Fish and cultural surveys for the Thomes-Newville site should be updated. The direct reservoir-induced impacts to special status species and cultural values should be quantified in the EIS/EIR.

Water Quality

The offstream storage reservoir sites are located in a region that naturally produces selenium and high amounts of metals and other potential pollutants, including methyl mercury. Reservoirs can act as a vector for these materials, concentrating them and then releasing them downstream. In addition, the reservoirs are relatively shallow, which will result in the warming of water and relatively high temperatures for water released downstream. The water quality impacts of the project should be fully considered in the EIS/EIR.

Seismic Issues

The potential offstream storage sites are located on a large fault system known as the Great Valley fault. This system is created by an active tectonic boundary between the Sierra Nevadan basement and Coast Range. This complex zone is the source of at least two major earthquakes (the 1892 Winters-Vacaville quake rated at magnitude 6-7 and the 1983 Coalinga quake rated at magnitude 6.7) and several small to moderate quakes.

According to the most recent seismic studies, faults underneath and adjacent to the proposed locations of the various Sites dams could produce a maximum credible earthquake of magnitude 7. The maximum potential earthquake for the Thomes-Newville project is estimated at magnitude 6.5-7. The costs of engineering project facilities to withstand such quakes should be considered in the EIS/EIR. In addition, the possibility of reservoir induced seismicity impacts to local communities, particularly those with un-reinforced masonry buildings, should also be considered in the EIS/EIR.

Downstream Floodway

The construction of a large reservoir on any stream requires that a floodway be maintained downstream that is of sufficient size to allow for emergency releases from the upstream facility. Since the offstream reservoirs under consideration would be on relatively small perennial and seasonal streams, the existing floodway capacity of these waterways can be assumed to be limited. In fact, flooding in the Colusa Basin from small seasonal streams is already a chronic problem. Establishment of sufficient downstream flood capacity could significantly impact downstream land use and development, as well as substantially increase the cost of the project associated with the relocation of structures and roads, as well as levee construction. These impacts and costs should be quantified in the EIS/EIR.

Power Production

Studies to date suggest that operating offstream reservoirs for pumped-back energy production could produce net revenues even while using more energy that it produces. This estimate was based on a much more static energy market prior to 2000. In fact,

large pumped back projects were not operating during the recent energy crisis because these projects rely on lower nocturnal rates that simply were not available. The cost feasibility of offstream facilities generating pumped back energy in the current and relatively unpredictable energy market must be factored in the EIS/EIR. In addition, the physical and environmental impact of pumped back storage on reservoir levels and reservoir recreation, as well as downstream flows must also be considered in the EIS/EIR.

Please provide a copy of the draft EIS/EIR when it becomes available.

Thank you.

Sincerely,

Steven L. Evans
Conservation Director

Sources:

North of the Delta Offstream Storage Investigation Progress Report (Final Draft), Integrated Storage Investigations, CALFED Bay-Delta Program, California Department of Water Resources, July 2000.

CALFED Storage and Conveyance Component Facility Description and Cost Estimate Reports, Volume 1, CALFED Storage and Conveyance Refinement Team, October 1997.

An Example of Average Monthly Diversion from the Sacramento River for Off Stream Storage Reservoir, California Department of Water Resources, August 1998.

Reconnaissance Survey of the Sites Offstream Storage Project, California Department of Water Resources, July 1996.

Flow Regime Requirements for Habitat Restoration along the Sacramento River between Colusa and Red Bluff, Integrated Storage Investigation, CALFED Bay-Delta Restoration Program, December 1999.

Ecosystem Restoration Program Plan – Strategic Plan for Ecosystem Restoration, Final Programmatic EIS/EIR Technical Appendix, CALFED Bay-Delta Restoration Program, July 2000.

Woodland, Scott

From: John Garino [jgarino@thegrid.net]

Sent: Thursday, February 07, 2002 4:25 PM

To: Woodland, Scott

Subject: Thomes/Newville Dam

Scott Woodland
Senior Engineer, Department of Water Resources

Dear Mr.. Woodland,

This letter is in regards to the Thomes/Newville Dam proposed project. My husband and I have discussed this project at length and we, like many others in the area strongly oppose the plan. We are concerned about the negative impact it will have in this area, and surrounding areas. It will adversely change our way of life as we know it, as well as that of the wildlife. It will not only change the wildlife population and movement, but more importantly, I am convinced that it will have a devastating affect on the wildlife. Obviously by changing the flow of the creek, it will eliminate many things, one of them being fishing. The list goes on.

It will also have a major, negative impact on the many family ranches, who have, for generations irrigated out of Thomes Creek. Their very livelihood depends on that water, just as the wildlife are dependent on that very same water.

I also have been told that this project would also put the historic Newville Cemetery under water, which, if true, I object to most vigorously. The thought of such a ridiculous, insensate, unintelligent and somewhat demented plan, appalls me. I can only imagine what the families of those buried there must think.

I thank you for your time. Please let me hear from you at your conveinence to discuss this project further.

Sincerely,
John Garino and Janice Garino

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January 2, 2002

Mr. Scott D. Woodland P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
Sacramento, CA 94236-0001

Subject: Scoping Meetings

Ladies and Gentlemen:

I have received your communication noticing of government explorations relevant to North of the Delta Offstream Storage. I am a 4th generation Northern California Farmer and have always been told and observed the critical place water takes in everyone's life. No civilizations need is higher than that for an adequate supply of quality water.

In California it has always been a critical element in efficient agriculture, industry and community growth...and California will have growth regardless of the supply! Accordingly, I am fully behind developing additional water storage, be it by expanding Shasta or other storage facilities or developing new needed sources with such projects as the Auburn Dam (onstream) or by taking advantage of excess river flows with projects such as the Sites Reservoir (offstream). The Sites Reservoir appears to be a particularly bright scheme because of its proximity to the Tehama Colusa Canal and the availability of a suitable geological site that is virtually useless for conventional purposes.

We must not let the "save the environment industry"...and make no mistake, it is an industry with all the profit and selfish desires of any industry, delay necessary and proper exploitation of our natural resources, particularly water. Our needs are obviously pressing even in the best of years and a real drought is eminent. Therefore, if we are to avoid a calamity that will make the energy crunch look like a minor pothole on a country road, we must secure additional water supplies without delay.

Sincerely,

Kenneth Gilmore

Kenneth Gilmore
4377 Emerald Ridge Lane
Suisun, CA 94585

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Haskell Environmental Research Studies Center

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May 2, 2000

TO: CALFED BAY DELTA PROGRAM

FROM Brenda Brandon, Technical Outreach Services for Native American Communities Coordinator.

SUBJECT: Pomo Cultural Risk Assessment Comments Related to CALFED Bay-Delta Program Draft Programmatic EIS/EIR, including Ecological Risk Assessment.

These comments apply to the lack of inclusion of tribal cultural concerns in the CALFED Bay-Delta Program Programmatic Environmental Impact Statement /Environmental Impact Report (EIS/EIR). The undersigned Pomo Tribes have expressed concerns about general and specific cultural potential impacts that have not been addressed in these EPA documents.

According to the National Environmental Policy Act Regulations Part 1506.6 (Public Involvement): "Agencies shall: Make diligent efforts to involve the public in preparing and implementing their NEPA procedures." The general feeling among the concerned tribal officials is that they were left out and uninformed of the preparation of the CALFED Bay-Delta Program. The delivery of a 4000 page technical document to the tribes with little time to comment was not appropriate, given that most of the impacted tribes do not have the resources or expertise to comprehend the full impact of such a huge undertaking. Many tribes were requesting resources to be brought up to date and to participate effectively in the commenting process. To the disappointment of all concerned, educational and training funds were not appropriated to the tribes. Essentially, they have not been involved to date.

There are two aspects of the NEPA process that the Pomo Tribes have requested to be involved in. First, they would like to address all issues and matters related to their tribal water rights. Secondly, the tribes have concerns about the risks related to potential impact to cultural resources that were not investigated or discussed in the EIS/EIR documents.

Tribal sovereign powers include rights to land, water, and other natural resources. In order to effectively address environmental impact concerns, a government to government relationship between parties involved must be established. Knowing that they must first be given opportunity to exercise their sovereignty rights, the Pomo Tribes are concerned about the future of their water rights. It is certain that many tribes feel threatened by potential impact to water rights brought about by the implementation of the CALFED Program.

There was no inclusion of tribes or mention of tribal reserved water rights in the CALFED Bay-Delta EIS/EIR document. Questions revolving around equitable participation in and equitable distribution of the water benefits to the tribes has not been addressed. There has been no effective establishment of advocacy that will protect tribal water rights in impacted areas. All of these issues bring about problems in building trust between the tribes and the involved agencies. In part the law mandates tribal involvement in the NEPA process, to avoid future environmental justice action.

Tribal cultural considerations are not only dependent upon the nature and degree of environmental impact to resources, but are also dependent upon tribal-specific impacts. As with any tribe, the Pomo people choose to define their own culture and express it in their own way. Certainly, each Pomo Tribe has specific concerns about the CALFED process that can be defined only by each Pomo Tribe itself. These comments are intended to serve as a guideline, which suggests the types of cultural issues the Pomo Tribes may want to have addressed during assessment of impact to their lands.

HERS has identified four general categories of tribal considerations that are frequently impacted by NEPA process. Below are listed the types of concerns that the Pomo may inquire about in relation to the EPA documents and NEPA process, specifically the CALFED Bay-Delta Programmatic Program EIS/EIR.

Subsistence living issues are not understood or considered.
Traditional cultural practices are not considered.
Impact to culturally significant sites, plants and animals may not be understood.
Long-lasting effects to aesthetic constitution of the environment are not discussed.

The Pomo rely heavily on natural resources in Northern California, not only for reasons dictated by their culture, but because they are located in primarily rural areas. Sustainability issues are primary concern to these tribes. Potential impact to culturally significant plants and animals has not been investigated. Many plants and animals that are utilized by the tribe were not included in the CALFED investigations. Medicinal plants were excluded from the ecological assessment altogether. Neither, was there any mention of addressing impact to culturally significant sites.

There are numerous plants and animals of cultural significance to the Pomo that have not been studied through the conventional approach used in the CALFED impact statements. Basket plants, an integral part of Pomo culture were not investigated in the CALFED documents. Some wetland plants of concern are already in a state of duress and could easily be devastated. The Pomo Tribes should be given opportunity to participate effectively in decision-making processes that revolve around the implementation of the CALFED Program to protect cultural resources.

There a number of complexities associated with the cultural use of biota, especially in relation to riparian and wetland ecology. Trophic level considerations were addressed only in a general sense in the Ecosystem Restoration Program Plan. The long-term impact on culturally significant natural resources by the CALFED Program has not been addressed and should take priority as the tribes struggle to maintain their cultural integrity in a world destined to never ending resource depletion. Pomo cultural preservation issues are real and deserve attention and fair consideration by federal agencies. The tribes should be given opportunity to evaluate the effects of alternatives and consider the impact that each may have on plants, animals and sites of significance.

The CALFED Program has the potential to disrupt the aesthetic constitution of the natural environment. It is the close relationship that Native American Tribes maintain with their environment that motivates them to pursue involvement in environmental processes. Because the psychological impacts of the disrupted environment are difficult to measure, cultural preservation precautions become pertinent. The long term impact to cultural resources is certainly an issue that the Pomo would like to see addressed. Given opportunity, through community involvement, the Pomo Tribes could obtain a sense of control over seemingly overwhelming environmental issues. Education, getting the community up to date on the NEPA process, would be a step taken in the positive direction. The tribes are, at the minimum, likely to request involvement with creating a cultural risk management program to help curtail the potential impact to their natural resources.

An effective tribal risk management model should include the following elements:

- Background research of oral and written history, cultural and ecological resource applicability, archeology, and scientific records.
- Examination of potential impact to culturally significant resources.
- Explicit communication of alternative solutions, which incorporate traditional cultural and ecological knowledge.
- Implementation of cultural risk management plan.
- Continuous monitoring of implementation actions that is in harmony with the tribes' cultural and psychological identity.

HERS' commitment to the Pomo Tribes is to assist them in communicating cultural concerns to government agencies. Another need that the Pomo foresee, is the development of a cultural risk management plan. Community involvement is key to the development and success of tribal cultural risk management plans. HERS could potentially contribute resources to assist the tribe develop such a plan.

Again, it should be noted that the Pomo Tribes are responsible for bringing forth information about specific cultural concerns with the involved agencies. The tribe however, must be given opportunity to discuss issues, and to become effective contributors to the decision-making processes that revolve around the implementation of the CALFED Bay-Delta Program for the next thirty years.

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MARY ANNE HOUX

SUPERVISOR, THIRD DISTRICT

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January 3, 2002

Scott D. Woodland, P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
Post Office Box 942836
Sacramento, California 94236-0001

Re: Sites Reservoir

Dear Mr. Woodland:

I am writing in strong support of new off stream storage in Northern California. I have studied the issues surrounding the Sites Reservoir and feel that it is probably the best choice from and environmental viewpoint and from a practical viewpoint.

Those of us who live in Northern California feel very strongly about the issue of transferring our water to Southern California. Water is essential to growing the crops which Northern California grows. Agriculture is our largest contributor to the economy. "No water – no crops" is more than just a slogan.

If there is an effort to save the run-off of water, then a transfer becomes less onerous.

Northern California feels it is necessary to have storage before transfer!

I hope that all agencies involved in this important issue give every favorable consideration to advancing the Sites Reservoir.

Sincerely,

Mary Anne Houx
maoh/

cc. David Guy, Executive Director
Northern California Water Association

CALIFORNIA LEGISLATURE

SENATE SELECT COMMITTEE ON CALFED

K. MAURICE JOHANNESSEN
CHAIRMAN

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***VIA FACSIMILE* (916) 651-9289**

February 8, 2002

Mr. Scott D. Woodland, P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Re: **Comments on North of Delta Offstream Storage EIR/S**

Dear Mr. Woodland:

This letter serves as my formal comments on the scope of issues to be addressed in the above referenced document and its accompanying supporting appendices and reports. Thank you for the opportunity to present to you the issues I feel are important and that need to be addressed at the outset of this project to ensure its future success.

As the leading North State Senator on water and water storage issues and as Chairman of the Senate Select Committee on the CALFED Bay-Delta Program, I am in a unique position to comment on the development of this particular environmental document. Any project approved at the end of this process will be built in my district and hopefully, will provide new water to my constituents.

As you may know, since the inception of the CALFED Program I have been involved in an oversight role as Chairman of the Select Committee and I have played an integral role in the development of the Program. I have held countless hearings on a variety of key

issues and these hearings have helped to shape the overall development of the CALFED Program and its environmental documentation.

Unfortunately, as someone who is intimately aware of the development of the CALFED Program, I cannot recommend that you rely on its environmental documentation. As you are undoubtedly aware, the CALFED Program is currently under litigation by several different organizations. The lawsuits allege significant errors and defects in the CALFED environmental review process and the accompanying documentation.

Given this fact, I would recommend that you obtain an independent legal opinion as to the advisability of tiering the North of Delta Offstream Storage EIR off of the CALFED Program EIR/S and ROD. This would be a prudent course of action in the event that the CALFED EIR/S and ROD is overturned in court at a future point in time. And again, prudence dictates that California taxpayers should be protected from paying twice for defective environmental review.

Moreover, I have a keen interest in seeing new water storage facilities built in this state as soon as possible. Any delay in providing new water storage in this state is unacceptable. It is my hope that any environmental review done for this project can stand alone so that we avoid any foreseeable delays that could be caused by any adverse rulings in the pending litigation. By taking this course of action, we can also avoid known errors and defects that exist in the CALFED EIR/S and ROD.

At this point, I would like to turn your attention to the four areas that you requested comments on, which are as follows:

> ***(1) The definition of future conditions without Offstream Storage (No Project/Action Alternative);***
>
> ***(2) Alternatives to be considered;***
>
> ***(3) Focus of Impact Assessment with respect to potential benefits or impacts; and***
>
> ***(4) Issues to be considered in the Cumulative Impact Assessment.***

I will address my concerns for each of the four areas that you have identified above.

(1) Comments on No Project/Action Alternative.

As I understand it, "[t]he California Environmental Quality Act ("CEQA") requires that the 'no project' alternative discussed in an EIR address 'existing conditions' as well as 'what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services' (*Planning and Conservation League v.*

Department of Water Resources (Sept. 2000) 83 Cal. App. 4th 892, 911; 100 Cal. Rptr. 2d 173)."

One very significant "existing condition" for purposes of your analysis is known water shortages in the state's water system. And as the above court pointed out, "[r]eduction of SWP entitlements to acknowledge permanent shortage (or, more accurately, realistic yield) will allow for more accurate forecasting...and more accurate planning efforts by regulatory authorities...(*Id.* At 915)."

This means that you would have to analyze the existing state water system and its known supply problems, including the projected population increase expected in the next twenty years and what impact this expected growth will have on the existing water availability and infrastructure in the state. In other words, how will the expected growth in the state's population impact the current state water system and its existing capacity?

I believe that this analysis will clearly show the dire straits the state finds itself in right now with respect to water. We simply do not have enough water right now, let alone significantly increased needs for the future. If we are to provide one of the basic necessities of life for the citizens of this state, the status quo is simply unacceptable with respect to water storage in this State.

Alternatives To Be Considered

"The range of alternatives required in an EIR is governed by a 'rule of reason'....[and]...[t]he key issue is whether the selection and discussion of alternatives fosters informed decisionmaking and informed public participation...(CEQA Guidelines, Section 15126(d)(5))."

The handout material that was provided at your scoping meetings listed the following alternatives: (1) Sites Reservoir; and (2) Newville Reservoir. Under the heading of "Other Possible Alternatives," you mention in passing the enlargement of Shasta Dam, and the conjunctive use program.

In my opinion, I believe it would be reasonable to include in this study the enlargement of Shasta Dam. Studying only two alternatives besides the 'no project/action' alternative would unnecessarily limit the potential storage options available to address the water shortages we are currently facing in the state. Both suggested alternatives are similar. Differences provide broader analytical methodology and discussions within the EIR. And this is what CEQA is predicated upon.

I believe it would be valuable to include the enlargement of the Shasta Dam in this Study. Shasta Dam is certainly 'north of the Delta' and its inclusion would provide a useful analytical counterpoint to the other two alternatives being considered, especially because it is an *onstream* as opposed to an *offstream* alternative.

Thus, its inclusion would add significant depth and value to the overall scope and extent of the discussion of possible storage options north of the Delta. The value of the

EIR would be greatly enhanced if the enlargement of Shasta Dam is included in the project alternatives.

Benefits/Impacts Assessment

Obviously, the single most important benefit provided by new storage infrastructure is the addition of "new" water into a system plagued by chronic shortages. This new water will provide much needed operational flexibility within the state water system as well as giving the state the ability to meet new growth demands that are already upon us.

Moreover, by meeting the new demand in growth, the local economy, and ultimately, the state's overall economy will benefit. And when the state's economy benefits, its citizens reap the rewards.

Considering the importance of "new" water, I believe it is imperative that in this EIR/S, you identify and quantify how much "new" water will be available as a result of the various storage options studies in this analysis. Furthermore, please identify exactly who will benefit from the addition of this "new" water.

I would also like to know if anyone will lose water entitlements if any of these storage projects are built. In other words, are we actually adding new water or are we simply shifting or transferring water in the system? If there are any transfers, what are the adverse impacts of such a transfer?

Specifically, will the water be available to local users as opposed to export uses? In other words, who will have ownership rights of the "new" water. And who will "own" the storage project ultimately selected for construction? Will it be the state, the federal government, a combination of state/federal ownership or some other arrangement? The public should be advised of these important decisions at the outset of this process.

Another major consideration will be the cost of the water. How much will it cost to provide "new" water from these particular projects? Will this cost be compared to the cost of water obtained from an expansion of Shasta reservoir so that a comparative analysis of cost is done for the various storage options included in this study?

Obviously, the addition of "new" water that is too expensive for the intended beneficial users in the local area raises serious questions about whether or not the development of the "new" water is feasible. We need to know this information in order to make the best choices about which storage alternative provides the greatest benefit for public use.

I believe a thorough and complete comparative analysis would be truly beneficial as an education tool for the public. The more information that is provided to the public on this issue, the greater the foundation upon which these projects can be based and with this

complete information, the best choices can be made about which storage options are the most beneficial to the state and its citizens.

Cumulative Impact Assessment

"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). This includes single projects done over a period of time where incremental impacts may not be adequately studied.

There are many important aspects that should be considered and adequately studied as part of this section of the analysis. The transfer of water out of its "area of origin" has serious impacts, both economically and socially. Its impact on the rural community can be devastating over time. These impacts must be studied and assessed before decisions are made about which projects merit construction.

The Klamath Basin problem where water was denied to those farmers in favor of endangered suckerfish had devasting economic and social consequences for the entire region. You should be very mindful of these types of consequences to local communities in preparing these planning documents. Decisions made in isolation without scientific bases to support them have real consequences. I urge you to carefully consider these types of consequences as you prepare this EIR/S.

In closing, I want to thank you for the opportunity to alert you to some areas of interest and importance that I believe should be taken into account and addressed from the very beginning of the EIR/S process. By taking these areas of importance into account from the beginning, we can properly address and study them and arrive at conclusions that make sense for not only the local citizens, but for the state as a whole.

I look forward to reviewing the initial draft when it is available to the public for comments. In the meantime, please be sure to place my name on the mailing list to receive notices of upcoming meetings. Thank you in advance for your attention to this request.

Very truly yours,

SENATOR K. MAURICE JOHANNESSEN
Fourth Senate District

c: file

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Business Filings
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Uniform Commercial Code
Elections
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January 9, 2002

Tom Hannigan, Director
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

Dear Mr. Hannigan

I strongly support the joint efforts of the Department of Water Resources and the CALFED Bay-Delta Program to move ahead expeditiously with all aspects of the Sites Reservoir project. During the initial discussions on establishment of CALFED, Senator Costa and I insisted that water storage facilities be an integral feature of the Delta plan. I strongly urged that a Sites Reservoir be the first of a series of water storage projects that need to be built to show the CALFED partnership that Northern California water interests would be protected. Collaborative efforts such as these are necessary to live up to the promise of CALFED, namely that "We all get well together."

I am deeply concerned that the CALFED process has become Balkanized. It is through efforts like the one you are considering now that we can re-establish the statewide leadership that is so necessary to get us back on track, notwithstanding a Record of Decision of that so many found inadequate for that purpose.

I believe this project, if ultimately constructed, will be a first step toward providing the kind of water supply reliability that is so desperately needed for California to live up to its responsibility to be a steward of our environmental resources. Again, this project would be tangible evidence that the state will take a leadership role in this issue. While our infrastructure is crumbling and failing to meet the needs of a growing state, state sponsorship of a water project has been virtually nonexistent. Local districts have been doing what they can to meet their needs, but this is a statewide issue that requires statewide leadership.

I had the opportunity to join with you, Mr. Director, and our colleagues to unanimously support AB 2315, in 1993 that led to this joint endeavor. I have been involved from the earliest stages as a supporter of CALFED efforts, and I was a joint author of Proposition 204—the largest environmental water bond of its kind when it was proposed in 1996—that served as a down payment on this unique state-federal partnership.

I am also uniquely qualified to comment on this process because I am personally familiar with water issues and how CALFED actions affect California's future. I come from a farm next to Mendota in western Fresno County. My

parents, my brother and one of my daughters and her husband still farm that ground, and I still own an interest in a portion of the farm. Our farm relies upon water delivered by the Firebaugh Canal Company and Westlands Water District. My father served on the state's water commission during the 1960s when the state saw a renaissance in state infrastructure building, including water development projects. My father also served on the boards of the Firebaugh Canal Company and the San Luis and Delta-Mendota Water Authority for many years. In those roles, he has been a leader in efforts to secure a reliable, long-term water supply for California's vital agricultural industry.

But apart from those personal interests, I am involved and interested as a citizen and as a policy-maker who has a long-held interest and a deep appreciation for the importance of water issues and an understanding of their many complexities.

It is in that spirit and with that understanding that I urge you to move ahead with the planning for and construction of this offstream storage project. As those familiar with water issues are well aware, the DWR assessment of California's water needs shows California's supply infrastructure falls short of meeting our needs even in years of average rainfall. At any time, we are literally one drought away from a water crisis. It is difficult for policy makers to explain to the public, the year after they see the Yolo Causeway area flooded and the Sacramento River teeming from bank to bank, why they must conserve water so the state can meet its most basic needs.

Sites Reservoir, filled primarily with diversions from the Sacramento River during times of peak flow, will reduce the impact of pumping for valley conveyance systems during summer months and will allow for additional flows for salmon and steelhead during critical times. This kind of project is what California needs to begin managing its resources to meet urban and agricultural needs, instead of trying to manage the short-term crises and the inevitable chronic crises that will come with the state's projected growth.

Thank you for considering these remarks and I urge you to do all that you can to ensure that your decision is one more step toward completion of this critical project.

Sincerely,

BILL JONES

cc: Kirk Rodgers, Acting Regional Director, USBR
Honorable Gray Davis, Governor

KERN COUNTY
WATER AGENCY

February 6, 2002

EXPRESS MAIL

Mr. Scott D. Woodland P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Woodland:

We are writing to provide you with our comments on the scope of issues to be addressed in the Environmental Impact Report (EIR) on the North of Delta Offstream Storage (NODOS) project. As you may be aware, the Kern County Water Agency is the second largest contractor of the State Water Project and its economy largely relies on water from that project. Agriculture drives approximately one-third of the Kern County economy and oil production (which utilizes water in the steam extraction of heavy crude) for another one-third.

The Agency has been working, along with the other state water contractors, with Sacramento Valley interests on a regional water management program that would help meet in-Valley needs as well as help the state and federal projects meet the requirements of the Bay-Delta Water Quality Control Plan (the so-called "Phase 8" negotiations). As part of our Settlement Agreement with the Sacramento Valley interests, we recognized that new off-stream surface storage is an essential element of the program and can increase the reliability of water supplies for export water users as well as upstream interests.

Clear factors demonstrate the need for additional surface storage:

- The state's existing network of reservoirs and aqueducts is outdated, undersized, and inadequate to provide an adequate water supply in a sustained drought.

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- Conservation and recycling programs alone cannot meet the growing needs of a population that has more than doubled since the system's major features were built 40 to 60 years ago.
- Additional storage is also needed to address new environmental requirements, which have increased demands on the system and reduced operational flexibility.
- Scientists are predicting a reduced snowpack due to global warming, suggesting that augmented surface storage capacity is necessary in order to offset the reduced natural storage in the snowpack.

Thus, the CALFED Record of Decision properly found the need to expand surface storage capacity in the state's system, and committed to study the Sites Reservoir in the Sacramento Valley as one possible location for new off-stream storage. That commitment should be honored.

Last year, after a string of five very wet years, the Agency received a water supply allocation of 39% of its contracted supply. This low level of supply reliability will begin to have serious adverse economic consequences up and down the state as soon as a multiple year dry period is encountered. The No Action Alternative must analyze the economic consequences of increasingly severe water supply shortages in the absence of new surface storage.

Specific Assessment Needs

New off-stream storage in the Sacramento Valley will provide considerable environmental as well as water supply benefits. The Sites Reservoir could provide the following environmental benefits:

Improved water temperatures for fisheries in the Sacramento River
2. Increased supplies and system flexibility in support of state and federal efforts to improve fisheries of the Sacramento River, including the EWA
3. Reduced exposure of juvenile fish to diversions
4. Greater ability to emulate the natural flow regime of the Sacramento River

The EIR must analyze these environmental benefits as well as the water supply benefits likely to result from Sites Reservoir or any other off-stream storage project.

Please add us to your mailing list to receive future announcements and information pertaining to this project. Thank you for your consideration of the comments we have provided.

Sincerely yours,

Thomas N. Clark
General Manager

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MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Feburary 7, 2002

Mr. Scott D. Woodland P.E.
Senior Engineer W.R.
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Response to Scoping: North of Delta Offstream Storage

Dear Mr. Woodland:

This letter provides comments of the Metropolitan Water District of Southern California on the scope of issues to be addressed in the Environmental Impact Report (EIR) on the North of Delta Offstream Storage (NODOS) project.

Metropolitan, in concert with the Department and the USBR, has been working with Sacramento Valley interests on a regional water management program that would help meet in-Valley needs as well as help the state and federal projects meet the requirements of the Bay-Delta Water Quality Control Plan (the so-called "Phase 8" negotiations). As part of our Settlement Agreement with the Sacramento Valley interests, we recognize that new offstream surface storage may be an essential element of the program and can increase the reliability of water supplies upstream users, export water users and provide environmental management benefits.

Metropolitan supports the conclusion in the CALFED Bay-Delta Program Record of Decision (August 28, 2000) that: "Expanding water storage capacity is critical to the successful implementation of all aspects of the CALFED Program." Expanded surface water storage can help meet future consumptive water needs, provide desperately needed system operational flexibility to protect fisheries and water supply, help provide improved drinking water source quality and to enhance flood control opportunities.

Alternatives

Non-reservoir alternatives to the project should be considered only to the extent they meet the broad purpose and need established for surface storage. That is, such alternatives should be able to provide the multiple benefits cited in the CALFED Record of Decision to be considered reasonable alternatives.

121 L Street, Suite 900, Sacramento, California 95814 • Telephone: (916) 650-2600 • Fax: (916) 44[illegible]08

Impact Assessment

In analyzing system-wide versus localized impacts of the project, the EIR should consider a number of different operating scenarios and focus on a scenario that provides the most broad and balanced operating benefits as the preferred alternative from an operating perspective. Site alternatives and operating alternatives that provide different levels of various benefits should be measured against this preferred alternative.

Benefits and beneficiaries of the preferred alternative should be analyzed. Care should be taken to recognize that any supply benefits derived from this project will likely only lessen existing regulatory burdens on previously authorized and financed water projects. As such, the benefit will be a general public and environmental benefit, compensating water project shareholders for water lost through regulatory actions which was previously paid for through user fees and other sources.

No-project Alternative

The EIR/S should consider the impacts upon water supply, water quality, fisheries and flood control of not achieving the benefits of the preferred alternative. This analysis should also consider changes in the base condition due to hydrologic changes which may result from global warming e.g., smaller snow packs and higher winter stream flows. These analyses should also consider socioeconomic impacts.

Thank you for considering these comments. Please add us to your mailing list to receive future announcements and information pertaining to this project.

Sincerely yours,

Timothy H. Quinn
Vice President, State Water Project Resources

Offices of:
John S. Mills
P.O. Box 911
Jamestown, Ca. 95327
(209) 532-0432 Fax: (209) 532-0480
e-mail address; sixbit@mlode.com

Scott D. Woodland P.E.
Senior Engineer, Water Resources
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, Ca. 94236-0001

January 18, 2002

Subject: North of Delta Surface Storage, Notice of Preparation

Dear Mr. Woodland:

This letter shall constitute the comments on the above referenced document on behalf of my clients, the Regional Council of Rural Counties (RCRC). These comments are provided in a timely manner as per the noticed review period and we hereby request they be entered into the administrative record of this proceeding.

It is my understanding that the following are the facts. The California Department of Water Resources (DWR) is the State lead agency under the California Environmental Quality Act (CEQA), and the Bureau of Reclamation (BOR) is the federal lead agency under the National Environmental Policy Act (NEPA) charged with preparing an Environmental Impact Report/Environmental Impact Statement (EIR/EIS), to comply with the referenced Acts. This document will be for the potential development of offstream water storage north of the Sacramento/San Joaquin Delta.

The DWR and Reclamation are jointly holding scoping meetings, prior to the drafting of the environmental documents in order to better assess the salient issues relevant to this proposal. There are a series of three meetings to take verbal comments and written comments are accepted until Friday January 25, 2002.

Written comments should be directed to the manager of this process and further, you are the manager.

The RCRC has been an active participant in the CALFED Bay-Delta Program since early 1996. New water storage has been one of RCRC's main concerns in this process and has identified, along with numerous other parties, that the state's water supplies are inadequate to meet all unmet needs even in above normal water years.

While RCRC has generally supported new surface storage, it has continually focused on the requirement that the new storage be functional storage. That is, that it not adversely impact its membership area, that it not be in conflict with the CALFED Solution Principal of no redirected impacts resulting from the CALFED Program and further that new storage should provide local water supplies. In addition, RCRC has advocated for affordable, high quality, reliable, water supplies from any new storage be attributed generally to the areas of origin. Further, RCRC has advocated that there be no adverse fiscal or socio economic impacts to the County(ies) or local economies and that local input and advice be sought throughout the process. In addition, RCRC has raised a series of technical questions that have thus far remained unanswered by the CALFED.

Please note that the majority of the existing surface storage in the state as well as most of the snow pack and water supplies (sources) of the state are located in the RCRC membership area. Further, the new off stream facilities were being located in the RCRC Membership area.

It is my understanding that you intend to "tier" this environmental document on the CALFED Programmatic EIR/EIS. Please note that RCRC has challenged that document and it is quite possible that the CALFED Programmatic document and process may be found legally inadequate. Therefore, any analysis carried out in this specific process should include a broad regional (all areas upstream of Delta), watershed wide analysis of potential impacts and alternatives for consideration. Analysis of such a proposal cannot be limited to focused "on site" topics.

I request that the following questions and points to be answered within the environmental document and administrative record:

1. How would the reservoir site, facilities and water be owned and managed? Specifically, what party(ies) would own the facility and what mechanism would be used to achieve that ownership arrangement?

2. What would the size, location and operational characteristics of any diversion facility, directly or incidentally associated with the project be? What would the impacts be at the point of diversion? What would the capacity need be at the points of diversion? What diversions (if any) would be displaced by the new diversions?

3. Please do an analysis of the year 2010, 2020 and 2030 water needs of all water users in the Sacramento watershed. Determine what surplus water, if any, is in the Sacramento Watershed to fill this reservoir for the same time periods. What would the specific water use be from this reservoir and what would the sale price of the water be?

4. What does the water produced by this project cost to the user? How often does the user receive this water? Is the water quality of the water appropriate to the beneficial use to which it will be applied? Will there be adverse impacts from the use of this water as it is applied and if so where? Will there be water supply benefits to the local area resulting from this project? Please specifically answer each question with specific data to support statements of conclusion.

5. Describe and analyze the linkage between this project and water exports from the Bay-Delta and any CALFED water acquisition programs, including the Environmental Water Account and the Environmental Water Program?

6. What entity would own the land necessary for the facilities (this would include those lands acquired for environmental mitigation purposes as part of this action)? Through what specific mechanism(s) would local governments and local communities be protected from adverse fiscal and socioeconomic impacts resulting from this project?

7. What relationship, if any, exists between the water resources necessary for this facility and to those water resources necessary to implement the Trinity River Restoration Flow Decision? The latter is a federal action which is already underway and we should be assured that any proposal

within the Sacramento watershed does not anticipate water resources from the Trinity which may not be present in the future.

8. What relationship, if any, exists between the water resources necessary for this facility and those necessary for previously authorized federal surface storage facilities such as Auburn Dam? Please specifically analyze the potential for this project to displace water resource appropriations necessary for Auburn Dam or any other surface storage project in the Sacramento watershed.

9. Will the current, County of Origin, Watershed of Origin and Protected Areas statutes of the California Water Code apply to this project? If not, specifically explain why not.

10. The applicants claim that this project will enhance the CALFED Environmental Water Account. The CALFED EWA is only a four year program. It will end prior to this project even coming on line. Therefore, is the statement by the applicants in error, or is the EWA extended by this action, or has the EWA already been extended counter to existing authorization? Please provide specific rather than general explanation.

11. The applicants further claim that there will be *"...increased flexibility to the system and to Lakes Shasta, Oroville and Folsom..."* as a result of this project. We wish to know what the specific details of flexibility are. Furthermore, if there are benefits attributable to this project that accrue to the above listed reservoirs who will those benefits be assigned to (in terms of water users)? Again, these answers must be specific and not general. Please define and disclose any new operations to these facilities which will now have increased flexibility, and disclose the impacts to users and beneficiaries of these facilities.

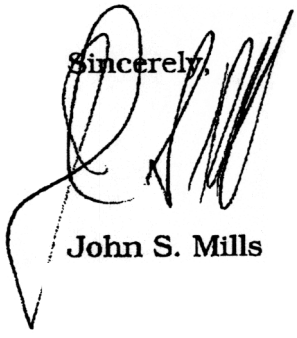
12. Please identify any potential Bay-Delta water quality impacts, or benefits which may be associated with this proposal. Please conduct that analysis with the information provided within the CALFED Bay-Delta Program and its environmental documents regarding water quality in the Delta as well as proposed increases in Delta exports in Stage 1. If there are impacts associated with this project how will they be mitigated and what parties and resources will be used to accomplish that mitigation? If there are benefits associated with this project (to water quality in the Delta) are those benefits being used to offset or mitigate for impacts to Delta water quality caused by implementation of Stage 1 pumping?

13. What additional power use will be associated with this project? What specific parties would bear the burden of providing, or paying for that power? What are the cumulative impacts of increased power use resulting from this project and other CALFED actions such as; Joint Point of Diversion, Environmental Water Account and Stage 1 implementation? What specific parties would bear the burden of providing, or paying for that power?

14. Is this project a Central Valley Project or State Water Project Facility? If it isn't why isn't it?

I look forward to the opportunity to review the draft environmental documents and wish thank you for the opportunity to comment.

Sincerely,



John S. Mills

Regional Council of Rural Counties

J Minton

11 February 2002

From: John L. Morton
Colusa County Historical Researcher
P.O. Box 743
Colusa, Ca. 95932

To: Jonas Minton, Deputy Director
Department of Water Resources
1416 – 9th Street
Sacramento, Ca. 94236

Dear Mr. Minton;

I am writing to you because I am concerned about the Cemetery at Sites. I have listened to the Colusa Board Supervisors, some Senators and Assyblymen and I have read the article in the Colusa County Newspaper about the Town Meeting held in Maxwell. The Subject of the Sites Cemetery was never brought up.

The Town of Sites is named after John Sites. The cemetery has 63 Buriels, with the last one done in 1969. There is also one Civil War Veteran buried there, Joseph John Shearin, a Confederate, born In North Carolina. A brief bio is enclosed. His brother, Mark Shearin, also a Civil War Veteran, is buried in the Maxwell Cemetery. Both brothers, along with the other 176 Civil War Veterans buried in Colusa County, are recorded on the Colusa County Civil War List.

The Cemetery is located on private property, owned by Charles Wells. I am sure the cemetery has been a topic of discussion on The water storage project, but I just want to know how it is going To be handled.

I do have a suggestion for all of you, why don't you make Sites Cemetery a " California Historical Landmark " and a " Colusa County Historical Landmark " and see if that will keep it there Instead of moving it?

A copy of John Sites obituary article from the Colusa Daily Times Newspaper is enclosed. It is a little dark, but it explains a little History on the Town's Founder.

Thank you for your time reading my letter.
Sincerely, John L. Morton, Colusa County Historical Researcher

John L. Morton

CONTROL# 2002-0186

CALL-UP 02/27/02

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CEMETERY INSCRIPTIONS
OF
COLUSA COUNTY, CALIFORNIA

Volume 2

Compiled and Published By:

COLUSA COUNTY GENEALOGICAL SOCIETY
P.O. BOX 973, WILLIAMS, CALIFORNIA 95987

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SITES CEMETERY

The Sites Cemetery is located about one half mile west of the town of Sites to the south of the Sites-Lodoga Road. When age at time or death rather than date of birth is given on a stone this information is shown in parantheses in order of years, months and days.

BIELER, Jacob	30 Jul 1872	11 Feb 1873
CLARKE, R A	20 Nov 1815	22 Sep 1879
DURBEY, Hugh (67years)		26 Nov 1889
EGGMAN, Conrad (48years)		7 Nov 1898
HARMON, James H	1868	1948
HUFFMASTER, Clarence	1859	1898
Ed	29 Apr 1826	17 Jun 1890
KENNEDY, Fern Ollean	18 Jan 1904	25 Aug 1935
James R	1855	1934
Willie H, dau H & HW	11 Dec 1861	4 Oct 1876
Mrs H W	22 Jan 1832	7 Apr 1897
Infant, dau Mrs W H		26 Feb 1877
Willie, dau James	18 Mar 1878	10 Feb 1879
KIRKUP, George		1905
Isabella Rigg	1878	1948
James M	30 Mar 1880	7 Nov 1953
Margaret M		1921
William	1876	1969
KRUGER, Willis A (38-3-3)		24 May 1908
MITCHELL, John (67-10-10)		3 Aug 1872
R, wife of John (71-4-25)		10 Jan 1882
PETERSON, Lot - Mellvah, our babies		1880
Lida M	1840	1892
Peter S	1820	1907
PHELPS, Nancy V (21-2-26)		18 Feb 18
PRINE, Riley T (11-6-10)		13 May 1874
Willie H (2-4-7)		6 Nov 1870
PRYOR, Frances B	Nov 1818	Jan 1906
REYNOLDS, Alaska son D & M (1-3-3)		24 Jan 1871
RIGG, Isabella Kirkup	1878	1948
RIDLEY, Arthur A son Hallie Shearin	1911	1945
RYNEARSON, Hannah wife of L	4 Feb 1827	13 Sep 1880
SHADDOCK, Emma dau JC & L	17 Apr 1871	18 Oct 1902
Evert son of JC	16 Jul 1877	9 Feb 1899
Ida dau JC & L	12 Aug 1873	30 Mar 1891
Lydia	12 Nov 1854	16 Mar 1890
SHEARIN, Octavia C	1838	1919
Wm M	1867	1951
J J	1834	1911

CIVIL WAR SOLDIER
BURIED IN SITES CEMETERY
COLUSA COUNTY

Joseph John Shearin B – 1833 D – 13 January 1911
Company A, 14th Infantry, North Carolina Regiment Commanded By Brigadier General S.D. Ramshur, Colonels F.M. Parker, R.Tyler Bennett & Bryan Grimes and Major Joseph H. Lambeth.
Note: He was born in North Carolina and enlisted in the Confederate Army in 1862 and participated in the Battles of Gettysburg (3 June – 1 August 1862) and Chancellorsville Campaign (27 April – 6 May 1863). He mustered out in 1866 and came across the plains to California and settled in the Sites area doing farm work at his ranch.

References: #6 – Colusa County Cemetery Books, Volumes 1 – 3 Published by the Colusa County Genealogical Society.
#7 – Colusa County Sun Herald Newspapers
#16 – The War of the Rebellion, A Compilation of the Official Records of the Union & Confederate Armies.
#17 – Louis Olker, Sons of the Confederate Veterans, Petaluma, Ca.

SITES, Anna O (0-7-9)		4 Sep 1883
Johnnie Franklin son W &SM	8 May 1880	7 Jan 1891
Maudie Jane dau WF & SM		25 Dec 1897
Sarah Maggie wife WF	20 Jun 1864	15 Jan 1904
William Franklin	9 Sep 1852	13 May 1939
Mary A	11 Oct 1862	21 Oct 1934
John	1834	1914
Laura E wife of John	16 Jun 1851	31 Mar 1884
Mary Francis dau J & LE		17 Aug 1870
Twin boys sons J & LE		14 Oct 1868
SMITH, Frank	26 May 1884	7 Dec 1949
Mary Ellen	1847	1931
Nellie wife of Frank P	1883	1936
Percy Lee	1881	1910
John B (stone broken)		
Lillie dau JB & SC (4-4-9)		20 Mar 1870
TATE, Marion D	1853	1920
James E	1876	1911
WALKER, John C		1889
WILSON, infant son WA & SA (4weeks		15 Nov 1876
WOLFE, Greta Rose	1902	1923
Rosie Marie	1923	1924
WRIGHT, Henry A (33-1-28)		5 Jun 1883

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double-sided printing.
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NCPA
NORTHERN CALIFORNIA POWER AGENCY
A PUBLIC AGENCY
180 Cirby Way • Roseville, CA 95678

(916) 781-4203
(916) 782-2191 FAX

January 25, 2002

Mr. Scott D. Woodland, P.E.
Department of Water Resources
Division of Planning and Local Assistance
PO Box 94836
Sacramento, California 94236

SUBJECT: Comments to the Scope of EIS/R- North of Delta Storage Evaluation

Dear Mr. Woodland:

The Northern California Power Agency[1] (NCPA) appreciates this opportunity to begin dialog on the development of improved storage capability in the Sacramento Valley. NCPA schedules Central Valley Project (CVP) preference power for its members, utilizing CVP hydropower generation resources to meet the customer loads. As such, we are interested in maximizing the effective utilization of the CVP resource and its appropriate integration with other existing or planned water and power resources in the region. We offer the following comments relative to the scope of the Environmental Impact Statement/Report (EIS/R) evaluation.

No schedule or milestones for subsequent EIS/R forums and subsequent decision processes were provided after the initial meeting (or in the letter announcing the EIS/R) and need to be established. Specific items that will require development in the EIS/R include: the purpose and need, project alternatives, the no-action and cumulative effects conditions, and evaluation criteria and methodology. The EIS/R report should provide an economic assessment for each alternative including: cost-benefit ratios; allocation of project capital and O&M costs between project beneficiaries; repayment capability of each of the project beneficiaries; and sources of funds to cover project capital and O&M costs. The report should also address the potential benefits and impacts to both CVP and SWP power resources, as well as the northern California regional energy supply. This includes the level and timing of generation, the gain or loss of power resources provided to CVP and State Water Project (SWP) power customers and the resultant cost/benefit impacts, and any cost impacts to the CVPIA restoration fund and its contributors. The scope of

[1] NCPA is a nonprofit California join powers agency established in 1968 to generate, transmit, and distribute electric power to and on behalf of its fourteen **members:** cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Ukiah, the Port of Oakland, the Truckee Donner Public Utility District, and the Turlock Irrigation District; and seven associate members: cites of Davis, Santa Barbara, ABAG Power, Bay Area Rapid Transit District, Lassen Municipal Utility District, Placer County Water Agency, and the Plumas-Sierra Rural Electric Cooperative serving nearly 700,000 consumers in central and northern California.

the report should also indicate the source of power to be used for project pumping, its costs, and proposed mitigation for any redirected impacts as a result of the project's pumping operations.

The evaluation needs to clearly define the operational scenario (when water is pumped and released), and compare SWP and CVP operations (e.g., daily/monthly release patterns, generation, storage, water delivery by division) with and without implementation of the specific North of Delta alternative. This allows for assessment of potential redirected impacts to CVP and SWP projects.

The no-action alternative is a critical feature of the analysis, and requires much more dialog between interested and affected parties, resource agencies and the EIS/R team. The no-action alternative needs to fully consider other proposed CALFED and Northern California resource projects that could significantly reduce/improve the project benefits and impacts.

It is our view that all alternatives need to be analyzed to provide fair comparisons. Specifically, Shasta enlargement is one alternative that needs more analysis. All alternatives need to specifically address their compliance with the CALFED solution principles, and define *specific necessary mitigation approaches.*

Thank you for the opportunity to comment, and we look forward to an open and collaborative dialog in the successful development of improved North of Delta storage capability. Should you have any questions, please feel free to contact Alan Zepp, NCPA's federal legislative analyst, at (916) 781-4238 for further information.

With Warmest Regards,

JANE CIRRINCIONE
Assistant General Manager
Legislative & Regulatory
Business Unit

AZ/cap