

**From:** [Elaine Benjamin](#)  
**To:** [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)  
**Subject:** SWC Comment Letter re: Sites RDEIR SDEIS  
**Date:** Friday, January 28, 2022 1:17:22 PM  
**Attachments:** [image003.png](#)  
[SWC Comments on Sites RDEIR SDEIS 01-28-22.pdf](#)

---

Good Afternoon,

On behalf of the State Water Contractors, here is our comment letter for your consideration.

Thank you,  
Elaine

---

**Elaine Benjamin** | Office Manager/Finance Administrator  
**State Water Contractors**  
1121 L Street, Suite 1050 | Sacramento, CA 95814  
P: 916.447.7357 x202 | M: 916.812.2369  
[ebenjamin@swc.org](mailto:ebenjamin@swc.org)



<https://saveourwater.com/>

This communication, together with any attachments or embedded links, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of the communication, along with any attachments or embedded links, from your system.



January 28, 2022

Delivered via email: [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)

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

U.S. Bureau of Reclamation  
2800 Cottage Way, W-2830  
Sacramento, CA 95825

Subject: SWC Comments on the Revised Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement for the Sites Reservoir Project

Dear Ms. Forsythe:

The State Water Contractors (“SWC”) appreciate this opportunity to comment on the Revised Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement (“RDEIR/SDEIS”) for the proposal to construct and operate a new offstream water storage reservoir and associated facilities (“Sites Project”). The Sites Project proposes to capture excess water from the Sacramento River and local creeks and store it in the new 1.5 MAF Sites Reservoir for later use.

The SWC is an organization representing 27 of the 29 public water entities that hold contracts with the California Department of Water Resources (DWR) for the delivery of State Water Project (SWP) water.<sup>1</sup> Collectively, the SWC members provide a portion of the water supply delivered to approximately 27 million Californians, roughly two-thirds of the State’s population, and to over 750,000 acres of irrigated agriculture. Water supply delivered to the Bay Area, San Joaquin Valley, Central Coast, and Southern California from the SWP is diverted from the Sacramento-San Joaquin River Delta. The SWC members have made significant investments in the SWP and continue to make investments to protect this important water supply. Several of the SWC members are potential Sites Project Storage Partners.

#### DIRECTORS

**Ray Stokes**  
President

Central Coast Water  
Authority

**Craig Wallace**  
Vice President

Kern County Water Agency

**Kathy Cortner**  
Secretary-Treasurer  
Mojave Water Agency

**Stephen Arakawa**  
Metropolitan Water District  
of Southern California

**Robert Cheng**  
Coachella Valley Water  
District

**Laura Hidas**  
Alameda County Water  
District

**Thomas Pate**  
Solano County Water  
Agency

**Matthew Stone**  
Santa Clarita Valley Water  
Agency

**Jacob Westra**  
Tulare Lake Basin Water  
Storage District

**General Manager**  
Jennifer Pierre

<sup>1</sup> The SWC members are: Alameda County Flood Control & Water Conservation District, Zone 7; Alameda County Water District; Antelope Valley East Kern Water Agency; Central Coast Water Authority; City of Yuba City; Coachella Valley Water District; County of Kings; Crestline-Lake Arrowhead Water Agency; Desert Water Agency; Dudley Ridge Water District; Empire-West Side Irrigation District; Kern County Water Agency; Littlerock Creek Irrigation District; Metropolitan Water District of Southern California; Mojave Water Agency; Napa County Flood Control & Water Conservation District; Oak Flat Water District; Palmdale Water District; San Bernardino Valley Municipal Water District; San Gabriel Valley Municipal Water District; San Geronio Pass Water Agency; San Luis Obispo County Flood Control & Water Conservation District; Santa Clara Valley Water District; Santa Clarita Valley Water Agency; Solano County Water Agency; Tulare Lake Basin Water Storage District.

January 28, 2022

Page 2

The SWC recognizes the importance of multi-benefit storage projects such as the proposed Sites Project, especially considering climate change impacts, including the frequent hydrologic whiplash from year to year and reduction of snowpack because of rising temperatures. Those impacts affect flood control, conditions for the environment, and water supply. While the SWC is supportive of such projects, it is essential that the SWP water supply reliability and the long-term investments by the SWC members are protected.

As noted in the RDEIR/SDEIS, the Sites Project proposes to divert excess flows from the Sacramento River. The unregulated flows downstream of the rim reservoirs constitute a significant portion of the SWP water supplies in addition to the water supply stored in Lake Oroville. The RDEIR/SDEIS notes that proposed diversions for the Sites Project would not impact SWP's ability to capture unregulated or excess flows. This commitment should be formalized in the Sites Project operations agreements with DWR and should include criteria that would protect the SWP water supplies and its ability to meet regulatory and contractual obligations. The operations agreements should also spell out how the Sites Reservoir operations would be accounted for and tracked to ensure ongoing SWP and CVP operations are not impacted.

The RDEIR/SDEIS also notes that the proposed operations of the Sites Project would rely on the SWP facilities, including Lake Oroville, to provide the water supply benefits to the Sites Project Storage Partners. The Sites Project operations agreements with DWR should ensure that the use of SWP facilities to provide benefits to Sites Project Authority or Storage Partners do not adversely impact SWP water supply or increase costs to the SWC members. Similarly, the agreements should ensure that the SWP is not backstopping the Delta outflow benefits proposed to be provided by the Sites Project.

In closing, the SWC believes the development of additional storage is a critically important part of the water supply portfolio for California to prepare and adapt to the rapidly changing climate. In addition to the new storage, the proposed location of the Sites Project also offers many opportunities for innovative and flexible water management needed in California. The SWC looks forward to working with you and DWR to ensure that the Sites Project is designed to avoid any adverse impacts to the SWP. If you have any questions or would like to discuss, please do not hesitate to contact me at (916) 447-7357 ext. 203.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Pierre". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jennifer Pierre  
General Manager