

# **SAVE THE CANAL.INFO**

## **www.gofundme.com/savethecanal**

This is the document we provided at our recent meeting 7/11 in order to educate the public about some of the major impacts of the Upper Main Ditch project. It can be used as a resource in order to formulate your comments that are due on July 23 by 5pm at EID. Any comments received by this time have to be addressed in the final EIR document. The EIR document itself is over 1000 pages long.

You may prefer to access the entire DEIR document at:

<https://www.eid.org/about-us/project-updates/upper-main-ditch-piping-project/main-ditch-updates-and-documents>

### Table of Contents:

CEQA Comment Letter FAQ	2
Cultural/Historical Resource	3
Aesthetics & Recreation	3, 4
Firefighting Resource	5, 6
Biological & Environmental	7
Tree Mortality	7, 8, 9
Financial Impacts	10
Water Quality	10
SWPPP	11
Easements	11

# CEQA Comment Letters FAQ

**IMPORTANT:** Your comments must be received by EID by July 23 @ 5pm. Any comments received after will not be accepted or considered BY EID.

## Ways to get your comments to EID:

- #1 Contact us via email and we will bring them down to EID for you. <[savethecanal2016@gmail.com](mailto:savethecanal2016@gmail.com)>.
  - #2 Send by Email to EID:<[MainDitchEIR@eid.org](mailto:MainDitchEIR@eid.org)> (follow up call to Karen Cross to confirm receipt 622-4513)
  - #3 Deliver to Front Desk at EID: [2890 Mosquito Rd](#) by JULY 23, 5PM.
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## Header:

Date:

ATTN: Upper Main Ditch Project: [MainDitchEIR@eid.org](mailto:MainDitchEIR@eid.org)

Name:

Address:

EID Ratepayer?:

Profession/Qualifications and relevant expertise:

Dear EID,

These comments are offered about EID's plan to pipe the Upper Main Ditch.....

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## Content:

Comments can be in the form of a question or they can be a statement. They SHOULD be as specific as possible!

### Examples of questions:

- ◆ What sources of information did you use to determine that tree mortality would not increase when the water source is removed?
- ◆ Did a registered professional forester make the determination that tree mortality would not be increased due to the project?

### Examples of statements:

- ◆ It is not reasonable to claim that the ditch loses 3,000,000 gallons per day through seepage and evapotranspiration, but the trees in the area will not be impacted. Please provide the sources for your claim that this project would not increase tree mortality.
- ◆ The maps showing tree removal are inadequate. First, you need to define what you consider to be a tree. EID should contact adjacent property owners to clearly determine which trees will be removed and/or damaged and create better maps and realistic counts. Otherwise the board will not have adequate information to base their decision on regarding the impacts of the project.
- ◆ The comment period is inadequate. EID has failed to provide a complete plan, so it is not possible to make informed comments. There are over 1000 pages in the EIR and appendices, so 45 days is simply not enough time for working people to comment effectively.
- ◆ EID should have a real town hall in which the community can gather and speak in order to clearly understand and respond to the proposed project. This allows the public to be better informed about the project, and for EID to be better informed about the public's opinion.

# SAVE THE CANAL: A CULTURAL/HISTORICAL RESOURCE AESTHETICS & RECREATION

PLEASE HELP US WITH OUR LEGAL FEES: [WWW.GOFUNDME.COM/SAVETHECANAL](http://WWW.GOFUNDME.COM/SAVETHECANAL)

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## **CULTURAL/HISTORICAL RESOURCE:** pages 3.5.1 through 3.5.14

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The EIR recognizes that the El Dorado Canal has been recorded as a Previously Recorded Cultural Resource Within the Project Study Area. It is shown as "Historic", Primary Number P-09-4147, (pg.3.5.9) This information was obtained from Far Western Anthropological Research Group 2018. A records search was conducted at the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) on Oct. 17, 2012 for the proposed Project Study Area. An updated search was conducted on Feb. 1, 2018.

EID claims that the ditch has lost its original integrity and therefore is not to be considered for historical consideration. They state that there are 7 vehicular and pedestrian bridges crossing the canal. This in no way affects the integrity of the ditch, as it simply crosses over the top of the canal--not IN it.

The attached picture loaned from the El Dorado County Museum shows a turn of the century picture showing the canal looking just like it does today. It began as an earthen canal and is still an earthen canal that has retained its main identity and course. There is some naturally occurring erosion but it does not compromise the original use of the canal which was to bring water to miners and later to provide water for hydraulic mining. This was an incredibly important time in the history of California--the discovery of Gold.

Later as mining phased out, the canal continued to supply water to the surrounding inhabitants and provided water for agricultural use. The canal has continued to function very well since the early 1850s and it still running smoothly today.

How can you say it has lost its integrity? How do you replace this piece of history?

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## **AESTHETICS & RECREATION:**

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**The Context:**

The canal (Upper Main Ditch) is a mining era water conveyance system. Although it is man-made, over the past 150 years it has become a beautiful tree-lined stream with a rich assemblage of riparian vegetation and supports a myriad of wildlife species. It is now an integral part of Pollock Pines where residents come to recreate and commune with nature. It is located almost entirely on private lands, but has remained open to public use through the generosity of the adjacent landowners.

The proposed Project would convert the existing seasonal creek with a trail along the bench into a service road, with a 1-4' wide drainage ditch along the side. The pipe would be buried at the bottom of the existing ditch with 46,000 cubic yards of compacted imported fill to create a 12' wide road surface. All vegetation within 10' of the

uphill bank and 10-20' on the downhill bench will be removed as needed, and maintained vegetation free in the future to protect the pipe. Adjacent properties will be graded as needed in a corridor up to 50' wide.

### **EID's Claim of Less Than Significant Impacts:**

- The ditch and the bench are generally clear of vegetation.
- As such, the ditch corridor appears as a clearly defined break in the otherwise generally forested area similar to a winding road.
- Aesthetic "Changes would include temporary views of construction activities, staging areas, and construction equipment. Typically, Temporary changes to the visual character of the area resulting from the construction activities of the proposed Project are anticipated to last a total of approximately 12-months".
- Construction activities are not considered to result in a substantial change to visual character when they do not result in permanent alterations to the visual environment.
- The ditch under proposed Project conditions would display similar visual character to the existing ditch and would seasonally continue to convey stormwater flows.
- The District's rights do not include the right for the general public to access the ditch corridor. Therefore, the District does not consider the ditch or the ditch bench to be a recreational resource.
- Visual impacts are restricted to private property viewers, limited passing motorists, and limited recreational viewers from Forebay Lake.
- The Upper Main Ditch Piping Project would have a less than significant impact on aesthetic and visual resources due to the linear nature and temporary and limited duration of construction activities, linear dispersion of tree removal, surrounding forest density, and the existing intermittent flows of the ditch, and minimal effect on public views.
- Since there are currently no public recreational activities authorized along the Upper Main Ditch, and the proposed Project would not impact recreational uses at Forebay Reservoir, and the proposed Project would not impede future plans for recreational activities, there is no potential for the proposed Project to affect current or future recreational activities. Therefore, no impact to recreation would occur.

### **Response:**

- The ditch and bench are not generally clear of vegetation. In truth there are over 300 trees located between the ditch and the bench trail. There is also ferns and riparian vegetation that line the ditch. EID falsely characterizes the current setting to justify the claim of less than significant impact.
- The impact to Aesthetics and Recreation will not be limited to a 12 month period. The claim that the impact is limited to the construction phase is nonsense. The DEIR states that the corridor will be maintained vegetation free, and trees don't grow back in a 12 month period in any case.
- It is disingenuous to claim that a maintained vegetation free corridor with a service road and an inside ditch to convey winter storm water is not a significant change from the current visual character of the upper main ditch.
- The aesthetic impacts are not limited to private property owners. As described in the DEIR, the bench trail is used by the public. If the visual impacts to passing motorists are considered, why would recreation users that walk or ride along the ditch be excluded?

The proposed project and all of the alternatives will result in a significant impact by degrading the Aesthetic qualities of the area. Furthermore, the recreational opportunities will be impacted. Pollock Pines has limited local recreation opportunities, most of which are controlled by EID.

Forebay recreation area, managed by EID, is currently closed due to the Dam Project and raising the water level will permanently decrease the space available for recreation since no contact is allowed with the water.

Sly Park Lake, also managed by EID, has a fee structure that exceeds many local residents ability to pay. EID even charges to park along the road over the dams – a common local day use area. Even if you have a pass or are willing to pay, Sly Park is often full during the summer months, further limiting local recreation opportunities.

**No accommodation is made for local residents or EID ratepayers.**

# SAVE THE CANAL: A FIREFIGHTING RESOURCE

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## **FIREFIGHTING RESOURCE:**

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### **THE CONTEXT:**

The greatest threat to our safety and our properties is the threat of wildfire. While EID would like to point to the threat of possible contamination of our water source as justification for this project, we all know the greatest risk to our community and our security does not come from contaminated water – it comes from FIRE. If someone wants to do harm to our community or water system, they simply need a match. Any project that reduces our fire defense capabilities is inherently significant.

### **EID'S Claim of Less than Significant Impact on Firefighting Resources**

- The ditch itself is not a substantial water source with no appropriate infrastructure, permanent supply, or water rights sufficient for fighting fires
- Currently, the water in the ditch is intended for use as a drinking water supply and does not provide fire water supplies. The District maintains water rights to all the water within the ditch and it is not available to adjacent land owners for firefighting purposes.
- The intermittent nature of the flows in the ditch make the ditch an unreliable water source under existing conditions and removal of the sources, under the proposed Project, would not significantly alter available firefighting water supplies.
- Additionally, mandatory evacuations would be put in place and firefighting operations would be handled by CAL FIRE, in the event of a wildfire in the Project area which would eliminate any potential for the proposed Project to further expose people or structures to the risks associated with wildfires beyond which are already present within the densely forested area.

### **RESPONSE**

The claim that this canal has no value as a firefighting resource is false. The fact that “mandatory evacuations would be put in place and firefighting operations would be handled by CAL FIRE, in the event of a wildfire in the Project area” does not mean that they would have adequate water resources to effectively fight fire. CAL FIRE and evacuations will not “eliminate any potential for the proposed Project to further expose people or structures to the risks associated with wildfires beyond which are already present within the densely forested area”, as EID claims.

The loss of any water resource will impact firefighting effectiveness, add risk to properties and the safety of residents, as well as firefighters. The loss of this resource would result in the addition of a significant adverse impact with regard to the surrounding property owners and the entire community of Pollock Pines.

### **RECENT HISTORY OF FIREFIGHTING USE OF THE EL DORADO CANAL**

During the recent King Fire, the segment of the El Dorado Canal just above Forebay Reservoir provided water for suppression efforts, acted as a wet-line fuel break, and served as an anchor for backfiring operations. In direct contradiction to EID's claims, the El Dorado Canal supported the pumping operations that saved several homes along Randolph Canyon Road. The 1.7 mile segment of the El Dorado Canal just above Forebay Reservoir was also used during the King Fire as a

critical fuel break to contain the spread of fire into the northern portion of Pollock Pines. The 1.7 mile segment was also used as the anchor point for backfiring operations during the King Fire.

At the time of the King Fire, fire chiefs utilized the deck of local resident Ruth K, which overlooks the American River canyon and borders the Eldorado Canal as an observation point. The chiefs indicated that if the containment line at the canal did not hold, there would be a direct path through steep terrain and heavy fuels into the dense residential areas of Pollock Pines and much of the town would likely be consumed. The canal has already protected us and proven its value as a firefighting resource.

### **CURRENT USE OF THE EL DORADO CANAL AS A FIREFIGHTING RESOURCE**

The South Fork American River Cohesive Strategy (SOFAR), which is designed to improve “Resilient Landscapes, Fire Adapted Communities, and Safe and Effective Wildfire Response” utilizes segments of the Eldorado Canal just east of the Forebay reservoir to create the Camino-Pollock Pines fuel break. While that segment is not currently part of the proposed project, it does clearly show that the canal has value as a firefighting resource. To suggest that the Upper Main Ditch Segment has no firefighting value because it is not intended for that purpose, and “would not significantly alter available firefighting water supplies” is false. There is no other water resource in many areas.

It is important to note the context of EID’s claim that there would be no impact on available water resources. EID has failed to provide sufficient infrastructure to provide fire hydrants in the area. The canal serves not only as a natural wet-line barrier to fire spread, it also provides a source of firefighting water. During wildfire events the normal rules regarding the access and use of water sources are ignored. Firefighting efforts frequently use water sources that were not intended for firefighting including, but not limited to, reservoirs, canals, and protected anadromous fish bearing streams. Essentially all restrictions are suspended when life and property are threatened.

The El Dorado County SRA Fire Safe Regulations also indicate that EID’s claim that the canal has no value is false. Those regulations indicate:

- 1) Where water distribution systems are not available, the following will be considered by the structural fire protection district:
  - a) tanks;
  - b) reservoirs;
  - c) **canals;** and
  - d) other systems as may be approved by the structural fire protection district.

The only canal in El Dorado County is this canal, so it clearly has value!

### **RELATIONSHIP TO TREE MORTALITY AND WATER STRESS:**

Moisture content in vegetation is the most critical factor related to how much fuel is available to burn in a wildfire. When the moisture content of living vegetation—also known as live fuel moisture—reaches a critical low threshold, fire danger becomes high. Piping the canal under any of the alternatives would reduce the available moisture, thereby adding to the available fuel and increasing fire danger.

As discussed in the Tree Mortality comments, the proposed project and all of the piping alternatives will result in ongoing tree mortality impacts. This mortality has the potential to become widespread throughout our community as bark beetle populations expand. The result will be an exponential increase in ground, ladder, and crown level fuels leading to increased fire behavior and increasing the risk of the most catastrophic and dangerous types of crown fires, which run from tree to tree at speeds which exceed the ability to evacuate safely.

### **MITIGATIONS:**

The only alternative that mitigates all the impacts is the “no project” alternative. EID plans to provide no mitigations – not even the addition of hydrants in the project area where none are present.

### **DEFINITIONS:**

**Anchor Point:** An advantageous location, usually a barrier to fire spread, from which to start building a fire line. An anchor point is used to reduce the chance of firefighters being flanked by fire.

**Backfire:** A fire set along the inner edge of a fireline to consume the fuel in the path of a wildfire and/or change the direction of force of the fire’s convection column.



# SAVE THE CANAL: BIOLOGICAL & ENVIRONMENTAL TREE MORTALITY

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## BIOLOGICAL AND ENVIRONMENTAL

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The DEIR states that the riparian environment will no longer exist due to removing the water from the canal. For decades, an ecosystem has evolved because of the water in the Upper Main Ditch. Birds migrate to the canal area from as far away as Canada and South America every year for nesting and as a migration route North and South. Birds follow migration patterns from previous years and generations. When there is no longer a riparian habitat, many birds which come to the area for nesting and migration, will not return. As stated in the DEIR, the potential impact to nesting birds is that nesting season will be disrupted. Project construction related activity during the nesting season, March 31 through August 31 “have the potential to cause direct impacts to birds including the loss of habitat and direct fatality. A destruction of breeding or foraging habitat could directly impact the survivorship of birds.”

Interruption of migration patterns also includes many other species of animals and plants that either return to or grow along the Ditch due to the water provided each year. Mammals, such as foxes, deer, bear, skunk, rabbits, racoon, and squirrels use the water provided by the canal during the dry summer into fall seasons, at which time the ditch is currently full of water. Two to three species of dragonflies, crawdads, trout, and freshwater mussels can be found in or near the water during these months, as well. Plants that grow along the banks and thrive due to the water, such as ferns, Indian rhubarb, lupine, daisies, and monkeyflower will die. As noted below, tree mortality will occur to the many species of trees which flourish due to the water provided during the dry months in Pollock Pines. The biological studies and data used by EID is incomplete and inadequate. It is known that some of the studies were conducted during months when the canal was dry, and when migrating birds, as well as water species including fish, crawdads, dragonflies, and mussels were not present.

The mitigation measures of the DEIR are inadequate to address these losses. The loss of the riparian environment cannot be mitigated.

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## TREE MORTALITY:

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**THE CURRENT CONTEXT:**

The Governor has issued a Proclamation of Emergency for tree mortality. The County has also declared a State of Emergency for tree mortality. This is a slow moving wave that is heading north and we are just beginning to see the impacts. No projects that will exacerbate this problem and ignore the potential impacts should be approved.

**TREE MORTALITY, CONSTRUCTION PHASE, DIRECT REMOVAL:**

Many trees will be killed during the construction phase. This will be along the canal (or other routes) as well as staging areas. The estimates of approximately 300 trees is a gross underestimate.

Although the DEIR does not define a tree, it has been stated that only trees over 8 inches in diameter were counted. This discounts most hardwoods and riparian species which are often under 8 inches. These trees are of great value because they enhance the aesthetics and diversity of the area. Prior to the close of the comment period, EID needs to mark each tree over 2” diameter so that the real number is known. This will provide the information needed for the Board and the public

to make an informed decision about the impact of the project on this resource. It will also provide private landowners an enforceable standard which is now absent.

### **TREE MORTALITY: LONG TERM – ADJACENT TO THE PROJECT:**

Tree mortality will not be limited to those trees directly removed during the construction phase. Regardless of the piping route, this project will alter the water relations of the trees along the canal. It is not reasonable to suggest that the canal seeps 3,000,000 gallons/day to the areas around the canal, but removing that water will not put added stress on trees- stress that leads to increased mortality.

The riparian species that line the ditch are adapted to stream side conditions including having their “feet wet” and a moist, cool micro climate. Conifer trees primarily defend against bark beetles by releasing pitch (sap), but without adequate water they are defenseless. It will likely take several years to evaluate the impacts to trees. The “no project” alternative is the only one that will not cause this impact.

EID claims that all of the trees in a mixed conifer forest are deep rooted and will therefore not be impacted by the water loss. This is not true. Even trees with some deeper roots have the greatest concentration of roots in the first 2 feet. The trees along the canal have root systems that are oriented and adapted to the ditch as a water resource – removing it will cause stress and mortality.

The problem is not just the removal of a water source – the construction phase will disrupt the roots even further. This will be due to trenching, grading, and adding compacted fill (see Tree Note 19 excerpts below). It is generally accepted that the roots extend to at least the dripline of the crowns and likely 150% of that distance. Any disturbance within that radius will impact/stress the trees. This will in turn attract bark beetles and other diseases.

The bark beetle epidemic is not limited to pine beetles as EID claims. Bark beetles populations that attack other species (e.g. fir engraver beetle, ips beetle) are also exploding, so all of the conifer trees in the area are vulnerable.

EID claims that since they see no difference in the health of the trees immediately adjacent to the canal from those in the surrounding area, the canal is not helping to relieve stress on those trees along the canal. That is a false claim made by people that are not professional foresters. As noted in Tree Note 13 below it is not possible to accurately determine the level of stress by visually looking at the tree. EID also falsely claims that the planned tree removal will help the surrounding trees by removing competition. It is common knowledge among professional foresters that thinning operations during times of stress can lead to increased mortality and even stand collapse.

### **TREE MORTALITY: LONG TERM – POLLOCK PINES**

Once a stressed tree has been successfully attacked, bark beetles use strong chemical attractants (pheromones) to bring in beetles from the surrounding areas. These beetles will quickly overwhelm other stressed trees in the area and as the population explodes they can successfully attack what appear to be otherwise healthy trees. With the recent drought, most of the trees in our area are stressed. It takes several years of precipitation at or above normal for trees to recover from long term stress. That is why the 2016/2017 winter did not end the problem. The creation of stressed trees along the canal will generate enhanced risk and provide the starting point for an epidemic that could quickly spread through our town.

### **IMPACTS AND MITIGATIONS:**

The impacts of tree mortality are not limited to aesthetics. Tree fall and branch fall represent a real hazard to life and property, like your home. Dead trees are also volatile fuels and add to the risk of catastrophic fire adding to the risk of life and property. We will not know the full extent of the problem for several years – long after the proposed project is complete.

EID has no planned mitigations for the adjacent property owners or the town as a whole. The burden and cost of tree removal will fall on private landowners, not to mention the loss of property values and the possible loss of insurance. You are paying for a project that puts you at risk!

Remember that this problem is so dangerous that the State mobilized a task force (Tree Mortality Task Force) to address the issue and have State and County emergency declarations in place to get assistance to address this problem where it threatens public resources. Private landowners remain financially responsible to address this problem on their properties.

### **Tree Note 13 excerpts: <http://calfire.ca.gov/foreststeward/pdf/treenote13.pdf>**

Noted for its aggressive, tree-killing behavior, the western pine beetle (WPB), *Dendroctonus brevicomis*, is the bark beetle most frequently found killing larger ponderosa and Coulter pines (*Pinus ponderosa* and *P. coulteri*) in California. In general, any factor which contributes to tree stress will increase a tree's chance of being killed by WPB, including disease, advanced age, overcrowding, mechanical injury and substantial changes to the tree's environment. During periods of extended drought, the existence of large numbers of moisture-stressed trees typically leads to beetle epidemics. The attacking beetles produce a potent chemical scent (pheromone) capable of attracting large numbers of beetles to an individual tree, resulting in a 'mass attack.' Groups of trees are frequently attacked and killed, as large numbers of beetles concentrate in an area. Any sudden and substantial change in the tree's environment may result in stress that is not necessarily reflected in the tree's appearance.



Drought is one example. Trees of all levels of vigor may be stressed by drought, so it is not unusual to see trees that appear healthy being killed by WPB. Even trees that are growing in apparently wet environments may be severely stressed when drought causes normally high water tables to drop below the reach of a tree's roots. Construction practices that adversely impact a tree's roots can have a similar effect by suddenly cutting off supplies of air and/or water. The severity and persistence of damage will largely determine the tree's fate.

**PREVENTION AND CONTROL:**

Recognizing the causes of tree stress and taking steps to insure good tree health is the best approach to preventing bark beetle attack.....

Although thinning is generally beneficial, some precautions may be necessary to avoid potential problems: Thinning during a drought is not recommended. The best time to thin is during non-drought years when trees are less likely to be stressed and are best able to respond to and take advantage of additional space.

**Tree Note 19 excerpts: <http://calfire.ca.gov/foreststeward/pdf/treenote19.pdf>**

Resistance to bark beetle attack in pines and other conifers involves sustained pitch flow which floods the beetles' tunnels as they bore into the tree. In this manner, attacking beetles are repelled or 'pitched out'. Drought, root disease or high stand density, may affect pitch flow and limit the tree's capacity to resist attack. Healthy trees with an adequate water supply are seldom killed or seriously injured. Attacking bark beetles produce a powerful volatile attractant (pheromone) which draws additional beetles from the surrounding area and precipitates a 'mass attack' on the tree. Host resistance can be overcome if there are sufficient numbers of attacking beetles. Bark beetle populations can increase dramatically when sufficient food is available. Forests experiencing severe and prolonged drought coupled with high tree densities are one example where bark beetles can cause increased tree mortality in a short amount of time.

**MANAGEMENT OPTIONS:**

Prevention of tree injury and stress is the most prudent method to minimize tree loss. This is best achieved by preventing or minimizing root injury and other damage during construction, road building or logging; reducing water stress during droughts and in hot, dry inland areas by periodic, deep watering; and selectively removing trees (thinning) to reduce competition for water and nutrients. Drought is one of the most common factors predisposing trees to bark beetle attack. During drought, periodic deep irrigation of landscape trees beginning in the late spring and continuing through the summer can decrease water stress and improve their resistance to beetle attack. During construction, avoid grade change (the removal or addition of soil close to trees). Excavation and trenching can sever roots, while the addition of fill-soil can suffocate them. Fill-soil can impede water infiltration and or drainage, leading to drought conditions or waterlogging. If possible, fence off the root protection zone(s) (radius of dripline plus 50%) during construction to avoid soil disturbance and soil compaction from heavy equipment. Compaction destroys the soil's natural porosity, reducing its capacity to hold air and water. Hard, dry and poorly aerated soil impairs tree health and pest resistance. Soil can also be compacted by vehicles, livestock, and foot traffic. Try to eliminate or at least limit these activities within the dripline. Mulch the impacted area with up to six inches of wood chip mulch or coarse, ground bark to reduce further compaction and help improve soil conditions.

**REMEMBER, the EID board is split  
3:2 with George Osborne, our EID  
division rep casting the deciding  
vote to approve this project.  
(Email Director Osborne  
GOsborne@eid.org)**

# SAVE THE CANAL: FINANCIAL IMPACTS & WATER QUALITY

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## FINANCIAL IMPACTS:

EID is already in debt over \$350 million, plus unsecured pension liabilities. This project will add another \$10-15 million dollars of debt. Our rates have doubled in the past ten years and they keep climbing, but the debt keeps growing due to fiscally reckless spending. Currently  $\frac{1}{3}$  of our rates go to service the interest on that debt, and this project will add another \$600,000 annually to the 39,000 ratepayers, forcing additional rate hikes. The truth is there is no need to do this project. EID already has 30,000 acre feet of water rights, which exceeds the needs of our county, as evidenced by the sale of thousands of acre feet to southern CA. Pollock Pines residential use is 462 acre feet annually, so these projects are clearly designed to benefit future downstream development. Why should the burden of these costs fall on the backs of the current rate payers? Any possible financial benefits would take 30 years to materialize. This insanity has to stop.

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## WATER QUALITY:

EID would like to paint the picture that 1) this is a contaminated waterway and 2) that piping it would solve all contamination and security problems. Remember that there are 21 miles of open ditch upstream and the Forebay will remain open and unsecured with large inputs of storm drainage from Safeway/CVS, so this project will have little value for improved water quality or security. While it may be true that there are some increases in total coliform, E. Coli, and turbidity attributable to the ditch, it is important to understand that these contaminants exist in the water entering the ditch from the Forebay. EID's own manager of the water treatment plant stated that there would be no difference in the treatment process if piped.

The claimed risk of ditch failure is not supported by the history of the upper main ditch. The canal between the diversion at Kyburz on the American River and Forebay reservoir have had many failures over the years, but the upper main ditch has not.

EID has not conducted a study to determine the source of the claimed inputs. It may be possible to mitigate most or all of these issues to a level that is less than significant at a fraction of the cost of the piping project. Clearly redirecting street and storm runoff that enters the system, and limiting the proximity of livestock, would be a good place to start.

If someone intentionally poisoned our water it would be discovered at the treatment plant long before it is distributed as drinking water. If someone wants to do harm to our community intentionally, they don't need to put something into the water – ALL THEY NEED IS A MATCH!

**REMEMBER, the EID board is split 3:2 with George Osborne, our EID division rep casting the deciding vote to approve this project. Email Director Osborne: <GOsborne@eid.org>**

# SAVE THE CANAL: SWPPP & EASEMENTS

PLEASE HELP US WITH OUR LEGAL FEES: [WWW.GOFUNDME.COM/SAVETHECANAL](http://WWW.GOFUNDME.COM/SAVETHECANAL)

**IMPORTANT: YOUR COMMENTS MUST BE RECEIVED BY EID BY JULY 23 @ 5PM.  
ANY COMMENTS RECEIVED AFTER WILL NOT BE ACCEPTED OR CONSIDERED BY EID.**

**Ways to get your comments to EID:**

- #1 Contact us via email and we will bring them down to EID for you.  
<savethecanal2016@gmail.com>.
- #2 Send by Email to EID: <MainDitchEIR@eid.org>  
(follow up call to Karen Cross to confirm receipt 622-4513)
- #3 Deliver to Front Desk at EID: 2890 Mosquito Rd by JULY 23, 5PM /take a photo

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## **STORM WATER POLLUTION PREVENTION PLAN (SWPPP):**

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As a professional Consultant for road construction primarily for Caltrans I am state certified as a QSD and QSP in SWPPP. It falls under the General Plan enacted in 2003 of the Industrial Environmental Protection Agency.

What exactly is the purpose of SWPPP ? It is to protect our waterways throughout our country. How does it do that?

Under the general plan a contractor at any construction site over seen by the client is required to implement BMP's. What are BMP's? They are known as Best Management Practices. There are natural BMP's such as root systems of trees, grasses, and root systems of brush such as manzanita and berry bushes. These natural BMP.s hold the soil in place absorb the water and prevent run off and soil erosion. Then there are artificial BMP.s which are required to be placed when construction takes place and these natural BMP.s are removed. I am sure most of you have seen some of these artificial BMP's; for example fiber rolls which are the rolls you see on embankments along side a road, gravel bags you see at the outlet of a culvert, or the netting you see at the top of the forebay dam on the dry side.

The problem with artificial BMP's they are temporary. The contractor is required to replace them with natural BMP's at the end of a project such as grown grasses.

Our terrain along the canal is a very old and very well established series of natural BMP's which are so extensive and border right on individual property owners that implementation of artificial BMP.s until natural BMP's can be in place would be very time consuming . The cost to the contractor of trying to put in place natural BMP's would be incredibly high with no guarantee of working. The consequences of the natural BMP's not working are extensive soil erosion and top soil runoff which it would make very difficult to repopulate the area along the pipe in the future.

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## **EASEMENTS:**

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The three miles of canal that El Dorado Irrigation District plans to pipe is almost entirely located on private property. Despite their claims, EID does not have the necessary easements over the piping route for any of the proposed alternatives. Each parcel of land that is not encumbered with an appropriate easement will have to be appraised and the owner negotiated with for just compensation. If the owner does not agree with the district estimate for "just compensation", the owner has the right to retain an attorney and proceed against EID in court. Everyone loses in this scenario.

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