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Public Meeting Regarding

SITES PROJECT DRAFT EIR/EIS

Thursday, December 7, 2017

Reported by Vickey L. Benson, CSR No. 8076

19:01:42 I think that flood plains are really the
19:01:46 future. And so this is one part. But you will see
19:01:50 that in California, we're in this newer era where flood
19:01:56 plain storage as well as surface storage, because it's
19:01:59 in the short term. But flood plain storage is what
19:02:03 we'd like to see.
19:02:04 And if this is going to impact opportunities
19:02:06 for other pieces of the puzzle, for economic benefit,
19:02:10 environmental benefit, and the long-term goals of the
19:02:13 state of California with how we're going to work with
19:02:16 our water resources, then we'll have to deal with that
19:02:19 in the details.
19:02:20 So thank you so much for comment period and
19:02:23 the time. The extension was wonderful. It is a big
19:02:26 document, so we really appreciated that. And thank you
19:02:29 all for being here, because it's very important.

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STATEMENT BY JIM BROBECK

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19:02:38 MR. BROBECK: My name is Jim Brobeck. I'm
19:02:40 the water policy analyst for Aqua Alliance. We're
19:02:45 located in Chico.
19:02:46 The DWR 2013 preliminary administrative draft
19:02:47 percents discusses in some detail the saline, selenium,

aluminum, arsenic, copper, iron manganese, mercury, nickel and phosphorus concentrations that are mobilized by water and found in Antelope Valley streams.

Page 27 of chapter seven of this EIR/EIS mentions, quote, "DWR observed alluminum, arsenic, copper, iron, manganese, mercury, nickel and phosphorus in Funks Creek and in Stone Corral Creek near Sites station during intermittent water quality sampling. The concentrations appear to be higher during and immediately following storm events," unquote.

The Sites draft omits a detailed analysis of the obvious presence of toxic minerals that exist in the area of inundation. These substances are common in the geological setting that is on the western edge of the central valley.

The Sites draft certainly describes some existing concentrations of these substances in the creeks that gently flow out of the primary area, but fail to analyze how inundation and evaporative enrichment can cause elevated concentrations in terminal water bodies, downstream ecosystems and irrigated landscapes.

I would like to ~~site~~ cite the November 17, 2017, comment letter sent to you by Jerry Bowles. He's the former chief of water quality of the northern district

19:04:14 1 of the Department of Water Resources.
19:04:16 2 Quote, "High concentrations of metals that
19:04:19 3 exceed water quality criteria exist in source waters to
19:04:25 4 the proposed project," unquote. Mr. Bowles provides
19:04:27 5 data from the Department of Water Resources Water data
19:04:30 6 library that show high concentrations of toxic metals
19:04:36 7 that can be expected during the high flow months of
19:04:38 8 winter, when diversions would be occurring to the
19:04:41 9 proposed reservoir.
19:04:42 10 The high concentrations of metals in the
19:04:44 11 source water will adversely impact Sites Reservoir
19:04:48 12 water quality for most, if not all, the proposed
19:04:51 13 beneficial uses of the stored water.
19:04:53 14 These concentrations of metal in the river
19:04:55 15 that exceed water quality criteria cannot be regulated
19:04:59 16 by governmental entities, since they are natural
19:05:02 17 occurrences.
19:05:02 18 But once confined artificially in a
19:05:06 19 reservoir, subjected to increased contamination through
19:05:09 20 onsite soluble salts and metals and concentrated by
19:05:14 21 cumulative evaporative enrichment, any releases in the
19:05:18 22 reservoir will likely be subject to review by water
19:05:22 23 quality regulatory agencies to ensure that such
19:05:25 24 releases do not adversely affect downstream resources.
19:05:29 25 The contribution of additional metal loads

19:05:32 1 from summer releases into the river from Sites could
19:05:35 2 cause concentrations of metals in the Sacramento River
19:05:38 3 to exceed criteria and standards, or at least be
19:05:41 4 subject to the Water Board anti-degradation policy that
19:05:45 5 prohibits releases that can cause criteria or standards
19:05:49 6 to be exceeded by downstream input.
19:05:56 7 Soil salinization is a global phenomenon that
19:06:00 8 threatens the sustainability of agriculture production
19:06:04 9 at a time when food demand is increasing.
19:06:07 10 Chapter 7 of the draft explains that, quote,
19:06:09 11 "Saline water has been observed to seep from
19:06:12 12 underground salt springs within the proposed inundation
19:06:14 13 area of Sites Reservoir. The deeper water in the salt
19:06:17 14 lake appears to be approximately 15 acres based on
19:06:21 15 observations in 2017. The depth of the water has not
19:06:24 16 been monitored."
19:06:27 17 Chapter 7 of the Sites draft admits the
19:06:31 18 saline water will increase the salinity of the water in
19:06:35 19 storage and introduces an inaccurate estimate on the
19:06:38 20 impacts by grossly estimating the volume of salt lake
19:06:41 21 and assuming that the amount of salt that is springing
19:06:44 22 from the ground under current uninundated conditions
19:06:49 23 will not change.
19:06:50 24 Not only have the proponents failed to
19:06:53 25 accurately survey the depth of hydrodynamics of salt

19:06:55 1 lake, they failed to imagine how much more acrid the
19:06:58 2 saline springs would be remember if the reservoir was
19:07:01 3 inundated.
19:07:02 4 Proponents are willing to admit that the
19:07:05 5 saline damage is worth investing money and effort into
19:07:07 6 the grouting of the salt springs that filled the salt
19:07:10 7 lake, but they admit their efforts may be ineffective.
19:07:14 8 The draft explains, in the section titled
19:07:17 9 "Irreversible or Irretrievable Resource Commitments"
19:07:21 10 that, quote, the permanent conversion of a vegetative
19:07:26 11 landscape to the project and its associated facilities
19:07:29 12 would be a major change in the Landscape.
19:07:32 13 Reservoir construction and operation always
19:07:35 14 results in denuding the areas of inundation. The draft
19:07:40 15 mentions that the vegetative landscape would be
19:07:43 16 converted without disclosing the obvious. There will
19:07:46 17 be an intentional and total elimination of vegetation
19:07:50 18 that currently serves to reduce storm run-off erosion.
19:07:55 19 The analysis must disclose the inevitable
19:07:58 20 increase in erosion of soils that are exposed during
19:08:01 21 the filling and refilling of the reservoir. The draft
19:08:04 22 fails to disclose the toxic mineral contents of the
19:08:08 23 soils in the footprint of the reservoir that will be
19:08:12 24 exposed to repeated and unmitigated storm run-off
19:08:16 25 erosion.

19:08:16 The Sites draft must survey the project area
19:08:19 to determine the presence or absence of naturally
19:08:23 occurring contaminants and describe how the project
19:08:27 might mobilize contamination deposits that occur in
19:08:31 this region.

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