman #A
Pat Andrews	95546	pro box 640
elisa conte	02835	126 hamiltona ve
Claire Perricelli	95501	2259 16th
Natalie Blasco	96007	19075 River Crest Dr
Shirley Ramstrom	96002	2451castlewood dr.
Albert Wedworth	95926	2384 Tiffany Way Chico, Ca.
Pat and Bruce von Alten	96097	921 Campbell Ave, Yreka
Donna May	96097	625 Butte St
Barbara Brumley	95969	6908 Sesame Street
Susan Bradley	95454	PO Box 52
Leslie Marconi	96068	207 Gaudenzio
Marguerite McDonald	93546	51 Pinon Dr. #b
Karen Duncanwood	95969	6656 Pentz Rd. #56
Shannon Robertson	94040	191 e el Camino Real 236
shara jay	95503	eureka
Bob Wagner	96027	Etna, CA
Ann Thompson	54880	2017 Ogden Ave
Brenda Sherman	95973	3143 Hidden Creek Dr
Pamela Cundy	96067	P o box 1692
Miguel Insignares	33331	Opal Creek

Name	Postcode	Address
George and Ruth Blitz	96003	1206 Grouse Dr.
Tacey Hatfield	96003	21684 Elk Trail West Redding, CA
Kimberly Tays	95570	P.O. Box 75
Phil Seymour	96003	4500 Alder St Redding, CA
Ronalee Phares	95969	1374 Mccullough Dr.
Faith Boyarin	96094	2331 Lakewood Ranch Rd.
Eva Adams	95003	112 El Camino del Mar, Aptos
jeff pruden	95501	ca
michael macdonald	95454	p,o, box 882
Lionel Ortiz	95524	2820 Graham Rd
Lewis Elbinger	96067	712 Om Shasta Path
JUDITH BENOIT	49345	1383 Meadow Park Dr
Michael Adams	96097	919 North Street
Peter Westfall	95503	3235 H St
Pat McCutcheon	95521	1630 Buttermilk Lane
Carla Resnick	95973	3010 Alamo Ave
alita angell-murray	96019	3876 wellington place
Norman Carpadus	96054	PO BOX 226
Tom Stover	97322	2186 geary #1
Roderic Stephens	96001	1787 Lakeside Dr.
Anne-Marie Heupink	68410	Enschede
Helen Winfrey	95540	525 Garland Ave.
RALPH RING	95969	1749 EDEN ROC DR. PARADISE,CA
Ted Hoffman	96032	8433 N. State Hwy 3
Stephen Jessen	95560	P.O. Box 2371, Redway, CA
Edmund Light	95501	3824 Jacobs Ave. #32
Mauro Oliveira	96065	Box 225 Montgomery creek
melinda groom	95525	po box81
Yolanda Guerra	94544	25053 Joyce St
Tania Borras	95490	25630 Fairbanks Place
Jerry Sullivan	96067	1909 Eddy Cir

Name	Postcode	Address
Ronald Lunder	96137-1174	P.O. Box 1174 Westwood, CA
Zoe Chapman	95589	P>O. Box 23
Tom Pava	96025	4212 Branstetter St.
Rick Kincade	96044	15634 Klamathon Rd, Hornbrook CA
Doug Blackwell	96067	PO Box 511 Mount Shasta, CA
Ravell Moss	95519	1453 Harden Dr
Pat Weaver	95560	5719 Briceland thorn Rd.
Thomas Peters	95501	221 Dollison St., Eureka, CA
kelly keen	95521	4513 valley west Blvd. C
Bernadette Webster	95589	76501 Usal Road
Nancy Martin	05927	P.o. Box 1244. Chico, Ca
Virginia Eagan	95927	2412 Guynn Ave. , P.O. Box 6316
Jean Baker- Stapleton	95973	2668 Waverly Court
Helen Joseph	96001	7599 placer rd,
Lilo Ducommun	95454	Laytonville
Judy Pfandler	95969	149 Sutter Rd
Kim Chamberlain	95540	1751 Newburg Rd.
Mona Gutierrez	96067	1037 Lassen Lane
john alexander	95926	543 mission santa fe circle
stephen lyon	96011	po box 114
Molly Knappen	95969	136 Roe Road
Susan King	80228	2312 S. Braun Way, Lakewood, CO
Gene Slade	95966	20 Linda Loma Dr
Meaghan Simpson	95540	2401 Newburg Road
pat wolfe	96013	burney california
Sheila Dillon	56201	1701 5th St SW
Louis kimzey	33905	13231 Idylwild farm rd. fort myers
Karyn Smoot	97401	1790 Alder St.
Karen Scheuermann	96022	17455 Big Bear Lane
Mary Rogers	95966-6524	2595 C St.
Lynette Coffey	96019	4059 La Mesa Ave.
Kay Scovill	96067	Deer Creek Rd.

Name	Postcode	Address
Arthur Scharf	96067	307Or Street Mt Shasta
Deanna Knickerbocker	94040	1846 Limetree Ln
Patricia Woods	97477	3033 Gateway St. Apt. #59
BARBARA Trumbull	96064	10812 Hart Rd
Mirabai Applegate	96067	1224 Davis place
juliana duncan	95519	985 Gross Rd.
William Mark Casebier	97386	1351 Poplar St.
Joseph Tonan	91764	207 E. J Street
Trisha Lee	95501	2425 C Street
Carol Wilson	95519	2004 St Maru Ln
Noelle Adams	95969	9289 Skyway # 30
fred lewis	96067	1409 highland dr.
Karen Feridun	19530	260 East Main St.
Karynn Merkel	95503	833 Everding Street
Chelsea Swick	95524	440 Solaris Lane
Valerie Romero	95971	1962 E. Main ST.Quincy, CA.
Lisa Zure	94960	221 The Alameda
Bob Stewart	95521	221 G Street
Michael King	97401	1390 Mill
Melanie Schneiter	67213	1941 S.Hiram Wichita Ks.
Rose Armin- Hoiland	95524	2364 Graham Rd
leah childs sumerlin	97470	1115 s.e. roberts ave.
Eva Suhr	95928	1417 Ridgebrook Way, Chico, CA
Hannah Hawkins	30083	603 Tahoe Circle
Talia Fradin	94611	233 Capricorn Ave
Ethan Retherford	95501	1435 Dean St 7
harriet miller	96049	pob 493953
Haley Simas	95529	1805 Henry Ln. Mckinleyville CA
Carolee Tamori	95966	111 Putnam Dr
Katherine O'Neill	96094	4824 Rainbow Drive, Weed, CA
alexandra bacca	94621	851 81st ave

Name	Postcode	Address
Dan Bacher	95821-3713	3201 Eastwood Road
alison helton	97220	244 NE 92nd PI
Leonard Incristo	96073	22086 WESLEY DR
Calvin Godfrey	51103	411 George St. Apt-1
claudia anderson	95662	9323 elm ave
Michael Wittman	91360	1332 Mill Creek Court
Alan Covey	95928	1747 Salem St.
Francine Fischl	95556	6955 IshiPishi road or leans CA
Robert Michael	95926	13 Glenoak Ct.
Mitchell Enfield	95501	2215 Tydd Street Apartment 7D
Phil Corcoran	96003	1290 Deodar Way
karine josso	41370	48 route de cravant
AniMaeChi drabic	93023	405 N Arnaz St
Jessica Stahle	84054	480 North Cloverdale Road
Stephen Lewis	95562	325 Center St., Rio Dell, CA
Jason Marrone	96067	1037 Lassen Lane
Loreen Silvarahawk	37354	499 Crowder Rd.
Cécile Simon	44000	Nantes
Robert Tait	95536	PO Box 247
Helena Pisani	94020	PO Box 224
beverly pyle	97402	835 tyler st Eugene OR
Asa Mittman	95926	5 Begonia Lane
Eileen Morris	95973	782 Lindo Lane
Ann Radwell- Newberg	95947	6260 N. Arm Rd.
Dale Thomas	95927	PO box 9191 chico, CA
Laurie Roy	95503	3401 Union St
Kenneth Kirby	96003-7912	2172 Sophy Place, Redding, CA
Michael Logue	95945	13149 Ridge Road
Scott Thayer	96003	14850 Lamoine Dr.
scott Love	95927	POB 5555 Chico, CA
Ralph Wadsworth	95973	13600 Gaarner Lane
Laurence Burdick	95521	1124 A St

Name	Postcode	Address
Harvey Raider	95521	1383 Anvick Road, Arcata, CA
maia peter	05971	po box 324
William Gaylord	98112	2244 38th place east Seattle WA
Shannon Campbell	95926	970 Mathews Drive
Will Fulton	96059	PO Box 546
John Jeavons	95490	5798 Ridgewood Road
Jessica Hueter	95954	37 Mallard Ct, Magalia, CA
carl christenson	96097	709 Jackson
Ross Stuart	96067	528 Redwood Road
Kirsten Vinyeta	97402	1261 Tyler St.
Margaret Rooker	96003	215 Lake Blvd
Thomas Lyon	92056	2174 Palmer Drive Oceanside,CA
Julie Bacon	97401	491 w12th
Mary Stanleigh	95503	3360 E St
christa lowe	97402	2425 W 18th ave
Jane Rittenhouse	97405	2485 Tyler st
Chuck Acridge	95540	3378 Creekside Ct.
Chloe Adams	95973	315 Sycamore Dr
galen thompson	95927-4185	Box 4185
John Stewart	95560	P.O. Box 185
Tennielle Hughes	95963	4527 Co. Rd. FF 1/2
Uma Bingham	95501	2161 Fairfield
jessica jordan	95524	2182 old arcata rd
valerie donner	94596	20 Sutters Mill Ct.
JASON THOMAS	96019	3710 LAUREL ST
janet cook	95589	p.o box 535
Heather Chan	60615	5110 S Kenwood Ave. Apt. 606
judith porter	94619	3824 [- suter street
Amy Lin	91006	100 west orange grove ave., Arcadia
Laureen Oliveira	96065	PO box 225
Jan West	95570	PO Box 30
adene katzenmeyer	96094	5016 solus pl
Sarah Salisbury	95928	1262 Broadway. Chico, CA

Name	Postcode	Address
rosa rodriguez	94404	catamaran
Melissa Crawford	95960	p.o. box 915
William Nelson	96067	P.O. Box 3
Dickie Magidoff	96013	20388 Hudson Street
Kathleen Caruso	95661	2020 Elk Rd.
Thomas Walker	95926	1670 Hooker Oak Avenue
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Kevin Anderson	96003	11037 Erickson Way
Joanna Stewart	97401	336 Clark St.
Phaedra Kossow- Quinn	95521	343 G Street Apt D
Lilia Letsch	97403	E 16th Ave Eugene
Clifford Minor	95926-4522	336 Mansion Avenue, Chico, CA
Steven Hammond	95926	751 Brookwood Way, Chico, CA
Kristi Wrigley	95503	Eureka,CA.
Bill Allison	95519-8112	1340 filedbrook rd, mckinleyville,ca,
Kathleen Hurley	95928	2 Valley Lake Commons, Chico, CA
Paul Wilson	97401	1489 Cal Young Rd
Danny Hansen	96130	chestnut st
Ariel Wills	97402	930 W 17 st.
Sheila Barnes	96007	5850 Oak St Anderson CA
Stacy York	96019	4474 Arrow Rock Ave
Joy Hoover	93436	3395 Via Barba
Joy Hoover	93436	3395 Via Barba
natasha salgado	21122	5 maynard ave
David Zupan	97405	870 W 23rd Ave.
Janet Lambert	96067	211 Pine Ridge Ave.
Gillian Black	95521	1440 UnionStreet
Emily Meigs	95926	952 Karen dr
Megan Ireson- Janke	96044	18923 Cottonwood Greek Rd
Chip Elliott	96076	P.O. Box 51
Dennis Hanson	95540	577 berry ck ave
Ligia Giovannoni	95501	2145 C St.

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Janic3 Burton	14817	3058 Slaterville Rd
Lee Dedini	95524	1539 Irene St, Bayside, CA
mary carlisle	95969	12 olive branch lane, paradise, ca
Wick Humble	95973	3191 Coronado RD
Carol Kraus	96067	1020 Kingston Rd, # 2 B
Cindy Martel	96025	5809 Castle Ave.
Katherine Johnson	96067	209 Terry Lynn Ave
John Sanguinetti	96067	416 E Ivy St.
Diane Daily	97424	PO Box 1611
Mirranda Willette	97402	355 North Polk
Trudy Duisenberg	95928	4515 Ord Ferry Road
Joy O'Connell	96001	Chaparral Dr
Margaret Johnson	95501	1505 D St. Eureka, Ca.
Carol Callaway	94568	7512 Oxford Circle
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Amy Lefevre	13413	27 Leard Rd

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Lea Betty	96130	720 Cameron Way
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Carrie Sachs	96025	POB 771
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Pandora Kane	96067	510 Glen Mar Drive
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peter reinheimer	96067	p.o. box 471
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Helen Pitre	95570	PO Box 919
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Paolo Nugent	98382	120 Sunland Drive
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Marci Goulart	95928	435 Cypress St
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Mary A Miller	97404	501 Division Avenue sp 58
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Beatrice Cox	95472	5219 Wendell Lane
Talitha Derksen	96051	19691 Statton Rd
Sandra Taylor	95969	625 Scott Dr.,
Jennifer Yun	22202	815 18th Street South
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Jessica Huntzinger	95503	479 Howard Heights
shirlee Hall	60565	40 Harbor Cove
R Mulvey	95338	Indian Peak Rc
RICHARD JACKSON	95521	230 WARREN CREEK RD.
Mollie Wood	98006	15724 SE 46th Way
Kelly Dawn	95966	8145 Reservoir Road
James Theimer	96001	2065 Pine Street
sheila keene	60017	111 Spring Rd
Sarah Greene	97405	3050 Charnelton Street, Eugene, Oregon
Sunnie Noellert	95519	2822 Sandpointe Drive
Hilary Arakaki	96816	4268 Huanui St.
Leilani Sabzalian	97477	1166 Water St
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Cailin Riggs	95540	8th Street
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Harriet Behm	97405	3189 Lincoln St
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richard wilson	95521	1972 zehndner ave.
Doug Busch	95926	1332 Sheridan Ave., Apt. 2
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Sarah Ross	97405	1804 grantst
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Sandra Hansen	96067	1010 Mc Cloud Ave.
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Lana Fredrickson	95658	355 Lehi Ln
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patricia daniels	95521	453 bayside court
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Robin Singler	96057	610 Wetzel
Lisa Vandertuin	95521	5018 Valley East Blvd. #E
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Duplicate DEIS Public Comments

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Rhythm Mohab	94002	506 crest view ave #358,Belmont, Ca
Nina Kramerova	96001	F. Hecku 5
Pamela Check	95926-1475	2237-1/2 Ceres Avenue
Elizabeth Kuiper	95926	1126 Bidwell Ave
Will Parrinello	94965	31 East Pier
John Lynch	95501	1131 Hayes St.
Mark Stedman	95993	2846 art drive
Catherine Campaigne	94707	835 Peralta Ave.
CA Lonergan	94602	4370 Whittle
Javier Dura	95926	9 Savannah In
Matthew Swisher	95603	1180 auburn ravine rd
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Laura P	96073	8858 sun valley dr
Jim Freeberg	97520	POB 938
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Emily Sachs 96001 1975 10th Street, Apt. 1 Barbara Mauk 96046 591 Pelletreau Ridge Road, POB 153 Jane Waite 97402 28346 rainbow valley rd Jen DaParma 95502 PO Box 9042, Eureka CA Patrick Walsh 95219 7008 Tucker Bay Ct. C. ames 94114 525 Hill Street Jay Youngflesh 49684 4356 Carlson Drive Hildegard Williams 95501 1120 John Hill rd. Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Ellen Bryant	95503	3545 M St
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Jane Waite 97402 28346 rainbow valley rd Jen DaParma 95502 PO Box 9042, Eureka CA Patrick Walsh 95219 7008 Tucker Bay Ct. C. ames 94114 525 Hill Street Jay Youngflesh 49684 4356 Carlson Drive Hildegard Williams 95501 1120 John Hill rd. Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Emily Sachs	96001	1975 10th Street, Apt. 1
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Patrick Walsh 95219 7008 Tucker Bay Ct. C. ames 94114 525 Hill Street Jay Youngflesh 49684 4356 Carlson Drive Hildegard Williams 95501 1120 John Hill rd. Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Jane Waite	97402	28346 rainbow valley rd
C. ames 94114 525 Hill Street Jay Youngflesh 49684 4356 Carlson Drive Hildegard Williams 95501 1120 John Hill rd. Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 1355 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Jen DaParma	95502	PO Box 9042, Eureka CA
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Hildegard Williams 95501 1120 John Hill rd. Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	C. ames	94114	525 Hill Street
Charlotte Massey 95136 72 Park Sharon Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Jay Youngflesh	49684	4356 Carlson Drive
Timothy Hart 95062 1415#A Seabright Ave. Santa Cruz CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Hildegard Williams	95501	1120 John Hill rd.
CA. Wayne Steffes 96001 2187 Wisconsin Avenue Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View PI. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96002 1076 Hawthorne Ave Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Charlotte Massey	95136	72 Park Sharon
Carolyn Hedger 96067 POB 2 mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Timothy Hart	95062	
mary seppi 95642 153 frontier, jackson, ca Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Wayne Steffes	96001	2187 Wisconsin Avenue
Amanda Piscitelli 95603 109 Lincoln Way Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Carolyn Hedger	96067	POB 2
Gemma Hunt 94708 1305 Bay View Pl. Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	mary seppi	95642	153 frontier, jackson, ca
Jackson Crane 94020 110 Canada Vista Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Amanda Piscitelli	95603	109 Lincoln Way
Janet Jordan 98506 6702 Garrett Court NE Shanta Gabriel 96067 PO Box 730 Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Gemma Hunt	94708	1305 Bay View Pl.
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Rachel Whalen 94702 1271 Addison St. Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Janet Jordan	98506	6702 Garrett Court NE
Marta Spangler 07405 963 tiara crt Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Shanta Gabriel	96067	PO Box 730
Madeline Dills 94702 2135 Curtis Trina Blanchette 96003 1852 Del Mar Avenue Linda Kehoe 96002 1076 Hawthorne Ave Rebecca Nageotte 94707 1541 Portland Ave.	Rachel Whalen	94702	1271 Addison St.
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	Barbara Hayes	95560-2366	PO Box 2366, Po box 2366
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greg d	96067	no mail
William Webster	95966-9233	36 Westwood PI
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Lorrie Emery Palomita Reza		
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Palomita Reza Katie Zukoski	95060 98117 95928	9865 Empire Grade Seattle 1884 Humboldt Rd
Palomita Reza Katie Zukoski Connie Bilton Patricia Wilson	95060 98117 95928 96059	9865 Empire Grade Seattle 1884 Humboldt Rd 21645 Graham Road
Palomita Reza Katie Zukoski Connie Bilton Patricia Wilson Caine Laurence	95060 98117 95928 96059 95003	9865 Empire Grade Seattle 1884 Humboldt Rd 21645 Graham Road 3050 Marlo Ct #9, Aptos, CA
Palomita Reza Katie Zukoski Connie Bilton Patricia Wilson Caine Laurence Fitzsimons	95060 98117 95928 96059 95003	9865 Empire Grade Seattle 1884 Humboldt Rd 21645 Graham Road 3050 Marlo Ct #9, Aptos, CA 1234 5th
Palomita Reza Katie Zukoski Connie Bilton Patricia Wilson Caine Laurence Fitzsimons Britta Guerrero	95060 98117 95928 96059 95003 96091 95823	9865 Empire Grade Seattle 1884 Humboldt Rd 21645 Graham Road 3050 Marlo Ct #9, Aptos, CA 1234 5th 5500 muskingham way

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D Harton	96025	6901 Dunsmuir Avenue
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NAOMI Stout	19057	27 Valley Rd
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Phyllis Hockley	97402	220 N Adams #2
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Gerard Eisenberg	95460	Bx 344
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Sally Bianco	95926	2050 Laburnum Ave
daniel shedd	14850	112 terraceview dr
Erika Lincango	97405	3370 Potter st
Nancy Harmon	96067	P.O. Box 745
Carole Crews	87529	HC 74 Box 24508
Erik Johnson	49009	5823 West Jefferson Commons, Apartment #101
Christy Sherman	97408	2515 Benson Ln
Jeannine Grizzard	97520	698 Roca st
Devon Pena	98155	1840 NE 177th St Shoreline
Jane Farrell	97405	1855 W 28th Ave
Casy Cann	96087	P.O. Box 429 Shasta CA
Mike Duncan	95816	duncanm1971@yahoo.com
karl Greenblatt	92869-4234	5215 E Chapman Ave #41
Julia Holloway	50132	P.le Doantello, 38, Florence
Jason Jackson	97526	1224 nw sunset dr
Kimberlee Tellez	95501	210 West Buhne
Jackie Sheggeby	95502	PO Box 874
laura winner	95966	1275 cox lane
Diana Tuggle	96002	1803 Vega St
Elizabeth Sabel	94618	5850 Birch Court #2
Kristine Wyndham	94602	1379 El Centro Ave
Jim Brobeck	95926	1605 Manzanita
martha santiago	95608	5325 el camino avenue
Anne Ryan	18847	58 Maiden lane
David Arnold	96003	2013 Hedgerow Ave

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Kirk Davis	96001	2442 California Street
Joa Janakoayas	96067	601 Cedar St
Stephanie Turner	97206	512 Mill Street
Kevin Cheli- Colando	95521	4514 Valley West
Grace Sesma	80466	Nederland, CO
MG Hanley	96067	Brush Street
Claire Knox	95519	1915 Cliff Ave, McKinleyville CA.
Andrew Royer	96019	1911 Locust Ave
Linda Allen	96003	11441 Rugby Hill
vincenza scarpaci	97401	1090 Corydon St.
Michael Pottinger	95521	320 10th st.
Susan Cashman	95524	Bayside, CA
Anna Ward	97526	1975 Sarartoga Way
Susie Miller	75106	p o box 2312
Marianne Bithell	95521	1019 Alder Grove Road
Mollie Kjenaas	95746	4120 Douglas Blvd
Tarra Neff	97501	7000 Griffin Creek Rd
Kendra Howard	97405	1959 Jefferson, Eugene, OR
Paulette Connor	44134	5620 w24th str. Parma Ohio
Daphne Martin	95410	Albion, Ca
Viola Cafferata	96031	HC 4 610 Godfrey Ranch
Joshua Stark	95691	1918 Carolina Ave., West Sacramento, CA
Teri Mihalevich	96067	805 Caroline Ave
Sirina Sucklal	20723	8511 Autumn Grain Gate
Jacob Pounds	95501	898 10Th St
Christina Okesson	97402	4487 Knoop Ave, Eugene, OR
Victoria Webb	95519	McKinleyville, CA
Johnna Morrow	55412	3427 North Colfax Ave.
T Murfin	95501	2524 harrison avenue, eureka
Jewel Murphy	97404	933 Irvington
Christine Jensen	96130	PO Box 1667
ART BURKE	96022	16490 BLUEOAK ROAD

Jimmy Durchslag 95560 PO Box 984 PO Box 984	Name	Postcode	Address
robert furukawa 94952 4 raymond heights Rachel Caspary 95926 1421 1/2 Hobart St. Gall Babich 95589 200 Cougar Rd Tamar Danufsky 95521 990 Union St. Beth Livezey 96088 Shingletown, Ca steve crossman 95490 1644 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindl Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av<	Jimmy Durchslag	95560	PO Box 984
Rachel Caspary 95926 1421 1/2 Hobart St. Gail Babich 95589 200 Cougar Rd Tamar Danufsky 95521 980 Union St. Beth Livezey 96088 Shingletown, Ca steve crossman 95490 1844 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. </th <th>Doug Barrett</th> <th>97439</th> <th>P.O. Box 114 Florence OR</th>	Doug Barrett	97439	P.O. Box 114 Florence OR
Gail Babich 95589 200 Cougar Rd Tamar Danufsky 95521 980 Union St. Beth Livezey 96088 Shingletown, Ca steve crossman 95490 1644 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue <th>robert furukawa</th> <th>94952</th> <th>4 raymond heights</th>	robert furukawa	94952	4 raymond heights
Tamar Danufsky 95521 980 Union St. Beth Livezey 96088 Shingletown, Ca steve crossman 95490 1644 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 9910	Rachel Caspary	95926	1421 1/2 Hobart St.
Beth Livezey 96088 Shingletown, Ca steve crossman 95490 1644 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 <t< th=""><th>Gail Babich</th><th>95589</th><th>200 Cougar Rd</th></t<>	Gail Babich	95589	200 Cougar Rd
steve crossman 95490 1644 Crawford Drive Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 <th>Tamar Danufsky</th> <th>95521</th> <th>980 Union St.</th>	Tamar Danufsky	95521	980 Union St.
Michelle Donaldson 94122 1727 43rd Ave SF CA Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926	Beth Livezey	96088	Shingletown, Ca
Nocolette Swan 97404 886 Tyler St Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268	steve crossman	95490	1644 Crawford Drive
Nicki Dillenbeck 97478 205 S 54th St. Springfield Or. Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box PO Box 97078 <	Michelle Donaldson	94122	1727 43rd Ave SF CA
Mary Simmons 31831 12750 GA Hwy 85 Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754	Nocolette Swan	97404	886 Tyler St
Cindi Alvitre 92626 3094 Mace Avenue costa mesa ca Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Lo	Nicki Dillenbeck	97478	205 S 54th St. Springfield Or.
Alina Randall 95501 232 c st Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Mary Simmons	31831	12750 GA Hwy 85
Hannah Rappaport 87529 P.O. 1647 Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Cindi Alvitre	92626	3094 Mace Avenue costa mesa ca
Gregory Esteve 33898 3655 North Scenic Highway Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Alina Randall	95501	232 c st
Darral Seekatz 95969 213 Pacific Dr. Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Hannah Rappaport	87529	P.O. 1647
Joseph Orozco 95546 PO Box 1220 Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Gregory Esteve	33898	3655 North Scenic Highway
Susan Santiago 94949 111 D Cortez Circle Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Darral Seekatz	95969	213 Pacific Dr.
Wendy Deharpport 95570 box 482 Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Joseph Orozco	95546	PO Box 1220
Cameron Knutson 99024 600 kelton av Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Susan Santiago	94949	111 D Cortez Circle
Tiffany Mitchell 94952 431 Stadler Ln. Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Wendy Deharpport	95570	box 482
Alexandra Nagy 91311 9652 Keokuk Avenue Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Cameron Knutson	99024	600 kelton av
Janelle Anderson 96099 PO Box 991075, Redding, CA Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Tiffany Mitchell	94952	431 Stadler Ln.
Charles D'Elia 95926 1350 Manzanita Ave. Apt. 7 Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Alexandra Nagy	91311	9652 Keokuk Avenue
Rececca Robles 92672 119 Avenida San Fernando Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Janelle Anderson	96099	PO Box 991075, Redding, CA
Grace Marvin 95926 1621 N. Cherry St. M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Charles D'Elia	95926	1350 Manzanita Ave. Apt. 7
M.C. Reardon 97268 PO Box 67078 Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Rececca Robles	92672	119 Avenida San Fernando
Ron S. 95233 P.O. Box two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Grace Marvin	95926	1621 N. Cherry St.
two elk standing 59912 po box 1754 Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	M.C. Reardon	97268	PO Box 67078
Ernesto Moreno 90005 861 Fedora Street, Los Angeles, CA carole vandal 55408 1 w. lake st	Ron S.	95233	P.O. Box
carole vandal 55408 1 w. lake st	two elk standing	59912	po box 1754
1 Williams St	Ernesto Moreno	90005	861 Fedora Street, Los Angeles, CA
craig speck 97402 329 N. Polk St.	carole vandal	55408	1 w. lake st
	craig speck	97402	329 N. Polk St.

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Michael Murphy	91024	680 Gatewood Ln.
Richard Lucas	96067	PO Box 990 Mount Shasta, CA
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Nicole Gulotta	98279	151 Peapod Ln
Lisa Lombardo	97401	491 w 12th ave
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Gail Luckenbaugh	17339	725 Lewisberry Rd.
Leslie Scales	96001	2435 Lincoln St
Don Maddox	96094	9431 Rocky Road, Weed, Ca

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Lindsay Budner	96067	606 Brush Street, Mt. Shasta, CA		
Sharynn-Marie Blood	96127	P.O. Box 270021		
MaryEllen DORRITY	94110	744 GUREEERO st.		
Michael Sorenson	94703	1716 B Virginia St		
Caleb Sponholtz	93446	835 19th Street		
Karol Powers	96025	560 South First St.		
Sylvia Cave	98660	2206 Thompson Ave		
Janet Liss	90808	3530 Monogram Avenue		
kathleen gardner	96057	box 165 mccloud		
Alexandra Nun	96067	1739 highland dr		
Frances Ransley	95457	P.O. Box 1542, Lower Lake, CA		
april carmelo	96089	p.o. box 5634 shasta lake, ca		
Chris Crescioli	93401	1386 Laurel Lane		
Kristina Brown	95973	1160 Metalmark Way		
Kelsey Watson	96067	1632 Christian Way		
Kim Anne	97403	4317 E 20th Ave		
Tim K. Murphy	94118	701 Parker Ave., Apt. 203, SF, CA		
Coleen Crume	97601	Klamath Falls OR		
Suellen Rowlison	95928	1363 Woodland Ave.		
Rebecca Peterson	78043	220 N Zapata Hwy		
Jesus Rodriguez	94114	439 Corbett unit 1 San Francisco		
Jennifer laccarino	96067	Mt. Shasta, CA		
Misty Reilly	94970	po box 237		
Patience Harvey	96001	10220 Kangaroo Mine Rd		
Chelsea Powers	97230	4118 NE 131st Place		

Name	Postcode	Address		
Bryn Truett-Chavez	95033	23229 Summit Rd.		
Guarionex Delgado	95959	11328 Red Dog Rd.		
Alicia Wiley	70131	18 English Turn Drive		
Linda Danielson	97405	195 East 38th Avenue Eugene, OR		
Atava Swiecicki	94609	4796 Webster St		
Cameron Dollinger	96150	1153 dedi ave south Lake Tahoe ca		
Susan Elliott	59068	P. O. BOX 1042		
Noel Wolfe	95067	306 McCloud ave		
Gloria Decater	95428	25451 East Lane		
corrine Lewis	89406	8728austin rd		
Leon Chadwick	04041-0273	96 Hiram Hill Road P.O.Box 273		
maia peter	95971	po box 324		
Michelle Andras	96067-9617	1815 EDDY DR		
Heidi Strand	96096	P.O. Box 172, Whitmore, CA		
Marianna Monaco	97405	1487 West 24th Place, Eugene, OR		
Holly Sheehan	94920	110 Taylor Rd		
Michael Singsen	94708	1404 Summit Road, Berkeley		
layla feghali	91326	11660 porter valley dr		
Natalie Ortiz	96067	1634 North Old Stage Rd		
Ben Cody	98418	3618 Tacoma		
Campbell Derral	96002	7154 Robles Drive, Redding CA		
Janet Johnson	95926	1384 Spruce Avenue		
Lorraine Luna	95691	2860 canvasback way		
dylan hayes	94110	3544 19th street		
Gene Dunning	95942	POB 422, Forest Ranch CA		
Deborha d'Arms	96094	14937 shoreline		
nonnie welch	94956	12307 sf drake		
Jennifer Gulick	94510	136 Dartmouth PI		
Aidan Dunn	94103	134 Duboce Ave., #11		
Caroline Kittrell	95928	275 E. 19th St., Apt. B		
Catherine Grant	55419	4835 Colfax Ave So		
Atta Stevenson	95454	general delivery		
Tiffany Eklund	96069	30528 Smith Logging Rd		

Name	Postcode	Address		
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Rachel Seto- Templeton	87529	P.O. Box 888 El Prado NM		
Catriona Esquibel	94601	2932 E 29th ST		
Jennifer Bove	81230	352 Crocus Road, Gunnison, CO		
Franklin Lambert	93933-1525	PO Box 1525, Marina, Ca.		
christopher streetman	95977	7118 State Highway 20		
Michaela Herbert	96067	303 Eugene st		
vugil linda	85795	3461 n flowing wells #5		
Keira Reed	77531	200 e brazoswood dr #1202		
Della Martin	96003	300 Elk Drive		
Gene Beley	95219	6428 Embarcadero Drive		
Carolyn Rissanen	94805	5820 Sierra Ave		
Bari Talley	95556	PO Box 175		
Armondo Loretto	95127	30 manning ave. san Jose, ca,		
Joe Nesbitt	72762	2000 Blueberry Lane		
Eileen Butler	91385	PO Box 55523		
Daniel Kealey	96067	3609 N.Old Stage Rd, Mt.Shasta		
Julian Lang	95519	P.O. Box 2276		
karen ramirez	956083404	6615 grant ave		
Amelia Adams	94601	4401 San Leandro St # 29		
Melanie Giangreco	97487	Veneta, OR		
Bing Gong	94956	PO Box 478, Point Reyes Station, CA		
Marguerite Wilson	95616	1 Shields Ave., Davis, CA		
Rebecca Swarthout	49245	430 S. ByronSt lot 35		
cassandra compton	95448	530 fitch st		
Andy Adkins	96080	859 Washington Street #291		
Quinn Costello	94117	999 Steiner St.		
Erin Lee	94109	640 Post Street #502 San Francisco, CA		
Heather Schwarzenberg	96067	1511 Holiday Lane		
Candy Petersen	89128	1517 Bellglen Dr.		
Michael Gannon	97440-2324	Box 10324, Eugene, OR		

D-LCDA Duplicate of O-LCDA

Lakehead Community Development Association P.O. Box 322 Lakehead, CA 96051

September 27, 2013

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

Re:Response to SLWRI Environmental Impact Statement

For many years discussions and studies have taken place regarding the possible raising of Shasta Dam to benefit California fish habitat, agriculture an increased population in California. The current EIS by the Bureau of Reclamation sets forth the needs of each of these interests and the benefits each would enjoy which justifies the raising of Shasta Dam. The study defines negative impacts to wildlife, insects, plants, and communities and provides suggested mitigation measures to lessen the impact from raising the dam.

The study further indicates that many homes and businesses, both on private and US Forest Service leased land will be impacted and that Federal Law provides for financial compensation to the owners of these properties in accordance with Federal law. The majority of the homes and businesses impacted by this project are in the unincorporated community of Lakehead. In numerous meetings with BOR and the US Forest Service we have heard that while private properties on Forest Service land will be provided new Forest Service land to rebuild, no such provision is provided for private property owners, be they homes or businesses to include resorts serving the recreational needs of Shasta Lake.

The community of Lakehead has a stated population of 550 permanent residents, but perhaps an additional 300-400 part time residents who have summer/vacation homes in or around the Lakehead area and Lake Shasta. Should the dam be raised and these impacted private homes and businesses be lost, the community of Lakehead will suffer a tremendous loss of citizens, and economic benefit to the community, Shasta County and the recreational users of Lake Shasta. Many have stated that the loss of the residences and businesses due to raising the dam will be the end of Lakehead, just as the area lost the towns of Kennett, Coram, Baird, Heroult, Marley and many more small towns that are now at the bottom of Lake Shasta. The major difference here is that the vast majority of these lost properties will not be drowned by higher water, as was the case with the original construction of Shasta Dam. Many of the impacted homes and businesses on private land will just be too close to the new high water mark, thus creating a need for elimination due to

setback requirements by the County, State of Federal agency's. There seems to be no reasonable reason why with the raising of Shasta Dam, the Department of the Interior, Bureau of Reclamation, and US Forest Service should not open up new private property for both residents and business of Lakehead to mitigate the losses as described above.

There must have been provisions for private land along the edge of Lake Shasta when the original dam was built as much of Lakehead as seen today was developed in the 50's 60's and 70's subsequent to the dam being built. Many of the homes that will be lost have been here for 50 years or more and to just say to these property owners and the community that we will have no opportunities to rebuild our homes and businesses to serve a thriving community is irresponsible, and should be a valid mitigation consideration.

With the EIS stated increased population of the State of California and the need for increased recreation opportunities, it does not make sense that we will have fewer resorts and businesses serving the needs of the visitors to Shasta Lake. The US Forest Service has stated publicly that there will be fewer but bigger resorts. This seems short sighted and a desire for the US Forest Service to control all resorts as they will be on Federal Land vs private.

When the Draft Environmental Impact Study was released in 2011 the Lakehead Community Development Association formed a Stakeholders Committee made up of Citizens and Business owners to cooperatively work with the Bureau of Reclamation and USFS in the process of this study. While the BOR has been cooperative holding meetings and providing information on the progress of the study, we have not received any cooperation in regard to many of the very important issue that have been raised at these meetings to include losing a significant portion of the town of Lakehead, it's citizens and businesses that have been vital to the success of our community.

The US Congress, Bureau of Reclamation, and US Forest Service have a tremendous opportunity to mitigate the loss of citizens, businesses, jobs, and economy of both Lakehead and Shasta County with the opening of new private property. The raising of the dam will create a tremendous job of relocating roads, bridges, railroad crossings etc. To add to this project the opening of new private land for citizens to purchase and thus add to the opportunity of Lakehead to recover from the project for its citizens, businesses and economy. This would be both reasonable and responsible mitigation, and bring a positive result for a town that does not have to be devastated.

The EIS states that there will be a need to relocate roads, bridges, railways, utilities, septic systems etc. but does not address the costs, or impact on additional homes and businesses. Not addressing these issues in the EIS leaves the report incomplete and the true impacts immeasurable. In meetings with the BOR, the need to address the major roads, utilities etc. within Lakehead have been loudly stated by the

community, but the response has only been that none of these issues will be addressed prior to the US Congress taking action to move forward with the raising of Shasta Dam. The community believes that the EIS would be in error to not address these issues and their impacts in the study without these issues being addressed.

- We request that the Bureau of Reclamation and USFS address the negative impacts on the community of Lakehead, its citizens and private business owners to include the socio economic impacts. Further we request that the our government make allowances for new private property along the shoreline of Lake Shasta to mitigate the losses described herein. There is no need to lose 170 or more private homes and businesses when an opportunity is present to mitigate these losses by creating new lands, just as the USFS will create for their leased properties.
- We request that the Bureau of Reclamation and USFS provide replacement lands for any and all lakeside resorts, and not just those on Forest Service leased land.
- We request that the EIS address the revision of roads, access to homes, businesses, utilities, septic systems etc to show a truer impact on the community of Lakehead, and thus create opportunities for mitigation in its report to Congress.
- Within the town of Lakehead there are several community water systems
 that serve neighborhoods. The impacts on these systems as they serve their
 respective communities needs to be studied, as the loss of numerous homes
 within a water company will impact their revenue stream for the whole
 community, or the elimination of wells servicing these communities due to
 new high water from the raising of Shasta Dam will create environmental
 impacts which have not been addressed.

We believe that these issues and our comments for mitigation are reasonable and if responsibly considered will provide further support for the BOR to gain acceptance of raising Shasta Dam by the community of Lakehead.

Sincerely;

Joe Myers, President, Lakehead Community Development Association

D-NRDC1 Duplicate of O-NRDC1



Fwd: NRDC Comments on SLWRI DEIS

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

Wed, Oct 23, 2013 at 1:09 PM

Sent from my iPhone

Begin forwarded message:

From: "Obegi, Doug" <dobegi@nrdc.org>
Date: September 30, 2013, 5:08:57 PM PDT
To: "KChow@usbr.gov" <KChow@usbr.gov>

Cc: "Rachel Zwillinger (external)" <rzwillinger@altshulerberzon.com>.

"Poole, Kate" <kpoole@nrdc.org>

Subject: NRDC Comments on SLWRI DEIS

Dear Ms. Chow,

Attached are the comments of the Natural Resources Defense Council on the SLWRI DEIS. Because of the file size, I will send you the attachments to our comments in separate emails. I would appreciate if you would confirm receipt of our comments. Please let me know if you have any problems opening the attachments.

Doug		
Sincerely,		

Doug Obegi

Staff Attorney*

Water Program

Natural Resources Defense Council

111 Sutter Street, 20th Floor

San Francisco, CA 94104

415.875.6100 (phone)

415.875.6161 (facsimile)

* Admitted to practice in California

Final NRDC comments SLWRI DEIS.pdf 98K



NATURAL RESOURCES DEFENSE COUNCIL

September 30, 2013

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

SENT VIA EMAIL TO KChow@usbr.gov AND VIA U.S. MAIL

Re: Comments on the Draft Environmental Impact Statement for the Shasta Lake
Water Resources Investigation

Dear Ms. Chow:

On behalf of the Natural Resources Defense Council ("NRDC"), which has more than 1.3 million members and activists, 250,000 of whom are Californians, we are writing to provide comments on the inadequacy of the draft Environmental Impact Statement ("DEIS") for the Shasta Lake Water Resources Investigation ("SLWRI"). The DEIS evaluates the potential

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¹ The DEIS states that "[t]his document has also been prepared in accordance with the California Environmental Quality Act (CEQA)." DEIS at ES-1. However, the document is clearly not CEQA compliant. First, there is no state lead agency, and no state agency is listed as a "cooperating agency" in the DEIS. Id.; see Cal. Pub. Res. Code § 21082.1 (EIR "shall be prepared directly by, or under contract to, a public agency"); tit. 14 Cal. Code Regs. § 15379 ("'public agency" "does not include agencies of the federal government"). Further, the DEIS fails to identify an environmentally superior alternative, see tit. 14 Cal. Code Regs. §15126.6(e)(2), and improperly defers mitigation measures to the future. See id. § 15126.4(a)(1)(B); City of Long Beach v. Los Angeles Unified Sch. Dist., 176 Cal. App. 4th 889, 915-16 (2009) ("Impermissible deferral of mitigation measures occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR."); see, e.g., DEIS at 25-39 (with respect to impacts to McCloud River, stating "[n]o specific mitigation measures are proposed at this point in the planning process" and referencing "Comprehensive Mitigation Strategy"); id. at 2-27 to 2-28 (brief discussion showing Comprehensive Mitigation Strategy devoid of details and standards). The DEIS also fails to even determine whether impacted tribal archaeological sites qualify as historical resources, as required by tit. 14 Cal. Code Regs. § 15064.5(c), and does not address California's stringent requirements for mitigating impacts to historic resources, see id. § 15126.4(b). See DEIS at 14-12 to 14-18, 14-23. The DEIS also notes that, "formal CEQA scoping has not been initiated," despite the fact that scoping begins the CEQA process. DEIS at

NRDC comments on draft SLWRI EIS September 30, 2013

environmental effects of five alternative plans to enlarge Shasta Dam and Reservoir, each of which purportedly has the primary purposes of (1) increasing anadromous fish survival in the Sacramento River, primarily upstream from Red Bluff Pumping Plant, and (2) increasing water supply and water supply reliability for agricultural, M&I, and environmental purposes, to help meet current and future water demands, with a focus on enlarging Shasta Dam and Reservoir. DEIS at ES-6.

Unfortunately, the DEIS is fundamentally flawed. First, the DEIS fails to analyze an adequate range of alternatives. None of the alternatives achieve the "coequal" primary purpose of increasing anadromous fish survival, and the Bureau of Reclamation ("Bureau") unlawfully rejected federal agency recommendations to consider additional alternatives that would help achieve that primary purpose. Second, the project purposes are unlawfully narrow; the purposes fail to reference the Bureau's legal obligations to achieve anadromous fish doubling under the Central Valley Project Improvement Act ("CVPIA"), and the narrow purpose inappropriately excluded alternatives that would not involve expanding the dam but could benefit anadromous fish, provide water supply flexibility and improvements in water supply. Third, the DEIS fails to adequately analyze the impacts of those alternatives, including impacts on anadromous fish survival, tribal resources, and cumulative impacts. The analysis presents biased results, presents conclusions that are not supported by substantial evidence, and ignores contrary analysis provided by state and federal agencies.

The proposed project is also fatally flawed because the DEIS demonstrates that all of the alternatives would cause significant, unmitigated impacts on tribal resources and would unlawfully impair the legally protected trout fishery and wild and scenic values of the McCloud River (California Public Resources Code section 5093.542). This project, and the millions of dollars spent on related studies and this environmental analysis, represents an unacceptable waste of millions of taxpayer dollars. Accordingly, we recommend that the Bureau withdraw the DEIS and terminate the SLWRI study. Should the Bureau decide to continue consideration of the SLWRI, the Bureau must prepare and recirculate a legally adequate feasibility study and EIS/EIR, consistent with NEPA and CEQA.

On the pages that follow, we discuss these issues in greater detail.

ES-36. Finally, the DEIS is deficient under CEQA for the same reasons the document fails to comply with NEPA, including, *inter alia*, its failure to analyze a reasonable range of alternatives, its unlawfully narrow project objectives, its failure to accurately analyze the effects of alternatives, and its failure to adequately analyze cumulative impacts. An adequate analysis of alternatives and impacts is required, consistent with CEQA.

NRDC comments on draft SLWRI EIS September 30, 2013

I. The DEIS Fails to Consider a Reasonable Range of Alternatives

Pursuant to the National Environmental Policy Act ("NEPA"), an environmental impact statement must consider a reasonable range of alternatives. 42 U.S.C. § 4332; 40 C.F.R. §§ 1502.14, 1508.25(b). "The existence of a viable but unexamined alternative renders an environmental impact statement inadequate." Natural Res. Def. Council v. U.S. Forest Serv., 421 F.3d 797, 813 (9th Cir. 2005) (quotation marks and citation omitted). The DEIS clearly fails to include a reasonable range of alternatives because although water supply and increased anadromous fish survival are of "coequal priority," DEIS at ES-6, as discussed in detail infra, none of the alternatives are likely to substantially increase anadromous fish survival.

One of the DEIS's most glaring deficiencies is its failure to consider an alternative that meets both primary objectives, and does not include raising Shasta Dam. In June 2008, the U.S. Fish and Wildlife Service ("FWS") prepared a report pursuant to the Fish and Wildlife Coordination Act in which it recommended that "Reclamation should include a SLWRI alternative that evaluates the capability of increasing anadromous fish survival and water supply reliability without raising Shasta Dam." U.S. Fish and Wildlife Service, Draft Fish and Wildlife Coordination Act Report for the Shasta Lake Water Resources Investigation vii (June 2008) (hereinafter "FWS Report").2 The report detailed the components of such an alternative, including modifying Shasta Dam's temperature control device, increasing water use efficiency, and making operational changes to Shasta Dam to increase cold water storage and increase minimum flows. Id. at 16-17, 22-23. There are dozens of similar measures that could have been considered in a no-dam-raise alternative, including conjunctive management and water recycling. Analysis of an alternative with components like these likely would have shown that it is possible to improve water supply and anadromous fish survival at a lower cost than spending billions of dollars raising Shasta Dam. The Bureau, however, failed to include a single alternative that did not involve raising the Dam. Had it done so, it would have been able to avoid some of the most substantial impacts that plague each of the proposed action alternatives, including violating Section 5093.542 of the California Public Resources Code by impairing flows on the McCloud River and harming its trout fishery, and permanently impairing culturally significant tribal resources.

In addition to a no-dam-raise alternative, the Bureau failed to consider other alternatives that combined dam expansion with measures that could provide substantial increases in anadromous fish survival. Notably, the FWS explicitly recommended several such measures that should be analyzed as part of one or more alternatives. For example, the FWS Report recommended analyzing an alternative that included increasing minimum flows in the upper Sacramento from

3

² The FWS Report is available online at: www.usbr.gov/mp/nepa/documentShow.cfin?Doc_ID=14138 and is hereby incorporated by reference.

NRDC comments on draft SLWRI EIS September 30, 2013

the current 3,250 cfs to 4,000 cfs from October 1 through April 30, if end-of-September storage is 2.4 MAF or greater. FWS Report at vi. This could have resulted in expanded spawning habitat, reduced redd dewatering, improved migratory survival, and other benefits to anadromous fish survival. FWS Report at 16-17; see, e.g., National Marine Fisheries Service, Biological Opinion and Conference Opinion on the Long-Term Operations of the Central Valley Project and State Water Project (2009) (hereinafter "NMFS 2009 BO").3 The DEIS failed to analyze increased minimum flows in any of the action alternatives. See DEIS at 2-18 (dismissing need for such analysis). FWS also recommended modifications to Shasta's storage and release operations to provide pulse flows to improve the quality of aquatic habitat. FWS Report at 22. These actions could improve migratory survival of juvenile anadromous fish, provide geomorphic flows to improve habitat, and provide other benefits. See, e.g., DEIS at 11-269. The DEIS, however, failed to analyze any alternative that included modifications to Shasta's storage and release operations. While CP4 purports to include dedicated storage for the cold water pool,4 it does not increase carryover storage requirements for Shasta reservoir; an alternative that increased carryover storage requirements would have helped to ensure adequate cold-water reserves in the reservoir to improve downstream temperatures and thus anadromous fish survival. See, e.g., NMFS 2009 BO. Yet the DEIS failed to analyze any alternative that increased the carryover storage requirement.5

The DEIS also fails to consider a reasonable range of alternatives because all of the alternatives would violate state and federal law by unlawfully degrading the wild and scenic characteristics of the McCloud River and its protected trout fishery. As discussed *infra*, the DEIS appropriately concludes that each action alternative would violate California law (and thus violate federal law) by impairing the McCloud's trout fishery and free-flowing condition. *See* DEIS at ES-30 (listing as a significant and unavoidable impact the "Effect on McCloud River's eligibility for listing as a Federal Wild and Scenic River and conflicts with the California Public Resources Code, Section 5093.542 (all action alternatives)"); *see* DEIS at ES-122 to ES-123. Yet the DEIS failed to analyze a single alternative that would avoid these impacts and thus comply with state and

³ The 2009 BO is available online at:

http://swr.ninfs.noaa.gov/ocap/NMFS Biological and Conference Opinion on the Long-Term Operations of the CVP and SWP.pdf and is hereby incorporated by reference.

⁴ The DEIS also fails to adequately explain whether and how the benefits of increased storage for anadromous fish would be reasonably certain to occur, without increasing existing carryover storage requirements or other regulatory standards.

⁵ The eight management measures common to every alternative do not meaningfully improve conditions for anadromous fish survival; instead, at best they simply maintain status quo conditions in light of modifications to the dam. DEIS at ES-12. In addition, alternatives CP4 and CP5 include minimal spawning gravel augmentation and habitat restoration. DEIS at ES-19 to ES-21. However, these measures appear to only "partially offset" the impacts of the loss of geomorphic flows on downstream habitat. See DEIS at 11-270.

federal law. Because each proposed alterative violates state and federal law and none of the alternatives lawfully may be implemented, the range of alternatives is clearly unreasonable.

In order to analyze a reasonable range of alternatives, the DEIS must include one or more alternatives that do not expand the reservoir but still improve water supply and anadromous fish survival, one or more alternatives that meaningfully improve anadromous fish survival, and one or more alternatives that do not violate state and federal law.

II. The DEIS Utilizes an Unlawfully Narrow Project Purpose and Objectives

The DEIS also fails to comply with NEPA because it defined the project's objectives in unreasonably narrow terms. See Nat'l Parks & Conservation Ass'n v. Bureau of Land Mgmt., 606 F.3d 1058, 1070 (9th Cir. 2010) ("An agency may not define the objectives of its action in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action, and the EIS would become a foreordained formality." (quotation marks and citation omitted)). First, the Bureau's water-supply focused objective is narrowly defined to require the raising of Shasta Dam. DEIS at ES-6 (water supply goal includes "a focus on enlarging Shasta Dam and Reservoir"). This definition is inappropriate because it unreasonably forecloses the possibility that both the water supply and anadromous fish survival objectives could feasibly be achieved without increasing the Reservoir's capacity.

Second, the fish-focused primary objective is narrowly drawn to ignore the CVPIA's salmon-doubling requirement. See P.L.102-575, § 3406(b)(1) (CVPIA § 3406(b)(1)). Because the Bureau's operation of Shasta Dam must comply with the CVPIA, the statute's command that the Secretary of Interior make "all reasonable efforts" to ensure that "natural production of anadromous fish in Central Valley rivers and streams will be sustainable, on a long-term basis, at levels not less than twice the average levels attained during the period of 1967–1991" must have been explicitly incorporated into the DEIS's fish-focused objective and progress towards that objective evaluated in the DEIS. Id.⁶

By narrowly defining project objectives that fail to reference the Bureau's mandatory obligations under the CVPIA and which apparently preclude alternatives that would not expand the Dam but

quantitatively analyze the impacts on anadromous fish abundance and achievement of the salmon-doubling goal under CVPIA.

⁶ The DEIS acknowledges the CVPIA's salmon-doubling goal, but states that it will only be included in a qualitative cumulative impacts assessment. DEIS at 3-23 to 3-24. This is inadequate in light of the Bureau's legal obligations under the CVPIA, the terms and conditions of the Bureau's water rights, and state law. It is also inaccurate, as nowhere in Chapter 11 does the DEIS analyze the cumulative effects of the project in meeting the Bureau's obligations under section 3406(b)(1) of the CVPIA. In addition, as discussed *infra*, modeling tools exist to

would otherwise achieve improved water supply and anadromous fish survival, the DEIS's project purpose and objectives violate NEPA.

III. None of the Alternatives is Likely to Achieve the DEIS's Coequal Primary Objective of Increasing Anadromous Fish Survival

The alternatives analyzed in the DEIS were clearly unreasonable because none meets the primary project objective of increasing anadromous fish survival in the upper Sacramento River. Commenting on the SLWRI Plan Formulation Report, the FWS highlighted the minimal benefits provided to anadromous fish:

Only one alternative (CP4) provides *any* measurable benefit to anadromous fish survival, and even under that alternative, in the vast majority of years the enlarged cold water pool results in either negligible or slightly negative impacts to Chinook salmon survival. In about 90 percent of the years, there would be no benefit to anadromous fish survival. Even in CP4, the benefits of an enlarged cold water pool for each of the four runs of Chinook salmon are limited to a few critical and dry water years representing 6 – 16 percent of the water years, based on the 1922 – 2002 period of simulation.

FWS Report at v (emphasis in original). Similarly, commenting on the SLWRI Feasibility Report, the California Department of Fish and Wildlife ("CDFW") stated that "[o]nly in one alternative (CP4) does enlarging the cold water pool provide benefits to anadromous fish survival. However, it appears that the benefits to anadromous fish are limited to a few critical and dry water years representing 5% to 10% of the 1922-2003 period of simulation." Cal. Dept. of Fish and Wildlife, SLWRI Comments on the Public Draft of the Feasibility Report, and Selected Attachments, January 2013 (February 8, 2013) at 5 ("CDFW, Attachment 1").

In spite of these agencies criticisms, the alternatives analyzed in the DEIS are similar to those presented in the Plan Formulation and Feasibility Reports, and analysis of the DEIS's alternatives continues to show insubstantial benefits to anadromous fish survival. The DEIS's flawed analysis makes clear that even alternative CP4, which is the most "fish friendly" alternative analyzed in the DEIS, will fail to increase anadromous fish survival in the vast majority of years.

⁷ Our comments focus on alternative CP4 because it purports to provide the greatest benefits to anadromous fish, and the DEIS's flawed methodology demonstrates that other alternatives provide even worse outcomes for anadromous fish survival. *See, e.g.*, DEIS at 11-93 to 11-110 (showing decreased winter run and late fall run production under CP1, and no significant increase in production of other runs); DEIS at 11-98 (showing that alternatives CP1, CP2, and CP5 result in increased mortality of winter run); DEIS at 11-209 to 11-217 (showing that on

For example, in most years, CP4 will actually result in *decreased* production for winter-run Chinook salmon. In particular, the DEIS's modeling shows that, compared to existing conditions and the no action alternative, winter-run production will decrease in dry, below normal, above normal, and wet years. DEIS at 11-255. Only in critical years, which represent just 16% of modeled years, will there be any increase in production. *Id.* Thus, in 84% of modeled years, the most fish friendly alternative will have a negative impact on winter-run Chinook salmon, and even the DEIS concludes that, "[w]inter-run Chinook salmon would have an *overall insignificant* increase in production" under CP4. DEIS at 11-256 (emphasis added).

The DEIS shows that CP4 will have a similar impact on fall-run Chinook salmon. Compared to existing conditions and the no action alternative, the DEIS concludes that CP4 will cause production to *decrease* in below normal, above normal, and wet years. DEIS at 11-261. Only in critical and dry years, which represent just 30% of modeled years, is fall-run production predicted to improve. *Id.* As a result, in the vast majority of modeled years, the most fish-friendly alternative will result in negative impacts to survival of fall-run Chinook salmon, and the DEIS concludes that overall, CP4 will have an "*insignificant increase in overall production*" of fall-run Chinook salmon. DEIS at 11-262 (emphasis added).

Further, as discussed *infra*, the substantial flaws in the DEIS's modeling results cast doubt on even the modest benefits to anadromous fish survival that the DEIS claims. Because the DEIS's flawed analysis shows that no alternative will provide substantial benefits to anadromous fish, the range of alternatives that the DEIS analyzes is clearly inadequate.

IV. The DEIS Fails to Adequately Assess the Impacts of Proposed Alternatives on the Environment, and Fails to Adequately Analyze Cumulative Impacts

One of NEPA's primary purposes is "to guarantee relevant information is available to the public." N. Plains Res. Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1072 (9th Cir. 2011). The DEIS is deficient because it fails to provide the public with adequate, accurate information that it can use to make an informed comparison of the alternatives that the Bureau did evaluate. See Natural Res. Def. Council, 421 F.3d at 811 ("Where the information in the initial EIS was so incomplete or misleading that the decisionmaker and the public could not make an informed comparison of the alternatives, revision of an EIS may be necessary to provide a reasonable, good faith, and objective presentation of the subjects required by NEPA." (quotation marks and citation omitted)).

average, alternative CP3 results in negative production of endangered winter-run Chinook salmon, threatened spring-run Chinook salmon, and late-fall run Chinook salmon). We also note that the flaws with the analysis of impacts pertain to all of the alternatives in the DEIS.

NRDC comments on draft SLWRI EIS September 30, 2013

A. The DEIS Fails to Adequately Analyze Impacts on Anadromous Fish Survival

The DEIS relies exclusively on the SALMOD model to quantitatively analyze potential impacts of alternatives on anadromous fish survival. However, given the extensive flaws and limitations of the SALMOD model (see infra), and the fact that other modeling tools are available to the Bureau to quantitatively analyze potential impacts, the DEIS fails to adequately analyze the alternatives' impacts on anadromous fish survival.

For instance, several other life cycle models are available to the Bureau to quantitatively analyze the impacts of alternatives on survival of winter-run Chinook salmon. The OBAN model⁸ is one such model which the Bureau and other federal agencies have utilized as a tool to assess impacts on winter-run Chinook salmon. One of the key advantages of using the OBAN model to analyze impacts is that OBAN can analyze impacts to population abundance over time, whereas SALMOD is limited to analyzing impacts in a single year; in other words, the SALMOD model does not account for the effects of alternatives to previous generations of fish, assuming a constant number of spawning salmon, thus inaccurately describing (and likely understating) the negative impacts of the alternatives to the survival of anadromous fish over multiple generations. The CDFW has likewise identified additional modeling tools that should have been utilized in the DEIS to analyze impacts on anadromous fish survival. See CDFW, Attachment 1 at 5-6. The Bureau's failure to analyze impacts with other existing models, including the OBAN model, is inexplicable and violates the agency's obligations to adequately analyze impacts under NEPA.

Even the modest benefits to salmon that the DEIS suggests will occur in some years may be offset by negative impacts that each action alternative will cause, and the DEIS fails to adequately analyze these negative impacts. For instance, the DEIS concludes that CP4 and the other action alternatives will reduce the frequency and magnitude of intermediate to high flows, causing a reduction in ecologically important geomorphic processes in the upper Sacramento River. See DEIS at 11-269. "[I]ntermediate to large flows [are] necessary for channel forming and maintenance, meander migration, and creation of seasonally inundated floodplains." Id.

lysis - Appendix 5 G - Fish Life Cycle Models 3-27-13.sflb.ashx, hereby incorporated by reference. However, we note that there are also scientific concerns with the adequacy and accuracy of the OBAN model, and nothing herein constitutes a waiver of claims regarding the adequacy and accuracy of that model or of the environmental analysis in BDCP.

⁸ A description of the OBAN model is available online at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=69587 and is hereby incorporated by reference. It concludes that reduced water temperatures in spawning reaches, increased flows during outmigration, and reduced water exports are the factors most likely to increase abundance of winter-run Chinook salmon. *Id.* The OBAN model is one of several modeling tools utilized by the Bureau and other federal agencies in the administrative draft of the environmental impact report for the Bay-Delta Conservation Plan. *See*http://baydeltaconservationplan.com/Libraries/Dynamic_Document_Library/BDCP_Effects_Analege Plan.

These processes, in turn, are ecologically important for maintaining essential habitat functions and values for anadromous fish. *Id.* Thus, while salmon and other anadromous fish may benefit from slightly decreased water temperatures, each action alternative would reduce the quality of their spawning habitat. Because the impact of this habitat impairment was not included in the Bureau's quantitative modeling under SALMOD, and because the qualitative conclusions regarding impacts do not account for these flow-related impacts, the analysis is inadequate. At a minimum, the DEIS must adequately explain how these impacts can reduce or eliminate the temperature-related benefits. See N. Alaska Envtl. Ctr. v. Kempthorne, 457 F.3d 969, 975 (9th Cir. 2006) (NEPA's "hard look' should involve a discussion of adverse impacts that does not improperly minimize negative side effects.").

The DEIS's reliance on CalSim II is also problematic. As the FWS Report pointed out, because CalSim II provides hydrological data in monthly time steps, and flooding and temperature conditions operate on a finer time scale—from hours to weeks—the model is unable to adequately simulate the impacts of each alternative on flooding and temperature conditions. FWS Report at 105. The model's failure to incorporate a finer time scale casts doubt on the accuracy of many of the DEIS's conclusions regarding the hydrologic impacts of the proposed alternatives.

The DEIS's reliance on the flawed SALMOD created a misleading overstatement of project benefits to salmon

The DEIS's analysis of impacts to salmon relies on the flawed SALMOD model, even though more accurate models are available. The Bureau's failure to utilize the best available science to evaluate and describe the proposed alternatives' impacts on anadromous fish leaves the public with a distorted perception of the project's impacts and benefits, and makes it difficult to meaningfully understand and comment on the alternatives.

In its 2008 Fish and Wildlife Coordination Act Report for the SLWRI, FWS described many of the problems with the Bureau's reliance on the SALMOD model. FWS explained that SALMOD is not able to simulate the effects of resource competition and predation among different size classes of the four runs of Chinook salmon and steelhead, and noted that such competition and predation "are thought to be an important source of mortality for salmonids in

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⁹ While the DEIS contends that CP4 will provide the greatest benefits for anadromous fish because of the increased cold-water pool, it also concludes that CP3, CP4, and CP5 would cause a more substantial impact to important geomorphic processes than CP1 or CP2 because the larger reservoir size would cause a greater reduction in the frequency and magnitude of intermediate and high flow events. See DEIS at 11-224.

The impact from reductions in the frequency and magnitude of intermediate and high flow events would only be partially offset by the habitat restoration efforts that are included in CP4 and CP5. DEIS at 11-270.

the Sacramento River." FWS Report at 9. FWS also emphasized that SALMOD is not able to simulate juvenile mortality in the Sacramento River downstream from Red Bluff Diversion Dam. *Id.* FWS concluded that these flaws cause SALMOD to underestimate mortality to all four salmon runs. *Id.* at 83, 88. It also pointed out that the SALMOD "modeling results in the SLWRI overstate the benefits that the SLWRI would provide for spring-run Chinook salmon" because SALMOD overestimates the number of spring-run spawners returning to the mainstem Sacramento River. *Id.* at 178.

The CDFW has raised similarly serious concerns regarding the Bureau's use of SALMOD to analyze the SLWRI. See CDFW, Attachment 1; Cal. Dept. of Fish and Wildlife, Shasta Lake Water Resources Investigation, Comments on the Administrative Draft of the Environmental Impact Statement and Environmental Impact Report, Feasibility Report, and Appendices (November 7, 2008) ("CDFW, Attachment 2"). In these comments, CDFW raises significant concerns regarding "overdependence on the SALMOD model in the ADEIS/DEIR and unsubstantiated assumptions driving the model," asserts that "SALMOD has not been accepted by the Department for use in the Central Valley," and identifies other modeling tools and approaches that should be utilized to analyze impacts. Id.

Even the Bureau has acknowledged the shortcomings of the SALMOD model: The 2008 Biological Assessment for the CVP/SWP Operations Criteria and Plan ("2008 OCAP BA"), for which the Bureau was the lead federal agency, stated that SALMOD has never been peer reviewed, that it cannot account for the impacts of changes in geomorphology, and that the model may be inappropriate where the number of spawners is small (i.e. fewer than 500).¹¹

In addition to the criticisms raised by the agencies, the SALMOD model fails to account for daily fluctuations in temperature, which can have a profound impact on salmon mortality. SALMOD derived its flow data from CalSim-II, and that data had to be disaggregated from monthly to weekly data. DEIS at 11-59. The DEIS acknowledges that this disaggregation was a potential source of error, *id.*, but does not further acknowledge that using weekly data may mask lethal daily temperature spikes. SALMOD's failure to account for daily temperatures likely causes it to underestimate salmonid mortality. The National Marine Fisheries Service has

¹¹ See Bureau of Reclamation, Biological Assessment on the Continued Long-Term Operations of the CVP and SWP (August 2008), App. P at 7-8, available online at:

http://www.usbr.gov/mp/cvo/OCAP/sep08_docs/Appendix_P.pdf and hereby incorporated by reference. The DEIS acknowledges that the number of spring-run spawners used in their SALMOD modeling (132) was too low to obtain an accurate result. DEIS at 11-55. Yet the DEIS also claims, based on the modeling results, that "[s]pring-run Chinook salmon would have significantly reduced flow- and water temperature-related mortality under CP4" and that "they would experience a significant increase in production during almost all critical water years." Id. at 11-259. The Bureau's reliance on the inaccurate modeling results to show benefits to spring-run Chinook salmon is misleading.

previously expressed concern with the adequacy of the Sacramento River temperature modeling in SALMOD, warning that there is "a great deal of uncertainty in the temperature model results" and that the model fails to accurately account for adaptive management operations. See NMFS 2009 BO at 257.

SALMOD also inaccurately assesses project versus non-project mortality, asserting that mortality from such factors as disease and predation are completely unrelated to project operations, see DEIS at 11-265 (analyzing CP4 and concluding that for winter-, spring-, fall-, and late fall-run Chinook salmon, non-operations factors will cause 89%, 89%, 66%, and 79% of total mortality, respectively), while substantial scientific evidence shows that project operations cause and contribute to these and other stressors. See, e.g., NMFS 2009 BO. SALMOD's assessment of the causes of mortality and drivers of production is inconsistent with more recent modeling and scientific studies, including the OBAN model referenced supra.

In spite of these numerous criticisms and flaws, and in spite of their knowledge of the existence of other, superior models, the Bureau proceeded to use SALMOD as their only model for assessing impacts to anadromous fish. The sole reliance on the SALMOD model is inadequate to assess the impacts of alternatives on anadromous fish survival, and the lack of adequate analysis of these impacts constitutes a violation of NEPA.

B. The DEIS Fails to Adequately Analyze Impacts on Tribal Resources

The DEIS's analysis of impacts to tribal resources is also inadequate. While the DEIS acknowledges that each action alternative will result in significant impacts to tribal resources that cannot be mitigated, it fails to provide an accurate picture of the extent of these impacts. For example, with respect to archeological and historic-era structural resources, the DEIS states that "the frequency and distribution of recorded sites within the project study area only give a limited and incomplete picture of the actual number of resources. This is because only a very small percentage of the project area has been systematically inventoried for cultural resources." DEIS at 14-16. In fact, systematic surveys have only occurred in five percent of the Shasta study area, and in fifteen percent of the upper Sacramento River. *Id.* The DEIS therefore acknowledges that "there are undoubtedly many more cultural resources that have not been identified or formally recorded." *Id.* In light of the lack of available survey data, the DEIS conducted a sensitivity analysis to estimate the number of resources that would be impacted by each alternative. Considering the sensitive, irreplaceable nature of the tribal resources that would be affected, this cursory analysis is inadequate to fully inform the public about each alternative's impacts. ¹²

¹² As discussed in footnote 1, *supra*, the DEIS's failure to determine whether tribal archeological sites qualify as historical resources, and its failure to address stringent state-law mitigation requirements for impacts to historical resources makes clear that the DEIS does not comply with CEQA. *See* tit. 14 Cal. Code Regs. §§ 15064.5(c), 15126.4(b).

C. In Several Additional Ways, the DEIS Failed to Provide Accurate, Adequate Information for the Public to Assess the Proposed Alternatives

There are several other ways in which the DEIS failed to provide the public with sufficient information to assess the impacts of the proposed alternatives. Most generally, the DEIS substantially misleads the public by claiming that certain alternatives benefit anadromous fish when they do not. For example, the DEIS concludes that CP4 will be beneficial for winter-, spring-, and fall-run Chinook salmon. As discussed above, however, these benefits are largely illusory. The inaccurate information that the DEIS provides makes it difficult for members of the public to assess the potential costs and benefits of the proposed projects.

The Bureau also failed to explain how the DEIS integrated the RPA actions from the 2008 and 2009 BOs, and it inaccurately modeled implementation of the RPA actions, rendering the modeling inaccurate and misleading. The DEIS states that "the No-Action/No-Project Alternative is based on CVP and SWP operational conditions described in the 2008 Biological Assessment on the Continued Long-Term Operations of the CVP and SWP (2008 OCAP BA), and the BOs issued by USFWS and NMFS in 2008 and 2009, respectively." DEIS at 2-20. But the DEIS fails to provide details regarding how the 2008 and 2009 BOs' requirements were included in the DEIS's baseline conditions.

For example, the DEIS's modeling appendix fails to clarify how the complicated, sometimes flexible requirements of the RPAs were included in the models. Instead, it merely states, in a conclusory fashion, that particular RPA actions were included in the modeling for existing and future conditions. See, e.g., DEIS Modeling Appx. at 2-5 (Shasta Lake end-of-September storage based on NMFS BO Action 1.2.2); id. at 2-6 (Delta flow and salinity based on 2008 BO Action 4); id. at 2-6 (combined flow in OMR based on 2008 BO Action 1, 2, 3 and 2009 BO Action IV.2.3). The modeling appendix elaborates that, "[i]n cooperation with NMFS, USFWS, and CDFW, the Reclamation and DWR have developed assumptions for implementation of the USFWS BO (December 15, 2008) and NMFS BO (June 4, 2009) in CalSim-II." Id. at 2-9 n.10. But the DEIS does not describe the agencies' assumptions. For RPA actions that include adaptive management provisions, such as OMR flow requirements, this lack of clarity makes it impossible to assess whether the requirements were properly integrated into the Bureau's modeling.

In addition, the modeling shows noncompliance with the RPA actions in certain months and years, and presents other results that appear highly anomalous and inaccurate. For instance, the modeling shows that Delta outflow in the month of September in wet and above normal years would substantially exceed the Fall X2 RPA action requirements (the CVP and SWP would release water from the reservoirs and/or reduce Delta exports in excess of the Fall X2

requirement), which is inconsistent with operational practices; in contrast, Delta outflow in the month of October in wet and above normal years would not achieve the minimum outflow requirements under the Fall X2 RPA action. See DEIS, Fisheries and Aquatic Ecosystems Technical Report, Attachment 1, Assessment of Fisheries Impacts within the Sacramento – San Joaquin Delta, at 2-9 to 2-10, 2-43 to 2-44, 2-47 to 2-48. The 2008 delta smelt biological opinion requires that the Fall X2 requirement be separately achieved in the months of September and October, and as such, the modeling is inconsistent with implementation of the biological opinion. The modeling also appears to fail to account for the "first flush" action of the Delta smelt RPA actions, as Old and Middle River flows are highly negative in wet years during the month of December. See id. at 2-61. These modeling flaws cast significant uncertainty on the reliability of all of the modeling results that are used to assess impacts.

Several alternatives in the DEIS also result in impacts on delta hydrology, including reductions in delta outflow. See, e.g., DEIS at 11-126 11-129 (CP1). The DEIS claims that the effect would be less than significant, but it does not provide any analysis to support this conclusion. In contrast, there is substantial scientific information that reductions in Delta outflow in the winter and spring months has significant effects on the abundance and survival of listed species in the Delta, including green sturgeon, longfin smelt, and Chinook salmon. See, e.g., SWRCB 2010, Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem (August 3, 2010). The DEIS fails to analyze the effects on abundance and survival of these species as a result of reductions in outflow, and the DEIS's conclusion that these effects are less than significant are not supported by substantial evidence.

The DEIS also fails to provide certain information by water-year type, making it difficult for the public to accurately compare the impacts of various alternatives. For example, the DEIS presents figures showing changes in mean monthly water temperature at modeled locations in the Sacramento River. See, e.g., DEIS Figures 11-34 and 11-35 at 11-267 to 11-268. These averages fail to show the dangerously high temperatures that can occur in dry and critical water years, making it difficult to assess the true impacts of each alternative. Moreover, the monthly averages mask daily temperature changes, which can result in substantial mortality or sublethal effects that reduce survival.

Further, the no-action alternative is misleading because it improperly includes the Vernalis Adaptive Management Plan ("VAMP") as part of its 2030 baseline. See DEIS at 3-16, 3-18 to 3-19. As the DEIS acknowledges, VAMP expired in 2011. Id. at 3-19. Yet the DEIS justifies its inclusion of VAMP in the no-action alternative by stating that the Bureau "intends to continue implementing actions similar to the VAMP for the foreseeable future, or until the SWRCB

¹³ This report is available online at: http://www.swrcb.ca.gov/waterrights/water_issues/programs/bay_delta/deltaflow/docs/final_rpt0 80310.pdf and is hereby incorporated by reference.

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adopts new, permanent objectives for San Joaquin River flows that replace the current program."

Id. As the State Water Resources Control Board has explained, with the expiration of VAMP the Bureau is obliged to meet the pulse flows required under the Bay-Delta Water Quality Control Plan and Decision 1641. This requires additional flows in certain water year types, and the exclusion of these flows from the modeling creates inaccurate results that may understate impacts.

The DEIS also inaccurately assesses impacts on other special status species. For instance, the DEIS asserts that the project will increase entrainment of Delta smelt, but the methodology used estimates that on average, 41,937 Delta smelt are entrained, whereas the take limit for salvage of Delta smelt under the current biological opinion is in the hundreds of fish at current abundance levels. See DEIS, Fisheries and Aquatic Ecosystems Technical Report, Attachment 1, Assessment of Fisheries Impacts within the Sacramento – San Joaquin Delta, at 2-88 (Table 2-170). The entrainment methodology utilized in the DEIS is unreliable, and fails to accurately assess entrainment impacts to Delta smelt. With respect to other special status species, the DEIS concludes that the project will result in significant and unavoidable impacts to numerous botanical and biological resources, including species listed under the California Endangered Species Act. DEIS at ES-66 to ES-67, ES-77 to ES-86; CDFW, Attachment 1. However, the DEIS improperly defers analysis of impacts to California Red-Legged Frog to a future date and fails to analyze the impacts to this species in this document. DEIS at ES-86. And as noted in footnote 1, the DEIS improperly defers mitigation measures for these impacts under CEQA.

Finally, the DEIS utilizes multiple baselines for comparison (e.g., existing condition and no action), which leads to substantial confusion for the reader and undermines NEPA and CEQA's goal of informed decision-making.

D. The Draft SLWRI Feasibility Report Must be Revised to Provide the Public and Decision Makers With Adequate Information on the Costs and Benefits of the Alternatives

Prior to releasing the DEIS, the Bureau released a draft SLWRI feasibility report, which is incorporated into the DEIS. See DEIS at ES-1, ES-35 to ES-36, 1-26. As noted in NRDC's comments on the draft feasibility report, the Bureau's initial analysis failed to account for changes to CVP and SWP operations caused by the 2008 and 2009 BOs. See NRDC comments on SLWRI feasibility report, attached hereto as Attachment 3. Based on these and other comments, the modeling assumptions used in the DEIS have changed substantially from those analyzed in the feasibility report, and the feasibility report no longer presents an accurate picture of the alternatives' costs and benefits (FWS's report indicates that the feasibility report dramatically overstated project benefits to anadromous species). See also DEIS at 1-1 to 1-2 (noting that water operations modeling was significantly revised as compared to that utilized in

the feasibility report). However, the DEIS also makes clear that the DEIS and feasibility report both play an important role in providing the public and decisionmakers with information on the costs, benefits, and impacts of the alternatives, in order to make an informed decision. DEIS at ES-1, ES-35, 1-26. As a result, the DEIS's reliance on the November 2011 draft SLWRI feasibility report to inform the public about the costs and benefits of the proposed alternatives is misleading, and the Bureau must revise the project's feasibility report in order to comply with NEPA and the Bureau's other legal obligations.

E. The DEIS Fails to Adequately Account for Climate Change Impacts and Analyze the Effects of the Alternatives and Climate Change

The DEIS's climate change modeling appendix reviews global climate change forecasts and discusses some of the implications of climate change for California's water resources. ¹⁴ It also presents a quantitative analysis of climate change's impacts on various resources, using models to compare climate-change influenced CP4 and CP5 to a climate-change influenced no-action alternative. Thus, the Bureau has acknowledged the important role that climate change will play in California's water future, and showed that it is capable of modeling future scenarios in a way that accounts for climate change impacts. Yet in its analysis of alternatives in the DEIS, the Bureau failed to include climate change impacts in its modeling for any of the alternatives. Instead, it merely briefly discussed climate change in its cumulative impacts analysis for each analyzed resource area. See DEIS at 3-10; see also, e.g., id. at 11-335 to 11-341. The Bureau's brief, qualitative analysis of climate change in the cumulative impacts sections of the DEIS fails to provide sufficient detail for the public to meaningfully analyze the proposed alternatives, and NRDC recommends that the Bureau include climate change in the modeling of all future scenarios.

Moreover, even when the DEIS did account for climate change impacts in the climate change modeling appendix, it assumed that the CVP and SWP would operate as they do today. See DEIS Climate Change Modeling Appx. at 4-4 (indicating system operations were modeled using the SLWRI 2012 Benchmark Version CalSim-II model). This is unacceptable because a failure to adapt project operations to account for climate change impacts likely will result in jeopardy to several threatened and endangered species, see NMFS 2009 BO, and the Bureau must acknowledge that simply maintaining the status quo in a warmer future is unacceptable. See also National Wildlife Federation v. NMFS, 524 F.3d 917, 929-931 (9th Cir. 2008) (jeopardy analysis under the ESA must consider the effects of the action in light of "present and future human and

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¹⁴ The Bureau's analysis should be updated to include a discussion of the climate change impacts described in the California Environmental Protection Agency's recent publication, *Indicators of Climate Change in California*, August 2013. The document is available at: http://oehha.ca.gov/multimedia/epic/pdf/ClimateChangeIndicatorsReport2013.pdf and is hereby incorporated by reference.

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natural contexts." (quotation and citation omitted)). NRDC recommends that the Bureau's modeling of all future scenarios account for modifications to CVP and SWP operations that will have to occur to avoid jeopardy to threatened and endangered species.

F. The DEIS Fails to Adequately Analyze Cumulative Impacts of the Alternatives

"The cumulative impact analysis must be more than perfunctory; it must provide a 'useful analysis of the cumulative impacts of past, present, and future projects." Kern v. U.S. Bureau of Land Mgmt., 284 F.3d 1062, 1075 (9th Cir. 2002) (quoting Muckleshoot Indian Tribe v. U.S. Forest Serv., 177 F.3d 800, 810 (9th Cir. 1999)). Moreover, "[t]o be useful to decision makers and the public, the cumulative impact analysis must include some quantified or detailed information; . . . general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." N. Plains Res. Council, 668 F.3d at 1076 (quotation marks and citations omitted). Nonetheless, for several projects that are in advanced planning stages and that will have substantial impacts on resources in the DEIS's study area, the DEIS fails to provide anything more than vague, general statements regarding cumulative impacts of the projects and the action alternatives.

For example, the DEIS improperly fails to provide any detailed analysis of the cumulative impacts that BDCP will have on resources within the study area, even though BDCP will have a profound effect on many of the same resources that would be impacted by each of the proposed action alternatives. Among other impacts, both BDCP and the proposed alternatives would affect OMR flows, Delta salinity and outflow, and fish entrainment. Moreover, BDCP will have a substantial impact on the SLWRI's primary objectives-water supply reliability and anadromous fish survival. The DEIS, however, concludes that "[i]t would be speculative to consider [BDCP] at any more than a conceptual level because [its] effects are not defined in sufficient detail to allow meaningful analysis." DEIS at 3-22 to 3-23. This makes little sense because the administrative draft of the EIR/EIS for BDCP was released before the SLWRI DEIS was issued. In fact, the DEIS discussed details regarding BDCP, including the draft plan's twenty conservation measures. DEIS at 11-32; see also id. at 3-27 to 3-28. Because the SLWRI and BDCP will impact the same resources, and because details regarding BDCP were available during the DEIS's development and are currently available (including quantitative analysis of the effects of BDCP on upstream reservoir storage, Sacramento River inflows, Delta outflows, and Old & Middle River flows), the Bureau should have provided a quantitative analysis of the cumulative effects of BDCP and expansion of Shasta Dam.

The same problems exist for the DEIS's assessment of cumulative impacts from other surface storage projects being contemplated by the Bureau, including Sites Reservoir and Temperance Flats Reservoir projects. As it did for BDCP, the DEIS concludes that it would be speculative to

consider these projects at anything more than a conceptual level. DEIS at 3-22 to 3-23. Yet it notes that the notice of intent/notice of preparation for the Sites Reservoir project was issued in November 2001, that a complete plan formulation report was published in September 2008, and that the final EIS/EIR/Feasibility Report is scheduled to be complete in 2013. *Id.* at 3-32. The DEIS also acknowledges that the plan formulation report for the Temperance Flats Reservoir project was released in October 2008. *Id.* at 3-38. Though sufficient information was available, the DEIS fails to analyze the cumulative impact of implementation of these reservoir projects and the SLWRI on water quality (including outflow, X2 location, turbidity, and water temperatures), flows, anadromous fisheries, and other environmental resources. Even assuming that the impacts of a single reservoir project are less than significant, the reduced flows resulting from additional storage in 3 new upstream reservoirs could result in impacts that are cumulatively significant.¹⁵

The DEIS also fails to analyze the effects of the SLWRI on implementation of existing RPA actions to allow winter-run Chinook salmon to spawn upstream of Shasta Dam. See NMFS 2009 at 659-671. The alternatives in the DEIS could impede implementation of this action, for instance by inundating additional upstream spawning habitat, reducing survival while salmon migrate through the reservoir, or increasing abundance of non-native and warm-water species that could predate on salmon. Although the DEIS mentions impacts on adfluvial salmonids (salmon that do not migrate to the ocean), the DEIS wholly fails to analyze the potential impacts of the alternatives on implementation of the RPA action to allow winter-run Chinook salmon to spawn upstream of Shasta Dam.

V. The Bureau Should Withdraw the DEIS and Terminate the SLWRI Because All of the Alternatives would Violate State Law and Irreparably Harm Tribal Resources

¹⁵ In the executive summary, the DEIS admits that all action alternatives could result in significant and unavoidable cumulative impacts on Delta outflow and X2. See DEIS at ES-30 to ES-31. However, Chapter 11 of the DEIS fails to quantify or even qualitatively describe the magnitude of these cumulative impacts on Sacramento River flows, Delta outflow, or X2, and it does not find that it would result in these significant and unavoidable cumulative impacts. None of the surface storage projects being evaluated by the Bureau are referenced or included in the cumulative impacts analysis. Reductions in Delta outflow in the winter and spring months could cause significant impacts on state and federally listed endangered species that live in or migrate through the Delta, including longfin smelt, green sturgeon, winter run Chinook salmon, and Delta smelt. The DEIS wholly fails to analyze these cumulative impacts on listed species in the Delta. Because the DEIS admits that there are significant impacts, the failure to identify mitigation measures violates CEQA. See Footnote 1, supra. Feasible mitigation measures could include restrictions on when water can be stored in upstream reservoirs, in order to prevent downstream impacts on river flows, X2, and delta outflow, and thereby on biological resources, including listed fish species.

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A. All of the Alternatives Unreasonably Harm Tribal Resources

In addition to failing to analyze any alternatives that would substantially benefit anadromous fish, the Bureau failed to analyze a single action alternative that would avoid causing irreparable harm to important tribal resources. As discussed above, the Bureau could have, but chose not to, analyze an alternative that would meet its water supply and anadromous fish survival objectives without raising Shasta Dam. As a result, each action alternative will inundate additional land surrounding Shasta Reservoir, further harming tribal resources that surround the lake.

Several culturally important tribal resources exist in the areas immediately surrounding Shasta Lake. The Pit River Madesi Band has indicated that twenty-two ethnographic villages and associated burial grounds are located within existing reservoir and proposed reservoir areas, DEIS at 14-10, and the Winnemem Wintu identified important localities within the study area where ceremonies are regularly conducted, such as Puberty Rock and the doctoring pools near Nawtawaket Creek. With respect to the Winnemem Wintu's identified locations, the DEIS concluded that "ongoing use of many archeological and religious sites is fundamental to the well-being of their culture, particularly the education of their youth." *Id.* at 14-10 to 14-11. Because the Winnemem Wintu believe that the location of these important sites is preordained, they cannot be relocated. *Id.* at 14-23. The Winnemem Wintu Tribe has prepared detailed comments regarding these impacts to cultural and tribal resources, which we support.

The DEIS concludes that even CP1, which would inundate less land than CP2, CP3, CP4, or CP5, would have a direct, significant adverse impact on these and other tribal resources. *Id.* at 14-22. For example, CP1 would impact Puberty Rock and the doctoring pools near Nawtawaket Creek, and would place approximately 212 prehistoric sites and 355 historic-era archival localities in the inundation zone, and many more sites in the fluctuation zone and quarter-mile buffer zone. *Id.* at14-22 to 14-23. The other action alternatives would place many more cultural resources in the inundation zone. Accordingly, the DEIS concluded that "it is clear that raising Shasta Dam would result in cumulative effect on historic properties." *Id.* at 14-33. Yet the Bureau chose not to analyze any alternative that would avoid these impacts by meeting the project's objectives without raising Shasta Dam and flooding the lands surrounding the reservoir.

B. All of the Alternatives Violate State and Federal Law by Negatively Impacting the McCloud River's Free-Flowing Conditions and its Trout Fishery

In 1989, the Legislature passed an amendment to the California Wild and Scenic Rivers Act to protect the McCloud River's free-flowing conditions and the fishery below McCloud Dam, adding Section 5093.542 to the California Public Resources Code. The Legislature found and declared "that the McCloud River possesses extraordinary resources in that it supports one of the

finest wild trout fisheries in the state." Cal. Pub. Res. Code § 5093.542. The statute states that "[t]he continued management of river resources in their existing natural condition represent the best way to protect the unique fishery of the McCloud River" and that "maintaining the McCloud River in its free-flowing condition to protect its fishery is the highest and most beneficial use of the waters of the McCloud River." *Id*

The DEIS, however, concluded that each action alternative will cause impacts to the McCloud's free-flowing conditions and to its trout fishery, and would therefore conflict with Section 5093.542. DEIS at 25-30 to 25-31, 25-34, 25-38 to 25-39. In particular, by raising Shasta Dam, each proposal would increase the size of Shasta Reservoir so that it inundates portions of the McCloud River in violation of state law. The DEIS concludes that CP1 would impair the free-flowing conditions in 1,470 feet of the McCloud River, *id.* at 25-26, that CP2 would impair 2,740 feet, *id.* at 25-31, and that CP3, CP4, and CP5 would impair 3,550 feet, *id.* at 25-35. Each alternative would also adversely affect spawning habitat for trout in the lower McCloud River. See, e.g., *id.* at 25-28 to 25-29. The DEIS concludes that no mitigation is currently available for these impacts. *Id.* at 25-39.

Because each action alternative conflicts with Section 5093.542, each alternative also violates the CVPIA. See P.L. 102-575, § 3406(b) (CVPIA § 3406(b)) (Secretary of the Interior "shall operate the Central Valley Project to meet all obligations under State and Federal law"). Accordingly, all five of the action alternatives would violate both state and federal law if implemented.

The DEIS also notes that some segments of the McCloud river are eligible for listing under the federal Wild and Scenic Rivers Act. DEIS at 25-6. Because free-flowing conditions are a fundamental requirement for Wild and Scenic River Act eligibility, the impaired reaches of the McCloud River would become ineligible for federal listing. *Id.* at 25-26. Water-level fluctuations would also reduce water quality in impaired sections of the McCloud, rendering them further ineligible for listing under the federal Wild and Scenic Rivers Act. *Id.* at 25-27.

Because none of the alternatives can be implemented consistent with state and federal law, the Bureau should withdraw the DEIS and terminate the SLWRI.

VI. Conclusion

As demonstrated above, the DEIS fails to comply with NEPA and CEQA, and all of the alternatives would violate state law, would significantly harm the tribal resources of the Winnemem Wintu Tribe, and would cause negative impacts (or provide insignificant benefits) to anadromous fish and other biological resources. As a result, the Bureau should withdraw the DEIS and draft feasibility study, and terminate the SLWRI. Should the Bureau decide to

NRDC comments on draft SLWRI EIS September 30, 2013

continue with the SLWRI, it must prepare and recirculate a revised DEIS/EIR and draft feasibility study that address the substantial flaws identified in these and other agencies' comments.

Thank you for consideration of our views. Please feel free to contact us at your convenience if you have any questions or concerns.

Sincerely,

Rachel Zwillinger

Altshuler Berzon

Doug Obegi

Natural Resources Defense Council

Attachments:

- Cal. Dept. of Fish and Wildlife, SLWRI Comments on the Public Draft of the Feasibility Report, and Selected Attachments, January 2013 (February 8, 2013)
- Cal. Dept. of Fish and Wildlife, Shasta Lake Water Resources Investigation, Comments
 on the Administrative Draft of the Environmental Impact Statement and Environmental
 Impact Report, Feasibility Report, and Appendices (November 7, 2008)
- 3. NRDC comments on SLWRI feasibility report

D-PORG Duplicate of O-PORG



Fwd: Brief Statement in Support of Comments

KATRINA CHOW < kchow@usbr.gov>

Wed, Oct 23, 2013 at 1:14 PM

To: KATHLEEN DUNCAN <kduncan@usbr.gov>

Sent from my iPhone

Begin forwarded message:

From: Pedro Lucero <plucero@usbr.gov>
Date: September 30, 2013, 11:45:06 PM PDT
To: KATRINA CHOW <kchow@usbr.gov>

Subject: Fwd: Brief Statement in Support of Comments

Pete Lucero PAO

Sent from my iPhone.

Begin forwarded message:

From: Patrick Porgans <porgansinc@sbcglobal.net>

Date: September 30, 2013, 11:23:56 PM PDT

To: <plucero@usbr.gov>

Cc: <pp@planetarysolutionries.org>

Subject: Brief Statement in Support of Comments

To: Pete Lucero, PIO, BOR Sacramento

As stated previously, Porgans & Associates (P/A) made several attempts before 5:00 p.m. to email comments to the PIO, expressing support of the Winnemen Wintu Tribal concerns for their "Sacred Sites", and, for that reason alone, P/A has reservations about the proposal to raise Shasta Dam. P/A respectfully suggest that the Bureau, via the Department of Interior restore, develop a plan to restore :Sacred sites"; not destroy them. I distinctly recall having had the "raise the dam experience" on one or two other occasions in the past 30 years.

P/A intimate knowledge of the adverse impacts attributable to the "operation" of the federal Central Valley Project (CVP), primarily to salmonid and other threatened and/or endangered species, is a real threat that has yet to be mitigated.

P/A would not object to a water project that could pay-foritself; identify the availability of water to be developed; demonstrate a legitimate need for the proposed project, and fully mitigate the impacts associated with the action.

Lastly, P/A represents Planetary Solutionaries and its policy and position are to stop CVP water contract renewal until the Bureau makes good for the protections that have yet to be forthcoming. Before the Bureau does any additional water development it should complete the following tasks:

- Fully comply with the terms and conditions of their water right permits and licenses, issued by and under the jurisdiction of the California State Water Resources Control Board;
- 2). Adhere to Board Adopted Water Quality Control Plans
- Provide cost-effective and proven solutions to CVP drainage problem and cease water deliveries to lands that are discharging toxic drainage into the Delta.
- Too be compliant with the provision contained in Board D-1631 dealing with drainage and water rights;
- 5). Achieve mandated fish-doubling populations;
- 6). Retire all lands within the San Luis Unit that have known toxic drainage problems, and
- 7). Permanently reduce water deliveries to those lands and

dedicated it for the protection of Delta water users and uses.

Time and my pre-occupation with other matters of state, limit P/As ability to give the "dam" proposal the time and attention it deserves; albeit, for the record, please confirm receipt of P/As comments.

Respectully,

Patrick Porgans, Solutionist

D-CFBF Duplicate of O-CFBF



SLWRI, BOR MPR <sha-mpr-slwri@usbr.gov>

Comments on Draft EIS for the Shasta Lake Water Resources Investigation

Chasteen Dianne K. <dchasteen@cfbf.com> Fri, Sep 27, 2013 at 3:20 PM To: "BOR-MPR-SLWRI@usbr.gov" <BOR-MPR-SLWRI@usbr.gov>

Cc: Scheuring Chris <cscheuring@cfbf.com>

Dear Ms. Chow,

The attached comment letter is being submitted by Christian C. Scheuring, Managing Counsel, on behalf of California Farm Bureau Federation. If you have any questions or comments, Mr. Scheuring can be reached at (919) 561-5600 or cscheuring@cfbf.com.

Sincerely,

Dianne Chasteen

Dianne K. Chasteen

Legal Secretary to Christian C. Scheuring

Legal Services Division

California Farm Bureau Federation

2300 River Plaza Dr.

Sacramento, CA 95833

(916) 561-5653 dchasteen@cfbf.com





California Farm Bureau Federation

OFFICE OF THE GENERAL COUNSEL

2300 River Piaza Drive Sacramento, CA 95833-3293 + Phone (916) 561-5665 + Fax (916) 561-5691

September 27, 2013

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

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

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

Dear Ms. Chow:

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

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

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

NANCY N. MCDONOUGH, GENERAL COUNSEL

ASSOCIATE COUNSEL:

CARL G. BORDEN · KAREN NORTHE MILLS · CHRISTIAN C. SCHEURING · KARL E. FISHER · JACK L. RICE

Ms. Katrina Chow

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

September 27, 2013

Page 2

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

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

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

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

Very truly yours.

Christian C. Scheuring Managing Counsel

CCS/dkc

D-RCOR Duplicate of O-RCOR

7/23/13

DEPARTMENT OF THE INTERIOR Mail - Comment Draft EIR



SLWRI, BOR MPR <sha-mpr-slwri@usbr.gov>

Comment Draft EIR

1 message

Randall Smith <randall_smith@charter.net>
To: BOR-MPR-SLWRI@usbr.gov

Sun, Jun 30, 2013 at 2:06 PM

Dear BOR,

Unable to review the Draft document leaves some disadvantage making comment upon it. The document may contain information sent to Katrina Chow previously, or it may not. In any event, the Final EIR prepared for raising Shasta Dam should include study, evaluation, written report (at least comment) explaining why the number one recommendation of the federal 1940 "Special Scientific Report #10, An Investigation of Fish-Salvage Problems in Relation to Shasta Dam" was never implemented, why such is not being considered now. Stillwater Creek has all of the nearly perfect salmonid spawning potential Stanford Professor Hanson and his team knew over seventy years ago. The necessary infrastructure to convey cold Sacramento River water has been built with federal money and is called the Bella Vista Water District. This sound idea needs to be visited again and now with minimal funding for pumping coming from those to whom this non consumptive water will be delivered.

Very truly yours,

Randall R. Smith, Chair Environment Committee Rotary Club of Redding 955 Sierra Vista Drive Redding, CA 96001 30 Jun 2013

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September 22nd, 2013

Page 1

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

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

Our community is overwhelmingly opposed to this project.

Citizens For Clean Air formally requests that the public comment period be extended until January 15, 2014.

Shasta County, a federally recognized Environmental Justice (EJ) community is being asked to review an approximately 6000 page document. It is unreasonable to expect average citizens, to meaningful participate as stakeholders in the review process under the Bureau's current time line.

The available evidence demonstrates this project is an attempted water grab by the Westlands and Metropolitan Water Districts. These two water districts are rich and powerful south state water companies, posing as public agencies.

The raising of Shasta Dam is being advocated as a benefit for North State farmers and endangered fish species. Yet nowhere in the massive 6000 page Draft EIS has the Bureau demonstrated any valid scientific evidence to prove such claims.

The raising of Shasta Dam will flood sacred native sites, destroy existing resorts and marinas, dislocate the town of Lakehead and impact our local economy in a negative manner.

If the Westlands and Metropolitan Water Districts want to raise the dam for their personal profits, they (and not the public) should pay for it. By allowing the use of eminent domain for private gain, the Bureau of Reclamation is complicit in activities that are legally indefensible.

Many Winnemem Wintu were left homeless when the government forcibly removed them from their ancestral lands, flooding their villages and sacred sites.

All these years later, the Winnemem Wintu have yet to receive the "like lands" that were promised in the 1941 Indian Lands Acquisition Act, which authorized the stealing and subsequent destruction of their homeland.

"Like lands" for a tribe who lived along the McCloud River for over six thousand years, would be along the McCloud River. This land along the McCloud would still be considered their ancestral land.

Page 2

The 3,000 acre Bollibokka Fishing Club on the McCloud River was sold to Westlands Water District for nearly \$35 million. Why does the nation's largest water district, located in Southern California (Fresno) want this land?

"We did not want to see the use of this land to be changed to impede the potential of raising the dam." Tom Birmingham, general manager, Westlands. ~Record Searchlight 2/19/2007

It is the very property that would protect the Winnemem Wintu's remaining sacred sites.

This is the land that Westlands has recently purchased in their efforts to "de-list" the

McCloud River and thereby remove a major impediment to the Shasta Dam raising project.

The Bureau of Reclamation knew the Winnemem were entitled to "like land" for their land the federal government removed them from in the late 1930's. Why didn't the Bureau stop the sale of the Bollibokka fishing club to Westlands?

Your agency's duty to honor your legal commitment to the Winnemem is much older and more important than appearing special interests in Southern California.

In 1851, the Winnemem (represented by the signature of Numterareman), along with other Wintu bands signed the [congressional] Treaty at Cottonwood Creek which ceded to the United States a vast territory.

In 1914, the U.S. government took steps to purchase land from the Winnemem Wintu.

Congress recognized the Winnemern Wintu in the 1941 Indian Lands Acquisition Act.

For decades the Winnemer received scholarships, health care and permits to gather eagle feathers from the federal government. They had federal tribal recognition.

In the 1980's, the Bureau of Indian Affairs reorganized their Agency and established a Federal Recognition List. The Winnemem Wintu were wrongfully (and secretly) left off of that list. The Bureau of Indian Affairs has not corrected it's own error to this day. The tribe's medical care, scholarships and permits were canceled without notification.

However, the most grievous harm by the Bureau of Indian Affairs is the tribe's loss of sovereign status. Without the Winnemem's rightful status, their fight to save ancestral and sacred sites from permanent destruction is severely compromised.

Until the Winnemem receive 'like lands' for the land Congress acknowledges they took and Congress declared they would compensate the Winnemem for, this project is without moral or legal grounds to proceed. The original deal has never been completed.

Is this the reason for the Bureau of Reclamation's formal "no response" to the theft of the Winnemem Wintu's lands?

The Westlands Water District and the Metropolitan Water District are behind legislation to de-list the McCloud River from current protection under the California Wild & Scenic Rivers Act.

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

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

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

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

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

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

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

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

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

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

Page 4

We uree you to visit this amazing wilderness yourself and after it wins your heart, apply for

National Wild and Scenic Status protection.

Shasta County was recognized by the federal Environmental Appeals Board, *In Re Knauf Fiber Glass*, as an Environmental Justice community, requiring EJ guidelines to be addressed.

We want to point out that in a Bureau of Reclamation press release dated December 7th, 2012, the Bureau claimed "Reclamation initially released the Draft Feasibility Report in February 2012..." Yet, the first time the Winnemem and Citizens for Clean Air realized the report had been 'released for public comment' was when citizens happened upon your press release on December 9th.

This does not qualify as "Early and sustained involvement with the effected community"

After public outcry, the comment period was extended until January 28. We were never notified of this time extension. Citizens discovered the extension while scrolling through press releases on the Bureau's website.

We attended the September 10, 2013 Bureau meeting held in Redding, CA regarding the SLWRI project. Several times the Bureau's staff mentioned (with humorous groans) that the new Environmental Impact Report was over 1,000 pages. Some people have estimates it to be around 6,000 pages. It is not conveniently numbered. On-line, it is divided into many sections which makes it very time consuming and confusing.

In legal circles, if you want to overwhelm and bog down your opponents, you "blizzard" them with thousands of pages of mostly unnecessary information they have to pick through to find what they need.

"However, for perspective, it relies on the reader being familiar with the massive, 10 year-old EISs for the implementation of the Central Valley Project Improvement Act and the CalFed program. Both documents were about two feet thick; organized for those looking for specific subjects, not overall perspective; and probably hard to find by now. It would be most useful for the revised DEIS, to include an account of the major water problems facing California, each of which is potentially budget-busting in a slow economy. Otherwise EISs for enormous, but still small, billion-dollar parts of the overall picture come across as examples of piece mealing..."

~Sept. 13,2013 Letter to the Editor, Buford Holt, U.S. Bureau of Rec. (retired.)

1,000's of pages of documents (in an unfriendly format) is a highly unreasonable burden to place on an Environmental Justice community. This is a low income community, with lower than average education rates.

Are citizens supposed to read thousands of pages, analyze the information and compose a comprehensive response in three months? In their spare time?!

Page 5

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

are not being seriously considered.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Page 6

"Pacific Constructors, the main company building Shasta Dam, set up its own camp near the base of the Shasta Dam site, called "Contractor's Camp" or "Shasta Dam Village". The company built an enormous 2,000-man mess hall, hospital, recreational center and other venues at the dam site. Three other makeshift camps nearby, called "Central Valley", "Project City", and "Summit City", soon filled with men from all over the state hoping to get jobs at the Shasta Dam as drillers, crane operators, mechanics, truck drivers, carpenters, welders, among others." ~ wikipedia.org/wiki/Shasta Dam

The 3M Quarry project includes several acres inside the limits of the City of Shasta Lake.

A road within city limits was identified by the facilitator of the 3M Scoping Meeting as being used by the proposed 3M project to bring in fuel and explosives as part of their planned operation. This is not addressed in the Bureau's Draft EIS.

If the Bureau intends to ever use aggregate or cement from the 3M Quarry, they must include the quarry and all it's impacts as part of the Bureau's Draft EIS. The Bureau must also go through the Draft EIS certification process with the correct local lead agency - the City of Shasta Lake.

In the Bureau's latest Draft EIS, the document skims over compensation for the residents/ businesses if their property is flooded. Bureau representatives left critical questions unanswered. How much would these residents be given for their properties? Which homes will be flooded? Which business will be flooded? How much will they be paid for their businesses? How are the business owners and employees being compensated for years of lost income?

The Westlands Water District, already the largest agricultural user of Northern California water, has purchased 3,000 acres along the McCloud River to "make it easier to one day raise Shasta Dam."

Westlands is also aggressively pushing legislation to remove the existing state law that protects the McCloud River from development or flooding. WWD is privately owned by 'farmers' that don't grow anything. They buy the water at a cheap 'agricultural' rate and resell the water further south at a profit.

Records obtained under the Public Records Act, revealed a "Secret Society" organized in 2009 to influence water rates (and other decisions) at California's largest public water district - The Metropolitan Water District. MWD has an annual budget of \$1.8 billion and serves a six-county region with an annual economy valued at greater than \$1 trillion.

The Delta Watershed acts as a natural limit to how much water can be diverted south. Each year, California pumps about 4.9 million acre feet of freshwater out of the Delta. The proposed Peripheral Tunnels, two giant water tunnels, would have the capacity to carry up to 11 million acre-feet annually. The proponents of the project say they would "never use the tunnels at full capacity."

Why then build them so large? Why not build one tunnel?

Page 7

It is indisputable that the additional 6 million acre-feet of water yearly would come from the Sacramento River and other North State Rivers. Therefore, the full impact of the

Peripheral Tunnels must be part of a valid and legally defensible EIS.

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

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

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

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

Sincerely,

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