Great Basin Group
Sierra Club
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Elizabeth Spaulding
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Dear Ms. Spaulding:

The Great Basin Group of the Sierra Club is pleased to submit scoping comments on the Truckee River Watershed project for Steamboat Ditch. The Great Basin Group has over 2,600 members in northern Nevada, most of whom reside in the Truckee Meadows area. In a typical year, our group organizes over 300 outings to local and regional destinations, accommodating nearly 3,000 participants.

Many of our members enjoy the Steamboat Ditch for hiking, biking, bird-watching and photography, by themselves or as part of an organized outing. We are greatly appreciative of having access to this greenway. One very popular use of the ditch is the 15 miles from Hole-in-the-Wall to Hunter Creek Trailhead to Woodchuck, through Caughlin Ranch, under McCarran to Horseman's Park and terminating at Manzanita Street. It's a community highlight to have a continuous riparian area along the Reno foothills. Even though it's not a public easement, the reality is that it's viewed as a public recreation pathway and has been for decades. We would like to see this valuable resource enhanced along with the proposed project's improvements to the ditch's water conveyance system.

Steamboat Ditch Context

This historic ditch has been in existence since 1880 and covers 34 miles. It currently conveys water to approximately 500 property owners with water rights across 1,600 acres and is operated and maintained by the Steamboat Canal and Irrigation Company (SCIC). It has been, and is currently considered, an ephemeral 'waterway' and greenway, with mature riparian vegetation and wildlife habitat, which is appreciated and enjoyed by many people in the community. The service road is one of the largest recreation resources in the Truckee Meadows, used daily by walkers, runners and cyclists. It's also a well established wildlife corridor that allows animals to move safely between natural drainages. Changes to the system should be considered in this context and not just as an irrigation ditch in which to install pipe for more efficient water conveyance.

Because the ditch is so heavily used by so many community members, we emphasize that, even though the public now has no valid "rights" to recreate on the ditch easements, perhaps this project plan can be the instigation for broader thinking on how to legitimize the current usage and enhance this resource for the future. Those that benefit from the conveyance of water to their properties need to realize that their benefit has also given rise to a larger community benefit. Those whose properties are merely crossed by the ditch may wish to have a clearer context than exists now of public access, of liabilities, and of the role of the ditch beyond simply a water channel.

In this broader context, we suggest that the project should consider severing the diversion part of the project from the piping part of the project. The point-of-diversion part of the proposed project takes place in a limited area and will not affect the recreational use of the ditch. It is aimed at a long-recognized need and can be accomplished with, we believe, little controversy. It could be done with just an EA rather than an EIS. In contrast, the plan to place piping along 15 miles of the ditch in the urban area has already generated an enormous amount of comments on social media and several news stories. It raises so many issues that a broader and longer process seems necessary. This would include perhaps another lead agency and have broad and inclusive outreach to the public. In this context, many of our scoping comments may appear to go beyond the intent of the proposed project.

Project Considerations and Needs

The proper term for this facility is "ditch", not "canal", and the term "ditch" should be used in all discourse concerning it. A "canal" is for water travel or for conveyance of goods. The Steamboat Ditch has never been used for these purposes. Using proper terminology clarifies all discussion.

Diversion Dam Replacement/Improvement

1. Create a fish passage in the Truckee River at the point of water diversion.
2. Improve, and not degrade, fish habitat. The Truckee River contains Lahontan cutthroat trout (LCT), federally listed as a threatened species, requiring consultation with the US Fish and Wildlife Service. The Nevada Department of Wildlife should also be consulted to determine other native fish that may be affected and ways this project could enhance their habitat.
3. Create a kayak safe-passage waterway on the Truckee River, or a safe land portage.

Natural Resource Protection and Preservation

1. Identify existing properties purchased as conservation easements and preserve the earthen open channels and vegetation in those locations.
2. Identify lengths of the ditch in need of preservation through thorough biological and cultural surveys. Preserve the earthen open channels and vegetation in these areas.
3. In general, preserve the earthen open channel to sustain vegetation and wildlife habitat throughout the urban area unless specific instances warrant concrete lining or, only where absolutely necessary, piping
4. Take into consideration that the open channel acts as a firebreak, particularly when water is present.

5. Consider enlarging and enhancing a few spots along the ditch, likely at ephemeral drainages, by supplying a small amount of water to encourage vegetation and wildlife presence.

Water Management

1. Identify specific areas of concern and address them individually. For example, if a downslope property owner is experiencing basement flooding when water is running in the ditch, then the area above their house could have the ditch lined with concrete. In other words, solve the known problems with the least amount of structural change.
2. Identify critical points where storm water drainage intersects the ditch and focus on improving these areas to manage the flow and decrease erosion. Some drainages have a pipe sticking out the bottom, which is creating downstream erosion and head cuts.
3. Analyze the increased flood potential on downslope properties created by piping. This is akin to downstream flooding which is enhanced by straightening natural water courses. The open ditch captures storm water along its entire length and has from its inception. Development above the ditch creates more runoff from the impermeable surfaces. Piping creates another impermeable surface, increasing runoff onto the downslope properties, not just at the creek/drainage crossings, but along the entire slope.
4. Research the large compensations to Fernley homeowners caused by flooding from a ditch in their area in 2008. Who is legally liable if a breach occurs on the Steamboat Ditch and property damage ensues?
5. Research how sales or simple transfers of water rights elsewhere in Nevada have been used for the public good. For instance, Walker Lake is now benefitting from the acquisition of upstream water rights from willing sellers. How could that apply at Steamboat Ditch?

Water Loss

1. Analyze the benefit of piping from the diversion dam on the Truckee to Verdi, or beyond to Hole-in-the-Wall, rather than in town. Using a covered pipe in this stretch would reduce habitat fragmentation and loss while still accomplishing the water delivery goal and would not be as contentious as a pipe through town. Soils at this location are sandier, which likely have higher seepage loss than areas in rock.
2. Analyze the benefit of piping at the southern end of the ditch, where the majority of water users reside. A pipe here would improve water delivery control.
3. Piping locations should be justified with site specific seepage data.
4. Piping locations should take into account flooding control.
5. The Sierra Club acknowledges the value of 'keeping water in the river' to increase flows to Pyramid Lake. The current estimate for water loss on the Steamboat Ditch is at 30%. The installation of piping or other improvements would reduce water loss. The amount of water diverted into the ditch should be reduced accordingly and those reductions considered unallocated waters to which the Pyramid Lake Paiute Tribe is entitled.

Land Management and Recreation

1. Identify public access areas on Forest Service, Washoe County, City of Reno, and other public lands. These areas should not have piping.
2. Although the service road was not originally intended for public use, it has been used by the public for decades. Many people in the community use it for walking, running, cycling,

birdwatching and access to other trail systems. This project presents an opportunity to move forward to make the unofficial "Steamboat Ditch Trail" a legitimate public access trail.

3. Investigate how the community could move toward adding this area as a trail system similar to the "Trails-to-Rails" program, which has turned many abandoned railways into popular recreational trails. How have other communities in the West made irrigation ditches into public amenities somewhat like a "linear park"?
4. The ditch impedes access to public lands when ditch water is running. For instance, one cannot cross into USFS land where the Tom Cooke Trail intersects the ditch service road. Can a small wooden bridge be installed to allow access to the trail on the opposite side of the ditch? What further crossing points need to be constructed so that the public has access to the public lands above the ditch?
5. Use a trail counter at various locations to gauge the level of public usage.

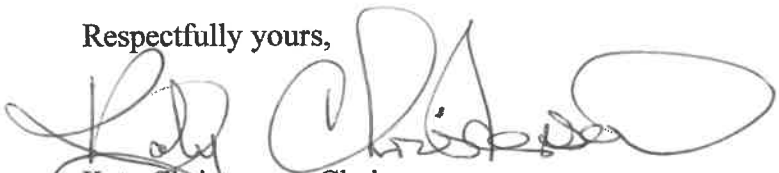
Determination of a need for an EIS is based on environmental impacts, not cost. This project has the potential to:

1. affect at least one Federally listed species;
2. remove riparian habitat in an area 15 miles long by approximately 20 feet wide, which will, in turn;
3. remove a water source and habitat for wildlife ranging from black bears, deer, coyotes, bobcats, skunks, raccoons, squirrels, birds, ducks, small rodents to reptiles;
4. turn a greenway into a gravel road over a pipe;
5. increase flooding potential on downslope property owners;
6. potentially remove significant parts of a popular outdoors resource for the entire Truckee Meadows community;
7. diminish a feature which helps to control the urban heat-island effect.

These potential effects appear to warrant an EIS.

Thank you for considering these comments.

Respectfully yours,



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