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Sites Reservoir Project
Draft Environmental Impact Report/
Environmental Impact Statement

December 5, 2017

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Public Comment

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1 I hope it is, and I hope we can go forward and
 2 figure out ways to make it a benefit, but I have a lot
 3 of concerns, and I feel like this feels premature
 4 because those concerns have not been addressed in the
 5 fishing community.]

6 And then the last thing I wanted to say, is I
 7 think there should be hearings in more areas that are
 8 impacted besides just in the communities that are
 9 farming communities.

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10 I mean, obviously people in the Trinity River
 11 have a lot of questions. You know, are the extra flows
 12 that we get to keep the Klamath Salmon alive, are they
 13 protected in this project? Is that considered in this
 14 project?

15 There are people in the upper Sacramento who
 16 probably have a lot of concerns too, so if you're going
 17 to alleviate those concerns and make sure everyone feels
 18 involved, you should probably open the process up a
 19 little more and provide some more information on
 20 consultations.]

21 Thank you very much.]

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22 [STEVE EVANS: [So my name is Steve Evans. I'm a
 23 consultant for Friends of the River, which is a
 24 Statewide river conservation group. We've been
 25 following this project for several years.

Went to the



1 I personally have lived near and along the
2 Sacramento River for over 30 years. So -- and --

3 As my wife points out to me, every time we
4 drive over a river, I remark about how high or how low
5 the flows are, and she thinks I'm kind of a nut, but it
6 does give me interesting background.]

7 For example, [the premise that Sites will
8 largely be storing water from tributaries of the
9 Sacramento River rather than water from the Sacramento
10 River, which is largely owned by the Bureau of
11 Reclamation, and other existing entities, that sort of
12 makes sense, but one of the issues is during drought,
13 say the third year of a drought when Shasta Reservoir is
14 very low, and there's not a lot of water coming in above
15 Shasta Reservoir to fill that reservoir, and you get a
16 storm event, that means the reservoir starts filling,
17 flow releases from Shasta Dam are relatively limited so
18 the reservoir will fill, so most of the flow in the
19 river will be from its undammed tributaries, which is a
20 good thing. It keeps the river alive.

21 But these are the flows that the Sites JPA are
22 proposing to defer to store in the Sites, and that's a
23 big concern in multiple drought years.

24 I know DWR is not part of this project anymore,
25 but they had an example on their website a couple of

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1 years ago during 2014, height of the five-year drought,
2 saying that --

3 If you'll recall, 2014 started out very dry,
4 and then we had a lot of rain in December for about a
5 three-week period, and DWR said, under current
6 environmental standards, we could have diverted X amount
7 of water into Sites, under that, and that's true.

8 That's because the environmental standards,
9 both flow standards and biological opinions on the
10 Sacramento River are inadequate. If they were adequate,
11 we wouldn't have to claim fisheries heading towards
12 extinction.

13 So, in fact, during that exact period, I
14 crunched the numbers and found that diversions from the
15 Sacramento River ^{Doj} fill sites in December 2014 would have
16 diverted more than half the flow of the river for a
17 three-week period, more than half the flow of the river.

18 That's a huge impact. It's hard to quantify
19 because ecosystems are not only more complex than we
20 think, they're more complex than we can think, so we
21 don't have all the answers.

22 But there are huge questions associated with
23 the operation of this project that need to be answered.]

24 And first of all, [I think you have to consider
25 that the water development industry in California has a

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1 credibility problem when it says that we're going to
2 build this dam, and it's going to provide environmental
3 benefits.

4 In fact, every major dam in the Central Valley
5 was premised on providing environmental benefits.
6 Salmon runs in the Trinity and Sacramento River would
7 not only be unharmed by Shasta and Trinity Dams, they
8 would be improved.

9 Well, we know that hasn't happened.

10 So, you know, it's a big issue particularly
11 when you're seeking State taxpayer bond money to build
12 part of this project in terms of, are you going to
13 actually provide a level of benefits that are being
14 claimed, and --

15 And you may have the intent as the proponents
16 of this project to do so, but others have a say on
17 whether you meet that goal.

18 Congress, for example, which continues to pass
19 writers and laws that weaken the environmental -- the
20 endangered species protection and biological opinions
21 for Sacramento River Salmon and Delta Chinook, and so
22 you can say that this project will provide X number of
23 benefits, but ultimately Congress can do something in
24 the future ^{that} ~~the~~ negates those benefits.

25 So this is a big issue. It's one that you

1 really need to address with a certain level of
2 certainty, and I'm not sure that's being done in the
3 EIR.)

4 I'm very concerned about flow impacts on the
5 Sacramento River, as I mentioned. Not only the ability
6 of Sites to reduce flood flows, which are essential for
7 the Sacramento River ecosystem, but also the fact that
8 Sites can actually reduce flows during drought years to
9 minimum levels.

10 As I mentioned, the flow standards for the
11 Sacramento River are inadequate, and this assessment of
12 impact in this EIR are largely based on inadequate
13 standards of biological opinions and flow standards for
14 the river. So in many ways, I think the assessment of
15 impacts is inadequate because of that.

16 Interestingly enough, a scientific journal just
17 recently, just last month, the end of last month came
18 out with a study report on the flood needs of riparian
19 ecosystems, and I'd like to quote part of the abstract
20 for that.

21 This is from a paper called, Flow Regime
22 Alteration Degrades Ecological Network for Riparian
23 Ecosystems by JD Tonkin. It's published in the Journal
24 of Nature Ecology and Evolution, November 27th, 2017.

25 Rivering ecosystems are governed by patterns of

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1 temporal variation in river flows. This dynamism will
2 change due to climate change in the near-ubiquitous
3 human control of river flows.

4 The most influential component of flow
5 alteration was flood reduction, with drought and flow
6 homogenization, both having greater simplifying
7 community-wide consequences than increased flooding.

8 These findings suggest that maintaining floods
9 under future climates will be needed to overcome the
10 negative long-term consequences of flow modification on
11 riverine ecosystems.

12 So if Sites wants to provide an environmental
13 benefit for the Sacramento River, it really needs to
14 look at ensuring that the Sacramento River floods often
15 enough to maintain its ecosystems.

16 ~~You're giving me --- can I have 30 more seconds?~~

17 ~~Okay.~~

18 And just as an example of my concern about
19 flows, I was going through ^{appendix} ~~a pending~~ 6B in the DEIR,
20 which identified, for example, Alternative C, will
21 reduce average monthly flows in the Sacramento River
22 below Keswick Dam from March through October by up to
23 five percent, and that's the average over the 80-year
24 period that was assessed, but during dry and critically
25 dry years by more than 17 percent in the month of April.

1 That may not sound like much, but if I suddenly
2 had 17 percent less money in my bank account, I'd be
3 concerned.

4 [There are a lot of other examples of that
5 nature, and I'll put them in my written comments.]

6 I do want to mention one thing. I think
7 there's a number of irregularities in DEIR, and it comes
8 from the basis of this document coming from DWR
9 originally, and -- and we'll be noting areas that need
10 to be cleaned up.

11 But one last thing.]

12 [The DEIR does admit, it's not certain how
13 Alternative C will affect the shaded riverine and
14 aquatic habitat that occurs along the banks of the
15 Sacramento River.

16 And that's getting back to my point about what
17 are the impacts of this project on the Sacramento
18 River's ecosystem?]

19 Thank you.]

20 [JEREMY SMITH: [Thank you for the opportunity to
21 speak today. My name is Jeremy Smith. I'm here on
22 behalf of the State Building and Construction Trades
23 Council of California. We represent throughout
24 California over 400,000 construction workers.]

25 [We're here to support the project, obviously

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