



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

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January 9, 2018

Janet Barbieri
Sites Project Authority
P.O. Box 517
Maxwell, CA 95955
Sent via e-mail: EIR-EIS-Comments@SitesProject.org

Subject: Comments on Draft Environmental Impact Report/Environmental Impact Statement
 (EIR/EIS) for the Proposed Sites Reservoir Project

Dear Ms. Barbieri:

The Humboldt County Board of Supervisors requests assurance that construction and operation of the Sites Reservoir Project will result in no additional demands for diversions of Trinity River water to the Sacramento Basin. We also request assurance that the Sites Project Authority and the Bureau of Reclamation will work with Humboldt County and other Trinity River stakeholders to identify opportunities to reduce out-of-basin transfers of Trinity River water as part of the coordinated operations of the Central Valley Project and the future Sites Reservoir Project. Humboldt County can support the proposed Sites Reservoir Project only if these assurances can be provided and are robust and binding.

Humboldt County's primary interests are protecting the commercial, recreational, and tribal fisheries that are dependent on fish produced in the Klamath-Trinity River system. Construction of the Trinity River Division of the Central Valley Project in the 1960s caused major adverse impacts to Trinity River fisheries by diverting up to 90% of the Trinity River flows. Diversions were reduced to approximately 50% after passage of the Trinity River Record of Decision (ROD) in 2000. However, populations of salmon, steelhead, and other fish and wildlife remain far below the recovery objectives. In order to achieve restoration of fish populations and alleviate the impacts on our fishing and tribal communities, the minimum annual flow volumes in the 2000 Trinity River ROD must be maintained, and retention of additional Trinity River water for in-basin needs will likely be required.

Humboldt County executed a contract with the Bureau of Reclamation in 1959 for not less than 50,000 acre-feet of water to be made available annually from the Trinity River Division of the Central Valley Project for the beneficial use of Humboldt County and other downstream users. Humboldt County's first-priority right to water from Trinity Reservoir, prior to out-of-basin transfers to the Sacramento River, was reaffirmed in the December 23, 2014 memorandum issued by the Office of the Solicitor for the U.S. Department of the Interior. In 2015 and 2016, the Bureau of Reclamation utilized Humboldt County's contract water to implement flow augmentation releases to reduce the risk of a fish disease outbreak affecting the fall run of Chinook salmon in the Lower Klamath River. In 2017, the Bureau of Reclamation adopted a Long-term Plan to Protect Adult Salmon in the Lower Klamath River which identified Humboldt County's contract water as the primary water source for fall flow augmentation

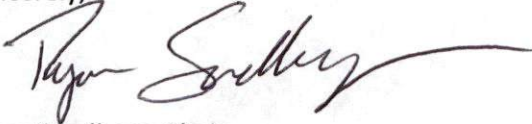
releases when needed. Humboldt County continues to work with the Bureau of Reclamation and other stakeholders on fully utilizing the County's contract water for Trinity River needs.

Concerns have been raised that construction of the Sites Reservoir Project could result in increased demands for export of Trinity River water into the Sacramento River basin. However, we also see opportunity for operation of the Sites Reservoir Project to strategically manage and store water during high-flow periods that could reduce demands for Trinity River water in the Central Valley. The Humboldt County Board of Supervisors requests assurances that the proposed Sites Reservoir Project will not negatively impact flows, water quality, or fishery needs in the Klamath-Trinity River system.

We appreciate the Sites Project Authority's recognition of Humboldt County's interests and request a formal response clarifying how the EIR/EIS for the proposed Sites Reservoir Project addresses Humboldt County's concerns.

The staff contact on this matter is Hank Seemann (hseemann@co.humboldt.ca.us) in our Department of Public Works.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Sundberg", with a long horizontal flourish extending to the right.

Ryan Sundberg, Chair
Humboldt County Board of Supervisors