





CHICO 350



California Water Commission
P.O. Box 942836
Sacramento, CA 94236-0001

March 17, 2019

Subject: Need for Recirculated DEIS/EIR for Proposed Sites Reservoir

Dear Mr. Yun and Members of the California Water Commission;

We write to you under your role as a responsible agency under the California Environmental Quality Act¹ regarding the environmental documentation for the proposed Sites Reservoir Project. While the CWC is not the CEQA lead agency for Sites, you will be required to use the EIR prepared by the Sites Project Authority. In order to ensure timely awarding of construction funds, you have a vested interest to ensure that a legally adequate EIR is prepared.

Attached is a letter we sent to the Sites Project Authority documenting the multiple inadequacies in the Draft EIS/EIR for the project. Most importantly, the project as described to date does not resolve the fundamental issue of what will be the minimum bypass flows for the Sacramento River. This is a key issue that underlies the basic water yield and economic feasibility of this project.

The California Department of Fish and Wildlife has recommended a much higher minimum bypass flow in the Sacramento River than is being proposed by the (13,000 cfs compared to 3,250 cfs at Red Bluff, 4,000 cfs at Hamilton City and 5,000 cfs at Wilkins Slough).² The impacts to the Sacramento River fishery have not been adequately described in the DEIS/EIR, nor is there an alternative analyzed in the DEIS/EIR that would provide the flow recommendations by CDFW.

¹ See PowerPoint Presentation on CWC's role under CEQA for the WSIP at https://cwc.ca.gov/-/media/CWC-Website/Files/Documents/2015/06_June/June2015_Agenda_Item_11_Attach_2_Powerpoint_King.pdf It should be noted that slide 12 says that CWC as a responsible agency should provide comments on the public review draft EIR, but according to the Sites Project Authority, the CWC did not provide comments.

² See CDFG letter of 1/12/18, page 9 "CDFW recommends the Project proponents revise the bypass flow requirement to maintain at least 13,000 cfs past all diversion facilities prior to the diversion of water to reduce impacts on out-migrating juvenile salmonids." Accessed at <https://www.friendsoftheriver.org/wp-content/uploads/2018/09/1-12-2018-CDFW-Sites-Project-Letter.pdf>

It is impossible for anybody to know if this project is cost effective and promised environmental public benefits can be delivered until the Sacramento River minimum bypass flow issue is resolved. The Sites Project Authority's recommendation for Sacramento River minimum bypass flows appears to justify a finding of financial feasibility, but how feasible will the project be if CDFW's minimum bypass flows are legally required?

We believe this issue must be fully and adequately analyzed in the DEIS/EIR, prior to any water rights hearing or other permitting process that will rely on the information in the DEIS/EIR.

Based on the inadequacies identified in the attached letter, we encourage you to strongly recommend that the Sites Project Authority prepare a recirculated Draft EIS/EIR.

Sincerely,

Tom Stokely, Director
Save California Salmon
tstokely@att.net

Bill Jennings, Executive Director
California Sportfishing Protection Alliance
deltakeep@me.com

Carolee Krieger, Executive Director
California Water Impact Network
Caroleekrieger7@gmail.com

Conner Everts
Facilitator: Environmental Water Caucus
Executive Director: Southern California Watershed Alliance
connere@gmail.com

Ron Stork
Senior Policy Advocate
Friends of the River
RStork@friendsoftheriver.org

Noah Oppenheim, Executive Director
Pacific Coast Federation of Fishermen's Associations &
Institute for Fisheries Resources
noah@ifrfish.org

Larry Glass, Executive Director
Northcoast Environmental Center
Safe Alternatives for our Forest Environment
Larryglass71@gmail.com

Natalie Carter
Executive Director
Butte Environmental Council
natalie.carter@becnet.org

Dr. Glen Holstein
Chapter Botanist
Sacramento Valley Chapter of the
California Native Plant Society
holstein@cal.net

Gary Estes
Board Member
Protect American River Canyons (PARC)
gary.estes@wdlikenoname.net

Lowell Ashbaugh
Conservation Chair
Fly Fishers of Davis
ashbaugh.lowell@gmail.com

Alan Levine, Director
Coast Action Group
alevine@mcn.org

Rebecca Wu
Volunteer for Friends of the River
rebeccadawnwu@yahoo.com

Tryg Sletteland
Founder and former Executive Director
Sacramento River Council
tbsletteland@gmail.com

Jonas Minton
Senior Water Policy Advisor
Planning and Conservation League
jminton@pcl.org

Colin Bailey, Executive Director & Managing Attorney
The Environmental Justice Coalition for Water
colin@ejcw.org

John McManus
President
Golden Gate Salmon Association
john@goldengatesalmon.org

Mark Rockwell
Vice President for Conservation
Fly Fishers International
Northern California Council
mrockwell1945@gmail.com

Greg Reis, Scientist
The Bay Institute
greg@bayecotarium.org

Caleen Sisk, Chief
Winnemem Wintu Tribe
caleenwintu@gmail.com

Konrad Fisher, Director
Water Climate Trust
k@omrl.org

Mary Kay Benson
Steering Committee Manager
Chico 350
mkbe.sparkles3@gmail.com

Jean Hays, ED Leadership Team
Women's International League for Peace
And Freedom Earth Democracy
Skyhorse3593@sbcglobal.net

Attachments: Coalition Letter to Sites Project Authority
Kamman Hydrology Analysis of Sites DEIS/EIR on Trinity River

cc: California Water Commission Members
Representative Jared Huffman
Karuk Tribe
Hoopa Valley Tribe

Yurok Tribe
Humboldt County Board of Supervisors
Trinity County Board of Supervisors
Eileen Sobeck, Executive Officer SWRCB
Charlton Bonham, Director CDFW