November 16, 2023

Alicia Forsythe
Sites Project Authority
122 West Old Highway 99
Maxwell, CA 95955

Vanessa King
Bureau of Reclamation
2800 Cottage Way, Room W-2830
Sacramento, CA 95825

Submitted via email to: EIR-EIS-Comments@SitesProject.org

Subject: Supplemental Comments on Sites Reservoir Project Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement

Dear Ms. Forsythe and Ms. King:

Contra Costa Water District (CCWD) thanks you for the opportunity to review the proposed Final Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Sites Reservoir Project (Project). CCWD appreciates the efforts that Sites Project Joint Powers Authority (Sites JPA), in conjunction with the Bureau of Reclamation (Reclamation), are making to modernize and improve flexibility within the water delivery system. CCWD understands the need for water supply projects to prepare the system for the impacts of climate change.

As you are aware, on January 28, 2022, CCWD submitted comments on the RDEIR/SDEIS.[1] While CCWD understands the need for the Sites Project, CCWD has identified some limited circumstances under which CCWD's existing water rights and supplies, and water quality in the Delta, could be impacted by operations of the Sites Project. Staff for CCWD and the Sites JPA have been working diligently for several months to develop a mutual understanding of the issues and to provide CCWD with the assurances we seek, and we are hopeful that this process will ultimately succeed. CCWD wishes to express its appreciation for the efforts of Sites JPA's staff, and particularly Ms. Forsythe, in this regard. However, due to the Project's timelines, it was not possible for the parties to reach agreement before the Final RDEIR/SDEIS must be presented to the Sites JPA board. Therefore, after reviewing the proposed Final RDEIR/SDEIS, CCWD is presenting these supplemental comments to augment its prior comments, as set forth below.

[1] CCWD also filed a protest on August 31, 2023 on water right application A025517X01 by the Sites JPA.

The RDEIR/SDEIS does not fully account for the potential impacts on CCWD operations, as described in CCWD's January 2022 comment letter. Specifically, under some circumstances, the diversions by the Sites Project have the potential to impact water quality in the Delta at CCWD's Intakes, which in turn will impact CCWD's water quality, water supplies, and energy costs, among other things. As the information from water right application A025517X01 and the Water Availability Analysis (WAA) confirms, Sites Project operations could impact CCWD's operations by causing:

1. Degradation in the quality, and hence reduction in amount, of the water available and suitable for diversion by CCWD at its Mallard Slough Intake.

2. Degradation in the quality of the water available for diversion by CCWD at its Rock Slough, Old River, and Middle River intakes, which would impact CCWD by reducing opportunities to fill Los Vaqueros Reservoir (LV), requiring CCWD to release more water out of LV, or forcing CCWD to incur additional monetary costs for pumping from more expensive intake(s).

3. Changes in the timing, quantity, or availability of the water available for diversion by CCWD under CCWD's Los Vaqueros Water right.

Illustrative examples of potential impacts are detailed in the attachment to this letter.

In addition, the RDEIR/SDEIS mentions the conveyance of water delivered from the Project through CCWD facilities, and CCWD's intakes are included as points of rediversion in the Project's water right application, but the RDEIR/SDEIS does not analyze the potential impacts of conveying water through CCWD facilities. When this analysis is performed, it may identify other impacts that require mitigation.

As noted above, CCWD appreciates our ongoing discussions to resolve the issues raised here and in CCWD's water rights protest. CCWD looks forward to coordinating with you on ways to address the Project's impacts on CCWD. Please do not hesitate to contact me at (925) 688-8168 or lshih@ccwater.com for further discussion.

Sincerely,

Lucinda Shih

Lucinda Shih
Water Resources Manager

CFC:wec

Attachment: Examples of Potential Impacts of Sites Project Operations on CCWD

Examples of Potential Impacts of Sites Project Operations on CCWD

This analysis examines a scenario illustrating the impacts Sites Project operations could have had on CCWD operations had Sites been diverting water in September 2006. According to the Water Availability Analysis (WAA) prepared by the Sites JPA as part of the Sites Project water rights application, if Sites had been operating in September 2006, Sites could have diverted up to 4,200 cfs. Such type of operations has the potential to alter hydrologic conditions and cause water quality and water supply impacts on CCWD.

As shown in Figure 1, under historical hydrologic conditions, CCWD's Old River intake would be expected to remain below CCWD's salinity target for diversions to LV storage through the end of October of 2006. However, diversions by the Sites Project would decrease inflows into the Delta and change the hydrodynamics, which would facilitate the salting-up process in the Central Delta. As a result, salinity at CCWD's Old River intake would increase significantly in September 2006, and CCWD would stop diverting water to LV storage at the beginning of October, a full month earlier than would have occurred without Sites Project operations. Thus, the water quality impact resulting from the Sites Project's diversion upstream would not only increase the salinity of the water that CCWD would divert to storage in LV in September of 2006, causing increased salinity in LV and loss of water quality blending benefit, but also would prevent CCWD from diverting water to storage in LV throughout October 2006, which would reduce CCWD's water supplies available for water quality blending and drought and non-drought emergency reliability.

Figure 2 shows that CCWD's Rock Slough intake would remain below CCWD's salinity delivery target through the mid-November of 2006. However, salinity at Rock Slough would rise above CCWD's salinity delivery target 23 days earlier due to Sites diversions in September. During this period, CCWD would have to switch diversions to Middle River intake, where the power cost is significantly higher. This would cause a monetary impact because CCWD would have to use more power to obtain its water supplies. Furthermore, the higher salinity at Middle River intake caused by Sites diversions in water year 2007 (from late December of 2006 to mid-February of 2007) would result in additional LV releases needed for water quality blending to meet CCWD's salinity delivery target, hence causing an additional water supply impact on CCWD.

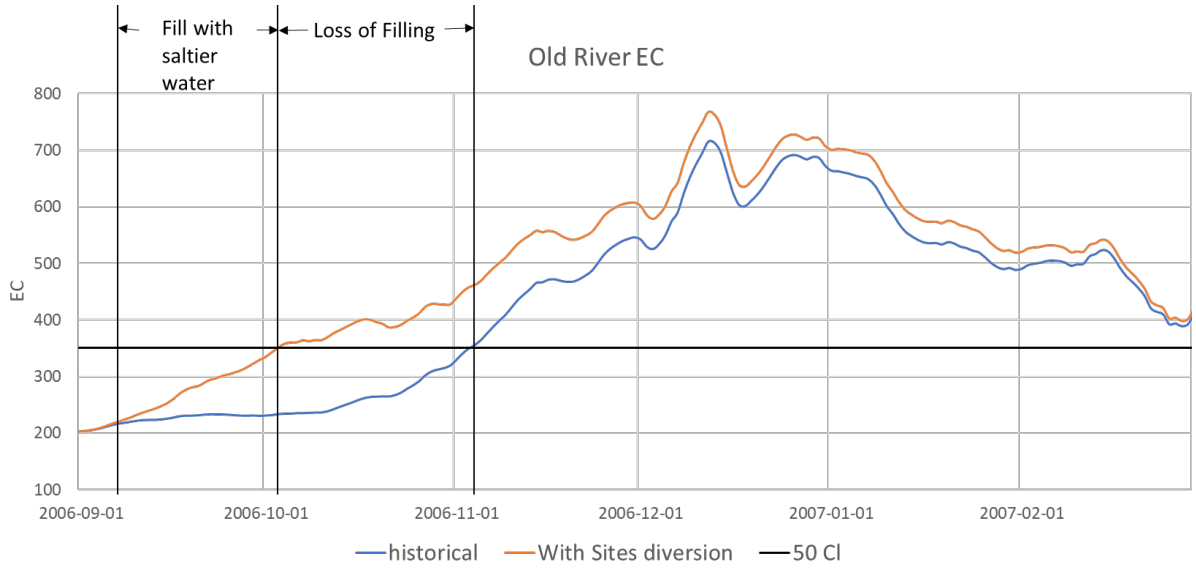

Figure 1. Salinity at CCWD's Old River Intake simulated with Delta Simulation Model 2 (DSM2) under historical hydrologic conditions (blue curves) and after accounting for the effect of Sites' diversions on hydrologic conditions (orange curves). The black horizontal line marks the corresponding electrical conductivity (EC) level for chloride concentration of 50 mg/L, which is CCWD's salinity target for Los Vaqueros Reservoir filling.

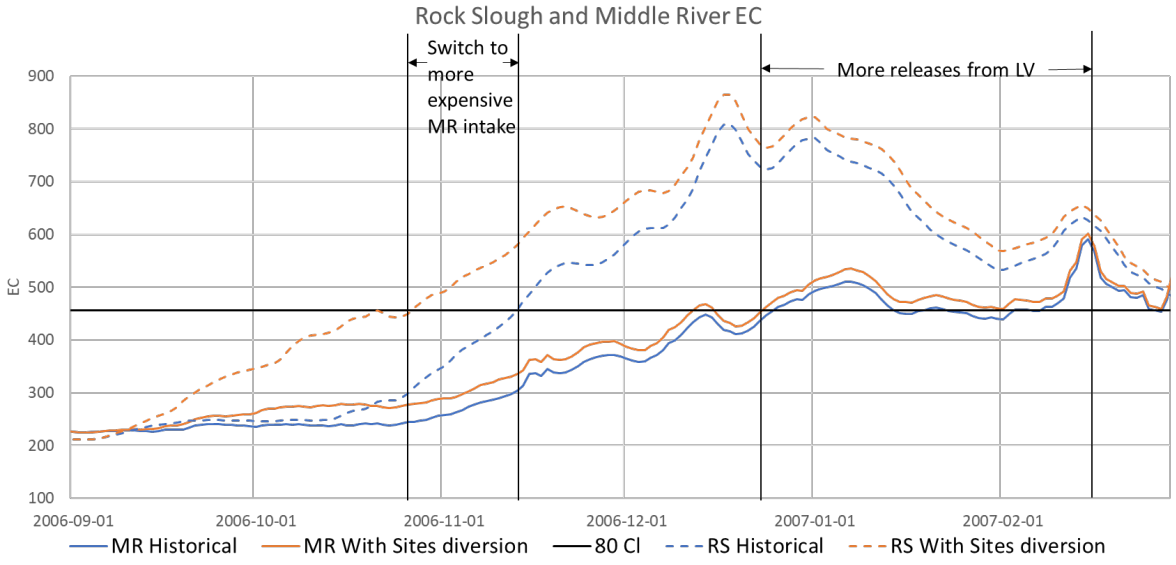

Figure 2. Salinity at CCWD's Middle River (solid curves) and Rock Slough (dashed curves) Intake simulated with DSM2 under historical hydrologic conditions (blue curves) and after accounting for the effect of Sites' diversions on hydrologic conditions (orange curves). The black horizontal line marks the corresponding EC level for chloride concentration of 80 mg/L, which is CCWD's salinity delivery target.