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Cc: [Osha Meserve](#)
Subject: Comments on the Sites Reservoir Project's Revised Draft Environmental Impact Report & Supplemental Draft Environmental Impact Statement (State Clearinghouse No. 2001112009)
Date: Friday, January 28, 2022 12:02:49 PM
Attachments: [22.01.28 LAND Ltr re Sites Proj.pdf](#)

To Whom It May Concern:

Attached please find the comments submitted on behalf of Local Agencies of the North Delta regarding the Sites Reservoir Project's Revised Draft Environmental Impact Report & Supplemental Draft Environmental Impact Statement (State Clearinghouse No. 2001112009). Should you have questions, please do not hesitate to contact our office. Thank you for your attention to this matter.

Sincerely,

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January 28, 2022

SENT VIA EMAIL (EIR-EIS-Comments@SitesProject.org)

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

**RE: Comments on the Sites Reservoir Project's Revised Draft
Environmental Impact Report & Supplemental Draft Environmental
Impact Statement (State Clearinghouse No. 2001112009)**

To Whom It May Concern:

These comments on the Revised Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement ("DEIR/S") for the Sites Reservoir Project ("Sites") are submitted on behalf of Local Agencies of the North Delta ("LAND").¹ The primary concern of LAND with respect to the Sites project pertains to potential effects on flows entering the Sacramento-San Joaquin Delta via the Sacramento River. Farmers and other beneficial uses in the Delta rely on these freshwater inflows. Any project that may reduce these flows, or change the timing or temperature of these flows, has the potential to interfere with these downstream uses.

The DEIR/S describes bypass flows ranging from 3,250 cubic feet per second ("cfs") to 8,000 cfs at various points where water would be diverted from the Sacramento River to the new reservoir. (DEIR/S, p. 2-31.) Diversion capacity would be 2,100 cfs and 3,000 cfs at the two diversion locations. (DEIR/S, Figures 2-36 and 2-37.) The DEIR/S only presents the simulated reservoir operations and Sacramento flow data as statistical probabilities. The actual simulated daily diversion rates and Sacramento flows at the time of diversion is not disclosed to decision makers and the public. The reader has no way of checking whether diversions are in fact being made during periods of very low river flow and how often. For public review of the project, it is critical to know the values of X2 at the time of each daily diversion.

¹ LAND is a coalition comprised of reclamation, water and levee maintenance districts covering about 100,000 acres in the northern geographic area of the Delta. Some of these agencies provide both water delivery and drainage services, while others only provide drainage services. These districts also assist in the maintenance of the levees that provide flood protection to homes and farms.

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The DEIR/S indicates that a draft of the Reservoir Operations Plan is expected to be completed in late 2021 (DEIR/S, p. 2-42), but it is not clear that has been completed. The lack of a Reservoir Operations Plan hinders the ability of the public to review the potential impacts of the project.

In addition, the modeling for reservoir operations does not use hydrologic data beyond 2003. A longer simulation period (e.g., through 2019), would add a further 16 years, potentially revealing recent changes in historical hydrology due to global climate change. Reservoir operations modeling should also use a daily time step to better reveal flow and water quality impacts. Monthly-averaged flows in the Sacramento River and Delta are not representative of the peak and low flows that can occur within a month.

LAND is also concerned about the cumulative impacts that Sites could have, in conjunction with other projects that propose new diversions on the Sacramento River. One such project is the Delta Conveyance Project or “Delta Tunnel”, which is proposed to have the capacity to divert up to 6,000 cfs. Initial information indicates that the Delta Tunnel is proposing bypass flows of as little as 5,000 cfs. Proposed diversions to Sites, combined with Delta Tunnel diversions, could severely reduce freshwater inflows into the Delta and have significant water quality and other negative impacts on beneficial water uses in the Delta.

Although the Delta Tunnel is mentioned in DEIR/S Chapter 31 as a cumulative project, there is no analysis of the combined effect on Sacramento River flows and water quality of implementing both Sites and the Delta Tunnel. Quantitative example analyses of the two projects operated together should be prepared to inform the public of the possible cumulative impacts of building and operating Sites and the Delta Tunnel. In addition, the Cumulative Impact chapter does not address increases in water transfers that may occur if both the project and the Delta Tunnel were operated. Such transfers would further reduce freshwater flows through the Delta and should be addressed in the DEIR/S as a reasonably foreseeable cumulative project.

Thank you for considering these comments and please feel free to contact me with any questions.

Very truly yours,

SOLURI MESERVE

A Law Corporation

By: 
Osha R. Meserve