

Comments on Sites DEIR/S and Draft Feasibility Report

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Wed 1/10/2018 1:05 PM

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

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

Mr. Mike Dietl
Bureau of Reclamation
2800 Cottage Way,
Sacramento, CA 95825

Jan. 10, 2018

Via Email: 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 I urge that this inadequate environmental document be withdrawn and revised to better assess and mitigate project impacts on the Sacramento River, downstream water quality (in the river and Delta), on natural and cultural resources that would drown under the reservoir footprint, and on the Trinity River and lower Klamath River systems associated with any changes in the timing and amount of water diversions from the Trinity River watershed to the Sacramento River watershed.

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 federally-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. It is disingenuous to justify this water-supply project based on benefits to biological resources. Further, even this very small projected benefit to certain salmonid populations is based on the assumption that the project will not be operated to maximize water deliveries to users. As recent statements by the U.S. Department of Interior have demonstrated, it is well within the reasonably foreseeable future for water exports from the Delta to be greatly expanded to increase water deliveries. A new DEIR should include a full evaluation and disclosure of project impacts throughout affected waters to salmonids and other native fishes and aquatic resources under a scenario of the project being operated to maximize water deliveries.

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,

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