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**Subject:** Supervisor Evans Comments - RDEIS/SDEIS  
**Date:** Friday, January 28, 2022 11:31:15 AM  
**Attachments:** [Sites Project EIR-EIS issued 11-2021-Comments Supervisor Evans.pdf](#)

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Good day Sites Project Authority,

Attached you will find both general and specific comments on the Revised Draft Environment Impact Report/Statement published on November 12, 2021 by the Sites Reservoir Project Authority, from Colusa County Supervisor, Gary Evans. On behalf of Supervisor Evans, I would like to thank you for the opportunity to formally comment on the RDEIR/SDEIS and should you have any questions please do not hesitate to contact Supervisor Evans at [gevans@countyofcolusa.com](mailto:gevans@countyofcolusa.com)

Ann

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GARY J. EVANS  
COLUSA COUNTY SUPERVISOR, DISTRICT IV

January 27, 2022

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[Via Email: EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)

Sites Project Authority  
P.O. Box 517  
Maxwell, CA 95955

RE: RDEIS/SDEIS Issued November 2021

Notwithstanding my role on the Sites Project Authority Board, I appreciate the opportunity as a member of the Colusa County Board of Supervisors, to formally comment on the Sites Reservoir Project Revised Draft Environmental Impact Report/Supplemental Draft Environment Impact Statement (RDEIR/SDEIS). I hope and anticipate that the Project will be completed in a manner that will limit the adverse impacts to our County while maximizing the water supply and environmental (public) benefits of this major improvement to the California water management system.

The following provides both general and specific comments on the Revised Draft Environment Impact Report/Statement (published on November 12, 2021 by the Sites Reservoir Project Authority). For ease of reference I have utilized the Executive Summary in most instances.

**Executive Summary**

**Page ES-8 – Table ES-1:** Releases into Funks and Stone Corral Creeks, should be based on the Historical ecological functions of each creek, not to create “Healthy Fish” habitat where none previously existed.

**Page ES-10 – Facility Elements:** The 100’ buffer around the Reservoir and Facilities seems to be in some instances quite excessive.

**Page ES-20 – Table ES-2 - Impact VEG-4** “Conflicts with Local Policy”, mitigation measures VEG 1.2, VEG 2.2 and VEG 4.2 call for compensation, however County Policy simply calls to conserve and enhance where feasible and avoid where feasible.

**Page ES-22 – Table ES-2 – Impact WILD-1:** Wildlife Resources mitigation measure WILD 1.8 calls for the transplanting of effected elderberry shrubs, so why is additional compensation for habitat removal necessary?

**Page ES-23 – Table ES-2 - Impact WILD-1:** Why is an assessment for California Red Legged Frog Habitat necessary when the “California Wildlife Habitat Relationships System” lays out the case there is not specific habitat in the project area?

**Page ES-26 – Table ES-2 - Impact FISH-2:** The information/data that evolved into creating an increase in the Wilkins Slough flow criteria needs to be wholly vetted by various peers in the industry before imposing a baseline criteria.

**Page ES-31-32 – Table ES-2 – Impact AG-1:** Prime Farmland/Williamson Contracts Mitigation Measures 1.1 and 2.1, even though Colusa County honors and supports existing contracts, there is no support for new contracts or conservation easements even if existing ones needs to be canceled for furtherance of the project.

**General Comments that should/need to be addressed:**

How many Oaks does it take in a specific area to be considered a “Woodlands”?

I found no mention anywhere in the document referring to Purple Star Thistle, which does exist within the footprint.

Regarding Climate: Temperature ranges within the Sites footprint area and the Valley floor, i.e. Funks Reservoir vary greatly in both summer and winter. Temperatures within the footprint in summer trend higher than indicated in Chapter 9, page 7.

Study area boundaries on the maps in Appendix 9B seem to have some very random alignments, especially in the inundation footprint. Also land cover types don't seem to reflect what does currently exist in numerous locations.

Respectfully submitted,



Gary J. Evans,  
Colusa County Board of Supervisor