County of Yolo November 7, 2023, Letter

General Response from the Authority: The Authority's adopted Strategic Plan includes a core value of recognizing the significant contributions of local Sacramento Valley landowners and communities and will be a respectful, supportive partner and a good neighbor throughout the life of the Project. The Authority appreciates the comments from Yolo County and is committed to being a good neighbor throughout the life of the Project.

Some of the comments address items that are outside of the scope of the Final EIR/EIS, such as whether easements are needed to convey water through certain facilities. The Authority has recently established the Lower Colusa Basin Drain System Working Group to work through the complex network of infrastructure and waterways that involves multiple partner agencies, private landowners, and a long history of cooperation and water operations to address questions related to operations of facilities, flowage rights, and how best to coordinate with other districts/operators and landowners in the future Sites Project operations. Yolo County has been invited to participate in this group and the Authority appreciates the counties participation to date. While the Lower Colusa Basin Drain System Working Group is focused on the Colusa Basin Drain downstream of the Balsdon Weir, the Knights Landing Ridge Cut, the Knights Landing Outfall Gates, and the Wallace Weir, extending into the Yolo Bypass Tule Canal and Toe Drain is a logical extension of the group and would work to address many of the questions that Yolo County raises.

Comment Number, Topic	**Comment**	**Response**
1.a Project Alternatives	The County questions whether the Final EIR/EIS presents a reasonable range of alternatives to the proposed project, including the Dunnigan Pipeline component, that would feasibly attain most of the project's basic objectives while reducing or avoiding any of its significant effects.	The Authority and Reclamation conducted an extensive screening process that considered the Project objectives and purpose and need to develop a reasonable range of potentially feasible alternatives (including the preferred Project [alternative]) for evaluation. This screening process conducted by the Authority and Reclamation built upon prior water supply evaluations that examined a broad array of factors (see Appendix 2A, Alternatives Screening and Evaluation, and Appendix 2B, Additional Alternatives Screening and Evaluation). The Authority and Reclamation considered multiple operational scenarios over the course of Project development that were designed to meet the Project objectives, purpose, and need; enhance

		Project benefits; and reduce or avoid impacts. The features of alternatives, including Sites Reservoir capacity, conveyance systems, and operational scenarios, were conceptually developed and refined over time to maximize the achievement of the objectives. The Dunnigan Pipeline was added to the Project as part of the Authority's 2019 value planning efforts. In an effort to rely on existing facilities to the extent possible and reduce the environmental impacts of building new infrastructure, the value planning process identified that a connection from the Tehama-Colusa Canal to the Colusa Basin Drain in the area of Dunnigan would allow the Project to utilize the excess capacity in the Tehama-Colusa Canal and connect with the Colusa Basin Drain with the shortest pipeline possible in the Dunnigan area. Please see Master Response 9, Alternatives Development, regarding the 2019 Value Planning Process and the Dunnigan Pipeline. In addition, while the EIR includes two configurations for the Dunnigan Pipeline, note that CEQA does not require an analysis of alternatives of a project component, and instead CEQA's alternatives requirement focuses on the alternatives to the project as a whole.
1.b Project Alternatives	The County specifically questions the need for, and ecosystem value of, discharges to the Yolo Bypass through the Colusa Basin Drain (an intended function of all project alternatives) and whether other means of providing ecosystem benefits for native Delta fish species, as mentioned in the project objectives listed on p. ES-11, were thoroughly evaluated.	Chapter 11, Aquatic Biological Resources, provides detailed analysis of the potential impacts on aquatic biological resources, including potential impacts on native fish species such as Chinook salmon, delta smelt, longfin smelt, and sturgeon. The Project includes actions to ensure operational impacts of the alternatives would be less than

		significant and would have no adverse effect to anadromous and endemic fish populations. Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives. Please see Master Response 5, Aquatic Biological Resources, regarding Project benefits to fisheries. It is important to note that the conveyance of water to the Yolo Bypass in a way similar to the North Delta Flow Action for the benefit of Delta smelt was a component of the Authority's Proposition 1 application to the California Water Commission. The California Department of Fish and Wildlife found this to be a net ecosystem benefit and the California Water Commission conditionally awarded the Sites Authority funding for this ecosystem benefit. The Authority envisions CDFW managing this water and the ecosystem benefit. However, the Authority and CDFW are in discussions on whether this water would be managed by the Authority or CDFW. Regardless, the water would be managed and conveyed through the Yolo Bypass consistent with analysis in the Final EIR/EIS – in particular, staying within the Tule Canal and Toe Drain and not overflowing onto adjacent agricultural lands and being conveyed through the Yolo Bypass from August through October. The Authority is not aware of another way to achieve the Delta smelt benefit than to provide water through the Colusa Basin Drain, to the Ridgecut, and into the North Delta. This action

		mimics the existing North Delta Flow Action and is the only way that the Authority is aware of to move aquatic organisms into the North Delta to provide food for Delta smelt.
1.c Project Alternatives	In particular, the County questions whether other alternatives with reduced impacts within Yolo County—which is not represented on the Sites JPA governing board—were carefully considered.	The Authority and Reclamation conducted an extensive screening process that considered the Project objectives and purpose and need to develop a reasonable range of potentially feasible alternatives (including the preferred Project [alternative]) for evaluation. This screening process conducted by the Authority and Reclamation built upon prior water supply evaluations that examined a broad array of factors (see Appendix 2A, Alternatives Screening and Evaluation, and Appendix 2B, Additional Alternatives Screening and Evaluation). The Authority and Reclamation considered multiple operational scenarios over the course of Project development that were designed to meet the Project objectives, purpose, and need; enhance Project benefits; and reduce or avoid impacts. The features of alternatives, including Sites Reservoir capacity, conveyance systems, and operational scenarios, were conceptually developed and refined over time to maximize the achievement of the objectives. Please see Master Response 9, Alternatives Development. Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives. In addition, and as stated above, the Authority is not aware of another way to achieve the Delta

		smelt benefit than to provide water through the Colusa Basin Drain, to the Ridgecut, and into the North Delta. This action mimics the existing North Delta Flow Action and is the only way that the Authority is aware of to move aquatic organisms into the North Delta to provide food for Delta smelt.
2.a Project Description	The County observes that the Project Description is vague and/or inconsistent in numerous respects.	The EIR/EIS includes information and data on the location, design, schedule, and operation for all Project components for each of the alternatives. The project description includes sufficient detail to analyze the Project impacts provides sufficient detail for decision makers to understand the alternatives being evaluated.
2.b Project Description	Inadequate description of how groundwater will be supplied to the Dunnigan Pipeline construction site, how it will be used, and whether there will be any runoff or other effects that require analysis (including effects from dewatering)	As indicated in Chapter 8, Groundwater Resources, in general, groundwater would be required for uses such as moisture conditioning of fill materials, batching concrete, grouting, and dust suppression for haul roads, stockpiles, disposal areas, quarries, and borrow areas. Groundwater encountered during excavation would be stored on site in bermed areas or Baker tanks within the Project footprint before being discharged onto suitable land where it would infiltrate back into the water table. Encountered groundwater may also be used for dust suppression or moisture conditioning of embankment fill materials, which would reduce reliance on pumped groundwater. In general, water use during construction would be primarily related to construction of the proposed pipelines (e.g., Dunnigan pipeline, Funks pipeline) for trench compaction and dust control. Water

		required for construction of Dunnigan pipeline (approximately 20,000 to 30,000 gallons per day) would be sourced from existing surface water from the Storage Partners pursuant to existing water rights agreements and permitted uses; existing groundwater wells in the pipeline area; or dewatering efforts (see Table 5-33, Summary of Expected Construction Water Use, Chapter 5, Surface Water Resources). The required daily construction use would be less than 1% of the 2018 groundwater pumped for total groundwater use within the Yolo County Subbasin (Table 8-2). The use of groundwater for the construction of the Dunnigan Pipeline would not result in a substantial decrease in groundwater supplies or substantial interference with groundwater recharge in this subbasin, as discussed in Chapter 8. Groundwater discharged to surface waterbodies and land would comply with RWQCB Order No. R5-2022-0006 and State Water Resource Control Board Order No. 2003-0003-003-DWQ, respectively (see BMP-14 in Appendix 2D, Best Management Practices, Management Plans, and Technical Studies). BMP-12 would address the potential for increased erosion that could occur as a result of ground-disturbing construction activities or areas of bare soil and would ensure that erosion rates would not be excessive. BMP-12 Sediment control measures, such as placement of silt fencing around areas of ground disturbance, would capture sediment that is generated from exposed soils. The runoff management measures would be implemented to reduce runoff rates and prevent concentrated runoff from causing scour.

2.c Project Description	Vague description of the approach to constructing the Dunnigan Pipeline, including a lack of detail regarding excavation methodology, equipment to be used, how soil will be stored and reused or disposed of, and related matters such as vehicle trips and potential air quality (including fugitive dust) impacts	The EIR/EIS includes information and data on the location, design, schedule, and operation for all Project components for each of the alternatives evaluated with sufficient detail to analyze the Project impacts and sufficient detail regarding the Project for decision makers to understand the alternatives being evaluated. Appendix 2C, Construction Means, Methods, and Assumption, describes construction details including excavation methodology for the Dunnigan Pipeline. For example, Section 2.2.1 *Water* identifies the need for 20,000 to 30,000 gallons of water per day during construction of the Dunnigan Pipeline and that water captured during dewatering may be reused. Table 2C-5 provides the total number of truck (18,460) and personal vehicle trips (51,830) anticipated during two year duration of construction. Section 3.3.6 *Conveyance to the Sacramento River* provides an overview of construction activities, including the description of clearing and grubbing, materials to be utilized, and various steps needed to stage for construction, trench and tunnel activities, installation of pipeline, and and backfill trenches. Detailed drawings are provided in Figures C2-59 and C2-60.Please see Chapter 18, Navigation, Transportation, and Traffic, for information about numbers of construction trips and vehicle miles traveled VMT during operation. Table 18-2. *Sites Reservoir Project Access Roads* identifies what roads will be utilized to access the Dunnigan Pipeline are for construction, including I-5 at Colusa-Yolo county line, County Road 99W south of County Road 8, County Road 8, and County Road 90B. Section 18.2.1.1., *Yolo County,* describes the

		Yolo County roads that would be affected by the Project including configuration and existing daily vehicle trips. Traffic and transportation impacts are addressed in Section 18.4, Impact Analysis. Based on the number of vehicle trips per day (146 employee and 154 truck trips for Alternative 1 and 3 and 228 employee and 280 truck trips for Alternative 2) impacts were determined to be less than significant. The air quality impacts of the Project are discussed in Chapter 20, Air Quality. Tables 20-17 and 20-18 compare the particulate matter generated between the alternatives. Appendix 20A *Methodology for Air Quality and GHG Emissions Calculations* also provides the assumptions and methodology used for quantifying air quality emissions related to construction, operation and maintenance of the Dunnigan Pipeline. Please also see BMP-10, Salvage, Stockpiling, and Replacement of Topsoil and Preparation of a Topsoil Storage and Handling Plan, discuses the storage and placement of excavated soil.
2.d Project Description	Vague and inconsistent language regarding discharges for water supply and ecosystem purposes into the Yolo Bypass, including the volume and timing of such discharges and related effects on farmland	Please refer to Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the project description and how they fulfill the requirements for project-level review under CEQA and NEPA. The EIR/EIS includes a level of detail appropriate for evaluation and review of the environmental impacts. As described in Chapter 2, Project Description and Alternatives, most water for Proposition 1 benefits would be conveyed through the Yolo Bypass/Cache Slough Complex, although water destined for Storage Partners who receive

		water from the North Bay Aqueduct could also follow this path (most likely though, this water would be released directly in the Sacramento River). Flows into the Yolo Bypass for ecosystem purposes would most likely occur during the summer and fall months. Please refer to Chapter 5, Surface Water Resources, and associated appendices, for more details regarding the potential changes in hydrology resulting from Project operations, including releases to Yolo Bypass, as modeled using CALSIM II. Tables 5-20 and 5-21 provide ample details regarding the expected timing and volume of releases to the Yolo Bypass and potential impacts of the Project on total Yolo Bypass flow, respectively. Table 5-30 includes information about simulated Sites water supply deliveries for Yolo Bypass Habitat Water Supply. Table 5-32 presents CALSIM II modeled flood flows for the NPA and the Project Alternatives, including flows through the Yolo Bypass. These hydraulic modeling results serve as the basis for the impact analyses and determinations subsequently presented in each resource chapter. Please refer to Chapter 15, Agriculture and Forestry Resources, regarding potential effects on farmland, including a detailed analysis of the potential for Sites Reservoir releases to result in inundation to the Yolo Bypass and CBD and thus potentially result in conversion of agricultural to non-agricultural land. Impact AG-4 concluded that agricultural lands would not be affected during the growing or harvesting seasons as a result of inundation at Yolo Bypass, nor would

		the Project substantially change concentrations of methylmercury or arsenic, or significantly affect water temperatures. Please also refer to Appendix 11M, Yolo and Sutter Bypass Flow and Weir Spill Analysis, for more details regarding modeling of inundation in Yolo Bypass and Sutter Bypass.
3.a Dunnigan Pipeline-Groundwater Impacts During Construction	In connection with Pipeline construction, the Final EIR/EIS describes the potential for impacts to groundwater as well as the temporary disturbance of agricultural wells and irrigation of fields near the pipeline alignment. Impacts will result from dewatering (mentioned at p. 2-68) along the Pipeline alignment, direct physical conflicts with existing irrigation infrastructure, and the groundwater demands/usage by the construction effort itself. Despite acknowledging the potential for such impacts, however, the Final EIR/EIS contains only scant and conclusory analysis. For example, at p. 5-57 the Final EIR/EIS simply states "[a]s identified in Chapter 8, there is sufficient groundwater supply to provide this water during the construction period without affecting yield from other wells."	No significant impacts on groundwater (see Chapter 8, Groundwater Resources) or agriculture (see Chapter 15, Agriculture and Forestry Resources) specifically related to Dunnigan pipeline construction were identified in the Final EIR/EIS. As noted in Chapter 2, Project Description and Alternatives, Page 2-68 states that dewatering would be necessary for a segment of the pipeline "to reduce groundwater levels to 20 or 30 feet below ground surface along its length. Trenching and pipeline installation would be completed after dewatering…Construction would include open cut of approximately 100 feet to cross Bird Creek in the dry season." Chapter 8, Groundwater Resources notes that dewatering, including in the Dunnigan Pipeline area, "would not change the permeability of the ground surface where construction activities would occur. Therefore, dewatering would not affect groundwater quality during construction." Chapter 8 further states that the Dunnigan Pipeline may require dewatering to a depth of 30 feet below ground surface (bgs). "The average well depth for domestic and agricultural wells within the Yolo Subbasin is typically 100 feet bgs, with well screens starting around 50 feet bgs (California Department of Water Resources 2020b). Clay soils in rice fields adjacent to the Dunnigan Pipeline would act as a

		barrier between the construction dewatering depth and basin aquifer." The Final EIR/EIS concludes that the pipeline installation would not result in a substantial decrease in groundwater supplies or substantial interference with groundwater recharge. As discussed in Chapter 15 for Impact AG-1 and AG-3, construction activities in general would temporarily disturb agricultural land but implementation of BMPs (BMP-10, BMP-13 and BMP-36) would result in the restoration of Important Farmland disturbed during construction to preconstruction conditions. Accordingly this would be a less-than-significant impact. Placement of underground pipelines on land zoned for agricultural use or in Williamson Act contracts would not result in a permanent change of land use from agricultural use. As such, no impact would occur under construction and operations (see Impact AG-2). As indicated in Chapter 8, Groundwater Resources, while water could come from both surface water and groundwater sources, the groundwater impact analysis conservatively assumes that the whole supply would come from groundwater. Even assuming that all construction water required for construction of Dunnigan pipeline would come from groundwater, the required daily construction use would be less than 1% of the 2018 groundwater pumped for total groundwater use within the Yolo County Subbasin (Table 8-2). Accordingly, it was determined that there would be a less-than-

		significant impact on groundwater supplies in the Yolo Subbasin and therefore no mitigation would be required (see Impact GW-2, Chapter 8).
3.b Dunnigan Pipeline-Groundwater Impacts During Construction	The Chapter 8 analysis, however, is largely bereft of meaningful detail and does not even clearly describe why construction of the Pipeline will require "approximately 20,000 to 30,000 gallons of water per day" for several years. The abbreviated analysis of these impacts and lack of ways to mi gate them limit the County's ability to comment on related impacts. (Final EIR/EIS at pp. 8-14 and -15.)	The Dunnigan Pipeline would be approximately 4 miles (Alternatives 1 and 3) or 10 miles (Alternative 2) in length, have a minimum depth of 6 feet below ground surface, and have an inner diameter of approximately 9 feet (Alternatives 1 and 3) to 10.5 feet (Alternative 2). These specifications were taken into consideration when estimating water use during construction of the pipeline. As indicated in Chapter 8, Groundwater Resources, while water could come from both surface water and groundwater sources, the groundwater impact analysis conservatively assumes that the whole supply would come from groundwater. Even assuming that all construction water required for construction of Dunnigan Pipeline would come from groundwater, the required daily construction use would be less than 1% of the 2018 groundwater pumped for total groundwater use within the Yolo County Subbasin (Table 8-2). Accordingly, it was determined that there would be a less-than-significant impact on groundwater supplies in the Yolo Subbasin and therefore no mitigation would be required (see Impact GW-2, Chapter 8). Please refer to Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the Project description within the context of CEQA and NEPA.

3.c Dunnigan Pipeline-Groundwater Impacts During Construction	Further, while the Final EIR/EIS mentions (at pp. 8-14 and -15) the possibility of using "existing surface water from the Storage Partners pursuant to existing water rights agreements and permitted uses" to supply a portion of the necessary water for Pipeline construction, this possibility seems far-fetched. How it is feasible to convey surface water to the construction site near Dunnigan? The Final EIR/EIS does not say. Accordingly, the County agrees with the decision to conservatively assume all water supply needs for construction of the Dunnigan Pipeline will be met with groundwater. And this, in turn, underscores why it is essential to include a much more robust analysis of potential groundwater and agricultural impacts arising from the Dunnigan Pipeline construction. Absent such analysis, the groundwater analysis in the Final EIR/EIS is deficient.	The Dunnigan Pipeline between the Tehama-Colusa Canal and the Colusa Basin Drain would generally be located within the Dunnigan Water District boundaries. The Authority could purchase water for its construction needs from Dunnigan Water District. A small portion of the pipeline falls outside of the district boundaries and thus, the Authority would need to work closely with Dunnigan Water District to determine if District water supplies could be used along this portion of the construction site. Similarly, the Dunnigan pipeline from the Colusa Basin Drain to the Sacramento River (which is not part of the Project as proposed for approval) is within Reclamation District No 108 boundaries. The Authority could work with Reclamation District No. 108 for a surface water supply from the District for this portion of the construction site. Exact connection locations and facilities for possible connection to either water district's distribution system are not known at this time and would be explored further if the Authority were to use surface water for construction. However, as the pipeline runs through both districts and both districts generally provide water to lands that the pipeline would be located on, connections for surface water, if needed, are expected to be in proximity to the construction site.
4.a Dunnigan Pipeline-Excavation and Soil Storage, Reuse, and Removal	The method of construction for the Dunnigan Pipeline is described vaguely, including whether its construction will be solely through open excavation or whether tunneling/boring will be used.	The EIR/EIS includes information and data on the location, design, schedule, and operation for all Project components for each of the alternatives evaluated with sufficient detail to analyze the Project impacts and sufficient detail regarding the Project for decision makers to understand the alternatives being evaluated.

		Specifics related to the Dunnigan Pipeline are included in EIR/EIS Chapter 2, Project Description and Alternatives. This includes a discussion on its construction. Appendix 2C, Construction Means, Methods and Assumptions outlines the construction activities associated with the Dunnigan Pipeline:
		• Clear and grade the pipeline alignment.
		• Excavate pipeline trench and provide shoring. It is anticipated that several hundred feet of open trench would occur at one time.
		• Install and weld up the pipeline and backfill with a combination of CLSM and native material.
		• Tunneling under Interstate-5, Highway 99, and the railroad, as follows:
		  ○ Construct jacking pit and receiving pit. Provide shoring to support these pits that are anticipated to be about 25 feet in depth +/-. Remove and stockpile excavated material.
		  ○ Assemble large boring machine sized to provide a roughly 128-inch to 144-inch casing pipe bore. Final diameter will be determined during design.
		  ○ Obtain steel casing pipe
		  ○ Lower tunneling machine into jacking pit after setting up guide rails to provide correct tunnel alignment.

		○ Begin tunneling from jacking pit to receiving pit. Remove and dispose of excavated material offsite. ○ Weld the steel casing segments together as tunneling progresses. ○ Continue tunneling, welding and removing excess material until tunneling machine reaches receiving pit. ○ Removing tunneling machine from receiving pit. ○ Install main carrier pipe in casing pipe and weld joints as pipe segments are lowered into jacking pit. Carrier pipe will have piping supports attached to help center in casing pipe and to keep from resting on casing pipe. ○ Depending on requirements of County and Caltrans, likely will fill annulus space between casing and carrier pipes with sand or lightweight grout. Ends of casing pipe will be plugged using boots or other methods to prevent grout or sand from running into pits. ○ Add cathodic protection requirements to casing and carrier pipes. ○ Connect extensions of carrier pipes in each pit to return to open cut methods for normal pipe installation. ○ Backfill the jacking and receiving pits with material removed during step 1.

		In some instances, slurry will be used around the pipes, followed by backfill with native excavated material. • Install flow meters, valving, air valves, blowoffs, and access manways. • Install a cathodic protection system consisting of rectifiers attached to pipe. • Revegetate and restore the pipeline route, and constructing a gravel maintenance road along the pipeline route • Construct the CBD Outlet Structure o Clear and grub area along CBD for the outlet structure. o Transport materials to the Project Site. Materials would consist of concrete, rebar, yard piping, energy dissipation valves, and electrical equipment. o Place construction materials at staging areas. o Build the outlet structure, which would consist of excavating the ground to accommodate placement of structure structural concrete and rebar. o Connect the outlet structure to the Dunnigan Pipeline. o Test the facility.
4.b Dunnigan Pipeline-Excavation and Soil Storage, Reuse, and Removal	First, at p. 2-103, the Final EIR/EIS mentions the removal, storage, and replacement of topsoil in irrigated agricultural areas following “restoration” so	Please see BMP-10, Salvage, Stockpiling, and Replacement of Topsoil and Preparation of a Topsoil Storage and Handling Plan, discusses the storage

	that "irrigated agricultural areas would have the same soils composition except in areas that would be covered by permanent maintenance roads." How will the Sites JPA ensure the productive capability of the soil is maintained or restored through this process? Is it reasonable to expect some degree of decline in productive capability? Will the Sites JPA retain an agronomist to guide this process, potentially in coordination with the Yolo County Agricultural Commissioner? The County strongly recommends that the Sites JPA develop an agreement with the County that appropriately addresses these issues.	and placement of excavated soil, including employing a soil scientist. The Authority will have agreements with the landowners whose property is affected by construction and commitments by the Authority to take appropriate measures to ensure soil composition post- construction are satisfactory to the landowner will be part of that agreement. Please see BMP-13 Development and Implementation of Spill Prevention and Hazardous Materials Management/Accidental Spill Prevention, Containment, and Countermeasure Plans (SPCCPs) and Response Measures, and BMP-36, Control of Invasive Plant Species during Construction, regarding additional protective measures protective of agricultural productivity. Please see Appendix 2D, Best Management Practices, Management Plans, and Technical Studies. As discussed in Chapter 15, Agriculture and Forestry Resources, implementing BMP-10, BMP-13, and BMP-36 would result in restoration of Important Farmland disturbed during construction to preconstruction conditions. Therefore, agricultural productivity and associated soil properties would not be reduced as a result of construction.
4.c Dunnigan Pipeline-Excavation and Soil Storage, Reuse, and Removal	Second, at p. 6-55, the Final EIR/EIS mentions that the Dunnigan Pipeline will "entail substantial excavation" but does not elaborate on whether this work presents the potential for impacts mentioned briefly in this portion of Chapter 6, including adverse effects on water quality. This is a further example of the overall lack of detail of potential construction impacts associated with the Dunnigan Pipeline—mentioning "substantial excavation" without including any related	Additional detail regarding construction of Dunnigan pipeline is provided in Chapter 2, Project Description and Alternatives. The greatest potential for water quality impacts from construction activities would come from in-water work (e.g., dredging and in-channel construction) and ground disturbance (e.g., excavation and tunneling), as well as through the release of chemical pollutants, and other mechanisms discussed for Impact WQ-1 in

	analysis leaves the County and general public without any basis for understanding this (and virtually every other) potential impact of Dunnigan Pipeline construction.	Chapter 6, Surface Water Quality. Accordingly, these mechanisms, and their potential effect(s) on water quality, are discussed generally rather than discuss in detail the construction of each component of Alternatives 1, 2 and 3.
4.d Dunnigan Pipeline-Excavation and Soil Storage, Reuse, and Removal	Related to this concern, Table 12-7 (on p. 12-68) of the Final EIR/EIS appears to indicate that excavation for the Dunnigan Pipeline will displace 100-250 acres of soil, depending on the project alternative selected. This is based on a 10-foot pipeline diameter, however, and therefore appears to understate potential impacts (as the external dimension of the pipeline will be somewhat larger). Based on information provided in different places in the document, the Dunnigan Pipeline will apparently be about 12 feet in diameter at depths of 6-30 feet below the ground surface.	As described in Chapter 2, Project Description and Alternatives, under Alternatives 1 and 3, the Dunnigan Pipeline would convey water released from the TC Canal to the Colusa Basin Drain. The Dunnigan Pipeline would be approximately 4 miles (Alternatives 1 and 3) or 10 miles (Alternative 2) in length, have a minimum depth of 6 feet below ground surface, and have an inner diameter of approximately 9 feet (Alternatives 1 and 3) to 10.5 feet (Alternative 2). Construction of the Dunnigan Pipeline from the TC Canal to the CBD would require dewatering, trenching, and using pile driving or a vibration hammer. Dewatering would be necessary for a segment of the pipeline to reduce groundwater levels to 20 or 30 feet below ground surface along its length. The Dunnigan Pipeline is anticipated to be structural steel and the outside diameter is about a foot greater than the 9.5 foot inside diameter.
4.e Dunnigan Pipeline-Excavation and Soil Storage, Reuse, and Removal	Similarly, aside from the language at p. 2-103, the Final EIR/EIS does not explain how excess soil will be stored and reused or disposed of in connection with the Dunnigan Pipeline. The County is greatly concerned that long-term storage of excavated soil near the community of Dunnigan or other residential areas could cause adverse air quality impacts due to fugitive dust. The County urges the Sites JPA to work cooperatively with County staff to identify	Please see BMP-10, Salvage, Stockpiling, and Replacement of Topsoil and Preparation of a Topsoil Storage and Handling Plan, discusses the storage and placement of excavated soil, including employing a soil scientist. Please also see BMP-28, Preparation and Implementation of Fugitive Dust Control Plans, discusses specific actions the Authority will take to limit air quality impacts from the Project, including during earth moving, cleaning

	appropriate, safe means of storing excess soil and removing it as promptly as feasible to avoid adverse air quality impacts in and near Dunnigan.	paved roads, minimizing dust emissions from dry disturbed soil surface areas and unpaved roads, and from soil piles. Please see Appendix 2D, Best management Practices, Management Plans, and Technical Studies. The Authority will have agreements with the landowners whose property is affected by construction and commitments by the Authority to take appropriate measures to ensure soil composition post- construction are satisfactory to the landowner will be part of that agreement.
5.a Dunnigan Pipeline-Construction Traffic	At p. 2-52, the Final EIR/EIS describes daily construction traffic but does not specifically (in this section or elsewhere) describe traffic associated with Dunnigan Pipeline construction. Similarly, the discussion of local roads to be used for the project that begins at p. 2-70 entirely omits any roads in Yolo County. The following passage later in the Final EIR/EIS indicates the significance of these omissions and the potential for a high volume of construction traffic in Yolo County, with significant physical impacts on County roads that will require significant maintenance and/or reconstruction: Daily construction traffic would consist of trucks hauling equipment and materials to and from the work sites as well as daily arrival and departure of construction workers. Construction traffic on local roadways would include dump trucks, bottom-dump trucks, concrete trucks, flatbed trucks for delivering construction equipment and permanent Project equipment, pickups, water trucks, equipment maintenance vehicles, and other delivery trucks. At the peak of construction in 2027, current estimates project between 701	Please see Chapter 18, Navigation, Transportation, and Traffic. Section 18.2.1, Project Access Roads, includes a discussion of overall project access and Interstate-5. County Road 99W, County Road 8, and County Road 90B in Yolo County are included in Section 18.2.1.1. Roadways and highways needed to access the Dunnigan Pipeline were included in Tables 18-12, 18-13 and 18-15 along with other project features. Table 18-14 provides a summary of the daily trips estimated on a typical day of peak construction for all facilities, including 228 employee trips and 280 truck haul trips for the Dunnigan Pipeline per day.

	and 978 daily haul trips for conveyance facilities, and approximately 1,760 daily offsite haul trips for reservoir facilities. (Final EIR/EIS at p. 18-26)	
5.b Dunnigan Pipeline-Construction Traffic	The Final EIR/EIS does not analyze the current pavement condition of affected Yolo County roads (though, as noted, it does include a brief summary of the pavement condition of local roads outside the County at pp. 2-70 and 2-75) or appear to describe and analyze how such roads will be affected by Dunnigan Pipeline construction. These omissions are significant and render the Final EIR/EIS deficient in this respect.	The estimated number of daily trips as a result of the Project was added to the baseline conditions for planned construction routes to understand potential changes to the level of service (LOS) and verify that the identified study roadway segments would not reach unacceptable LOS thresholds as identified in Table 18-9. Table 18-15 is a summary of the roadway capacity assessments and resulting LOS in the study roadway segments with construction traffic added. Roadways and highways need to access the Dunnigan Pipeline were included in Tables 18-12, 18-13 and 18-15 along with other project features. The 2019 average daily traffic and LOS for these accesses were not available for inclusion and analysis. Table 18-14 provides a summary of the daily trips estimated on a typical day of peak construction for all facilities, including 228 employee trips and 280 truck haul trips for the Dunnigan Pipeline per day. Please see Chapter 18, Navigation, Transportation, and Traffic, including “Impact TRA-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities” for information about numbers of construction trips and vehicle miles traveled (VMT) during operation. Section 18.2.1, Project Access Roads, includes a discussion of overall project access and Interstate-5. Conditions of County Road 99W, County Road 8,

		and County Road 90B in Yolo County are included in Section 18.2.1.1. BMP-16, Development and Implementation of a Construction Equipment, Truck, and Traffic Management Plan (TMP), states that the Authority will coordinate with the applicable jurisdictions, including local agencies for local roads, transit providers, and rail operators where applicable, and will provide construction notification procedures for Glenn, Colusa, Yolo, and Tehama Counties' police, public works, fire departments, and other public service providers, and cycling organizations, bike shops, and schools. BMP-12, Development and Implementation of Stormwater Pollution Prevention Plan(s) (SWPPP) and Obtainment of Coverage under Stormwater Construction General Permit (Stormwater and Non-stormwater) (Water Quality Order No. 2022-0057-DWQ/NPDES No. CAS000002 and any amendments thereto), states that during operations and maintenance, Project facilities including, but not limited to, roads (including access roads), other paved and unpaved surfaces, structures, and equipment, will be properly maintained so as to avoid the potential for erosion and sediment/siltation into local waterbodies and in compliance with all applicable federal, state, and local regulations. Table 4-3 identifies that a Transportation Permit will be required from Yolo County. The Authority has assumed that this permit would ensure that roads used for Project construction activities are left in a similar or better condition.

5.c Dunnigan Pipeline-Construction Traffic	The Sites JPA needs to address, preferably through an enforceable agreement with Yolo County, how impacts of soil hauling and other project construction activities on Yolo County roads and infrastructure will be fully mitigated. The Final EIR/EIS mentions a number of possible routes for construction of the Dunnigan Pipeline (including various County roads), but the final routes will need to be identified in coordination with Yolo County's Public Works Director, along with a binding commitment to reconstruct impacted roads after construction is complete.	Roadways and highways needed to access the Project included in Tables 18-12, 18-13 and 18-15. As described in BMP-16, Development and Implementation of a Construction Equipment, Truck, and Traffic Management Plan (TMP), the Authority will coordinate with the applicable jurisdictions, including local agencies for local roads, transit providers, and rail operators where applicable, and will provide construction notification procedures for Glenn, Colusa, Yolo, and Tehama Counties' police, public works, fire departments, and other public service providers, and cycling organizations, bike shops, and schools. Table 4-3 identifies that a Transportation Permit will be required from Yolo County. The Authority has assumed that this permit would ensure that roads used for Project construction activities are left in a similar or better condition.
5.d Dunnigan Pipeline-Construction Traffic	The Final EIR/EIS's analysis of general truck traffic is similarly devoid of much analysis. It states, on page 18-19, that a vehicles miles traveled (VMT) analysis was not necessary "because a qualitative assessment indicated that there would not be construction VMT impacts." We were unable to locate the qualitative assessment referenced in the Final EIR/EIR, other than simply surmising that construction workers and other trips "are effectively replacing other trips" to other projects, that could be even longer. Under that logic, a VMT analysis would be unnecessary for any project because every trip -- whether for recreational traffic or construction traffic -- is always a replacement for another trip. And even if the Final EIR/EIS intended to rely on such a theory, the analysis	Please see Chapter 18, Navigation, Transportation, and Traffic, Tables 18-11, 18-12, 18-14, and 18-15 for detailed information regarding Dunnigan Pipeline construction trips by type (employee commutes vs. truck hauls) and impacts on local roadways by location. The Final EIR/EIS appropriately addresses construction VMT as an Air Quality, GHG Emissions and Energy issue and not as a Transportation issue. VMT associated with construction trips is captured in Chapter 20, Air Quality, Chapter 21, Greenhouse Gas Emissions, and Chapter 17, Energy. Mitigation

	would have to be backed by evidence, not conjecture, about the number and distance of trips that construction workers, equipment, and materials would make absent the project. We expect that such an econometric analysis would be quite difficult to perform without extensive data about the regional construction industry, the projects that would be built during the me period, and the travel costs if the project were not undertaken. Rather than rely on such an untested and unsupported theory based on a hypothetical counter-factual, however, the transportation chapter for the Final EIR/EIS should provide the VMT generated by the construction activities and disclose them for public review. Nor should the Final EIR/EIS omit this analysis on the basis of SB 743 and CEQA Guidelines § 15064.3, as is implied under Impact TRA-2. Sec on 15064.3 states, "[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." By using the word "generally," Section 15064.3 acknowledges that automobile VMT alone may not always be the most appropriate measure of transportation impacts. The legislate intent of SB 743, and the associated CEQA Guidelines Sec on 15064.3, was to ensure that lead agencies include the appropriate analysis of VMT from infill projects in transit priority areas. However, this is no infill project; it is an extensive public works projects that will generate extensive VMT. Truck trips associated with hauling construction materials and equipment are a significant concern that could – and should -- be analyzed in the Final EIR/EIS.	Measure GHG-1.1 would reduce construction worker VMT through ride-sharing measures. SB 743 does not apply to construction truck traffic and does not require quantification of construction worker VMT.

5.e Dunnigan Pipeline-Construction Traffic	It appears that the Final EIR/EIS did indeed consider the VMT from truck trips generated by the project in Chapter 20 on greenhouse gas (GHG) emissions, but we cannot verify the information. Appendix 20A shows the general methodology as taking hauling into account. The Final EIR/EIS says on page 21-4, "Modeling assumptions are provided in Appendix 20B, Air Quality and GHG Analysis Data." On the Sites EIR/EIS website, however, Appendix 20B is not included, and we were not able to identify the modeling assumptions and data elsewhere to verify whether construction trips were considered in the GHG analysis. We do note that the emissions for initial construction were amortized over 30 years, which appears to minimize the project's immediate impacts. These maters should be clarified before the Final EIR/EIS is finalized.	Risk to human health resulting from emissions are included in Chapter 20, Air Quality, and in Appendix 20C. Overall, construction is expected to occur from 2024 to 2029, which is reflected in the modeling. Risks to receptors were calculated assuming exposure during the entire construction period using the maximum year of construction emissions. Table 20C-6 summarizes the construction periods, between 2 and 5 years, by modeled location. The models quantify different aspects of air quality, including regional mass emissions, localized concentrations, and health risks. Please see Section 20.3, Methods of Analysis, for additional information regarding air quality methods and modeling. Construction of the Project would generate emissions of GHGs, including CO2, CH4, N2O, and SF6. The combustion exhaust GHG emissions modeled in the EIR/EIS are based on Project-specific construction data (e.g., schedule, construction equipment and truck inventory) provided by the Project engineering team and a combination of emission factors and methodologies from the California Emissions Estimator Model (CalEEMod), version 2016.3.2; CARB's Emissions Factors (EMFAC) model (EMFAC2017) ; the U.S. Environmental Protection Agency's (USEPA) AP-42 Compilation of Air Pollutant Emission Factors (AP-42); and other relevant agency guidance and published literature (U.S. Environmental Protection Agency 2021b). Annual GHG emissions were quantified based on concurrent construction

		activity. Please see Chapter 21, Greenhouse Gas Emissions. The Appendix 20B was not used in the EIR/EIS, and the reference to 20B, Air Quality and GHG Analysis Data, in Chapter 21 is incorrect. Assumptions about construction are included in Appendix 2C, Construction Means, Methods, and Assumptions, and air quality monitoring assumption are included in Appendix 20C, Ambient Air Quality and Health Risk Analysis Technical Report. Chapter 18, Navigation, Transportation, and Traffic, provides a summary of the daily trips, including employee trips and truck haul trip estimated on a typical day of peak construction for all facilities.
6.a Dunnigan Pipeline-Inconsistent Language Regarding Releases into Colusa Basin Drain and Yolo Bypass	The Final EIR/EIS contains vague and inconsistent language regarding releases to the Colusa Basin Drain and into the Yolo Bypass, including which entity/ies are responsible for managing such releases once the project is operational. At pp. 1-7, the Final EIR/EIS describes a benefit agreement for ecosystem improvements to be administered by the California Department of Fish and Wildlife. But the terms of these agreements are not described in the Final EIR/EIS, let alone analyzed, and it is not clear whether these agreements will even cover releases into the Yolo Bypass as opposed to other ecosystem uses. Nor is there any other detail on which entity /ies will be responsible for managing such releases or, critically, how various assumptions regarding the timing and extent of releases into the Yolo Bypass will be implemented overtime, including (a) how oversight will occur, (b) whether the assumptions will later be	It is anticipated that potential water releases for ecosystem benefits under Proposition 1 would be provided by entering a contract with CDFW. Collaboration between the Authority and CDFW would ensure releases of ecosystem water are scheduled to address real-time conditions and needs. While the exact terms of such agreements are not yet available, such a level of details is not necessary to ensure planning level analysis of potential Project impacts. Please refer to Master Response 2, Alternatives Description and Baseline regarding the adequacy of the Project description and CEQA/NEPA requirements. The Authority would be responsible for managing releases, in coordination with the appropriate resource agencies, as would be the case for instance for ecosystem benefit water.

	expressed as binding and enforceable commitments, and (c) whether increased maintenance or other impacts of affected facilities, such as the Tule Canal and Toe Drain, will be necessary.	Please refer to Chapter 5, Surface Water Resources, and associated appendices, for details regarding the potential changes in hydrology resulting from Project operations, including releases to Yolo Bypass. Appendix 5A1, Model Assumptions, includes details regarding deliveries of ecosystem benefit water. The hydraulic modeling results serve as the basis for the impact analyses subsequently presented in each resource chapter and for the fully disclosed impact determinations.
6.b Dunnigan Pipeline-Inconsistent Language Regarding Releases into Colusa Basin Drain and Yolo Bypass	Of greatest concern to the County, the Final EIR/EIS is replete with vague and inconsistent language regarding the timing, volume, and purpose of releases into the Yolo Bypass. At p. 2-77, text addressing releases into the Colusa Basin Drain and the Yolo Bypass states: Water releases would generally be made from May to November but could occur at any me of the year, depending on a Storage Partner's need and capacity to convey water to its intended point of delivery. Water would be released from Sites Reservoir via the I/O Works back through the TRR PGP and into the TRR or back through Funks PGP back into Funks Reservoir. Water released could be used along the GCID Main Canal, along the TC Canal, or conveyed to the new Dunnigan Pipeline and discharged to the CBD under Alternative 1 or 3 or to the Sacramento River under Alternative 2. From the CBD, the water may be conveyed via the Sacramento River or the Yolo Bypass to a variety of locations in the Delta or south of the Delta.	The commenter's assertion that there is ambiguity regarding how the Project will be operated is unsupported by the information presented throughout the EIR/EIS, including in Chapter 2 (see pp. 2-86 through 2-88), Project Description and Alternatives, in the section titled "Releases from Sites Reservoir." Please also note that Chapter 2 provides a general description of operations. More details regarding the timing, volume, and purpose of releases into the Yolo Bypass can be found in Chapter 5, Surface Water Resources, and associated appendices, which discusses potential changes in hydrology resulting from Project operations, including releases to Yolo Bypass, as modeled using CALSIM II. Tables 5-20 and 5-21 provide ample details regarding the expected timing and volume of releases to the Yolo Bypass and potential impacts of the Project on total Yolo Bypass flow, respectively. Table 5-30 includes information about simulated Sites water supply deliveries for Yolo Bypass Habitat Water Supply. Table 5-32 presents CALSIM II modeled flood flows for the NPA and the Project Alternatives, including flows through the Yolo Bypass. These hydraulic modeling results serve

	In effect, this language seems to say that anything is possible. It is hard to reconcile this language with other provisions of the Final EIR/EIS that appear to contemplate much more limited releases into the Yolo Bypass. This overall ambiguity in the description of intended project operations prevents the County from understanding and commenting meaningfully on the likely environmental consequences of Project operations on existing uses in the Yolo Bypass, including agriculture, recreation, and environmental education.	as the basis for the impact analyses and determinations subsequently presented in each resource chapter. The EIR/EIS provides an appropriate level of detail for planning level analysis as required by CEQA and NEPA.
6.c Dunnigan Pipeline-Inconsistent Language Regarding Releases into Colusa Basin Drain and Yolo Bypass	Similarly concerning is language on p. 5-36, stating: Sites Reservoir releases to the Sacramento River (either through CBD via the Dunnigan Pipeline or directly from the Dunnigan Pipeline) are expected to be greatest during dry conditions, with average releases of approximately 350–580 cfs during June through August of Critically Dry Water Years (Table 5-19), with releases reaching a maximum of 1,000 cfs during some months (Chapter 2). Releases to the Sacramento River would be somewhat higher during Dry Water Years than Critically Dry Water Years due to greater storage in Sites Reservoir, with average releases of approximately 560–830 cfs during June through August (Table 5-19), and releases persisting at higher levels through November relative to Critically Dry Water Years. Sites Reservoir releases to Yolo Bypass would be greater during Wet Water Years than during Critically Dry Water Years (Table 5-20), with releases reaching 380–446 cfs during August and September of Wet	The first paragraph cited by the commenter, which mentions releases potentially reaching a maximum of 1,000 cfs during summer months, refers to releases made directly to the Sacramento River through the Knights Landing Outfall Gates. Such releases would not be conveyed through the Yolo Bypass as suggested by the comment. Similarly, the commenter seems to be confusing the anticipated timing of release discussed for the Sacramento River in the first paragraph cited (June through August and potentially persisting through November) with what is anticipated for releases made through the Yolo Bypass, as summarized in the second paragraph cited (mostly August through October), which is consistent with the description of ecosystem benefit water elsewhere in the EIR/EIS. The assertion that the EIR/EIS is lacking a stable and accurate depiction of how the Dunnigan pipeline will be operated is not supported by the information provided throughout Chapter 2, Project Description and Alternatives, and Chapter 5, Surface Water Resources.

	Water Years. Percent change in total Yolo Bypass flows is expected to be large during August through October because, during this me, Sites would be releasing habitat water to the Yolo Bypass, and existing Yolo Bypass flows are generally low during these months (Table 5-21). Small percent reductions in Yolo Bypass flows are expected during the rainy season as a result of the diversions to Sites Reservoir storage (Table 5-21) This text raises at least two specific concerns. First, if Alternative 1 or 3 is approved as the final project, it would seem that releases of "a maximum of 1,000 cfs during some months" will be solely feasible through the Yolo Bypass. Yet as the Final EIR/EIS acknowledges elsewhere, the Tule Canal and Toe Drain are used for agricultural irrigation and drainage in the summer and early fall and those features have limited capacity for additional releases from the Dunnigan Pipeline and Colusa Basin Drain. Even seting aside the existing uses of the Tule Canal and Toe Drain, the capacity of those features is constrained in some locations to only 200-300 cfs (as noted in the Final Environmental Impact Report/Environmental Impact Statement for the Big Notch Project, discussed elsewhere in the Sites Final EIR/EIS) and the releases discussed in the Final EIR/EIS could easily overwhelm these canals and inundate nearby agricultural land. Second, the timing of releases described in this paragraph (June through August, and possibly through November) is at odds with the discussion of timing elsewhere in the document, which is typically limited to the months of August-October. This	As described on page 6-71, the document states: The intent of the releases from Sites to the Yolo Bypass during this period is to transport nutrients and food sources for fish species in the Delta. If the water inundates floodplain areas (i.e., areas outside existing channels), the food would remain on the floodplain and fail to move into the Delta. As such, Sites Reservoir would be operated to maintain flows within the existing Toe Drain, Tule Canal, and other channels, and adjustments in operations would be coordinated between the Authority and parcel owners using the existing Yolo Bypass monitoring network. Because these flows would generally be contained within the Yolo Bypass channels without spreading across the bypass floodplain, water temperatures within the bypass would not be expected to increase as a result of the habitat flows. No flows through the Yolo Bypass would result in overbank flows as this would not result in the ecological purposes that this flow is intended to achieve. The Authority recognizes the need to coordinate with other agencies and landowners on use of the Tule Canal and Toe Drain to ensure that this is the case. The Authority has recently established the Lower Colusa Basin Drain System Working Group to work through the complex network of infrastructure and waterways that involves multiple partner agencies,

	language, taken together with the text discussed above on p. 2-77, further illustrates the lack of a stable, accurate description of how the Dunnigan Pipeline will be operated to convey water into the Yolo Bypass for water deliveries, ecosystem purposes, or both.	private landowners, and a long history of cooperation and water operations to address questions operations of facilities, flowage rights, and how best to coordinate with other districts/operators and landowners in the future Sites Project operations. Yolo County has been invited to participate in this group and the Authority appreciates the counties participation to date. While the Lower Colusa Basin Drain System Working Group is focused on the Colusa Basin Drain downstream of the Balsdon Weir, the Knights Landing Ridge Cut, the Knights Landing Outfall Gates, and the Wallace Weir, extending into the Yolo Bypass Tule Canal and Toe Drain is a logical extension of the group and would work to address many of the questions that Yolo County raises.
7.a Dunnigan Pipeline-Inconsistent Language Regarding Land Use Impacts of Operations	The Final EIR/EIS contains inconsistent language regarding potential land use and agricultural impacts of releases into the Yolo Bypass. As indicated in footnote 2, some language in the Final EIR/EIS indicates the potential for "inundation of low-elevation parcels in the upper Yolo Bypass (north of the I-80 causeway) due to August-October ecosystem releases." The precise impact appears to be quantified at p. 11-122, which states (with emphasis added): The modeling results of Yolo Bypass inundated suitable habitat show considerable increases in mean inundation acreage under Alternatives 1, 2, and 3 relative to the NAA during August through October, including up to 805 acres for September of Above Normal Water Years under Alternatives 1A and 1B (Table 11-13). These increases are the result	The excerpt from Chapter 6 (page 6-71), Surface Water Quality mentioned in footnote 2 of the comment specifically refers to the North Delta Flow Actions that are not part of the Project. These flows are mentioned because they provide similar flows into the Yolo Bypass compared to what the Project could release. But, as noted by the comment itself, the EIR/EIS on page 6-71 also states that the operations of the Project would be adjusted through coordination between the Authority and parcel owners to ensure flows remain within the existing Toe Drain, Tule Canal, and other channels, thus avoiding the "limited inundation of low-elevation parcels in the upper Yolo Bypass" observed as part of the North Delta Flow Actions.

	of planned agricultural flow releases from Sites Reservoir. The releases reach the Yolo Bypass via the CBD, entirely bypassing the Sacramento River. For this reason and because of the months in which they occur, these summer-fall increases in inundated acreage have negligible effects on juvenile Chinook salmon or steelhead, including winter-run. If this is accurate and the increased acreage includes land outside the Tule Canal and Toe Drain features, much more information on the modeled inundation footprint and related impacts is needed. However, the County notes that the Final EIR/EIS also contains conflicting information that indicates no impacts are predicted. For example, at p. 6-71, the document states: The intent of the releases from Sites to the Yolo Bypass during this period is to transport nutrients and food sources for fish species in the Delta. If the water inundates floodplain areas (i.e., areas outside existing channels), the food would remain on the floodplain and fail to move into the Delta. As such, Sites Reservoir would be operated to maintain flows within the existing Toe Drain, Tule Canal, and other channels, and adjustments in operations would be coordinated between the Authority and parcel owners using the existing Yolo Bypass monitoring network. Because these flows would generally be contained within the Yolo Bypass channels without spreading across the bypass floodplain, water temperatures within the	

	bypass would not be expected to increase as a result of the habitat flows. Similarly, text at p. 15-36 says: As discussed under Impact AG-4, agricultural lands would not be affected during the growing season as a result of inundation at Yolo Bypass or the CBD for Alternative 1, 2, or 3. Therefore, Alternatives 1, 2, and 3 would not result in temporary or permanent impacts as a result of changes in water regime at Yolo Bypass and CBD.	
7.b Dunnigan Pipeline-Inconsistent Language Regarding Land Use Impacts of Operations	Finally, the Final EIR/EIS does not describe the easement rights or other property interests necessary to enable the Yolo Bypass releases described therein. Does the agency/ies responsible for such releases intend to use the easement rights that the California Department of Water Resources is currently seeking to acquire through eminent domain for the Big Notch Project? Some discussion on this point should be included to ensure affected Yolo Bypass landowners (as well as the County and other interested local agencies, such as reclamation districts) understand how the project could affect their property rights.	As described in Chapter 15, Agriculture and Forestry Resources, under Impact AG-4, agricultural lands in the Yolo Bypass would not be inundated as a result of the Project. The Authority is assessing the need for flowage rights and easements for the Tule Canal and Toe Drain. The Authority appreciates that this is important for landowners and others to understand how the project could affect their property rights. The Final EIR/EIS provides a complete analysis of the impacts of additional flows in the Yolo Bypass and the question of property rights, in and of itself, is not an environmental impact.
8.a Dunnigan Pipeline-Capacity	The maximum capacity of the Pipeline is not clearly described. The Final EIR/EIS states that the Pipeline will be operated to convey up to 1,000 cfs, but it does not indicate that this is the maximum conveyance capacity of the facility. In approving the Project or otherwise, the Sites JPA should clarify the maximum conveyance capacity of the Pipeline.	The EIR/EIS includes information and data on the location, design, schedule, and operation for all Project components for each of the alternatives evaluated with sufficient detail to analyze the Project impacts and sufficient detail regarding the Project for decision makers to understand the alternatives being evaluated.

		Specifics related to the Dunnigan Pipeline are included in EIR/EIS Chapter 2, Project Description and Alternatives. This includes the following text, " The conveyance through the Dunnigan Pipeline to the CBD would use gravity (i.e., no pump station) and have a flow up to 1,000 cfs." This indicates a maximum capacity and is reflected in the analyses.