Bob Campbell
John Cargasacchi
Peter Cargasacchi
Richard Christensen
Nancy Crawford-Hall
Dan Gainey
Slick Gardner
Bill and Gail Giorgi
Fred Hayes
CJ Jackson
Palmer Jackson
Linda Johansen
Kenny Pata
Richard Pata
Bill Petersen
Bob Petersen
Kirk Romain
Michele & Wally Wallentin
John & Georgia Wiester
Nancy Williams
(partial list)

THE RIVER COMMITTEE

9/26/03

Cachuma Operation and Maintenance Board
3301 Laurel Canyon Road
Santa Barbara, CA 93105-2017

U.S. Bureau of Reclamation
David Young, Environmental Specialist
1243 N Street
Fresno, CA 93721-1883

Dear Sirs:

We are writing to you with comments regarding the Joint Draft Environmental Impact Report/Environmental Impact Statement For The Lower Santa Ynez Fish Management Plan and Cachuma Project Biological Opinion For Southern Steelhead Trout. Our comments are based on real-life observations of the Santa Ynez River for over 70 years and not hypothetical analytical models.

We are a group of concerned landowners who have lived and worked on or in the Santa Ynez River for up to seventy (70) years, long before the Cachuma Dam was constructed. Our properties stretch from the dam itself all the way through the Lompoc Valley. The Fish Management Plan as currently proposed appears to have serious potential consequences for our properties and livelihoods because most of us are involved in resource-based businesses such as mining or agriculture of various forms.

After carefully reading the EIR/EIS, we find that your environmental impact analysis is substantially incomplete, inadequate and inaccurate. From page one, it is clear that the intent of the Plan is to "restore" habitat for steelhead along the Santa Ynez River and its tributaries below the dam. The purported reason for this is to have a habitat that is more favorable for the lifestyle of steelhead trout than currently exists. There are some important assumptions in this goal: first, that there are native steelhead trout in the Santa Ynez River system now, and, second, given an improvement in the habitat, steelhead would survive. An affirmative conclusion to these two assumptions requires a quantum leap of faith since there is no evidence of the existence of either in this EIR/EIS.

In fact, to the contrary, we have existing records of the California Department of Fish and Game which clearly indicate their long history, since 1919, of planting rainbow trout in the Santa Ynez River and its tributaries (although never Hilton Creek). There is even a record of them planting steelhead trout on one occasion in the 1950's. If the Santa Ynez River and the tributaries were such a great habitat for steelhead trout, then why was it necessary to

stock the River system continually with hatchery-raised, non-native fish? This question is not addressed in the EIR/EIS. What it does clearly suggest, however, is that even early in the last century, before Cachuma Dam altered the River, it was recognized by the experts that this river system could not independently sustain a trout population. Furthermore, since steelhead were only planted one time, it indicates a recognition that the Santa Ynez River was not a suitable habitat for them.

The most obvious reason for the Santa Ynez River system not being a good habitat for steelhead is the lack of water. There is an ongoing lack of water not only in the tributaries but in the mainstem itself and this is a condition that has existed for the seventy years that we can attest to. Although this information is generally known, this EIR/EIS states repeatedly misleading and inaccurate references to adequate water supplies where they simply don't exist. The limited amount of actual water data found in this document is entirely based on the artificial supply of water from Lake Cachuma being pumped into Hilton Creek until it runs some way down the River.

The introduction of water to the River system on a year-round basis in 1997 has produced some consequences that constitute a public health threat and will become worse if this artificial watering program is allowed to continue. The explosion of phreatophytes along the mainstem of the river has become a sight hazard at the Lower Armour Ranch Road and Highway 154. Permits, requiring a lengthy and no doubt expensive process would be required from Federal agencies in order to remedy this situation. There have been numerous accidents at this site because of the tall trees and bushes obscuring visibility of oncoming traffic.

The introduction of water to the River during summer months when it would normally be dry has another consequence which is equally hazardous to public health and that is the increase in mosquito breeding habitat. With the rapid approach of West Nile Virus and the human and world-class horse populations in the Santa Ynez Valley, an epidemic is being created in our front yards without our consent. Neither of these potentially serious consequences is addressed in this EIR/EIS.

Another naturally occurring situation that is not included in this EIR/EIS is the lack of adequate water of proper temperatures for the survival of steelhead trout. It is well known that steelhead require water of a lower temperature than that necessary for the survival of rainbow trout. Although COMB

members have publicly stated that even if all of the water in Cachuma Lake was released down the Santa Ynez River, it still would not be enough to keep the water temperatures cool enough for the steelhead. If this is the case, and there would be no reason to doubt these members's sincerity, where is the discussion of how this seemingly impossible barrier to the fish's survival is to be dealt with?

A good deal of this EIR/EIS concerns itself with the plans for creation of new habitat for the steelhead. Considering that much of the Santa Ynez River system, including it's tributaries, for some reason no longer have appropriate habitat, there is much discussion about "woody debris", "cobbles" and "boulders" being placed around to provide shelter and shade for the steelhead. There does not seem to be any concern for downstream residents of the human kind when we have our next major rain event. There are a number of us in this group who have witnessed the fury of the Santa Ynez River during the winters of 1940-41, 1969 and 1983. To suggest, as does this EIR/EIS, that there will be no increase to flooding because of the plans to enhance the habitat is arrogant and certainly inaccurate. What protection is being offered to downstream residents when those "boulders" and "woody debris" items come tearing down the River?

The baseline for this EIR/EIS is necessarily skewed because there have been no data collected regarding the condition of the natural river and its tributaries before water was artificially introduced on a year-round basis. Because of the exponential growth of plants and mosquito populations, which were not in existence before this occurred, any studies since 1997 are thus inaccurate. There is, therefore, a serious lack of data on which to support the conclusions reached in this document.

Finally, as the intent and charge of the Endangered Species Act is to recover an endangered species, not to hurry its demise, we would respectfully suggest that you are attempting to create something which did not exist in the past and that to proceed with this proposed program will certainly hasten the death of any remaining steelhead in the Santa Ynez River, whether they are native or not. There are too many unknowns in this EIR/EIS over which you have no control. In addition to the natural conditions of this geographical area, there is too much dependence on organizations and individuals who

may or may not be interested in participating in this project. To say, oh well, we tried, is simply not the aim of the ESA. One must have a program with a reasonable chance of success which this one clearly does not. You cannot change nature to fit in with these plans because, steelhead trout, as an opportunistic fish, would only venture into the Santa Ynez River system when there were major flood events. All of the other years, there was not enough water to sustain them and their ingress and egress was blocked by the sand bar at Surf. That is the reality, which we see very little of in this EIR/EIS.

Thank you for this opportunity to share some of our thought, observations, and concerns with you.

THE RIVER COMMITTEE