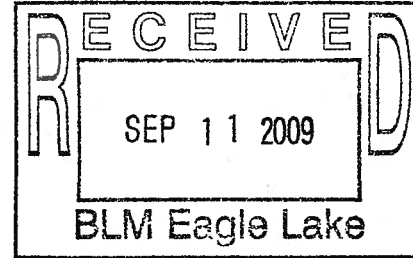




September 8, 2009

Mr. Dayne Barron, Field Manager
U.S. Bureau of Land Management
2950 Riverside Drive
Susanville, CA 96130



Re: Environmental Assessment to Evaluate Closing the Bypass Pipe within the Bly Tunnel, Eagle Lake, Lassen County

Dear Mr. Barron:

Several meetings have been held in the Susanville area this past year to discuss the declining level of Eagle Lake. Some residents believe water flowing through the Bly Tunnel from Eagle Lake may be a significant cause of the decline and have requested the Bureau of Land Management (BLM) to close the valve to the pipe. At these meetings information about water loss through the pipe was presented. One estimate is that water exiting the pipe can lower the lake elevation 2 to 4 inches per year depending upon lake level and flow in the pipe. In comparison, water loss due to evaporation has been estimated to be from 3 to 5 feet per year.

Loss of water from Eagle Lake substantial enough to lower the lake below a level capable of providing adequate amounts of littoral zone habitat could be detrimental to the ecosystem and the recreational trophy fishery. Lake levels also affect water quality. Lower lake levels create warmer water conditions and increase pH, thus decreasing the quality of the fish habitat. Warm temperatures and high pH levels reduce growth rates, reduces mucus coat, impairs respiration and otherwise stresses the trout.

In 1972 an Environmental Assessment (EA) was prepared prior to placing a plug in the Bly Tunnel. At that time the calculated loss through the tunnel was 10 cubic feet-per-second (cfs) equaling 3,050-acre feet per year. This same EA estimated loss due to evaporation at 3.5 feet per year or a loss of 102,200-acre feet. The 10 cfs diversion through the tunnel was responsible for less than 3% loss from the lake. Current maximum flow capacity through the bypass pipe is estimated to be approximately 3 cfs. On April 28, 2009, California Division of Water Rights staff measured water flow exiting the bypass pipe at 1.25 cfs. This volume of flow will lower the lake level one-half inch over the course of a year.

Loss of water through the Bly Tunnel is calculated to be approximately one percent of the volume of water lost due to evaporation. This small increment of water is not significant relative to the overall annual water loss and would not have any measurable impact to the lake's fish resources.

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Willow Creek, into which the Bly Tunnel discharges, has several water users, mostly agricultural, with rights to Willow Creek. In addition, the Willow Creek Wildlife Area (WCWLA) and a canyon-like reach of stream traversing BLM lands located between Willow Creek Valley and lower Willow Creek near Belfast, benefit from this stream and could be impacted by reduced flow.

The best fish habitat in Willow Creek is within the canyon-like reach and in upper Willow Creek Valley. Fish species native to Willow Creek include speckled dace, Lahontan reddsides, Tahoe sucker, mountain sucker, tui chub, and Paiute sculpin. Introduced species include brown trout and rainbow trout. Closing the Bly Tunnel valve will eliminate 1.25 cfs of water from the tunnel currently being discharged into Willow Creek. The EA should address potential impacts that elimination of this amount of water may have to these fish.

If you have questions or wish to discuss these comments please contact either Mr. Paul Divine, Fishery Biologist, at 530-254-6363 or Mr. Brian Ehler, Wildlife Biologist at 530-254-6808. You may write to either of them at California Department of Fish & Game, 728-600 Fish and Game Road, Wendel CA, 96136.

Sincerely,



GARY B. STACEY,
Regional Manager

ec: Messrs, Paul Divine, Brian Ehler, Steve Turek, and Randy Benthin
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