

**Table 4-2. Responses to Primary Forms and Petitions**

Letter Number-Comment Number	Comment	Response
60-1	I urge that this inadequate environmental document be withdrawn and revised to better assess and mitigate project impacts on the Sacramento River, downstream water quality (in the river and Delta), and on natural and cultural resources that would drown under the reservoir's footprint.	Since the 2017 Draft EIR/EIS, the Authority and Reclamation have engaged in public outreach and extensive review of additional alternatives and prepared a Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS). Please refer to Chapter 2, Project Description and Alternatives, for a description of the revised project analyzed in the Final EIR/EIS as well as Master Response 2, Alternatives Description and Baseline, which describes project refinements that have occurred since the RDEIR/SDEIS. Please see Appendix 2B, Additional Alternatives Screening and Evaluation, for further discussion of the extensive alternative development and review process.
60-2	The RDEIR assessment of impacts on the river are based on the false premise that current flow and water quality standards for the river are adequate. In fact, the current standards fail to protect and restore at-risk fish and wildlife species and are inadequate to maintain the river's dynamic, flow-based ecosystems on which these species depend.	Please see Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the impact analysis. Please also see Chapter 11, Aquatic Biological Resources, and Master Response 5, Aquatic Biological Resources, regarding analysis of impacts on fish. As described in Master Response 5, the Project will allow Storage Partners to deliver water from Sites Reservoir in exchange for conserving water in upstream reservoirs for use at times and locations that maximize potential benefits to anadromous fish.
60-3	Most major dam and water projects in California were promoted by water agencies and politicians as enhancing and protecting the environment. Decades later, the overall result has been salmon and other fish species declining towards extinction, extensive loss of wetlands and riverside habitat, and degradation of water quality. Because the project will depend on Prop. 1 water bond funding, the Sites RDEIR must prove to the public that Sites will avoid adverse environmental impacts and, in fact, provide net public benefits.	Please see Master Response 1, CEQA and NEPA Process, Regulatory Requirements, and General Comments, regarding the Water Storage Investment Program (Proposition 1). Please also see Chapter 11, Aquatic Biological Resources, and Master Response 5, Aquatic Biological Resources, regarding analysis of impacts on fish. As described in Master Response 5, the Project will allow Storage Partners to deliver water from Sites Reservoir in exchange for conserving water in upstream reservoirs for use at times and locations that maximize potential benefits to anadromous fish.

<b>Letter Number-Comment Number</b>	<b>Comment</b>	<b>Response</b>
60-4	The Sites RDEIR admits that the project will harm nearly 14,800 acres of oak woodlands, grassland, wetlands, riparian habitat, and croplands, with significant unavoidable impacts on the protected Golden eagle, paleontological and cultural resources, and air quality (through generation of greenhouse gas emissions). Potentially significant impacts on rare plants and other resources appear to have been low-balled in the DEIR.	Please see Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the impact analysis and Master Response 6, Vegetation, Wetland, and Wildlife Resources, regarding impacts on vegetation, wetlands, and wildlife.
60-5	The project will depend on coordinated operation with Trinity, Shasta, Oroville, and Folsom dams on the Trinity, Sacramento, Feather, and American Rivers to “benefit” endangered salmon downstream of these dams. The idea is that consumptive water supplies will be stored in Sites to allow the other dams to retain cold water for fish downstream. But according to the RDEIR, coordinated operations between Sites and other dams will on average “improve” salmon runs by a paltry 2-4 percent, at a cost to the taxpayers of more than a billion dollars.	Please refer to 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.
60-6	Although a major chunk of “environmental” water allegedly produce by Sites is allocated to maintain Delta water quality, there is little evaluation in the RDEIR as to whether this allocation will successfully restore a river and estuary already degraded by major water diversions. The State Water Board estimates that the Delta needs somewhere between 35-75 percent of its previously unimpaired flows, primarily from the Sacramento River. There is no information in the Sites RDEIR as to how project diversions and releases will achieve this standard.	Please see Master Response 1, CEQA and NEPA Process, Regulatory Requirements, and General Comments, regarding the relationship of the Project with other plans, programs, policies, and agencies.
60-7	I believe that the RDEIR fails to adequately assess the impact of climate change and reservoir evaporation on project yield.	Please see Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the impact analysis. The Reservoir Operations Plan, which is presented in Chapter 2, Project Description and Alternatives, Section 2.5.2.4, Operations and Management Plans, describes the management of water operations and accounts for losses and evaporation. Additional discussion of the Reservoir Operations Plan can be found in Master Response 2, Alternatives Description and Baseline. A discussion of CEQA and NEPA

<b>Letter Number-Comment Number</b>	<b>Comment</b>	<b>Response</b>
		<p>requirements as they relate to climate change follows.</p> <p>Chapter 28, Climate Change, summarizes modeling results associated with climate change and climate change effects. The modeling results and the modeling used for analyzing climate change are provided in Appendix 28A, Climate Change, which includes the effects of climate change on future precipitation as reflected in the revised 2035 CT results and the modeled WSIP 2070 results (provided as part of the Final EIR/EIS). Section 28.3, Methods of Analysis, in Chapter 28 describes the methods used to evaluate potential effects associated with climate change. The analysis is based on the Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, released by CEQ on August 5, 2016 (Council on Environmental Quality 2016). The 2016 guidance indicates that NEPA analyses should identify climate change effects on a proposed action and the potential effects of the proposed action on climate change by assessing GHG emissions. Estimated GHG emissions for the Project are included in Chapter 21, Greenhouse Gas Emissions. Additional information on how climate change was considered in the hydrologic modeling and hydrology analysis can be found in Master Response 3, Hydrology and Hydrologic Modeling.</p>
60-8	<p>This entire project is based on the false premise that there is “excess” water in the Sacramento River not needed for the environment. In fact, the State Water Board admits that it has grant rights to 151% of the Sacramento River’s annual flow. The Sites Project will simply increase this overallocation without creating any “new” water.</p>	<p>Please see the discussion of the merits of the Project and alternatives in Master Response 2, Alternatives Description and Baseline, for information regarding the specific circumstances under which diversions to Sites Reservoir would occur.</p>
60-9	<p>I urge that this entirely inadequate RDEIR be withdrawn and a new environmental document developed and released for public review that fully addresses the impacts of this project on the Sacramento River,</p>	<p>Please see Master Response 2, Alternatives Description and Baseline, regarding the adequacy of the impact analysis.</p>

<b>Letter Number-Comment Number</b>	<b>Comment</b>	<b>Response</b>
	Sacramento-San Joaquin Delta, threatened and endangered fish and wildlife that depend on the river and estuary, as well as on water quality.	
88-1	I am opposed to building a new 13,200 acres reservoir in the foothills west of the Sacramento River on lands with ceremonial and burial sites. The new Sites Reservoir in Northern California would be the size of Manhattan, could store up to 1.5-million acre-feet of water, and make it almost half the size of Shasta Reservoir. The reservoir would be owned by the private entity the Sites Project Authority, which is made up mainly of State Water Project (SWP) water contractors and irrigation districts. The authority is already offering new water rights in watersheds where five times more water is allocated than exists to powerful water districts, like the Metropolitan Water District. A previously file water rights application for the Sites project asked for 3-million acre-feet of water a year.	Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives. Please refer to Master Response 1, CEQA and NEPA Process, Regulatory Requirements, and General Comments, regarding the issuance of water rights. Potential impacts on cultural and tribal cultural resources are analyzed in Chapter 22, Cultural Resources, which acknowledges that impacts on archaeological resources would be significant and unavoidable under Alternatives 1, 2, and 3 and in Chapter 23, Tribal Cultural Resources, which acknowledges that impacts on tribal cultural resources would be significant and unavoidable under Alternatives 1, 2, and 3. Please also see Master Response 7, Tribal Coordination, Consultation, and Engagement, regarding the Authority and Reclamation’s consultation and engagement with Tribes, as well as Reclamation’s fulfillment of federal trust obligations.
88-2	MWD has stated it is reluctant to invest in Sites if it cannot be assured it will be able to pull its water out of the reservoir when it wants to. This has led many to believe the reservoirs would be used to fill Governor Brown's twin tunnels.	Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives.
88-3	The proposal includes inundating four creeks and adds new diversion pumps on the Sacramento River in Red Bluff. It does not include protections for the Trinity River or Upper Sacramento River salmon or for the Tribes and fishermen that depend on them despite the fact that it will lower flows and impact water quality some years. Water rights held by Tribes and counties and flows to avert fish kills in the Klamath River are currently not protected in the Sites proposal.	Please see Master Response 1, CEQA and NEPA Process, Regulatory Requirements, and General Comments, regarding Public Trust and California Reasonable Use Doctrines. Please see Master Response 8, Trinity River, regarding the Trinity and Klamath Rivers. As described in Chapter 2, Project Description and Alternatives, the Project would not affect or result in changes in the operation of the CVP Trinity River Division facilities (including Clear Creek). Reclamation would continue to operate the Trinity River Division consistent with all applicable statutory, legal, and contractual obligations, including, but not limited to, Public Law 84-386; Public Law 98-541; the Central Valley Project

Letter Number-Comment Number	Comment	Response
		<p>Improvement Act in Public Law 102-575; Public Law 104-143; the 2000 Trinity River Mainstem Fishery Restoration Record of Decision (Bureau of Reclamation 2000); the U.S. Department of the Interior, Office of the Solicitor Opinion M-37030 (U.S. Department of the Interior, Office of the Solicitor 2014); the 2017 Long-Term Plan to Protect Adult Salmon in the Lower Klamath River ROD (Bureau of Reclamation 2017); and Reclamation’s water rights.</p> <p>Furthermore, please see Master Response 7, Tribal Coordination, Consultation, and Engagement, which discusses how Chapter 29, Indian Trust Assets, indicates that Tribal water rights will not be affected by Alternative 1, 2, or 3, and how Tribal water rights on the Klamath River may actually benefit from the Project.</p>
88-4	<p>In theory, these pumps are meant to divert and store "surplus" water in winter and summer months, but they would also increase diversions and that would later return as sun-warmed water increasing the river's temperature.</p>	<p>Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives.</p>
88-5	<p>In truth, there is no "extra" water in this part of California, where up to 75% of the salmon habitat has been blocked by dams. Fisheries science has now proven that high flows during winter and spring are needed if salmon are to survive in California.</p>	<p>Please see Master Response 2, Alternatives Description and Baseline, regarding the merits of the Project and alternatives.</p>
88-6	<p>High flows have many benefits. Flushing flows in high water years inundate floodplains, help out migrating salmon, scour out sediments and algae, move spawning gravel, and reduce fish diseases, all of which greatly increase salmon numbers. In fact, new flow science coupled with extremely low salmon returns has led the state water board to create plans to restore winter and spring flows in the Sacramento River. In the Klamath watershed, the Trinity Management Council, which the Hoopa Valley and Yurok Tribes are members of, is recommending higher winter flows in the Trinity River and a recent lawsuit has forced higher spring flows in the</p>	<p>Please see Master Response 8, Trinity River, for responses to comments and questions related to the Project's effects on the Trinity River and its resources.</p>

<b>Letter Number-Comment Number</b>	<b>Comment</b>	<b>Response</b>
	<p>Klamath River to combat the C. shasta fish disease, which killed the majority of juvenile salmon in recent years. Steps have also been taken to use Trinity River reservoir water for fall cold water releases to prevent large scale adult fish kills in the Klamath River during droughts.</p> <p>Restoring flows are needed to bring back salmon. The Sites Proposal threatens all of these actions, and it could not come at a worse time. A recent report from U.C. Davis shows that over 45% of California salmon are facing extinction. Furthermore, the Klamath River is facing the worst salmon returns in history and wild Spring Chinook returns in the Klamath, Trinity and Sacramento Rivers last year numbered in the hundreds.</p>	