

Comments re: Sites Reservoir DEIR/S

Harriet Moss <harriet@moss.net>

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To: EIR-EIS-Comments <eir-eis-comments@sitesproject.org>;

Re: Comments on Sites DEIR/S and Draft Feasibility Report

Dear Mr. Watson and Mr. Dietl:

Please accept these comments in response to the Sites Reservoir Project DEIR/S and Feasibility Report. I urge that this inadequate environmental document be withdrawn and revised to better assess and mitigate project impacts on the Sacramento River, downstream water quality (in the river and Delta), and on natural and cultural resources that would drown under the reservoir footprint.

The DEIR/S assessment of impacts on the river are based on the false premise that current flow and water quality standards for the river are adequate. In fact, the current standards fail to protect and restore at-risk fish and wildlife species, are inadequate to maintain the river's dynamic, flow-based ecosystems on which these species depend.

Most major dam and water projects in California were promoted by water agencies and politicians as enhancing and protecting the environment. Decades later, the overall result has been salmon and other fish species declining towards extinction, extensive loss of wetlands and riverside habitat, and degradation of water quality. Because the project will depend on Prop. 1 water bond funding, the Sites DEIR/S must *prove* to the public that Sites will avoid adverse environmental impacts and in fact, provide net public benefits.

The Sites DEIR/S admits that the project will destroy 15,000 acres of oak woodlands, grassland, wetlands, riparian habitat, and croplands, with significant unavoidable impacts on the protected Golden eagle, paleontological and cultural resources, and air quality (through generation of greenhouse gas emissions). Potentially significant impacts on rare plants and other resources appear to have been low-balled in the DEIR.

The project will depend on coordinated operation with Trinity, Shasta, Oroville, and Folsom dams on the Trinity, Sacramento, Feather, and American Rivers to "benefit" endangered salmon downstream of these dams. The idea is that consumptive water supplies will be stored in Sites to allow the other dams to retain cold water for fish downstream. But according to the DEIR/S, coordinated operations between Sites and other dams will on average "improve" salmon runs by a paltry 2-4 percent, at a cost to the taxpayers of at least \$1.6 billion.

Although a major chunk of "environmental" water allegedly produce by Sites is allocated to maintain Delta water quality, there is little evaluation in the DEIR/S as to whether this allocation will successfully restore a river and estuary already degraded by major water diversions. The State Water Board estimates that the Delta needs somewhere between 35-75 percent of its previously unimpaired flows, primarily from the Sacramento River. There is no information in the Sites DEIR/S as to how project diversions and releases will achieve this standard. Further, I believe that the DEIR/S fails to adequately assess the impact of climate change and reservoir evaporation on project yield.

This entire project is based on the false premise that there is "excess" water in the Sacramento River not needed for the environment. I urge that this entirely inadequate DEIR/S be withdrawn and a new environmental document developed and released for public review that fully addresses the impacts of this project on the Sacramento River, Sacramento-San Joaquin Delta, threatened and endangered fish and wildlife that depend on the river and estuary, as well as on water quality.

Thank you for considering my comments.

Sincerely,

Harriet Moss
5 Laurel Avenue
Stinson Beach, CA 94970
415-868-2730 (h)
415-254-3492 (c)

