

L-4 *Reserved*

L-5 *Ralph Fertig, Santa Barbara Bicycle Coalition*



email
bike@sbbike.org

web
www.sbbike.org

phone
805-962-1479

mail
PO Box 92047
Santa Barbara
CA 93190-2047

board of directors
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CACHUMA PROJECT

Mr. Bob Epperson, Project Manager
Bureau of Reclamation
1243 N Street
Fresno, CA 93721

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September 2, 2008

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Dear Mr. Epperson,

We appreciate the Bureau's consideration of expanding recreational opportunities at Cachuma Lake. We totally accept the necessity of providing safe water, and the desirability of preserving the native habitat. However, we believe that some careful expansion of recreation in and around the lake is not only possible, but also desirable.

Consider opening the North Shore for hiking and biking to complement the equestrian opportunities that currently exist there. And for those wishing a deeper experience with the area's natural beauty, we urge the creation of a few primitive camp sites.

We understand that access to the North Shore would be prohibited during and after winter storms, and limited to low-water-level crossings of the Santa Ynez River. However, we wish you to consider the possibility of a bike/hike bridge across the river. Or a paved in-river crossing with slots to allow summer water to pass through rather than over the crossing. Such a paved crossing, if wide enough, could facilitate safer maintenance and emergency response vehicle access to the North Shore.

As for the other possibilities for development, we have misgivings about a water park, "fun center," or resort hotel. There are ample entertainment centers around our state that people can visit. The Cachuma Lake area is mostly unaltered native land, and visitors, especially children, should come for an appreciation of nature, not a rejection of it.

Thank you for considering our comments.

Sincerely yours,

Ralph Fertig, President
Santa Barbara Bicycle Coalition

CACHUMA PROJECT

Classification **LND-800**
Project **CAC**
Control No. **08062-925**
Folder ID **105 8509**

The Santa Barbara Bicycle Coalition is a countywide advocacy and resource organization that promotes bicycling for safe transportation and recreation.

Responses to Comment L-5

L-5-1

The comment is noted.

L-5-2

The Preferred Alternative would allow limited biking, hiking, and equestrian use on primitive trails and boat-in, primitive, self-contained camping in appropriate areas on the North Shore.

L-5-3

A crossing of the Santa Ynez River can be considered in the trail management plan. Implementation of the crossing would be based on public demand and availability of funding, and would subject to site-specific environmental evaluation.

L-5-4

The Preferred Alternative would allow for a water park (if demand warrants and funding is available) but does not include resort-like accommodations.

L-6 *Charles B. Hamilton, Carpinteria Valley Water District*



Carpinteria Valley Water District

1301 Santa Ynez Avenue • Carpinteria, CA 93013
 Phone (805) 684-2816 • Fax (805) 684-3170

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Charles B. Hamilton

October 29, 2008

Jack Collins, Resource Specialist
 United States Bureau of Reclamation
 1243 'N' Street
 Fresno, CA 93721

Re: Comments on Draft Environmental Impact Statement for the
 Cachuma Lake Resources Management Plan

Dear Mr. Collins:

Included below are some of our concerns / comments regarding the Draft Environmental Impact Statement for the Cachuma Lake Resources Management Plan (DRMP). We appreciate the effort the Bureau of Reclamation has made in developing this plan and thank you for the opportunity to provide our input into this important process.

The Carpinteria Valley Water District relies on Lake Cachuma for approximately 60% of its annual water sales. As such we are very concerned about the potential harm recreation may have on drinking water quality and water treatment. It is of utmost importance to our organization and our community that Lake Cachuma continue to provide us with water of the highest quality possible, while providing appropriate recreational opportunities.

- | | | |
|--------------|---|---|
| L-6-1 | [| <p>1. Absence of Alternative Negative1</p> <p>The DRMP presupposes the status quo and – more specifically – ‘more is better’ with regard to recreation at Lake Cachuma. The DRMP does not address the possibility that recreation and potentially harmful land-uses at the Lake should be curtailed or reduced in any capacity, beyond the repair of damaged hiking trails.</p> |
| L-6-2 |] | <p>Alternative 1 calls for the continuation of existing facilities - without trail rehabilitation. This alternative should include a detailed environmental and fiscal accounting of the programs County Recreation has implemented and a serious consideration that some of these policies / activities result in the degradation of water quality at Cachuma.</p> |

L-6-3

What works and what doesn't? What conditions have the greatest potential to harm water quality and how can these be ameliorated? Are the costs of inspecting, cleaning and quarantining boats for quagga mussels less expensive than the costs associated with on-boat rentals? Does reducing the number of overnight on-site County personnel improve or reduce camper supervision and the potential for swimming? Where is the analysis of reduced grazing or camping on the North shore?

L-6-4

Much of the problem with the report is that the 'planners' – read US Bureau of Reclamation - are divorced from the 'implementers' – read County of Santa Barbara Parks and Recreation or 'local implementing partner'. The DRMP presents a wish list of possible options for recreation at Cachuma absent of any substantive thinking about what can be paid for. Perhaps less is better.

2. WROS Inventory Protocol as Self-Defeating Prophecy

L-6-5

The most concerning statement about the errant focus guiding the report comes from Section 3, page 3-76, where the results of the Water Recreation Opportunity Spectrum (WROS) assessment technique are presented regarding recreation at Lake Cachuma:

“Based on the 11-point scale described above, it was determined that Cachuma Lake is currently providing various gradations of RD and RN water recreation opportunities. *The inventory revealed that some of the RD zone is approaching a Suburban-type opportunity and thus was labeled RD4, while other portions are approaching a RN-type opportunity and thus were labeled RD6 (Figure 2-1).* The WROS definitions are offered as a starting place for the lake planners, managers, and stakeholders to define their desired recreation opportunity and to reflect the special circumstances at the Lake. The WROS classifications applicable to Cachuma Lake are described below.” Italics added for emphasis.

L-6-6

The WROS approach relies on visual impression regarding the classification of landscapes into scaled rankings associated with the degree of 'naturalness' of a site. The problem is that the less 'naturalistic' a site appears to be, the greater the possibility to alter the local environment to fit perceived need or want. The peninsular region of Lake Cachuma that houses the County Park has paved boat parking facilities, concrete boat launches, permanent docks, buoys, boats in the water – and Bradbury Dam in the background – and comes across as 'semi-suburban' in the WROS analysis.

For a rural drinking-water reservoir surrounded by a National Forest to even be considered semi-suburban is problematic, but the response in the DRMP is troublesome. More boats? A water park? Expanded camping on the peninsula? Restrooms on the North shore? A swimming beach? Implementation of these

**L-6-6,
Cont.**

activities will ensure the area appears a little more ‘built-up’ – a little more ‘suburban’, ensuring that the next ‘go-around’ of planning review will result in further expansion of activities.

L-6-7

The real problem of WROS in this analysis is that it establishes a one-way progression of action – a more developed landscape leads to more development. The approach lacks the capacity to ‘remove’ activities to see the effect of moving in the other direction – i.e. to a more naturalized state. What if boat traffic on the Lake were reduced, or eliminated altogether? Wouldn’t that solve the problem of ‘suburbanization’ and help improve water quality at the same time?

L-6-8

The beautifully articulated presentation of wildlife species (birds especially) and the comparison of Lake Cachuma to other regional water facilities really points the way to go. Position Cachuma as a destination for naturalists (birders, etc) – an alternative to the hyper-recreation areas to the north – Nacimiento and San Antonio – and the ‘all things to all people swimming / water parks’ to the south – Pyramid and Casitas. We do not mean to suggest that Lake Cachuma become the next San Antonio Reservoir in Alameda County, but less impact would be a good thing.

3. Recreational Use Data

L-6-9

The entire effort of the DRMP – to enhance or expand recreation at Cachuma – appears to be based on an undisclosed number of ‘requests’ for recreational activities. Who is requesting expanded activities? How many requests have been submitted? What do we know?

L-6-10

We do know that the “annual average number of vehicles coming into the Plan Area from 2002 to 2007 was 167,075” and that the “highest number was 189,016 in 2002” and that the “lowest was 150,055 in 2006” (Section 3- page 3-77) but we don’t know where these vehicles entered the plan area, stopped or exited from the planned area. Given that highway 154 runs right through the planned area, we don’t even know if this is a vehicle count along the highway.

We also know that “the majority of the agencies, groups and general public *that have voiced their input support increased recreation at and around Cachuma Lake*, mainly in the form of man-powered and wind-powered boating, hiking, biking, horseback riding, and the use of RC airplanes.” (Section 3 page 3-69, italics added) While we applaud the report for meeting the needs of these diverse groups – see Alternative 3 - we wonder if the roughly 215,000 people that rely on Lake Cachuma as a primary drinking source have adequate voice in the plan because they didn’t request something. Who wants these activities? How many people (or horses)?

L-6-11

The visitor’s survey highlights the data problem. Twenty-five surveys from September 2000 – another survey in 2007 - and no data? (Section 3, page 3-72).

	4. Objectives, Needs and More Objectives
L-6-12	The cultural resources at Lake Cachuma appear to get short shrift in the objectives of the DRMP. Initially cultural resources place high in the overall objectives of the document (bullet number 2, Section 1.2, page 1-2) but then get shoved down a little bit during the discussion of needs (bullet 3, Section 1.3, page 1-3) and then fall to near the bottom of the heap when discussing management objectives (bullet 7, Section 1.4, page 1-4).
L-6-13	Similarly, the DRMP begins with the recognition that preserving water quality is a primary objective – a laudable goal from our perspective. Over time, however, the document proceeds to present alternatives that do nothing less than conflict with that goal – albeit in a ‘minor’ way. All proposed activities in Alternatives 2 and 3 seem to work against the primary objective – protecting water quality. How do these alternatives “[p]rotect the water supply and water quality functions of Cachuma Lake”? (page 1-2)
L-6-14	<p>The DRMP requires revisions in the following areas:</p> <ul style="list-style-type: none"> - The analysis of impacts associated with reduced activities at Lake Cachuma, including boating, possible body contact and grazing; - Expansion of the analysis of threats associated with exotic species and human / animal-borne pathogens; - Updated recreation use data; and - A singular focus on the protection of water quality.



Charles B. Hamilton, General Manager
Carpinteria Valley Water District

Responses to Comment L-6

L-6-1

See the response to Comments R-1-9 and R-1-11 in regard to the effect of recreation on water quality and a “reduced recreation alternative,” respectively.

L-6-2

Alternative 2 has been identified as the Preferred Alternative. The Final EIS has been revised to include new Section 2.9, which discusses the reasons that an alternative that would reduce recreational opportunities in the Plan Area was eliminated from detailed study.

L-6-3

Final RMP/EIS Sections 3.1 and 4.1 address the conditions that have the greatest potential to affect water quality.

The comment questions the (1) cost of implementing inspection and quarantine measures for invasive mussels compared to that of boat rentals and (2) the effects of reducing the number of overnight on-site County personnel. It is not clear how the questions relate to the environmental impact analysis in the RMP/EIS. The Preferred Alternative does not propose any changes to the vessel inspection protocols. Overnight staffing is not related to the purpose or implementation of the RMP.

The Preferred Alternative would not increase grazing and would allow boat-in, primitive, self-contained camping in appropriate areas on the North Shore. Grazing occurs concurrently with other low-impact recreation uses in other parks in the region, including those that contain drinking water reservoirs; therefore, conflicts are not anticipated.

L-6-4

The comment suggests that the RMP/EIS was developed without regard to County Parks or a “local implementing partner.” County Parks participated in the development of the RMP/EIS as described in the response to Comment R-1-5. As stated in Section 2.4.2.1 and elsewhere in the RMP/EIS, the local managing partner has the option of pursuing new or modified recreational uses based on public demand, sufficient funding, and potential for increased public benefits and use. Section 2.4.2.1 of the Final RMP/EIS has also been revised to state that the local managing partner has the option of continuing existing uses based on these same factors.

L-6-5, 6

Alternative 2, the Preferred Alternative, would not substantially expand recreation compared to the existing condition.

The WROS designation for boating capacity would be the same under future No Action and Preferred Alternative conditions (RD4; see Section 4.9.2). The Preferred Alternative would provide opportunities for more varied recreational experiences than current conditions, but the WROS designations would still range from RN to RD.

Ultimately, implementation of any new activity or facility would only take place if demand warranted and if funding was available. For that reason, the WROS zones envisioned under the Preferred Alternative should be considered the maximum allowable rather than imperatives for further expansion of recreation.

L-6-7

The WROS does not by itself drive expansion of recreation. Like land use or zoning designations in a city or county general plan, the WROS system is a tool used to classify the character of an area so that planning entities can focus development where it is appropriate, restrict development where it is not, and set aside areas for no development. Although the RMP does not specifically propose to “remove activities to see the effect of moving in the other direction” as proposed in

the comment, it provides for suspension of management actions when warranted. See the response to Comment R-2-14 for further discussion.

L-6-8

The comment is noted.

L-6-9

See the response to Comment R-1-10 in regard to requests for recreation activities.

L-6-10

Section 3.10.2 has been revised to clarify that the vehicle count data are from Santa Barbara County Parks (Medeiros 2010) and that the counts are for vehicles entering the Plan Area at Cachuma Lake County Park. The text has also been revised to include the vehicle counts for fiscal year 2008-2009 as well as Caltrans traffic data for SR 154 at the entrance to the County Park.

See the response to Comment R-1-10 in regard to requests for recreation activities.

L-6-11

Visitor surveys are completed voluntarily. Additional information about visitor survey results through fiscal year 2008/2009 has been added to Section 3.9.4.1.

L-6-12

The bullet list in Section 1.2 presents specific objectives of the RMP. The fourth bullet in Section 1.3 has been modified to include cultural resources with natural resources; its omission in the Draft RMP/EIS was inadvertent. Cultural resources are identified twice in the list of management objectives in Section 1.4 (bullets three and seven).

L-6-13

Alternative 2 is the Preferred Alternative. See the response to Comment R-1-11.

L-6-14

The Final RMP/EIS has been revised to include new Section 2.9, which discusses the reasons that an alternative that would reduce recreational opportunities in the Plan Area was eliminated from detailed study. Body contact will not be allowed under the Preferred Alternative; therefore, risks associated with human-borne pathogens would be minimized. See the responses to Comment L-6-3 in regard to grazing, Comment R-1-17 in regard to exotic species, and Comment L-6-11 for updated recreational use data.

Sections 3.1 and 4.1 of the Final RMP/EIS have been revised to include additional information on water quality. Also see the response to Comment R-1-11.

L-7 Glenn A. Dorfman, Santa Barbara Radio Control Modelers

GLENN A. DORFMAN
Attorney at Law

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CACHUMA PROJECT

2008 SEP 12 A 10:51

September 10, 2008

225 East Carrillo St., Suite 303
Santa Barbara, California 93101
Telephone (805) 965-1046
Fax (805) 965-6156
e-mail gadlaw1@aol.com

Robert Epperson
BUREAU OF RECLAMATION
1243 N Street
Fresno, CA 93721

Re: Lake Cachuma Recreational Management Plan

Dear Mr. Epperson:

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I am the President of the Santa Barbara Radio Control Modelers and appreciated the opportunity to meet you in Solvang recently as well as to hear the presentation regarding the RMP. Pursuant to your invitation for comments regarding the RMP, I respectfully submit the following abbreviated points that our club believes speak in favor of a radio control airplane field at East End Mohawk as proposed and analyzed in the RMP.

L-7-1

1. There are a total of 14 radio control airplane clubs currently operating on BLM land in the United States. A list of those clubs and locations is attached.

2. There are several clubs operating on a permanent basis on lakeshores in Southern California alone and probably hundreds throughout the entire U.S. Presumably most of these lakeshore flying sites present environmental issues quite similar to the issues present at Lake Cachuma in terms of bird habitats and noise.

3. Our Santa Barbara based club has been operating on private ranch land less than 1/2 mile from the Santa Ynez River and approximately three miles from the Mohawk site for over 10 years. Bird and animal life of all kinds continues to flourish in the area. Furthermore, we have been satisfied to operate on a three day per week (plus holidays), 9am to 1pm schedule. If we were to be granted the site at East End Mohawk, we would be glad to negotiate flying time limitations.

4. In regards to the noise issue, our club also self-imposes a rule of no more than four airplanes in the air at a time, in order to reduce mid-air collisions. This limits noise of course. Also, technology in the hobby is evolving such that probably

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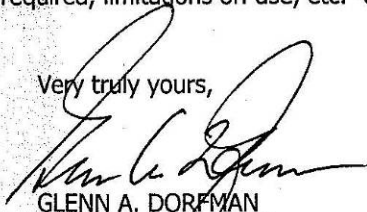
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one-third of our airplanes are electric powered and create virtually no noise at all. The ratio of electric to fuel powered airplanes will undoubtedly increase over time.

5. Granting our club of approximately 100 dues paying members a flying site at East End Mohawk will have a benign impact on the environment and a very beneficial impact to the interests of the Federal, State and local government at the lake. Our club members would become sheppards of the land, so to speak, and maintain it with loving care compared to the untended condition in which it is now. Our presence would provide another popular attraction at the lake and certainly generate significant additional revenue for operators of the lake facilities. In support of these contentions, I hope that you will devote a mere seven minutes to view the enclosed DVD entitled "Model Airplane Flying Sites in State Parks" where rangers at three different parks extol the benefits that they have witnessed from the presence of a radio control airplane facility.

On behalf of the Santa Barbara Radio Control Modelers, we thank you for your consideration of our strongest support for Alternative Three of the RMP regarding a radio control airplane site. We are readily available to discuss any aspects of the proposed plan for East End Mohawk to assist in your evaluation including improvements required, limitations on use, etc. Once again, thank you for your consideration.

Very truly yours,


GLENN A. DORFMAN
President, SBRM

FLYING SITES ON BLM LAND

		COUNTY	CITY	STATE
1.	Arizona Model Aviators, #1600	Maricopa	Mesa	AZ
2.	Wickenburg RC Flyers, #1816	Maricopa	Wickenburg	AZ
3.	Imperial Valley RC Assoc., #1135	Imperial	Imperial	CA
4.	CL Speed Flyers of CA, #3815	Los Angeles	El Monte	CA
5.	High Desert Aerobarns, #325	San Bernardino	Joshua Tree	CA
6.	Northern CA RC, #3233	Shasta	Anderson	CA
7.	Grand Junction Modelers, #1124	Mesa	Grand Junction	CO
8.	Sun Valley Aeronautical Soc, #2105	Blaine	Hailey	ID
9.	Helena Flying Tigers, #403	Lewis and Clark	Helena	MT
10.	Lander RC Club, #2623	Lander	Battle Mountain	NV
11.	Bend Aeromodeler, #2311	Deschutes	Bend	OR
12.	Eagle Draw Aeromodelers, #2938	Hot Springs	Thermoplis	WY
13.	Flying Cowboys RC Club, #3076	Sheridan	Sheridan	WY
14.	Worland RC Aeromodelers, #4067	Washakie	Worland	WY

Response to Comment L-7

L-7-1

A radio-controlled airplane site is not included in the Preferred Alternative (Alternative 2). This does not rule out a future application for an amendment to the RMP and would require additional environmental clearance through NEPA and possibly CEQA.

L-8 Kate Rees, Cachuma Operation and Maintenance Board

**CACHUMA OPERATION AND MAINTENANCE BOARD
AND
CACHUMA CONSERVATION RELEASE BOARD**

October 30, 2008

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jack Collins, Resource Specialist
United States Bureau of Reclamation
1243 'N' Street
Fresno, CA 93721

RE: Comments on Draft Environmental Impact Statement for the Cachuma
Lake Resources Management Plan

Dear Mr. Collins:

Thank you for the opportunity to provide the United States Bureau of Reclamation ("Reclamation") with comments on its Draft Environmental Impact Statement (the "EIS") for the Cachuma Lake Resources Management Plan ("RMP"). These comments are being submitted on behalf of the Cachuma Operation and Maintenance Board ("COMB") and Cachuma Conservation Release Board ("CCRB") (collectively, the "Agencies").

I. INTRODUCTION

COMB is a joint powers agency comprised of the five Cachuma Project Member Units ("Member Units"), the Carpinteria Valley Water District, City of Santa Barbara, Goleta Water District, Montecito Water District, and the Santa Ynez River Water Conservation District, Improvement District No.1. COMB is responsible for the operation and maintenance of the Cachuma Project water supply conveyance facilities. CCRB is also a joint powers agency and represents the South Coast Member Units' interests in Cachuma Project water rights and endangered species issues. The Member Units collectively provide water service to approximately 9,000 customers in the Santa Ynez Valley and about 200,000 people on the South Coast of Santa Barbara County, as well as more than 40,000 acres of irrigated agriculture. The Cachuma Project provides about 70% of the total water supply to the Member Units.

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Because of the Member Units' substantial reliance on Lake Cachuma, any recreational activity which may adversely impact the ability to utilize their water supply is of great importance. In addition, the Member Units have interests in the Santa Ynez River watershed that reach beyond protection of water quality and water supply facilities at Lake Cachuma. They have been involved with interagency cooperative efforts to study and improve the federally listed Southern California Steelhead ("steelhead") fishery in the lower Santa Ynez River system for over fifteen years, and are actively implementing the flow and non-flow management actions identified in the Lower Santa Ynez River Fish Management Plan and Cachuma Project Biological Opinion in cooperation with Reclamation.

The Agencies' comments are primarily focused on the following areas: (a) RMP/EIS assumptions; (b) analysis of the environmental effects of recreational activities that may impact water quality or water supply delivery facilities; (c) potential impacts to the steelhead fishery; (d) updating the alternatives analysis to include current information; and (e) responsibility for implementing and funding the RMP's mitigation measures. Following a brief summary, a more detailed discussion is presented of the Agencies' comments.

L-8-1

With regard to Reclamation's assumptions, the RMP/EIS acknowledges the importance of Lake Cachuma to the area's water supply, and states that the original purpose for constructing Bradbury Dam was "to provide irrigation, domestic, and municipal and industrial water supplies to nearby water supply agencies." (EIS at p. 1-1.) Despite these acknowledgements, the analysis in the EIS does not treat recreational uses as subordinate to those of providing a clean and reliable water supply to nearby communities. This results in an RMP/EIS that is tipped in favor of expanded recreation.

L-8-2

The Agencies have several concerns regarding potentially adverse impacts to water quality and water supply. First of all, despite the extensive boat inspection and Quagga mussel prevention program in place at Cachuma Park, there is a very real possibility, in future, that invasive mollusks will be transferred from launched boats into Lake Cachuma, and infest both the Lake and the water delivery infrastructure that is crucial to providing water supply in Santa Barbara County. There is also a significant risk that increased equestrian, bovine, and, particularly, human body contact will cause significant bacterial and pathogen loads to develop in a Lake that serves as the primary source of drinking water. Lastly, the EIS acknowledges that as much as 30 percent of the fuel used by carbureted two-stroke engines is discharged unburned into the water, yet fails to grapple with the water quality impacts of continuing to allow boats with two-stroke engines to use the Lake.

L-8-3

The RMP/EIS does not examine the potential impacts of continued or increased recreational fish stocking in Lake Cachuma to the steelhead fishery in the lower Santa Ynez River. When the reservoir spills, stocked fish escape over Bradbury Dam to downstream areas and (in the case of bass) prey upon or (in the case of stocked trout) interbreed with the native steelhead that currently reside in the mainstem river and tributaries below Bradbury Dam. It also does not address potential impacts to the downstream fishery if a Quagga mussel infestation does occur and the mollusks clog the Hilton Creek and Bradbury Dam outlet works, thus reducing

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L-8-3, Cont. required water releases to maintain steelhead rearing habitat or supplement migration passage flows.

L-8-4 Much of the alternatives analysis was prepared several years ago and has not been updated to reflect new information and events of the past few years. Because these are not acknowledged or analyzed, the mitigation measures described in the document may be insufficient to reduce the impacts of the proposed alternatives.

L-8-5 Finally, the Agencies request that the EIS make very clear that Reclamation and its local managing partner are the agencies responsible for mitigating the environmental effects of Reclamation's RMP and for providing all funding for the mitigation actions.

II. SUMMARY OF COMMENTS

A. RMP/EIS Assumptions

L-8-6 As Reclamation acknowledges in the first few pages of its RMP/EIS, the primary purpose of Lake Cachuma is to store and deliver water for municipal, industrial, and agricultural uses (EIS at p. 2-4) and notes that "the original Project purpose recognized that public recreation was an incidental benefit of the Project." EIS at p. 1-2. Indeed, the EIS states that the first objective of the RMP is to "protect the water supply and water quality functions of Cachuma Lake". However, the RMP/EIS alternatives analyses imply that enhancing recreational opportunities has, in practice, been elevated to a purpose equal to the provision of safe, high quality drinking water. This is demonstrated by the fact that the foremost objective of the RMP is described as doing both; that is: "protect water quality . . . while enhancing natural resources and recreational opportunities." EIS at p. 1-3. The fact that these goals are somewhat contradictory is not addressed. The Agencies agree with Reclamation that protection of the water quality and water supply of the reservoir must take primacy, but the EIS must recognize that primacy throughout its analysis, not just in its introduction.

L-8-7 The Purpose and Need Statement assumes that recreational opportunities at the Lake need enhancing. EIS at p. 1-3. This fundamental assumption is not consistent with other portions of the EIS, which state that population growth in the surrounding counties is expected to be "low" and that "growth in recreational demand for Cachuma Lake is somewhat unknown." EIS at p. 4-58. Furthermore, boat usage on Cachuma Lake has decreased (EIS at p. 4-40), and "the annual number of vehicles visiting the Plan Area is decreasing . . ." EIS at p. 3-77. Despite this, "growth is assumed" by Reclamation. EIS at p. 4-58. Data demonstrating a need for increased recreational opportunities should be provided.

B. Environmental Effects of Recreational Activities that May Impact Water Quality or Water Supply

L-8-8

1. Effects Related to Quagga and Zebra Mussels

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**L-8-8,
Cont.**

In recent years, the Quagga mussel and its closely related cousin the Zebra mussel have become a major concern for water supply agencies around the nation. These species were inadvertently transplanted to the Great Lakes area of the United States in the ballast water of ships traveling from certain Eastern European sea drainages and river systems. Quagga mussels have now spread throughout the Great Lakes region, the Mississippi River system, Lake Mead and its lower basin, the Colorado River Aqueduct system, which serves Southern California, and Zebra mussels have now reached Central California, completely infesting San Justo Reservoir in San Benito County.

As we are all aware, these mollusks wreak havoc on water delivery facilities, covering every inch of available surface in layers up to a foot thick. They consume vast quantities of nutrients from the water bodies they infest, leaving little in the way of food for native fish and other aquatic species and causing devastating impacts to natural ecosystems. Additionally, these mollusks can completely fill water pipelines, block filtration facilities, and cause increased corrosion of water conveyance facilities. Their removal often requires shutting down the facilities and manual removal of the mussels through pressurized hot water, the application of high saline solution, smothering through the wide-spread application of plastics for many weeks, or mechanical removal through sand blasting or manual scraping. The eastern portions of the United States have already suffered direct economic costs of over \$100,000,000 annually. In the west, impacts are likely to be as severe, if not more so, due to warmer water temperatures, abundant food supply, greater dependency on transporting water over long distances, and highly stressed aquatic ecosystems. The significance and potential impact of Quagga and Zebra mussels cannot be overstated.

Reclamation's RMP/EIS acknowledges that Alternatives 2 and 3 would both increase boat use at Lake Cachuma. EIS pp. 4-27, 4-31. The EIS also states that this increased boat usage comes with an increased risk that Quagga and/or Zebra mussels could be introduced into Lake Cachuma (EIS at p. 4-37), and that these "mussels can multiply quickly and clog waterways and pipelines, affect lake ecosystems, and create costly maintenance issues. However, the EIS concludes that, through the implementation of boat inspection procedures, there would be "no impact" caused by Quagga or Zebra mussels. EIS at p. 4-71 (Table 4.12-1). The analysis is both contradictory and incomplete.

First, the RMP/EIS states that quarantine and inspection protocols will be re-evaluated from time to time to determine their effectiveness and, should exotic mussels be found in the Lake, further protective measures would be suggested. However, Reclamation also admits that once a water body is infested, there is no means to completely eradicate the mussel species. Although efforts are being made to develop methods of controlling the growth and spread of these mussels, no effective eradication method in a natural system currently exists. Moreover, inspection and quarantine procedures are far from fool-proof. Quagga and Zebra mussels can be difficult to see when hidden on the mechanical assemblages of boats. Moreover, the mussels can survive for several days even when out of water, and their microscopic offspring can be transported in a minimal amount of water. Therefore, the Agencies request that Reclamation

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**L-8-8,
Cont.**

consider potential mitigation for any environmental effects, such as limiting all boating on Lake Cachuma to resident boats.

L-8-9

Second, the RMP/EIS concedes that Quagga and Zebra mussels can clog pipelines and create costly, ongoing maintenance issues, but the EIS does not evaluate the potential impacts to Lake Cachuma or the Cachuma Project conveyance facilities should an infestation occur. Currently, the Santa Ynez River system has remained unaffected by Zebra and Quagga mussels. However, if they do infest Lake Cachuma, they will attach to and clog the Cachuma Project infrastructure that delivers water to the South Coast of Santa Barbara County. Specifically this includes the Intake Tower, Tecolote Tunnel, South Portal, and South Coast Conduit facilities. Not only could this reduce the quantity of water delivered, but would also reduce the quality of that water as secondary contaminants excreted by mussels cloud the water. In addition, given the aggressive growth patterns of the mussels, total occlusion of the water delivery system is a distinct possibility. The Bradbury Dam outlet works would also be affected, which could impact downstream water rights releases and releases to maintain the downstream steelhead fishery. Lastly, a mussel infestation would greatly impact operations at Cater and Corona Del Mar Water Treatment Plants. As there is no redundant system for water delivery, the effects of shutting down that infrastructure to remove mollusk populations is, practically speaking, infeasible and impossible, and would be devastating to the entire region. Potential impacts to all of these facilities should be addressed in the EIS.

L-8-10

Third, Quagga and Zebra mussel infestations are almost exclusively spread through human activities and water currents. Accordingly, the impacts of a mussel infestation in Lake Cachuma would not be limited to the Lake but could spread to critical areas throughout the Santa Ynez River system. As Reclamation is aware, in 1997 the Southern California Steelhead was listed as a federally endangered species pursuant to the federal Endangered Species Act ("ESA"). Additionally, "critical habitat" for this species has been designated along the Santa Ynez River up to Bradbury Dam, an impassable barrier, inclusive of the downstream tributaries. As such, no federal action may adversely affect that habitat without first complying with the terms of the ESA. A mussel infestation could virtually shut down water deliveries to Hilton Creek through the Hilton Creek Watering System, which would adversely affect thousands of steelhead/rainbow trout now inhabiting lower Hilton Creek. The EIS states that "recreational uses and improvements must also not interfere with protection of ... Southern California steelhead" (EIS at p. 1-1), yet the increased boating opportunities identified in Reclamation's proposed Alternatives may increase the risk of mussel infestation of Lake Cachuma and downstream areas as water releases from Lake Cachuma are made to support the listed fish population. The potential effects of such an infestation on steelhead should be analyzed in the EIS.

L-8-11

A mussel infestation at Lake Cachuma would necessitate a permanent, long-term maintenance program for protection of the water delivery system, and this will be at an enormous cost. Reclamation must acknowledge in the RMP/EIS its responsibility and that of its managing partner, for implementation and funding of all mitigation measures to negate the environmental effects of Quagga mussels should they occur in Lake Cachuma.

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2. Effects Related to 2-Cycle Engines

Among the mix of watercraft used for recreational boating are those boats powered by carbureted 2-cycle engines. These engines were generally manufactured prior to 1999, which emit high quantities of air and water pollutants during operation. Specifically, 2-cycle engines dump as much as 30% of their fuel and oil directly into the water. EIS at p. 3-6. In addition, fuel can be introduced to lakes by overfilling boat fuel tanks, leaking hoses, nozzles, or storage tanks, and pumpage from bilges. This fuel contains such compounds as benzene, toluene, ethylbenzene, xylene, oxygenated additives, and other compounds known to have adverse effects on human health and aquatic life

L-8-12

Because of the need to protect drinking water and wildlife, many lakes throughout California are now restricting or prohibiting carbureted 2-cycle motor boats. Specifically, 2-cycle motor boats are forbidden or severely restricted at Anderson Reservoir, Calero Reservoir, San Pablo Reservoir, Los Vaqueros Reservoir, Lake Tahoe, Cascade Lake, Fallen Leaf Lake, Echo Lake, Diamond Valley Lake, and Lake Skinner.

The EIS should explain the possible impacts of 2-cycle motor boats on the quality of a public drinking water supply. The increasing prohibition of 2-cycle engines at other lakes throughout California may result in a concentration of these boats at Lake Cachuma, which could result in a larger concentration of pollutants than is anticipated by the EIS. This impact would also require the installation of costly water quality treatment facilities to specifically target the petroleum-based pollutants and could have a major effect on providing a clean and reliable water supply to Santa Barbara County.

L-8-13

Reclamation's RMP/EIS confirms that the use of these 2-cycle engines has resulted in "measurable water quality degradation in some of the nation's lakes and reservoirs." EIS at p. 3-6. The RMP/EIS also acknowledges that the boats for rent at Lake Cachuma are all 4-cycle engines, and that the only 2-cycle boats on the Lake are those brought in by recreational boaters. Additionally, the EIS states that these 2-cycle boats will continue to be allowed at Lake Cachuma until a five year phase out program is complete. The EIS also points to an 11-year-old study (from 1997) in support of Reclamation's conclusion that petroleum byproducts are not an issue at Lake Cachuma. Finally, the EIS concludes that the effect of allowing 2-cycle boat use on Lake Cachuma is minor (EIS at p. 4.70 (Table 4.12-1)), yet it contains no specific analysis regarding the potential long-term effects that these recreational boats engines may have on Lake Cachuma's wildlife or water quality. Nor does it contain any discussion whatsoever of the mitigation measures that would be required if hydrocarbon contamination at Lake Cachuma exceeds allowable limits.

In addition, mandatory water releases from Lake Cachuma for the benefit of the steelhead would carry with them any pollutants released by carbureted 2-cycle engines. These pollutants, in sufficient concentrations, could harm the listed species unless additional restrictions on 2-cycle engines or water treatment measures were put into place.

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L-8-14

The Agencies ask that Reclamation consider an immediate ban, or at the very least, a 2 year phase-out program for carbureted 2-cycle engines rather than the proposed five-year phase-out program. Finally, the Agencies insist that if Reclamation intends to allow the long term use of 2-cycle carbureted engines at Lake Cachuma, it also acknowledge that Reclamation or its local managing partner will be responsible for the development, implementation and funding of appropriate mitigation measures to negate the environmental effects such motors may have on the public water supply or on listed species.

3. Effects Related to Body Contact

L-8-15

Body contact activities in drinking water reservoirs are generally forbidden due to serious public health concerns, as well as increased water treatment costs. Because of these concerns, California law explicitly forbids body contact uses in drinking water reservoirs, with only a few limited exceptions. Health & Safety Code, § 115825(b) (“recreational uses shall not, with respect to a reservoir in which water is stored for domestic use, include recreation in which there is bodily contact with the water by any participant.”). A specific exemption from this law is required for reservoirs with mixed drinking water storage and body contact uses, of which only a handful have been granted.

Human body contact with a water body increases the pathogenic concentrations in that water body and, in turn, the risk of waterborne infection and disease for those using the reservoir for drinking water.¹ Studies show that, due to shedding of residual fecal material and accidental fecal releases, body contact recreation can significantly elevate the levels of *Cryptosporidium*, rotavirus, poliovirus, *Escherichia coli*, *Shigella*, and *Giardia* concentrations in a water body.² Both *Cryptosporidium* and *Giardia* are of particular concern in drinking water reservoirs because they can cause disease outbreaks at very low concentrations, and their effects include vomiting, diarrhea, fever, and even death.

The EIS explains that the one of the primary differences between Alternatives 2 and 3 is that Alternative 3 would designate a portion of Cachuma Lake for swimmers and allow body

¹ Allowing increased equestrian uses or expanded cattle grazing near Lake Cachuma could also raise the risks of contamination. The EIS repeatedly refers the reader to Section 4.1.3 for an analysis of the impacts of cattle and horse waste contamination of the Lake, but this section contains only two sentences discussing this impact. EIS at p. 4-8. Additionally, there is no evidence in the EIS supporting its conclusion that signs and educational materials and maintenance of the existing fences, the only proposed mitigation measures, would fully mitigate for increased Lake contamination from animal waste.

² *Cryptosporidium* is a microscopic parasite. Department of Health and Human Serv., Centers for Disease Control & Prevention website, available at <http://www.cdc.gov/crypto/>. It lives in a protective “shell” known as an oocyst, which allows it to survive a variety of environmental conditions and resist disinfection through chlorination. Assembly Bill (“AB”) 1934 (2003-2004), Bill Analysis by Senate Committee on Environmental Quality. *Giardia intestinalis*, a one-celled, microscopic parasite is likewise protected by an outer shell and can survive outside the body in the environment for long periods of time. See Division of Parasitic Diseases website, available at: <http://www.cdc.gov/ncidod/dpd/parasites/giardiasis>

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**L-8-15,
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contact with the water for the first time. EIS at p. 4-61. The EIS itself recognizes the problematic nature of mixing body contact and drinking water, noting that “introducing body contact to the lake has an obvious impact on water quality.” EIS at p. 4-61. This is due to the fact that “currently water delivered to Goleta West by the Goleta Water District is chlorinated at the Goleta Sanitary District, but not filtered....Uninformed customers could consume unfiltered water that has received body contact.” EIS at p. 4-6. For this reason, the impact from a swimming beach “would be major” and have “an obvious [negative] impact on water quality.” Nonetheless, Reclamation concludes that swimming should be allowed because “physical and chemical controls have been implemented at other drinking water reservoirs where body contact is allowed, which have proven to be acceptable (see Section 3.9.1.2).” There are multiple problems with this conclusion.

First, no support is given for the conclusion; no studies, factual data, or citations are given, other than the internal citation to the EIS itself. The internal citation to Section 3.9.1.2, actually contradicts the EIS’s conclusion. Of the eight lakes discussed, three of them are drinking water reservoirs, Lake Cachuma, Lake Margarita, and Lake Casitas (EIS at pp. 3-58 to 3-62). The exact same three lakes do not allow body contact recreational activities. EIS at p. 3-58. Section 3.9.1.2 contains such statements as “Casitas Municipal Water District manages Lake Casitas as a drinking water reservoir, and therefore no body contact is allowed,” and “as a drinking water reservoir for the City of San Luis Obispo, body contact is forbidden [at Santa Margarita Lake].” EIS at pp. 3-59 and 3-61. Thus, the referenced section actually shows that body contact is specifically *not* allowed where a reservoir is used for drinking water.

Second, the mitigation measures that would be necessary to diminish the impacts to water quality from the introduction of full body contact may be infeasible due to the high cost of upgrading or building a new water treatment plant. Metropolitan Water District (“MWD”) studies assessing the health risks of allowing body contact in Diamond Valley Lake showed that it would cost \$20.6 to \$62.4 million (in 1998 dollars) to install the necessary upgrades to existing water treatment facilities, plus an additional \$10 million in annual operation, maintenance, and increased treatment costs. In light of the enormous costs and marginal benefits, MWD prohibited body contact activities. If Reclamation has funding secured to upgrade or build new water treatment facilities, which are identified as the primary mitigation measures in the EIS (EIS at p. 4-8), that fact should be disclosed. Unless Reclamation can demonstrate that it has monies available for these mitigation measures, the proposed mitigation is infeasible and poses a serious, unmitigated impact to human health. Elsewhere, the EIS states that I.D. #1 would need to notify customers during an emergency that they are receiving untreated water, and would also need to supply alternative drinking water (e.g., bottled water). Again, there is no discussion of how much this would cost or how funding this mitigation measure would be achieved.

Because of the importance and primacy of Lake Cachuma as a drinking water supply, the danger of contamination from human body contact with the water, the possible infeasibility of the proposed mitigation measures, the existence of other swimming opportunities in the area (Lake Cachuma has a public swimming pool, and a number of other area Lakes do allow

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swimming. EIS at p. 3-58), and that fact that allowing body contact could violate California law, the Agencies request that Reclamation not allow swimming in Lake Cachuma.

C. Potential Impacts to Steelhead

L-8-16

As part of its analysis of alternatives, Reclamation anticipates increasing, or at a minimum maintaining, the population of stocked sport-fish in Lake Cachuma. EIS at p. 4-27. These fish would include bass, trout, and other species. The EIS, however, fails to analyze the potential effects that such a stocking program would have on endangered steelhead downstream. For example, bass prey upon smaller fish as a food source and can have a major effect on population size of the prey species. EIS at p. 4-27. The interaction of introduced fish with native fish populations is an issue that is of great importance with regard to Lake Cachuma. Because spills from Lake Cachuma carry non-native stocked fish into the lower river, the impacts of stocked fish on the listed fish population downstream should be examined.

Predation can play a major role in the decline of fish species, and at least one study has concluded that the predation impact of striped bass on federally endangered winter-run Chinook salmon would cause "a serious extinction risk. This study explains that striped bass were introduced to the Sacramento River to support commercial and recreation sport fishing, but that the bass prey upon juvenile winter-run Chinook salmon as a food source."³

Another issue is that non-native fish interbreed with native populations and thus dilute the wild population's genetic makeup. This is of particular concern because where this occurs, in most cases, the non-native fish have been found to exhibit reduced genetic diversity, which may lead to reduced fitness in the native fish through interbreeding.

L-8-17

The EIS explains that the Southern California Steelhead has been listed as an endangered species under the federal Endangered Species Act since 1997. EIS at p. 1-2. Additionally, the EIS discloses that water releases from Bradbury Dam are mandated for the protection of the steelhead. Finally, it states that any recreational uses of the Lake approved as part of the RMP must not adversely affect the listed fish. EIS at p. 1-1. Despite these statements, the analysis

³ Many studies concur that predation of bass species upon juvenile trout and other fish is a serious concern and that predation is a major source of mortality for a variety of fish species. See, e.g., Lindley, Steve T., and Michael S. Mohr. "Modeling the effect of striped bass (*Morone Saxatilis*) on the population viability of Sacramento River winter-run Chinook salmon (*Oncorhynchus tshawytscha*)," Fishery Bulletin 101.2 at p. 1 (April 2003); Naughton, George P. and David H. Bennett, "Predation on Juvenile Salmonids by Smallmouth Bass in the Lower Granite Reservoir System, Snake River," N. Amer. J. of Fisheries Mngmt., 24:534-544 (2004); Bolding, Bruce D. et al., "Effects of Introduced Fishes on Wild Juvenile Coho Salmon in Three Shallow Pacific Northwest Lakes," Transactions of the Amer. Fisheries Soc'y, 134:641 (2005); Tabor, Robert A. et al., "Smallmouth Bass and Largemouth Bass Predation on Juvenile Chinook Salmon and Other Salmonids in the Lake Washington Basin," N. Amer. J. of Fisheries Mngmt., 27:1174 (2007).

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provided in the EIS does not adequately evaluate impacts to steelhead. Instead, the RMP/EIS makes clear that its analysis focuses only on the “Plan area,” which includes only Lake Cachuma and the immediately surrounding areas. The analysis in the EIS should be expanded to examine the potential downstream impacts to steelhead.

These issues should be discussed in the EIS, as well as proposed measures to mitigate potential impacts. For example, stocking only sterile fish might eliminate interbreeding impacts to the endangered fish below Bradbury Dam.

D. Updating the Alternatives Analysis

As discussed in Reclamation’s Resource Management Plan Guidebook (“RMP Guidebook”), “when extracting information from current data, caution should be taken to ensure the accuracy, coverage, completeness, and current nature of such data.” RMP Guidebook at III-6. Some of the analyses and underlying data regarding the alternatives are outdated – in some instances the studies on which the EIS analysis is based are more than a decade old. For example, the EIS cites a 1997 analysis of gasoline compounds in Lake Cachuma. EIS at p. 3-6. This study is certainly not “current.” Furthermore, while the Total Dissolved Solids in the lake vary by season and over time, the EIS references no information more current than 1997. See EIS at p. 3-5. In addition, surveys for some types of listed species were performed more than ten years ago. EIS at pp. 3-29 to 3-30. Due to the outdated nature of some of these studies, it would be prudent for Reclamation to find more recent analyses, commission new studies, or perform other such actions to ensure the reliability of the data underlying the EIS’s analysis.

L-8-18

As acknowledged in the document itself, the alternatives in the EIS were developed in 2002 and 2003. EIS at p. 2-6. Such a gap is a long time in the events that affect water supply at Cachuma Lake. As described in the EIS, the planning time-span for the RMP is 20 years. Given the six-year delay, 30% of the Project time span has already elapsed. Therefore, the cause of the five to six year delay between the development of the alternatives and their evaluation in the RMP/EIS should be explained.

Moreover, any planning process should not only address existing issues, but also anticipate future events, at least those future events occurring during the 20-year planning time span. The RMP/EIS fails to acknowledge “future” events that have already taken place. For example, the National Marine Fisheries Service (“NMFS”) Draft Steelhead Recovery Plan has been in preparation for several years and a Recovery Plan Outline was published in 2007.

E. Responsibility for Implementing and Funding RMP/EIS Mitigation Measures

L-8-19

Reclamation’s RMP Guidebook states that “each alternative should be realistic and implementable within anticipated funding and staffing levels.” RMP Guidebook at III-9. Even though this is a programmatic RMP/EIS, it is missing a discussion of how implementation of the alternatives or mitigation actions identified in the RMP/EIS will be funded. Staffing requirements and associated costs are likewise not discussed. Without this information, it is

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measures discussed in the EIS, many of which are acknowledged as inadequate to fully mitigate potential impacts to the lake's water quality. Because of the importance of protecting the public's primary drinking water supply, the Agencies suggest the addition of a Water Quality/Water Supply Protection alternative to address this deficiency.

A. Reclamation's RMP Guidebook Directives

L-8-22

As discussed in Reclamation's RMP Guidebook, "each alternative . . . should address and resolve, in a different manner, the issues and concerns raised by the public . . ." RMP Guidebook at III-9 (Feb. 2003). The vital importance of protecting the water quality of Lake Cachuma was pointed out during the scoping process. EIS at p. 2-24. Despite this comment, however, none of the alternatives includes a component to do so. It must also be recognized that, in selecting the preferred alternative, the RMP Guidebook states that Reclamation should select those alternatives or combinations of land uses and management actions that are "widely accepted by the public and entities" and "without serious conflicts." RMP Guidebook at III-10. As discussed throughout this letter, several of the actions under Alternatives 2 and 3 present serious conflicts with the use of Lake Cachuma as a drinking water source.

B. Water Quality/Water Supply Protection Alternative Should Be Considered

L-8-23

NEPA requires that an EIS "rigorously explore and objectively evaluate all reasonable alternatives." 40 Code Fed. Regs., § 1502.14(a). This suggests that an alternative which would protect the water quality and water supply facilities, but would not necessarily expand recreation, should be analyzed. NEPA's requirements regarding analysis of alternatives indicate that inclusion of an additional alternative that protects the water quality of Lake Cachuma would strengthen the environmental analysis and allow for a more complete disclosure of the pros and cons of the different actions proposed by the RMP/EIS. However, the EIS considers only two alternatives, in addition to the No Project alternative, which are very similar and which both expand recreation around the Lake. A "range" of only two alternatives does not appear to meet NEPA's requirement to analyze "all reasonable alternatives" and may be inadequate here.

An additional water quality/water supply protection alternative could be developed by selecting a focused suite of components from the existing alternatives already evaluated in the RMP/EIS. The new "hybrid" alternative should include those activities that could be accomplished without impacting the reservoir's water quality or water supply facilities, but still enhance recreation. It could include all beneficial aspects of Alternatives 2 and 3 without the negative environmental impacts. For example, it could incorporate the Trails, Vegetation, and Fisheries Management Plans, a ban or rapid phase-out of 2-cycle motors, and institution of a strict Quagga mussel containment program by limiting access to the lake to local boats and rental boats only. .

Another set of alternative components might also be considered, which would implement the previously mentioned plans as well as a program of restoring and upgrading existing recreational infrastructure, expanding the hiking trail system, and building new dry camps, as

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long as those activities were all well away from the lake. This would enhance Lake Cachuma's recreational opportunities without increasing them, while fully preserving the Lake's water quality and water supply facilities.

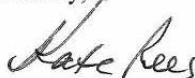
L-8-24

Lastly, Reclamation might consider an alternative with expanded recreational opportunities *outside* the Cachuma Recreation Area to support the notion that expanded recreational activities are needed in the general geographic area near Lake Cachuma. For example, activities similar to those proposed in Alternatives 2 and 3 could be analyzed for Lake Casitas, Lake Piru, or Lopez Lake instead. Or, because the proposed recreational opportunities are partially for the benefit of Los Angeles County residents (EIS at p. 3-62), expanded recreation in a lake in Los Angeles County could be analyzed. Because Lake Cachuma is first and foremost a drinking water reservoir, while other area lakes are not, this would have the possibility of meeting both the objectives to protect Lake Cachuma's water quality while enhancing recreational opportunities in the general geographic area. Without analyzing these or similar alternatives, which would have no negative impacts on Lake Cachuma's water quality and water supply facilities, the benefits and drawbacks of the current alternatives cannot fully be evaluated.

III. CONCLUSION

COMB and CCRB thank Reclamation for providing the opportunity to comment on the proposed Cachuma Lake Resources Management Plan and Environmental Impact Statement. Our comments are intended to provide Reclamation with a clear understanding of the primary concerns faced by the Agencies as they continue to supply a reliable and high-quality source of drinking water to residences, businesses, and agricultural lands during a time of great uncertainty regarding water supply availability.

Sincerely,



Kate Rees
General Manager
Cachuma Operation and Maintenance Board
Cachuma Conservation Release

References Attached

cc: COMB and CCRB Board of Directors
William Hair, COMB General Counsel
Eric Ford, Goleta Water District, Interim General Manager
Rebecca Bjork, City of Santa Barbara, Acting Water Resources Manager

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Tom Mosby, Montecito Water District, General Manager
Charles Hamilton, Carpinteria Valley Water District, General Manager
Chris Dahlstrom, SYRWCD, ID No. 1, General Manager

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Responses to Comment L-8

L-8-1–L-8-3

See the response to Comment R-1-1.

L-8-4

See the response to Comment R-1-8.

L-8-5

See the response to Comment L-2-2.

L-8-6

See the response to Comment R-1-9.

L-8-7

See the response to Comment R-1-10.

L-8-8–L-8-10

See the response to Comment R-1-17.

L-8-11

Because recreation at Cachuma Lake is not the only pathway by which invasive mussels could be introduced, limiting boating to resident boats as proposed in Comment L-8-8 would reduce the number of boats on the lake but would not address the potential transport of invasive mussels by nonrecreationists such as water facilities support staff, or by recreationists using the Santa Ynez River upstream of Cachuma Lake (see Final RMP/EIS Section 4.1.3). Reclamation and the

local managing partner will continue to enforce appropriate vessel inspection and quarantine measures and consider additional best management practices as they become available. Additional discussion about implementation and funding of mitigation has been added to Final RMP/EIS Section 4.1.7.

L-8-12, 13

See the response to Comment R-1-19.

L-8-14

The Preferred Alternative includes a 2-year phaseout of nonconformant engines. If annual testing of raw water at the William B. Cater Treatment Plant detects BTEX compounds, the phaseout would take place within 6 months of detection. As of 2009, no BTEX compounds have been detected.

L-8-15

See the response to Comment R-1-20.

L-8-16, 17

See the response to Comment R-1-18.

L-8-18

See the response to Comment R-1-15.

L-8-19–L-8-21

See the response to Comment R-1-12.

L-8-22

See the response to Comment R-1-12.

L-8-23, 24

See the response to Comment R-1-13. Reclamation acknowledges the NMFS Steelhead Recovery Plan Outline and the ongoing consultation regarding Cachuma Project operations. Sections 3.4.4.2 and 4.4.7 of the Final EIS have been revised to discuss the 2007 Recovery Plan Outline, the plan in development, and the conformity of RMP fisheries management actions with Recovery Plan provisions.