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COUNTY OF COLUSA
BOARD OF SUPERVISORS

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January 10, 2018

Honorable Authority Members:

Notwithstanding our role on the Sites Project Authority Board, the County of Colusa appreciates the opportunity to formally comment on the Sites Reservoir Project Draft EIR/S. The following are provided to assist the Sites Authority Board with detailed comments regarding specific County operations that may be affected by the Sites Project. We 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 Draft Environmental Impact Report/Statement (published on August 14, 2017 by the Sites Reservoir Project Authority).

Emergency Services

Chapter 29 (Public Services and Utilities) of the Draft EIR/EIS analyzes public services including police protection and emergency response. We believe the presence of 200,000 recreationists per year at Sites Reservoir is a significant number (nine times the total population of the County), well beyond the capacity of current public safety personnel. This increased seasonal visitation will impact law enforcement presence and response times to the Reservoir and the remainder of the County. Additionally there will be a need for on-site storage of patrol watercraft.

The South Bridge is the County's preferred alternative for most effective emergency response times to the communities of Lodoga and Stonyford, as well as the Mendocino National Forest and East Park Reservoir.

An Emergency Response Plan should be developed in coordination with local agencies, and should ensure implementation of Reverse 911 system for downstream emergency notifications.

Land Use

Chapter 20 (Land Use) of the Draft EIR/EIS analyzes the potential land use and agricultural impacts of the proposed project and its alternatives. As stated in the Draft EIR/EIS, the Colusa County General Plan Land Use Element provides for the creation of Sites Reservoir and the General Plan Land Use Map and Zoning Map have also already identified the proposed Sites Reservoir as a study area. However, when Colusa County adopted its new General Plan in 2012 and Zoning Code in 2014, the County did not adopt specific land use designations to reflect the Sites Reservoir because of the uncertainty, at that time. Rather, the County in its General Plan

and Zoning Code anticipated that it would most likely subsequently modify the applicable General Plan and Zoning designations in the future.

While Colusa County's General Plan and Zoning Ordinance allow for some and/or anticipated some of the uses envisioned with the Sites Reservoir (for example, public parks, campgrounds, or boat ramps) in order for the reservoir to be fully consistent with the Colusa County General Plan and Zoning Ordinance, it is anticipated that Colusa County would need to process a General Plan Amendment and Zoning Amendment to address the full breadth of proposed changes to land use that the necessary and desired infrastructure would bring. During this process creation of Community Services and Facilities Districts for long term management of the above-referenced facilities shall be required.

The Draft EIR/EIS addresses changes in the physical environment related to the proposed Project. As such, the Draft EIR/EIS can be used to support any required General Plan or Zoning land use designation changes in the future to ensure that the Sites Reservoir project is completely consistent with the County's land use requirements. As noted in the Draft EIR/EIS, additional environmental analysis may be necessary for certain projects, such as a use permit for a recreational facility, if application was not fully considered in the Draft EIR/EIS. County staff would make that determination in the future upon receipt of such an application.

Chapter 3 of the Draft EIR/EIS states that up to five recreation areas may be developed, although a total of three recreation areas are anticipated to ultimately be constructed. The recreational opportunities would include boating, camping, picnicking, fishing, swimming, and hiking. In addition, depending on the recreation area, proposed facilities could include boat launch sites, trails, designated swimming and fishing access, picnic tables, shaded canopies, campfire rings/barbeques, vault toilets, parking areas, and dumpsters. The Draft EIR/EIS should include a discussion regarding the applicability and necessity for county land use approvals from either Glenn or Colusa counties.

Further, a description of the facilities needed to provide potable water and power to the recreation areas on the west side of the reservoir are needed in the instance that the south bypass road and/or the bridge are not selected as project alternatives.

The role of Reclamation in the General Plan, Zoning and Williamson Act issues within Colusa County requires clarification.

Building Approvals

Chapter 3 of the Draft EIR/EIS states that Chapter 4 (Environmental Compliance and Permit Summary) of the Draft EIR/EIS recognizes that certain aspects of the Project may necessitate a building permit issued by Colusa County. Tables 1-1 (Primary Anticipated Permits, Approvals, and Authorizations for the Sites Reservoir Project) and 4-1 (Applicable Federal, State, and Local Permits and Approvals) identifies building permits as the responsibility of the Colusa County Public Works Department. Building permits in Colusa County are the responsibility of the Colusa County Building Unit of the Community Development Department. As such, Tables 1-1

and 4-1 should be corrected to reflect the correct responsible agency for building permits in Colusa County is the Building Unit of the Community Development Department.

Environmental Health

Chapter 28 (Public Health and Environmental Hazards) of the Draft EIR/EIS discusses the potential use of hazardous materials (such as fuels, oils, grease, and lubricants) but concludes that *“Implementation of environmental commitments identified in Chapter 3 Description of the Sites Reservoir Project Alternatives specifically related to spill prevention and hazardous materials management, implementation of a Worker Environmental Awareness Program, and performing an environmental site assessment would reduce the potential release of hazardous materials during construction, operation, or maintenance activities to a less-than-significant impact when compared to the Existing Conditions/No Project/No Action Condition.”*

Chapter 3 then discusses that the hazardous materials and hazardous wastes including fuels, oils, grease, and lubricants that would be used and stored for construction, operation, and maintenance of the proposed Project would be used, stored, and disposed of in accordance with applicable regulations (Chapter 4 Regulatory Requirements and Permit Summary and Chapter 28 Public Health and Environmental Hazards). Neither Chapter 4 nor Chapter 28 discuss the role that the Colusa Environmental Health Division of the Community Development Department has in regulating hazardous materials acting as the designated Certified Unified Program Agency (CUPA) by CalEPA. Table 1-1 assigns the annual permitting for the use and storage of hazardous materials and the development of Hazardous Material Business Plans to the “Fire Departments.”

At a minimum, Tables 1-1 and 4-1 should be amended to reflect that the Colusa County Environmental Health Division acting as the Colusa CUPA is the responsible agency for issuing permits including but not limited to Hazardous Materials Business Plans (HMBP) associated with the use of regulated amounts of hazardous materials in Colusa County.

Water Resources

Chapter 6 (Surface Water Resources) describes the existing conditions and project related changes to surface water resources. Diversions from Stony Creek should be addressed as a potential source. Should the water management regulations on this watershed be modified in the future, used allocated water maybe appropriate for storage by the Sites Project.

Chapter 10 (Groundwater Resources) of the Draft EIR/EIS discusses groundwater resources. Page 10-27 states *“... within the Primary Study Area, it is anticipated that the No Project/No Action Alternative would not entail material changes in conditions as compared to the existing conditions baseline.”* The No Project/No Action Alternative should clearly address the potential loss of beneficial impacts and the need for the Project to provide surface water storage north of the Delta in order to: (1) Enhance water management flexibility in the Sacramento Valley; (2) Increase reliability of California water supplies; and (3) Provide storage and operational benefits for programs to enhance water supply reliability, both locally and State-wide, benefit Delta water quality, and improve ecosystems.

Tables 10-2, 10-4, 10-5, and 10-6 of Chapter 10 are missing a significant amount of well data. For those wells that are included in the Draft EIR/EIS, all well data should be provided. Well construction information can be found on well completion reports obtained from the California Department of Water Resources (DWR). Groundwater level data from monitoring wells are compiled by DWR, USBR and the applicable water districts. If specific well data is not available, then those wells should not be included in the Draft EIR/EIS because it gives a false impression of the breadth of the available well data and it does not provide useful information.

In September of 2014, Governor Brown signed a three-bill package known as the Sustainable Groundwater Management Act (SGMA). The Sustainable Groundwater Management Act requires that a Groundwater Sustainability Plan (GSP) be adopted for all high and medium priority groundwater basins in California, establishes basic requirements for these Groundwater Sustainability Plans, and empowers local agencies to manage basins sustainably. While the proposed location of the Sites Reservoir is outside the defined Colusa sub-basin for which a GSP is required, portions of the proposed pipeline and other project facilities are within the Colusa sub-basin, and the reservoir will have a positive impact on groundwater resources within the sub-basin.

With the onset of the SGMA, there are two specific groundwater management activities related to the Sites Reservoir project that should be considered and discussed in the Draft EIR/EIS:

1. There is potential for Sites Reservoir to provide significant beneficial impacts to groundwater resources if Sites water can be made available for groundwater recharge projects in groundwater-stressed areas. This is an important potential beneficial impact that should be discussed in the project benefits section of Chapter 10.
2. The County's Water Resources Division currently manages a groundwater monitoring program and serves as the support staff for the Colusa Groundwater Authority (CGA); a JPA formed to implement the provisions of SGMA within Colusa County. Consideration should be given to development of a long-term groundwater monitoring program, in coordination with the Colusa Groundwater Authority (CGA). The County network of monitoring wells is under review by a consultant team as part of a Proposition 1 grant-funded project, and plans will be developed to upgrade the network over the next few years as the Groundwater Sustainability Plan is developed for the Colusa sub-basin. By including wells to specifically monitor for impacts from the Sites project, we could provide relevant real-time data in the primary, secondary and extended study areas. This would enhance SGMA monitoring efforts in the areas within the Colusa sub-basin, and also help to quantify any beneficial impacts to the groundwater basins from the Sites project.

Air Quality

Chapter 24 (Air Quality) analyzes air quality impacts for all project alternatives. Specifically, Tables 24-7, 24-10, 24-11 estimate average daily unmitigated emissions. During construction,

some of these emissions exceed daily significance threshold limits. This could be mitigated by lease of emission offsets. The County does not foresee any issues with the Sites Dam after completion of the construction portion of the project, thus the need to purchase offsets would not be applicable.

Flood Control

Chapter 9 (Flood Control and Management): It is acknowledged that the Sites Project would reduce or eliminate the flood that occurred in 2017 that inundated major portions of Maxwell and closed Interstate 5 by intercepting flood events on Stone Corral and Funks Creeks. This would increase flood safety to certain portions of the County subject to storm events that could hypothetically cause concerns about dam safety (please see the discussion of the credible maximum earthquake in the EIR/S and Federal Feasibility Report), the Sites Project may be required to rapidly reduce the volume stored behind the two major dams and saddle dams. The routing of this rapid release of water (most likely by way of the Stone Corral, Funds and Hunter Creek watersheds) and the emergency plans for the people and property within Colusa and Glenn Counties should be explored more fully and the development of detailed plans be part of the efforts following approval of the Project.

While we have not confirmed the calculation and the performance of the dams designs as part of this review, we support the use of the type of embankment dam structures proposed (as opposed to other more ridged but less expensive potential dam structures) and trust that the relevant State and federal agencies tasked with such a review will concur with this opinion and adjust details of the design to protect the lives of our residents and their property. Judging by the probability of the hypothetical and highly unlikely event and the design of the dams, the impact analysis (Chapter 9) should not focus on a total dam failure and the unrealistic instantaneous releases of the water stored in the dam but should concentrate on the unlikely but regulatorily required rapid but controlled release consistent with the State safety of dam regulations. Likewise, it is our understanding that should the dams be subjected to and fail from the listed ground acceleration, embankment dams would not catastrophically release the reservoir contents at the listed rate but a much lower amount. The calculation of the 2 million cfs discharge is dubious at best. Please confirm these calculations in the FEIR/S.

Should the focus remain on dam failures, the figure showing the potential inundation area needs further analysis as there are many structures in the buffer area that would be inundated. Additionally the buffer zone needs further definition, i.e. next adjoining parcel, or distance.

The elevation of the outlet structure and saddle dam 6 referenced in Alternatives C and D cannot be as described in Alternative A due to the increased storage capacity of Alternatives C and D.

With respect to pump back storage potential (ie Proposed Holthouse reservoir) alternative configurations/locations should be pursued that do not conflict with existing powerline and TCCA operations.

Coordination with local agencies, including the current Colusa County Floodplain Administrator should be ongoing during operation/maintenance of the dam, especially during major events and large releases.

Transportation

Roadways: We observed (and concur) that several decisions regarding our local roadways in the region of the Sites Project will require modification to 1) support the construction of the Project 2) allow for access to local residents to their land, 3) provide access to the Project and its facilities, and 4) allow those traveling through the area a reasonable route. We also note that several decisions regarding the modifications to our existing roadways appear to have been made and the factors considered are summarized in Chapter 3 (Project Description) and/or in the resource analysis. While these summaries may help the readers, they do not provide sufficient detail to allow our concurrence on the decisions, and eliminates potentially reasonable options from the EIR/S. For example, we fully support the inclusion of the South Bridge as the Preferred Project Alternative to traverse the reservoir and connect the communities of Lodoga and Maxwell. Yet, we believe the bridge as proposed provides an excess of freeboard with no explanation.

Additionally, we suggest that the Authority include the following ‘revised southern road option’ (described in more detail below) in one of the alternatives in the Final EIS. We acknowledge the ‘revised southern road option’ may increase travel time and degrade emergency response time between Maxwell and Lodoga. It will also result in increased potential for impacts to archaeological and biological resources. We also believe that this option will:

- 1) Ensure adequate access to privately-owned property who have lost access as a result of the Project
- 2) Provide a rural highway quality road (similar that the current road crossing Antelope Valley, between Maxwell and Lodoga)
- 3) Relieve maintenance calls for rock and snow removal

Guidelines for the description of the Revised Southern Road

- Develop a road consistent with the County’s rural highway standards
- Follow existing paved and unpaved alignments as shown in the attached figure (Attachment “A”)
- Provide equal quality access to private property isolated by the Project
- Roadway surface should not exceed 8% grade
- Roadway cuts should be graded to a 45% slope and include adequate drainage control features

We suggest the Authority consider an alignment as shown on the attached map, in each location in the document where a southern route is discussed.

We note that the proposed connection of Huffmaster Road to Leesville Road is not required for this project.

With regard to temporary access during construction, Table 3-7 does not appear to adequately address access for all property owners within the project footprint. There is no roadway proposed that will provide access to those property owners on the south end of the project area. Further, the County questions the necessity of the proposed North Bypass Road continuing from the saddle dams west to Sites Lodoga Road.

Chapter 3 of the Draft EIR/EIS should reflect that the spread of the spoils from the pipeline trench will be done in accordance with the US Army Corps of Engineers, local flood control district, as well as in compliance with the grading permit issued by the Colusa County Department of Public Works.

Railways: While the West Valley Line of the California Northern Railroad operates between Tehama and Davis, it should be noted within the document that rail service exists between the terminus in Davis and the Port of West Sacramento as well as Suisun Bay. The potential for railway usage during construction, would lead us to believe this clarification should be made to the document.

Recreation Management

Chapter 21 (Recreation Resources) provides information concerning potential recreational settings and opportunities as a result of the project. These additional recreational opportunities (such as equine centric facilities) will relieve pressure at other facilities across the northern portion of the state.

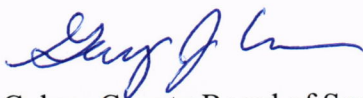
To that end the County would like to see included within the document a more in-depth discussion on the impacts to recreation from increased surface water as identified is Alternative D.

Finally, we again request consideration of our comments earlier in the document with regard to access and Leesville Road.

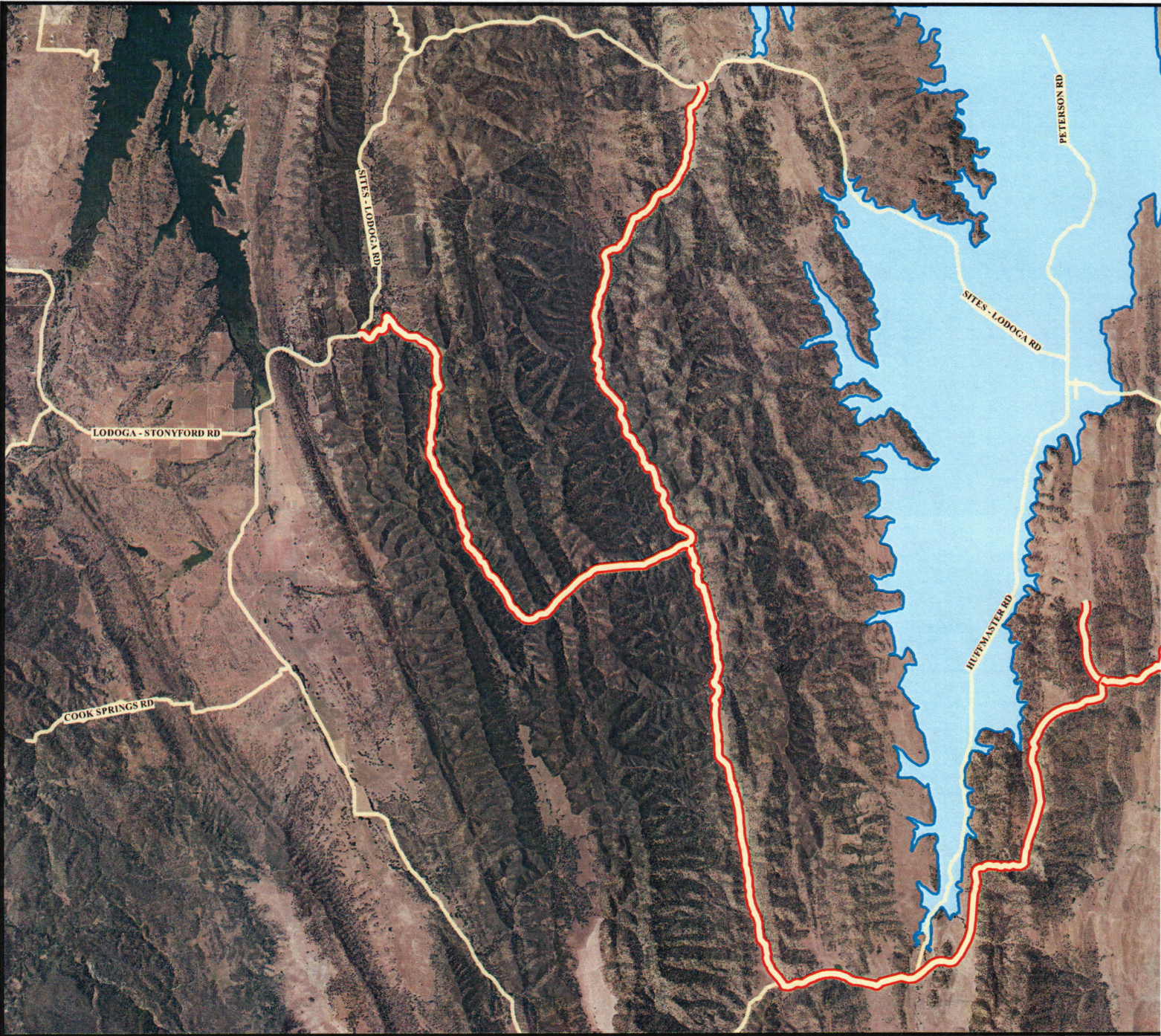
Chapter 18, (Cultural/Tribal Cultural Resources) discusses the cultural and tribal resources now known and likely to be discovered during project construction. As a mitigation measure, it is discussed that the Authority shall consult with the appropriate entity concerning relocation of specific cultural resources, i.e. cemeteries. The County believes this relocation effort should be expanded to include creation of a visitor's center to include sheriff's facilities, public events space, and the re-located Sites Cemetery or other relocated remains.

The County of Colusa looks forward to the construction of Sites Reservoir, the realization of a decades old dream, which will greatly benefit the water management system of California.

Respectfully submitted,



Colusa County Board of Supervisors
Gary J. Evans, Chair

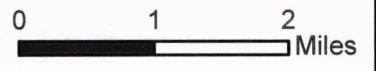


-  Southern Road Option (Proposed)
-  County Roads (Existing)
-  Sites Reservoir

County of Colusa
Department of Public Works

**Revised Southern Road
Option**

"Attachment A"



November 28th, 2017
By: D. Short

