

Withdraw the DEIR/S to address the environmental impacts of this project on the Sacramento River and San Joaquin Delta -- Comments on Sites DEIR/S and Draft Feasibility Report

Chris Lish <lishchris@yahoo.com>

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

Sunday, January 14, 2018

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

Mr. Mike Dietl
Bureau of Reclamation
2800 Cottage Way, W-2830
Sacramento, CA 95825

Subject: Withdraw the DEIR/S to address the environmental impacts of this project on the Sacramento River and San Joaquin Delta -- 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 Draft Environmental Impact Report/Statement (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 I urge that this inadequate environmental document be withdrawn and revised to better assess and mitigate project impacts on the Sacramento River, downstream water quality (in the river and Delta), and on natural and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.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

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.

“It is horrifying that we have to fight our own government to save the environment.”
-- Ansel Adams

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 Proposition 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.

“Our government is like a rich and foolish spendthrift who has inherited a magnificent estate in perfect order, and then has left his fields and meadows, forests and parks to be sold and plundered and wasted.”
-- John Muir

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.

“As we peer into society’s future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow.”
-- Dwight D. Eisenhower

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 two to four percent, at a cost to the taxpayers of at least \$1.6 billion.

“Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence.”
-- Thomas Jefferson

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 and 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.

“Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish—indeed, all the living creatures of prairie and woodland and seashore—from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement.”
-- Theodore Roosevelt

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.

“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”
-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA