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To: EIR-EIS-Comments@sitesproject.org
Subject: Sites Reservoir Project RDEIR/SDEIS, Comments of R. Morat
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The Revised Draft Environmental Report/Supplemental Draft Environmental Impact Statements (RDEIR/SDEIS) fail to disclose important and highly adverse environmental impacts to fishery resources.

The RDEIR/SDEIS fail to display the magnitude, frequency and duration of hydrological differences between the without-the-project and the with-the-project (alternatives) environmental conditions to allow comprehending fishery impacts. The plotted summaries of the project-occasioned hydrological differences presented obfuscate short-term differences during fish-habitat-critical periods.

The two draft documents fail to display tabular data for the no-action baseline and each alternative by years and months. Metrics missing include average monthly reservoir storage (TAF), average monthly Sacramento River flow and estuarine inflow and outflow (CFS), and average monthly river water temperatures. It is essential that this data be presented for appropriate river and estuarine stations. Reservoirs must include Sites, Funks, any new TRR, Shasta, Trinity and Whiskeytown.

The documents are dishonest statements of the environmental consequences of the project alternatives should one be built and operated. The statements fail in their legislated duty. Both documents should be rejected for correction and re-released for public review as drafts.

Current fishery habitat conditions in the Sacramento River from Keswick Dam downstream, in the Sutter and Yolo bypasses, and in the Sacramento-San Joaquin estuary are bleak and worsening. Native, beneficial non-native, estuarine and anadromous fish populations are in drastic decline with extinction probable for some species. While technically there is unappropriated water in the upper Sacramento River, much of the time there is none surplus to environmental needs. Human health and safety water needs are now recognized as having been inadequately protected by water project operations. Many projects have regularly over-delivered and when followed by dry conditions in subsequent years have potentially lost the ability to meet even human health and safety needs. Over-deliveries have definitely resulted in failed ability to meet water quality control plan standards and sustain the survival of some endangered species.

Fish are sustained by average as well as short term and some times instantaneous flow and water quality conditions. Mortality from direct and indirect factors depend on conditions, timing and duration. Durations as short as a day (e.g., redd dewatering) and hours (e.g., for lethal water temperatures) are often controlling entire populations of fish. The riverine and estuarine ecosystems are collapsing from what we expect them to be and the services they should provide.

The documents fail to include and evaluate the one alternative that might be reasonable albeit costly. An alternative with a new single-purpose diversion/return canal, pumps, generators and fish screens designed to manage diversion of at least 20,000 cfs is what is needed to yield the volumes of deliverable water matched to a 1 MAF+ Sites Reservoir. The water resources

infrequently available for new diversion require a big-gulp capability - at least 5 times greater than what is proposed.

If Sites is constructed and operated as proposed the Sacramento River and the Sacramento-San Joaquin Rivers estuary inflow and outflow will be further diminished and aquatic resources further significantly diminished. Meeting a horribly un-protective standard is not a basis for claiming a no-impact assessment.

Reasonable and foreseeable actions with- and without-the-project that will greatly affect project accomplishments are complicated, uncertain, and plagued with the reality of water scarcity. It is reasonable and foreseeable to anticipate intensifying and disruptive climate change, water shortages, intense demand and priority for new supplies to meet human health and safety needs, the failure of voluntary settlement agreements to help bridge the gap to improve protection for instream beneficial uses, and failed groundwater management requiring much increased groundwater recharge via diversion and spreading of high winter flows.

Collectively these procedural deficiencies render the documents unacceptably misleading. Poor decisions will result in waste of public money and public trust resources..

The Notice of Availability states "The project's purpose is to provide direct and real benefits to instream flows, the Sacramento-San Joaquin Delta ecosystem, and water supply reliability". Nothing about this project and operations are beneficial for fish save for fish which might inhabit Sites Reservoir. The Project stated purpose and the project's actual impacts do not match.

The RDEIR/SDEIS can only be viewed as a hopeful approach anticipating that "If we build it we will find a way to fill it". Today too many surface water supply projects are regularly meeting their need to capture storage by petitioning and getting approval for temporary urgency changes in order to divert water that is not permissible by their issued permits and licenses. This approach is decimating fishery resources. Future water supply projects shouldn't operate off continual to almost annual temporary urgency change petitions. The reasonable future is that those petitions will eventually be addressed as petitions for long-term change and likely not receive nearly as favorable terms and conditions as in the past. The only way Sites will collect significant Sacramento River water with the proposed scope of diversion and pumping facilities is for the Shasta and Trinity projects to be re-operated to be drained in the fall and early winter and the water transferred to Sites. This alternative is not proposed nor evaluated in these documents.

The State Water Resources Control Board does not pre-determine findings and do not attempt to dissuade parties from submitting applications and petitions if they comply with the administrative process and required fees. However, political, economic, environmental and social realities should inform applicants seeking to appropriate water. Environmental reality is a necessity that is lacking in these documents.

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