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**To:** [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)  
**Subject:** Comments on Sites Dam RDEIR and SDEIS  
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Sites Project Authority  
P.O. Box 517  
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To whom it may concern at the Sites Project Authority, Bureau of Reclamation, and beyond:

Please accept these comments on the Recirculated Draft EIR / Supplemental Draft EIS regarding the Sites reservoir proposal.

I thought one of the basics was that there should not be “piece-mealing” under CEQA – and act like merely local analysis on many issues is sufficient.

The first paragraph under Cumulative Impacts says after mentioning that both CEQA and NEPA require assessment of cumulative impacts, “The State CEQA Guidelines go on to state that the types of projects that should be considered in a cumulative impact analysis are ‘closely related past, present, or reasonably foreseeable probably future projects’ (State CEQA Guidelines, Section 15355; see also Section 15130, subd. (b)(1)(A)).” Yet, for instance, the document states clearly that ONLY THE SACRAMENTO VALLEY IS CONSIDERED IN THE CLIMATE CHANGE ANALYSIS.

Not even the foothills, hills, and mtns surrounding the Sacramento Valley on three sides??? Timber management policies in the Sacramento River WATERSHED, as well as Klamath, Trinity, Eel, and other watersheds can impact not only regional but even global climate. Also, I am disappointed, and it is another great reason to stop the project, that it is admitted that construction will release more GHGs for 10 years, and then there will be GHG emissions especially in first ten years of operation.

Also, seeing that water allotments far exceed reality, and you have optimistic forecasts, a new EI document must assess GHG emissions of a partially filled Sites dam which could impact the immediate area more – but not some areas from which it wishes to steal water to privatize.

I note that the bullet point on the top of page 31-2 says, “whether a project would result in impacts on the same environmental resources that would be affected by the implementation of Alternatives 1, 2, and 3 (collectively referred to as the Project); projects that would not affect the same resources were considered outside the scope of the cumulative impact

analysis. For example, the Project would not change the environment within Solano County; therefore, this cumulative impact analysis did not consider changes that would occur under the Solano County Multi-Species Habitat Conservation Plan (HCP).” I disagree. Even if there is no direct infrastructure related to the Sites project within Solano County, there is so much water shuffling proposed (much of which does not seem destined to flow down the Sacramento River into Suisun Bay and to San Pablo & San Francisco Bays) that there indeed may be an impact on riparian area and other species due to lower flows of the Sacramento River due to increased water diversions despite general drought conditions.

I am concerned that there was no serious analysis of the impact on Sites Dam on other water facilities in the general region (and their drainages). I believe that if those watersheds are not analyzed in this document, THEN THOSE WATER FACILITIES AND REGIONS MUST BE OFF-LIMITS FOR SITES RESERVOIR TO OBTAIN WATER FROM !

It especially appalling that in the area with the highest concentration of indigenous people living on or near the land in California (in the lower Trinity River area) do not even get an analysis of whether the various Records of Decisions will impact the species on which their culture, nutrition, forest, and spirituality is based. The Hupa, Karuk, and Yurok deserve better. The Trinity – Klamath system salmon rely on cold (sometimes stored for awhile) Trinity water – you should analyze impact on Yurok in lower Klamath – as well of course of the Hupa, Karuk, and other indigenous peoples along the Trinity.

This document gets a ZERO in terms of CLIMATE CHANGE and ENVIRONMENTAL JUSTICE analyses. Have some respect for the First peoples, please!

The lower part of page 31-3 tells of the 82-year hydrologic model they somehow believe relates to the project. Yet, there were massive storms in 1862-1863, a massive drought in 2021 and atmospheric rivers in December 2021 which should be accounted for in such analyses. Thus the dates for analysis should be from 1860 through 2021 or 2022 – while considering various scientists’ conclusions over the past two or three years of the American West likely being 20 years into perhaps a general 1000-year drought.

Withdraw this document, and thoroughly analyze the whole plumbing system with new climate analyses.

Sincerely yours,

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