

From: Black, Lyna/RDD

Sent: Friday, May 12, 2017 6:09 PM

To: 'Dietl, Michael' <mdietl@usbr.gov>; Hughes, Brian <bhughes@usbr.gov>

Cc: Oliver, Mark/RDD <Mark.Oliver@CH2M.com>; rthomson@sitesproject.org

Subject: Sites Reservoir Project EIR/EIS - Admin Draft EIR/EIS for Cooperating Agency Review

Mike and Brian,

The Sites Reservoir Project Admin Draft EIR/EIS for Cooperating Agency review is available on Box.com at the link below.

<https://ch2m.box.com/s/v4aikogyoskyjdzj07vtejbger0kqxmj>

I've attached a blank comment/response matrix for comments on this version.

Also attached is a comment response matrix with responses to Reclamation's comments on the April 10, 2017 Admin Draft EIR/EIS.

Per your request, the Word version of the revised Chp 25 – Climate Change/Greenhouse Gas section is also attached. This version includes revisions based on Mike Tansey's comments provided this week.

Thank you,

Lyna

Lyna Black
Environmental Planner/Operations Lead
Environment & Nuclear Market

CH2M HILL
2525 Airpark Drive
Redding, CA 96001
Direct – 530.229.3295
Mobile – 530.680.5276
Fax – 530.339.3243
lyna.black@ch2m.com

Sites Reservoir Project EIR/EIS
Comment/Response Matrix

Reviewed document:		Admin Draft EIR/EIS - All Chapters 20170410										
Index (Comment #)	Date Document was Submitted to Authority/Reclamation/DWR	Chapter	Section	Section Title	PDF (Page #)	PDF (Line #)	Referenced Text	Comment	Commenter Name	Commenter Organization	Comment Date	Response
1	4/10/2017							Reclamation's Mid-Pacific Region, Memorandum-Adequacy of the Administrative Draft Sites Reservoir EIR/EIS; provided by Mike Dietl on 4/28/2017	Nathaniel Martin	Reclamation	4/28/2017	As indicated in the electronic mail review summary from Mid Pacific Environmental Compliance and Conservation Branch review provided by Mike Dietl on 4/28/2017, all but 7 of the 42 components were determined to be covered in the review of the Admin Draft EIR/EIS. Four of the seven components indicated as "needing to be addressed" will be covered in the Final EIR/EIS (the four include: 1-Issues raised by agencies and public; 2-Choice among alternatives; 3-Clear basis for choice among options; 4-Identification of preferred alternative). Of the remaining three of the seven total components indicated as "needing to be addressed," 5-the pending energy chapter will be provided prior to public review; 6-the "excessive page length" of the Executive Summary and Introduction (the email indicated that this issue is not a management level issue; sections are rarely limited to 15 pages) is noted and was kept to the bare minimum given the complexity of the project; 7-the remaining "Not Adequately Covered" CEQ requirement is addressed below. It should be noted that while the word "conflict" is specifically used in Chapters 13, 14, 20, and 26 because it is in Appendix G of the CEQA guidelines, this requirement is addressed in Chapter 4 and Appendix 4A. Chapter 4 summarizes key policies and regulations applicable to the Project and its implementation. Appendix 4A contains additional detail related to plans, policies, and regulations applicable to the analysis of each specific resource section as well as Project construction and operation. Of Reclamation's original 438 comments on the Draft EIR/EIS, three were identified as "not yet addressed" in the email provided by Mike Dietl. These comments have been addressed as follows: 1-Tables 14-3 and 14-5 still need a column added addressing "potential for occurrence" Response: Potential for occurrence has been added to the tables. 2-Needs Reclamation's guidance on using proper NEPA terms. Response: Comment unclear - direction on use of NEPA terminology has not been provided. 3-Groundwater quality sections use a Stormwater Pollution Prevention Plan as an operation mitigation component, and an SWPPP is only for construction. Response: Text has been revised to account for both construction and O&M requirements
2	4/10/2017	1 - Introduction			1 - 10	5 - 7	"...EIR/EIS do not tier from the CALFED EIR/EIS"	On page 1-10, lines 5-7, I suggest we delete the last sentence stating that this EIS does not tier to the CALFED EIS. This came up in the NODOS and SLRWI context a couple of years ago. In SLRWI, we decided to tier to the CALFED EIS. It is my recollection that Reclamation rejected tiering in older drafts (NODOS and SLRWI) because the CALFED ROD was in litigation for many years, but it has since been upheld. Is there any other reason to not tier to the CALFED EIS? If there is not, then I suggest we delete the last sentence and add language that is consistent with the SLRWI EIS regarding tiering. I don't have it in front of me, but the SLRWI planning lead should be able to get you the language.	Kevin Tanaka	Reclamation	4/28/2017	As described in the November 11, 2016, memorandum provided by CH2M HILL, storage projects were considered extremely programmatic in the 2000 CALFED PEIS/EIR and ROD; and Sites Reservoir was not fully recommended without completion of "substantial technical work and further environmental review and development of cost-sharing agreements before decisions to pursue them as part of the CALFED Program" (page 43, CALFED, 2000b). Sites Reservoir is not specifically mentioned in the CALFED Draft or Final PEIS/EIR impact analysis; however, the surface water model assumptions appear to include storage capacity related to implementation of Sites Reservoir. Based upon information presented in Appendix 2A, it is recommended that the Sites Reservoir EIR/EIS not tier from the CALFED PEIS/EIR.
3	4/10/2017	1 - Introduction						Govt-to-Govt consultation and Section 106 Consultation. Steve and I both feel like there should be more explanation about Govt-to-Govt consultation and NHPA consultation to date. It looks like there will be adverse effects to cultural/tribal resources, possibly even burials, but there is not alot of discussion about G2G or 106 processes. I suggest you add some language about what has been done to date and how you intend to complete the 106 process. I tried to look at the Cultural and American Indian resource chapters, but I was not able to locate/open them, per my prior message. You should certainly consult with Stacey and Laurie about this	Kevin Tanaka	Reclamation	4/28/2017	Text revised as requested in response to comment in Chapter 4 (added Section 4.1.13.3, Native American Consultations) and Chapter 36 (Section 36.5.6 updated to include the recent AB 52 consultation activities). Information on government-to-government consultation was already included in the Indian Trust Assets chapter.
4	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives			3 - 36	24 - 30	The development of new recreation areas at the Sites Reservoir could meet public demand for recreation opportunities.	Where is the recreation demand analysis that determined the proposed development of five recreation area?	Andrew Burrows	Reclamation	4/28/2017	A demand analysis was not performed by DWR when the potential recreation areas were developed. Colusa County selected the areas preferred for Alternative D.
5	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives			3-37	18	Construction	Need to include phase development depending on public demand.	Andrew Burrows	Reclamation	4/28/2017	The Feasibility Report indicates that development could be phased. Similar text was added to Chapter 3.
6	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives			3-45	14	Field Office Construction	Phase development and if determined to be developed by the county. Need to build in flexibility.	Andrew Burrows	Reclamation	4/28/2017	The Feasibility Report indicates that development could be phased. Similar text was added to Chapter 3.
7	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives			3-88	1	Recreation Section	Is this the preferred alternative that Glenn County and Colusa County agree on?	Andrew Burrows	Reclamation	4/28/2017	Glenn County did not engage in the development of the recreation areas; however, Colusa County attended meetings, suggested modifications, and chose the recreation areas that are identified for Alternative D.
8	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives			3-89	1	Construction	Need to include phase development depending on public demand	Andrew Burrows	Reclamation	4/28/2017	Revised as requested.
9	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives					Recreation Sections	Flexibility needs to be include in all aspects in the recreation sections. The County will not be required to build recreation areas if the demand is not present.	Andrew Burrows	Reclamation	4/28/2017	Revised as requested.
10	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives					Recreation Sections	Have you reviewed Lake Berryessa they cannot sustain five concession areas. They have had several problems and only have two long term contracts for concession areas.	Andrew Burrows	Reclamation	4/28/2017	Concession contracts are not anticipated and would be developed as necessary upon implementation of the Project.

Reviewed document:		Admin Draft EIR/EIS - All Chapters 20170410										
Index (Comment #)	Date Document was Submitted to Authority/Reclamation/DWR	Chapter	Section	Section Title	PDF (Page #)	PDF (Line #)	Referenced Text	Comment	Commenter Name	Commenter Organization	Comment Date	Response
11	4/10/2017	3 - Description of the Sites Reservoir Project Alternatives					Recreation Sections	Have you reviewed San Luis Reservoir for camping, launching and day use. The State cannot sustain the recreation opportunities without the cost share agreement with Reclamation. It is not and revenue generator or revenue neutral recreation project. Need to make sure flexibility is built into construction and not require to have three recreation areas constructed.	Andrew Burrows	Reclamation	4/28/2017	Current and anticipated recreation use at San Luis Reservoir was evaluated. Federal funding is not proposed for recreation. Colusa County's preference is for two recreation areas.
12		21 - Recreation Resources			21			Where is the study on recreation demand and phased development?	Andrew Burrows	Reclamation	4/28/2017	A demand analysis was not performed by DWR when the potential recreation areas were developed. Colusa County selected preferred areas for Alternative D.
13		21 - Recreation Resources			21			Boat ramp availability and lake level will impact the recreation opportunity on Sites reservoir. It is imperative a discussion on feasibility for economic viable recreation areas with significant lake level fluctuation. Will the recreation areas be financially feasible? Need to discuss the impacts of the lake drawdown on recreation and low water years. Low water will impact recreation and revenue.	Andrew Burrows	Reclamation	4/28/2017	The original recreation area evaluations emphasized camping and on-shore activities more than boating, but anticipates there would be one to two boat ramps. The availability of the boat ramps is discussed under each impact section and the associated data provided in Appendix 21B.
14		21 - Recreation Resources			21			Cannot require recreation areas to be built without a market assessment (demand assessment) and feasibility analysis. Reclamation cost shares up to 50% under managing partner agreements with the State and counties for recreation management of several lakes in California.	Andrew Burrows	Reclamation	4/28/2017	There is no federal cost allocation assumed for recreation.
15		21 - Recreation Resources			21-1	6	The amount of visitation at regional lakes and reservoirs can reasonably be expected to increase as the population of California increases.	This is a general statement without analysis and support. How do you know that construction of a new recreation area will increase visitation? You evaluated the opportunity against the accessibility of boat ramps and lake level.	Andrew Burrows	Reclamation	4/28/2017	The statement refers to regional lakes and reservoirs, and is meant to provide general context.
16		21 - Recreation Resources	Appendix 21A					Why include a 1967 point rating; seems little outdated.	Andrew Burrows	Reclamation	4/28/2017	Anticipated point ratings were initially used by DWR recreation planners and were retained in the current version of the environmental document as an additional method of determined potential impacts and benefits in addition to boat ramp availability and other factors.
17		21 - Recreation Resources	Appendix 21B					What is the percent the boat ramp will be usable during the operating season for each year?	Andrew Burrows	Reclamation	4/28/2017	This information is included in Appendix 21B.

25. Climate Change and Greenhouse Gas Emissions

25.1 Introduction

This chapter includes (1) a discussion of the environmental setting/affected environment for greenhouse gases (GHGs) and climate change, (2) a GHG emissions impact analysis of the potential environmental effects of GHGs emitted by construction, operation, and maintenance of the Sites Reservoir Project (Project), and (3) a climate change sensitivity analysis of the projected changes in future climate and their expected effects on the Project, as well as the potential for environmental effects on climate associated with the Project.

The GHG emissions impact analysis and climate change sensitivity analysis presented in this chapter provide two related analyses of the Project. The GHG emissions impact analysis is presented first and focuses on the GHG emissions that would result from implementation of the Project alternatives. The impact analysis provides the analysis required by the California Environmental Quality Act (CEQA) (*CEQA Guidelines* §15064.4) to evaluate whether the Project would have an adverse impact by emitting GHGs that could have a potentially significant impact on the environment, or conflict with an applicable plan, policy, or regulation aimed at reducing GHG emissions. The federal, state, and local regulatory setting for GHG emissions and climate change is discussed briefly in this chapter and is presented in greater detail in Appendix 4A Environmental Compliance.

The existing and potential changes in water operations, power generation, and pumping in the Extended and Secondary study areas as a result of construction, operation, and maintenance of the Project were evaluated, and the associated changes in GHG emissions were estimated. GHG emissions are not directly linked to specific impacts at geographic locations. Instead, emissions from individual sources around the globe, including those potential sources of emissions described as part of the Project, result in contributions to global GHG concentrations in the atmosphere, which may result in impacts that manifest themselves at global, regional, and local scales. As a result, this chapter is not separated into analyses of the Extended, Secondary, and Primary study areas. Instead, GHG emissions were analyzed for the Project in terms of shorter-term construction emissions and longer-term operational and maintenance emissions, regardless of source locations. GHG emissions from implementation of the Project were analyzed as a cumulative environmental impact; therefore, GHG emissions from the Project have been placed in the context of the statewide, national, and global GHG emissions, and global atmospheric concentrations of GHGs.

GHG emissions from the Project are not tied directly to potential impacts of climate change. GHG emissions from the Project and potential impacts of climate change on the Project are handled separately.

The climate change sensitivity analysis provides an analysis of how projected future climate change could impact the performance and environmental impacts of the Project, with a focus on water resources and related systems. The climate change sensitivity analysis provides a discussion of the potential effects of climate change on the Existing Conditions/No Project/No Action Condition, and the Project alternatives, including Alternatives A, B, C, C₁, and D.

25.2 Background

Climate is the average of conditions (based on averages of 20 to 30 years) of temperature, seasonality, precipitation, humidity, and types and frequency of extreme events, such as tornadoes or heat waves. For example, the climate of California's Central Valley is a Mediterranean climate, which is hot and dry during the summer, and cool and damp in winter, with the majority of precipitation falling as rain in the winter months. Tornadoes occur rarely. Climate is unique to a particular location and changes on timescales of decades to centuries or millennia.

Global climate change is expressed as changes in the average weather of the earth that are measured by temperature, wind patterns, precipitation, and storms over a long period of time (United Nations Intergovernmental Panel on Climate Change [IPCC], 2013). Climate change is a term used to describe large-scale shifts in existing (i.e., historically observed) patterns in Earth's climate system. Although the climate can and has changed in the past in response to natural drivers, recent climate change has been unequivocally linked to increasing concentrations of GHGs in Earth's lower atmosphere, and the rapid timescale on which these gases have accumulated (IPCC, 2013). The major causes of this rapid loading of GHGs into the atmosphere include the burning of fossil fuels since the industrial revolution, agricultural practices, increases in livestock grazing, and deforestation.

The phenomenon known as the greenhouse effect keeps the atmosphere near the Earth's surface warm enough for the successful habitation of humans and other life forms. GHGs present in the Earth's lower atmosphere play a critical role in maintaining the Earth's temperature; GHGs trap some of the long-wave infrared radiation emitted from the Earth's surface that would otherwise escape to space (Figure 25-1). The Kyoto Protocol, which was adopted in December 1997, addresses the following six GHGs: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and hydrofluorocarbons (HFCs). *CEQA Guidelines* §15364.5 also identifies these six gases as GHGs.

Higher concentrations of heat-trapping GHGs in the atmosphere result in increasing global surface temperatures, a phenomenon commonly referred to as global warming. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including, but not limited to: the jet stream; El Niño; the Indian monsoon; ocean temperature and acidity; the extent of alpine glaciers, sea ice and polar ice sheets; the extent of deserts; atmospheric water content; and the extent and health of boreal and tropical forests (IPCC, 2007a; IPCC 2007b).

The IPCC has been established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC is an organization of more than 800 scientists from around the world. It regularly publishes summary documents that analyze and consolidate all recent peer-reviewed scientific literature, providing a consensus of the state of the science. Thus, IPCC is viewed by governments, policymakers, and scientists as the leading international body on the science of climate change, and its summaries are considered to be the best available science. IPCC documents address change at the global and super-regional scales. IPCC studies and California-specific studies (e.g., California Air Resources Board [ARB], California Energy Commission [CEC], California Department of Water Resources [DWR], California Natural Resources Agency [CNRA], and Bureau of Reclamation [Reclamation]) that are based on IPCC data are referenced throughout this chapter.

- 1 Insert Figure
- 2 **25-1 The Greenhouse Gas Effect**
- 3 (size: 8.5 x 11)
- 4

1 The IPCC estimates that the average global temperature rise between the years 2000 and 2100 could
2 range from 1.1 degrees Celsius (°C), with no increase in GHG emissions above year 2000 levels, to
3 6.4°C, with substantial increase in GHG emissions (IPCC, 2007a). Large increases in global temperatures
4 could have substantial adverse effects on the natural and human environments on the planet and in
5 California. GHGs are evaluated and regulated at the federal, State, and local levels. In addition, climate
6 change vulnerability assessment and adaptation and resiliency planning are encouraged (although not
7 regulated or required) at the federal, State, and local levels. Provided below is a list of the applicable
8 climate change and GHG laws, policies, guidance, and plans. These are discussed in detail in
9 Appendix 4A Environmental Compliance of this Environmental Impact Report/Environmental Impact
10 Statement (EIR/EIS).

11 **25.2.1 Federal Plans, Policies, and Regulations**

- 12 • National Environmental Policy Act Guidance on Consideration of the Effects of Climate Change and
13 Greenhouse Gas Emissions (Council on Environmental Quality [CEQ], 2016)
- 14 • Greenhouse Gas Reporting Rule (U.S. Environmental Protection Agency [USEPA], 2010)
- 15 • Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the
16 Clean Air Act (USEPA, 2009)
- 17 • Greenhouse Gas Tailoring Rule (USEPA, 2016)
- 18 • Federal Standards for Vehicle Fuel Economy (USEPA, 2015)

19 **25.2.2 State Plans, Policies, and Regulations**

- 20 • *CEQA Guidelines*
- 21 • Senate Bill (SB) 97 (Greenhouse Gas Emissions and CEQA) (2007)
- 22 • Governor's Office of Planning and Research Technical Advisory on CEQA and Climate Change (2008)
- 23 • Assembly Bill (AB) 1493 (Vehicular Emissions: Greenhouse Gases) (2002)
- 24 • Executive Order S-3-05 (2005)
- 25 • California Renewables Portfolio Standard Program
- 26 • AB 32 (California Global Warming Solutions Act of 2006)
- 27 • SB 1368 (Electricity: Emissions of Greenhouse Gases) (2006)
- 28 • Executive Order S-01-07 (2007)
- 29 • Executive Order S-13-08 (2008)
- 30 • SB 375 (Sustainable Communities and Climate Protection) (2008)
- 31 • SB 1771 (California Climate Action Registry and Updates to Statewide Inventory) (2008)
- 32 • Executive Order B-30-15 (2015)
- 33 • SB 605 (Short-lived Climate Pollutants) (2014)

- 1 • SB 350 (Clean Energy and Pollution Reduction Act of 2015) (2015)
- 2 • SB 1383 (Short-lived Climate Pollutants: CH₄ Emissions, Dairy and Livestock, Organic Waste,
- 3 Landfills) (2016)
- 4 • SB 32 (California Global Warming Solutions Action of 2006: Emissions Limit) and AB 197
- 5 (State Air Resources Board: Greenhouse Gases, Regulations) (2016)
- 6 • Climate Change Scoping Plan (2008, 2014, 2017)
- 7 • California Climate Change Adaptation Strategy (2009, 2014, 2016)
- 8 • California Cap and Trade Program
- 9 • Climate Action Plan Phase 1: Greenhouse Gas Emissions Reduction Plan (California Department of
- 10 Water Resources [DWR], 2012a)
- 11 • California Air Pollution Control Officers Association Guidance Documents on Addressing GHGs
- 12 under CEQA (2008) and Quantifying GHG Mitigation Measures (2010)

13 **25.2.3 Regional and Local Plans, Policies, and Regulations**

- 14 • Regional and Local Air District Programs
- 15 • County General Plans

16 Other than the federal and state programs described above, there are no regional or local plans, policies,
 17 and regulations applicable to GHG emissions in Glenn and Colusa counties. All of the above federal and
 18 state laws, policies, guidance, and plans show California's commitment to reducing GHG emissions and
 19 climate change planning and will have important influences on current and future development patterns,
 20 behavior, and investments. With respect to the regulation of GHG emissions, California law is already
 21 more stringent than federal law, therefore, California entities that meet State level requirements will also
 22 comply with federal regulations at this time. California's key GHG regulations, AB 32 and SB 32, and the
 23 regulations and GHG emissions reduction programs that are in place to achieve the goals of AB 32 and
 24 SB 32, provide the regulatory framework under which all current and future projects will proceed and the
 25 GHG emissions restrictions with which projects will have to comply.

26 **25.3 Greenhouse Gas Emissions**

27 **25.3.1 Environmental Setting/Affected Environment**

28 **25.3.1.1 Global GHG Emissions**

29 Global GHG emissions due to human activities have increased since pre-industrial times, with an
 30 estimated increase of 70 percent occurring between 1970 and 2010. Carbon dioxide (CO₂) is the most
 31 important anthropogenic GHG. Its annual emissions grew by approximately 80 percent between 1970 and
 32 2010. An estimated 49 billion metric tons per year (mt/yr) of CO₂ equivalent (CO₂e) were emitted by
 33 global anthropogenic sources in 2010 (IPCC, 2014).

34 Global atmospheric concentrations of CO₂, CH₄, and N₂O have increased markedly as a result of human
 35 activities since 1750, and now far exceed pre-industrial values determined from ice cores spanning many
 36 thousands of years. Atmospheric concentrations of CO₂ (379 parts per million) and CH₄ (1,774 parts per

1 billion) in 2005 exceed by far the natural range over the last 650,000 years. Global increases in CO₂
2 concentrations are due primarily to fossil fuel use, with land use change providing another significant, but
3 smaller, contribution (IPCC, 2014).

4 **25.3.1.2 Principal GHG Emissions that Would be Generated by the Proposed Project**

5 The primary GHGs that would be generated by the Project are CO₂, CH₄, N₂O, and SF₆. Each of these
6 gases is discussed below. Note that PFCs and HFCs are not discussed because these gases are primarily
7 generated by industrial processes, which are not anticipated as part of the Project.

8 Different GHGs have varying climate change impacts. The most commonly accepted metric for the
9 radiative forcing (heat trapping) impact of GHGs is the global warming potential (GWP), which is a ratio
10 intended to quantify the mass of CO₂ that would produce the same impacts over 100 years as 1 unit mass
11 of the GHG. Most current regulatory and voluntary reporting programs in the United States use GWP
12 estimates from the IPCC Fourth Assessment Report (IPCC, 2007a), although some may still use older
13 estimates from the IPCC Second Assessment Report (IPCC, 1996). Updated estimates are provided in the
14 IPCC Fifth Assessment Report (IPCC, 2013).

15 The California mandatory GHG reporting program uses Second Assessment Report GWPs. As an
16 example, according to the IPCC Second Assessment Report, the GWP of CH₄ is 21. By definition, the
17 GWP of CO₂ is 1. N₂O and the fluorinated gases have much higher GWPs. Emissions of individual and
18 total gases are reported as CO₂e in order to provide a metric for total climate change impact. For example,
19 the emissions of 1 ton of CH₄ and 1 ton of CO₂ would total 22 tons of CO₂e using Second Assessment
20 Report GWPs.

21 GHGs are emitted by both natural processes and human activities. Of the common GHGs, CO₂ and CH₄
22 are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely byproducts of
23 fossil fuel combustion or oxidation of fixed carbon resulting from land use changes. CH₄ emissions result
24 from offgassing associated with agricultural practices, the decomposition of organic materials within
25 landfills, fugitive emissions from oil and gas production, and other sources. Fluorinated gases such as
26 HFCs, PFCs, and SF₆ are byproducts of certain industrial processes and can also result from fugitive
27 releases of refrigerants and electrical insulators as well as other industrial uses of such gases.

28 GHGs in the atmosphere regulate the earth's temperature. Without the natural heat trapping effect of
29 GHGs, the earth's surface would be about 34°C cooler (Climate Action Team, 2006). However, it is
30 known that emissions from human activities, particularly the consumption of fossil fuels for electricity
31 production and transportation, have elevated the concentration of GHGs in the atmosphere beyond the
32 level of naturally occurring concentrations. GHGs anticipated to occur as part of the Project include the
33 following:

- 34 • **Carbon Dioxide** – The global carbon cycle is made up of large carbon flows and reservoirs. Billions
35 of tons of carbon in the form of CO₂ are absorbed by oceans and living biomass (i.e., sinks) and are
36 emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium,
37 carbon fluxes are roughly balanced (USEPA, 2013). CO₂ was the first GHG demonstrated to be
38 increasing in atmospheric concentration, with the first conclusive measurements being made in the
39 last half of the 20th Century. As noted above, CO₂ has a GWP of 1. Concentrations of CO₂ in the
40 atmosphere have risen approximately 35 percent since the Industrial Revolution. According to the
41 IPCC (2007a), the global atmospheric concentration of CO₂ has increased from a pre-industrial value
42 of approximately 280 parts per million by volume (ppmv) to 379 ppmv in 2005. By 2011,

1 concentrations increased to 391 ppmv (IPCC, 2013), and the National Oceanic and Atmospheric
 2 Administration Earth System Research Laboratory (NOAA/ESRL) reports a measurement of
 3 404 ppmv at the Mauna Loa, Hawaii station as the 2016 annual average (NOAA/ESRL, 2017).

- 4 • **Methane** – CH₄ is an extremely effective absorber of radiation, although its atmospheric
 5 concentration is less than CO₂, and its lifetime in the atmosphere is brief (10 to 12 years) compared to
 6 some other GHGs. Based on a number of factors, scientific assessments of the climate impact of CH₄
 7 have increased with time. The IPCC Second Assessment Report estimated the GWP of CH₄ as 21
 8 and, as noted above, the IPCC Fourth Assessment Report estimates it at 25. The IPCC Fifth
 9 Assessment Report reports a 100-year GWP of CH₄ and fossil CH₄ of 28 and 30, respectively,
 10 although few if any reporting organizations have adopted the higher estimates yet. CH₄
 11 concentrations have increased by an estimated 150 percent since pre-industrial times (IPCC, 2013).
 12 Anthropogenic sources of CH₄ include natural gas and petroleum systems, agricultural activities, coal
 13 mining, wastewater treatment, stationary and mobile combustion, landfills, and certain industrial
 14 processes (USEPA, 2013).
- 15 • **Nitrous Oxide** – Concentrations of N₂O also began to rise at the beginning of the Industrial
 16 Revolution. N₂O is produced by microbial processes in soil and water, including reactions that occur
 17 in fertilizers containing nitrogen, as well as a number of industrial processes and other sources.
 18 Concentrations of N₂O are estimated to exceed pre-industrial levels by 20 percent (IPCC, 2013). The
 19 Second Assessment Report and Fourth Assessment Report estimates of GWP for N₂O are 310 and
 20 298, respectively.
- 21 • **Sulfur Hexafluoride** – SF₆, a human-made chemical, is used as an electrical insulating fluid for
 22 power distribution and high voltage electrical equipment, in the magnesium industry, in
 23 semiconductor manufacturing, and also as a tracer chemical for the study of oceanic and atmospheric
 24 processes (USEPA, 2013). In 2005, atmospheric concentrations of SF₆ were 5.6 parts per billion and
 25 steadily increasing in the atmosphere. Second Assessment Report and Fourth Assessment Report
 26 estimates of the GWP for SF₆ are 23,900 and 22,800, respectively.

27 **25.3.1.3 GHG Emissions Inventories**

28 A GHG inventory is a quantification of all GHG emissions and sinks within a selected physical and/or
 29 economic boundary. GHG inventories can be performed on a large scale (i.e., for global and national
 30 entities) or on a small scale (i.e., for a particular building or person). Although many processes are
 31 difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources.

32 From 1750 to 2011, global CO₂ emissions to the atmosphere from fossil fuel combustion and cement
 33 production totaled 365 gigatonnes of carbon (1,340,000 million metric tons [MMT] of CO₂), while
 34 deforestation and other land use changes are estimated to have released 180 gigatonnes of carbon
 35 (661,000 MMT of CO₂). This results in cumulative anthropogenic emissions of 545 gigatonnes of carbon
 36 (2,000,000 MMT of CO₂) (IPCC, 2013). The 2010 global annual GHG emission inventory was estimated
 37 at 49,000 MMT of CO₂e (IPCC, 2014).

38 United States GHG emissions in 2015 were estimated to total 6,586 MMT of CO₂e, and in 2014, total
 39 GHG emissions were estimated to be 6,736 MMT of CO₂e (USEPA, 2017a). Total GHG emissions rose
 40 by 3.4 percent from 1990 to 2015, but total emissions decreased by 2.2 percent from 2014 to 2015 (a
 41 reduction of 150.1 MMT of CO₂e). Total GHG emission reductions between 2014 and 2015 were largely

1 to the result of reduced CO₂ emissions from fossil fuel combustion. CH₄ emissions, which have declined
 2 from 1990 levels, resulted primarily from enteric fermentation associated with domestic livestock,
 3 decomposition of wastes in landfills, and natural gas systems. Agricultural soil management was the
 4 major source of N₂O emissions. Overall, net GHG emissions in 2015 were 11.2 percent below 2005 levels
 5 (USEPA, 2017a).

6 California is a substantial contributor of global GHGs, the second largest contributor in the United States
 7 and the fourteenth largest contributor in the world in 2007 (ARB, 2011). In 2014, human activities in
 8 California released 441.5 MMT of CO₂e, which equaled approximately 6 percent of the United States
 9 total. The primary source of GHGs in California is transportation, contributing 42 percent of the state's
 10 total GHG emissions. Industrial emissions were the second largest source, contributing 23 percent of the
 11 state's GHG emissions (ARB, 2016).

12 Table 25-1 outlines the most recent global, national, and Statewide GHG inventories to provide context of
 13 the magnitude of potential Project-related emissions.

14 **Table 25-1**
 15 **Global, National, and Statewide Annual GHG Emissions Inventories**

Emissions Inventory	CO ₂ e (Metric Tons)
2010 IPCC Global GHG Emissions Inventory	49,000,000,000
2015 USEPA National GHG Emissions Inventory	6,586,200,000
2014 ARB State GHG Emissions Inventory	441,500,000

16 Source: IPCC, 2014; USEPA, 2017a; ARB, 2011, 2016.

17 **25.3.2 Environmental Impacts/Environmental Consequences**

18 **25.3.2.1 Proposed Project Greenhouse Gas Emissions Analysis**

19 **Evaluation Criteria and Thresholds of Significance**

20 Significance criteria represent the environmental thresholds that were used to identify whether an impact
 21 would be potentially significant. *CEQA Guidelines* §15064.4 indicates the following:

22 (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the
 23 Lead Agency consistent with the provisions in §15064. A Lead Agency should make a good faith
 24 effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the
 25 amount of greenhouse gas emissions resulting from a project. A Lead Agency shall have discretion to
 26 determine, in the context of a particular project, whether to:

27 (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project,
 28 and which model or methodology to use. The Lead Agency has discretion to select the model
 29 or methodology it considers most appropriate provided it supports its decision with substantial
 30 evidence. The Lead Agency should explain the limitations of the particular model or
 31 methodology selected for use; and/or

32 (2) Rely on a qualitative analysis or performance-based standards.

1 (b) A Lead Agency should consider the following factors, among others, when assessing the significance
2 of impacts from greenhouse gas emissions on the environment:

3 (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared
4 to the existing environmental setting.

5 (2) Whether the project emissions exceed a threshold of significance that the Lead Agency
6 determines applies to the project.

7 (3) The extent to which the project complies with regulations or requirements adopted to
8 implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse
9 gas emissions. Such requirements must be adopted by the relevant public agency through a
10 public review process and must reduce or mitigate the project's incremental contribution of
11 greenhouse gas emissions. If there is substantial evidence that the possible effects of a
12 particular project are still cumulatively considerable notwithstanding compliance with the
13 adopted regulations or requirements, an EIR must be prepared for the project.

14 For the purposes of this analysis, an alternative would result in a potentially significant impact if it would
15 result in the following:

- 16 • Generation of Cumulative GHG Emissions

17 Neither the Authority or Reclamation have established quantitative significance thresholds for GHG
18 emissions; instead the Project is evaluated on a case-by-case basis using up-to-date calculation and analysis
19 methods. By enacting AB 32 (Global Warming Solutions Act of 2006), SB 32 (California Global Warming
20 Solutions Action of 2006: Emissions Limit) and AB 197 (State Air Resources Board: Greenhouse Gases:
21 Regulations), the State Legislature has established statewide GHG emissions reduction targets. Further, the
22 Legislature has determined that GHG emissions, as they relate to global climate change, are a source of
23 adverse environmental impacts in California and should be addressed pursuant to CEQA. AB 32 did not
24 amend CEQA, although the legislation identifies the myriad environmental problems in California caused by
25 global warming (Health and Safety Code, Section 38501(a)). SB 97, in contrast, added explicit requirements
26 that CEQA analysis address the impacts of GHG emissions (PRC Sections 21083.05 and 21097).

27 Glenn County and Colusa County air pollution control districts have not established GHG emissions
28 thresholds for CEQA purposes. For evaluation of air quality impacts (see Chapter 24), staff at these
29 districts recommended use of thresholds established by a nearby air quality agency (Tehama County) as
30 surrogates to evaluate potential local and regional impacts in the Primary Study Area¹ (Ledbetter, 2016;
31 Gomez, 2016). The Tehama County Air Pollution Control District (TCAPCD) has developed specific air
32 quality guidelines and criteria for compliance with CEQA (TCAPCD, 2015). TCAPCD has established
33 recommended significance thresholds for Project construction and operation. Projects with the potential to
34 have higher emission levels are subject to increasingly more stringent environmental review and
35 mitigation requirements.

36 For GHG emissions, the TCAPCD has established a threshold of 900 mt/yr. However, this threshold is
37 intended to apply to land use projects such as residential or commercial developments. Because the

¹ The Glenn County Air Pollution Control District does not have CEQA guidelines for assessing air quality impacts; it would instead defer to the Tehama County guidelines, if necessary (Ledbetter, 2016). In addition, the Colusa County Air Pollution Control District does not have CEQA guidelines other than its New Source Review rules; thresholds developed by the Tehama County Air Pollution Control District would represent similar values (Gomez, 2016).

1 Project is not a residential or commercial development, TCAPCD recommends that “the 900 metric ton
2 screening criteria (CO₂ or CO₂ equivalents generated annually) referenced in the CAPCOA whitepaper is
3 being used by the District as a conservative criteria for determining which projects require further
4 analysis and mitigation with regard to Climate Change” (TCAPCD, 2015). The following discussion
5 provides review and analysis of anticipated potential climate change impacts to and from the Project.

6 Scientific studies (as best represented by the IPCC’s periodic reports) demonstrate that climate change is
7 already occurring due to past GHG emissions. Evidence suggests that global emissions must be reduced
8 below current levels to avoid the most severe climate change impacts. In accordance with scientific
9 consensus regarding the cumulative nature of GHGs, the analysis provides a cumulative evaluation of
10 GHG emissions. Unlike traditional cumulative impact assessments, this analysis is still project-specific in
11 that it evaluates only direct emissions generated by the Project. Because of the global nature of GHG
12 emissions and impacts that result from those emissions, Project emissions are placed into the context of
13 current global atmospheric GHG concentrations and projections of future concentrations. The analysis
14 does not specifically analyze emissions from past, present, and reasonably foreseeable projects in the
15 Extended, Secondary, and Primary study areas.

16 **Impact Assessment Assumptions and Methodology**

17 Combinations of Project facilities were used to create Alternatives A, B, C, C₁, and D. In all resource
18 chapters, the Authority and Reclamation described the potential impacts associated with the construction,
19 operation, and maintenance of each of the Project facilities for each of the five action alternatives. Some
20 Project features/facilities and operations (e.g., reservoir size, overhead power line alignments, provision
21 of water for local uses) differ by alternative and are evaluated in detail within each of the resource areas
22 chapters. As such, the Authority has evaluated all potential impacts with each feature individually and
23 may choose to select or combine individual features as determined necessary.

24 *Assumptions*

25 The following assumptions were made regarding Project-related construction, operation, and maintenance
26 impacts from GHG emissions:

- 27 • Direct Project-related construction, operation, and maintenance activities would occur in the Primary
28 Study Area.
- 29 • Direct Project-related operational effects would occur in the Secondary Study Area.
- 30 • The only direct Project-related construction activity that would occur in the Secondary Study Area is
31 the installation of an additional pump into an existing bay at the Red Bluff Pumping Plant.
- 32 • The only direct Project-related maintenance activity that would occur in the Secondary Study Area is
33 the sediment removal and disposal at the two intake locations (i.e., Glenn-Colusa Irrigation District
34 Canal Intake and Red Bluff Pumping Plant).
- 35 • No direct Project-related construction or maintenance activities would occur in the Extended
36 Study Area.
- 37 • Direct Project-related operational effects that would occur in the Extended Study Area are related to
38 San Luis Reservoir operation; increased reliability of water supply to agricultural, municipal, and
39 industrial water users; and the provision of an alternate Level 4 wildlife refuge water supply. Indirect
40 effects to the operation of certain facilities that are located in the Extended Study Area, and indirect

1 effects to the consequent water deliveries made by those facilities, would occur as a result of
2 implementing the alternatives. Indirect impacts associated with electricity generation and use would
3 extend statewide, or further, depending on the sources of the electrical power used.

- 4 • No additional channel stabilization, grade control measures, or dredging in the Sacramento River at or
5 upstream of the Delevan Pipeline Intake/Discharge facilities would be required.
- 6 • Construction activities are anticipated to occur between the hours of 6:00 a.m. and 7:00 p.m. Monday
7 through Friday. Nighttime and weekend construction are not planned, but may occur on an as-
8 needed basis.

9 *Methodology*

10 Existing conditions and the future No Project/No Action alternatives were assumed to be similar in the
11 Primary Study Area given the generally rural nature of the area and limited potential for growth and
12 development in Glenn and Colusa counties within the 2030 study period used for this EIR/EIS, as further
13 described in Chapter 2 Alternatives Analysis. As a result, within the Primary Study Area, it is anticipated
14 that the No Project/No Action Alternative would not entail material changes in conditions as compared to
15 the existing conditions baseline.

16 With respect to the Extended and Secondary study areas, the effects of the proposed action alternatives
17 would be primarily related to changes to available water supplies in the Extended and Secondary study
18 areas and the Project's coordinated operations with other existing large reservoirs in the Sacramento
19 watershed, and the resultant potential impacts and benefits to biological resources, land use, recreation,
20 socioeconomic conditions, and other resource areas. DWR has projected future water demands through
21 2030 conditions that assume the majority of Central Valley Project (CVP) and State Water Project (SWP)
22 water contractors would use their total contract amounts, and that most senior water rights users would
23 use most of their water rights. This increased demand in addition to the projects currently under
24 construction and those that have received approvals and permits at the time of preparation of the EIR/EIS
25 would constitute the No Project/No Action Condition. As described in Chapter 2 Alternatives Analysis,
26 the primary difference in these projected water demands would be in the Sacramento Valley. As of the
27 time of preparation of this EIR/EIS, the water demands have expanded to the levels projected to be
28 achieved on or before 2030.

29 Accordingly, existing conditions and the No Project/No Action alternatives are assumed to be the same
30 for this EIR/EIS and, as such, are referred to as the Existing Conditions/No Project/No Action Condition,
31 which is further discussed in Chapter 2, Alternatives Analysis. With respect to applicable reasonably
32 foreseeable plans, projects, programs, and policies that may be implemented in the future but that have
33 not yet been approved, these are included as part of the analysis of cumulative impacts in Chapter 35
34 Cumulative Impacts.

35 The Project was evaluated to determine how construction, operations, and maintenance of Project
36 facilities would generate GHG emissions. GHG emissions associated with the Project could contribute to
37 the cumulatively considerable impact of global climate change by adding GHGs to the atmosphere. The
38 discussion below reviews potential generation of GHG emissions for each of the Project's action
39 alternatives. For the purpose of this analysis, anticipated changes in GHG emissions caused by
40 construction, operation, and maintenance of the Project alternatives were compared to the Existing
41 Conditions/No Project/No Action Condition to identify the potential for impacts.

1 Construction-related GHG emissions would result primarily from fuel combustion in construction
2 equipment, trucks, and worker vehicles. To support calculations of GHG emissions, lists of the types and
3 numbers of construction equipment and number of days required for construction of each Project facility
4 were developed by Project engineers, and assumptions were developed about hours of operation for each
5 type of equipment (Barnes pers. comm., 2011). Information on the dates of construction start and finish,
6 and the duration of construction for each project feature, were obtained from the Concept Schedule for
7 Sites Reservoir provided by URS (Barnes, 2011). This schedule was used to estimate emissions for
8 Alternatives A, B, C, and C₁. A different schedule to expedite construction was developed for
9 construction of Alternative D (AECOM, 2017), and that new schedule was used in the emissions
10 estimates for Alternative D.

11 Appendix 24A Methodology for Air Quality and GHG Emissions Calculations provides the methodology,
12 assumptions, and information used to estimate the GHG emissions associated with construction,
13 operation, and maintenance of the alternatives. In addition, Appendix 24A Methodology for Air Quality
14 and GHG Emissions Calculations includes the detailed emission calculations, emission factors, and
15 summary tables.

16 Equipment-specific hours of use were multiplied by equipment-specific CO₂ emission factors to calculate
17 total equipment emissions for construction of each Project facility. Total CO₂ emissions for each Project
18 facility were estimated by summing the results of the equipment emissions. For construction, emissions of
19 other GHGs, such as CH₄ and N₂O, were not estimated, due to the lack of equipment-specific emission
20 factors for GHGs other than CO₂. Emissions of CH₄ and N₂O from fuel combustion would be much lower
21 than emissions of CO₂, contributing in the range of 2 to 4 percent of total CO₂ emissions. Therefore, it
22 was assumed that CH₄ and N₂O emissions would not substantially contribute to the construction-related
23 GHG emissions.

24 To estimate GHG emissions from Project facility operations and maintenance activities, Project facilities
25 were grouped to reflect activities, personnel, and equipment that might be shared to optimize efficiency.
26 Emissions were estimated for maintenance of the following Project facilities:

- 27 • Pumping Plants, Intake and Outlet Facilities, Pumping/Generating Plants
- 28 • Reservoirs, Recreation Facilities, Dams, Roads, and Bridges
- 29 • Electrical Switchyards and Overhead Power Lines
- 30 • Tunnels, Pipelines, and Canals

31 Equipment and personnel requirements for maintenance of facilities were assumed to be the same for all
32 Project alternatives (A, B, C, C₁, and D). Maintenance activities include both routine activities and major
33 inspections. Routine activities would occur on a daily basis throughout the year, whereas major
34 inspections would occur annually. Exhaust emissions from construction-type equipment were calculated
35 using load factors, horsepower, and emission factors from x D in the CalEEMod User's Guide,
36 Appendix D (CAPCOA, 2016). Emission factors for a motor boat and boat-operated dredge were
37 obtained from the OFFROAD2011 model, using the California Harbor Craft Emissions Inventory
38 Database and California Barge and Dredge Emissions Inventory Database, respectively. Vehicle exhaust
39 emissions were estimated using emission factors from ARB's EMFAC2014 model (ARB, 2013) for the
40 Colusa County portion of the Sacramento Valley Air Basin.

41 Estimating GHG emissions for the electricity used and generated in operation of the alternatives is
42 complex and involves assumptions about the amount and timing of pumping and generating activities, the

1 fuel source used to power pumping operations (fossil sources or renewable sources), and changes in the
2 operation of existing SWP and CVP facilities as operations of the alternatives are integrated into the
3 existing water delivery system and the California electrical distribution and balancing system. As
4 discussed in Chapter 31 Power Production and Energy and summarized below, the Project's action
5 alternatives would consume energy during the pumping phase of operations, Alternatives A, B, C, and D
6 would generate electricity during the release phase of operations, and would be able to provide resource
7 shifting and renewable integration services during pumpback operations. In addition, the seasonal
8 operations of the Project's action alternatives would make them highly conducive to operations during the
9 pumping and generating phases that may result in reductions in GHG emissions.

10 Emissions from operation of the Project's action alternatives were estimated by post processing the
11 CALSIM II modeling runs used to analyze the impacts of the Project's action alternatives throughout this
12 document. CALSIM II provides estimates of the amount of water that would be pumped and released at
13 each of the facilities during each month of the year for various water year types and hydrologic
14 conditions. The pumping and releasing of water can be converted to electricity use and electricity
15 generation by applying assumptions about efficiency of each pumping or generating plant. Chapter 31
16 Power Production and Energy describes assumptions of the Project's power and energy operations,
17 including pumpback operations and renewable integration services.

18 *Operation of Proposed Project Alternatives*

19 Although each of the Project alternatives has different features and would operate slightly differently, all
20 alternatives share commonalities among their operations that are important for analysis of GHG
21 emissions.

22 As discussed in greater detail in Chapter 31 Power Production and Energy, during winter and spring, the
23 Project alternatives would typically function in the pumping phase when excess water flows down the
24 Sacramento River. This is the time of year when hydroelectric generation and wind generation increase
25 and demand for electricity decreases, thus much of the increased electricity load required to pump water
26 out of the Sacramento River and into the reservoirs could be served by renewable electricity sources.
27 Further, the largest electricity load from the Project alternatives comes from lifting water from the
28 proposed Holthouse Reservoir to the proposed Sites Reservoir. The proposed Holthouse Reservoir has
29 been sized to accommodate a large amount of storage (up to 6 days of fill operations) allowing pumping
30 operations to move water from the proposed Holthouse Reservoir to the proposed Sites Reservoir to occur
31 at night or during other non-peak electricity demand periods or when renewable power is available.

32 During the summer and fall, Alternatives A, B, C, and D would typically function in the generating phase,
33 as water is released from the reservoirs to meet water supply and water quality objectives. This is the time
34 of year that electricity demand increases to satisfy summer cooling requirements. The release of water
35 from the proposed Sites Reservoir to the proposed Holthouse Reservoir could be timed to meet peak
36 daytime demand for electricity, thereby displacing the need to operate high emissions power plants.

37 During times of the year when the Project is not functioning in the pumping or generating phase, it could
38 be operated to perform daily pumpback operations. Daily pumpback operations would allow the Project
39 to use power from various high efficiency sources, including renewables, to pump water from the
40 proposed Holthouse Reservoir to the proposed Sites Reservoir typically during the nights and other low
41 demand periods. Then, during higher demand periods, the water could be released back from the proposed
42 Sites Reservoir to the proposed Holthouse Reservoir to generate electricity. Although this operation

1 would actually consume more electricity than is generated, the net result would typically be reduced GHG
2 emissions because electricity used to pump the water would be very low or zero GHG emissions sources,
3 such as ultra-efficient baseload gas fired power plants, nuclear, or renewable, and the generated electricity
4 would displace the least efficient peaking power plants that emit higher levels of GHGs.

5 In addition to operation of the Project's action alternatives' facilities, the implementation of any of the
6 action alternatives would also result in changes to operations of existing SWP and CVP facilities
7 including:

- 8 • Shasta Lake
- 9 • San Luis Reservoir
- 10 • Folsom Lake
- 11 • Trinity Lake
- 12 • Lake Oroville
- 13 • Banks Pumping Plant
- 14 • Jones Pumping Plant

15 Changes to operations of these facilities as a result of Project operations are described in Chapter 6
16 Surface Water Resources.

17 Pumping at Banks and Jones pumping plants would likely increase because of increased water supply
18 reliability created by the Project's alternatives. Thus, additional electricity would be needed to operate the
19 facilities to accommodate integration of the Project facilities and operations. The combined results of all
20 changes in operation of SWP, CVP, and Project facilities are described below for each of the Project's
21 action alternatives.

22 **Topics Eliminated from Further Analytical Consideration**

23 No Project facilities or topics that are included in the significance criteria listed above were eliminated
24 from further consideration in this chapter.

25 **Existing Conditions/No Project/No Action Condition**

26 Existing conditions and the future No Project/No Action alternatives were assumed to be similar in the
27 Primary Study Area given the generally rural nature of the area, and the limited potential for growth and
28 development in Glenn and Colusa counties within the 2030 study period used for this EIR/EIS, as further
29 described in Chapter 2 Alternatives Analysis. As a result, within the Primary Study Area, it is anticipated
30 that the No Project/No Action alternatives would not entail material changes in conditions as compared to
31 the Existing Conditions baseline.

32 Accordingly, Existing Conditions/No Project/No Action Alternative are assumed to be the same for this
33 EIR/EIS and, as such, are referred to as the Existing Conditions/No Project/No Action Condition, which
34 is further discussed in Chapter 2 Alternatives Analysis. With respect to applicable reasonably foreseeable
35 plans, projects, programs, and policies that may be implemented in the future but that have not yet been
36 approved, these are included as part of the analysis of cumulative impacts in Chapter 35 Cumulative
37 Impacts.

1 **Impacts Associated with Alternative A**

2 *Impact GHG-1: Generation of Cumulative GHG Emissions*

3 *Construction, Operation, and Maintenance of the Proposed Project*

4 **Project Construction Emissions**

5 Construction-related GHG emissions would result primarily from fuel combustion in construction
6 equipment, trucks, and worker vehicles, and from the production of concrete used for construction. Total
7 estimated GHG emissions resulting from construction of Alternative A are summarized in Table 25-2.

8 **Table 25-2**
9 **Estimated Total GHG Emissions from Construction of Alternative A (Metric Tons CO₂e)***

Emissions from Mobile Construction Equipment*	Emissions From Concrete Production	Total Construction-Related Emissions
172,066	66,637	238,704

10 *Calculated emissions based on Table 24A.A-5 in Appendix 24A Methodology for Air Quality and GHG Emissions Calculations.

11 The GHG emissions shown in Table 25-2 are the estimated total cumulative CO₂e emissions that would
12 occur over the 9-year construction period of Alternative A. Within the 9-year construction period, annual
13 GHG emissions would fluctuate. Because GHG emissions are well dispersed in the atmosphere and
14 persist for long periods of time (hundreds or thousands of years), estimates of emissions on a yearly basis
15 are less meaningful than the total amount of emissions released during the discrete construction period.
16 After construction is complete, emissions from these sources would cease.

17 **Project Operation and Maintenance Emissions**

18 Once construction is complete, the proposed Alternative A facilities would begin to operate. Unlike
19 construction emissions, operations emissions would occur over a long period of time, i.e., the useful life
20 of the Project, in this case 100 years.

21 Maintenance of Alternative A facilities would include regular inspections, land management activities,
22 sediment removal from forebays, and servicing of pumping plants. Estimated emissions from
23 maintenance activities are detailed in Appendix 24A Methodology for Air Quality and GHG Emissions
24 Calculations, in Table 24A.D-8. The estimated total for annual operations and maintenance of Project
25 facilities is approximately 5,100 mt/yr of CO₂.

26 In addition, operation of the proposed Alternative A facilities would involve both the use and generation
27 of electricity, as described in Chapter 31 Power Production and Energy. The amount of GHG emissions
28 from operation of Alternative A would depend on the specific sources of energy used for pumping water
29 into the proposed reservoirs and other operational parameters. Further, electricity needed to pump water
30 into the reservoirs and electricity generated by releasing water from the reservoirs would vary annually
31 and seasonally, depending on hydrologic conditions, renewable system integration, timing of generation
32 and use, and use of pumpback operations.

33 Operations of Project facilities would generate electricity but would also result in additional electricity
34 consumption from pumping and facility operations. Alternative A would have greater operations-related
35 emissions than the Existing Conditions/No Project/No Action Condition because it would result in net
36 energy consumption and would require additional electricity generation from other sources. To evaluate

1 the potential indirect impacts, GHG emissions were estimated for the predicted systemwide net generation
2 and consumption of electricity by CVP, SWP, and Project facilities associated with Alternative A.

3 Table 25-3 summarizes the GHG emissions estimated for each of the Project alternatives when compared
4 to emissions estimated for the net long-term generation and consumption of electricity for the Existing
5 Conditions/No Project/No Action Condition. Emissions associated with all Project alternatives are
6 presented in Table 25-3 for the purpose of comparison, and are evaluated in more detail in their respective
7 discussions. Over the long-term, net increased energy consumption associated with Alternative A would
8 result in indirect GHG emissions of approximately 109,000 mt/yr above the Existing Conditions/No
9 Project/No Action Condition.

10 **Table 25-3**
11 **Indirect GHG Emissions from Net Long-Term Electricity Use for the Existing Conditions/No**
12 **Project/No Action Condition, and Alternatives A, B, C, C₁, and D**

Condition/Alternative	Electricity Net Use (All Facilities: CVP, SWP, Proposed Facilities) – Long Term (gigawatt hours/year) ^a	Total GHG Emissions (mt/yr CO ₂ e) ^b	Incremental Increase (Compared to the Existing Conditions/No Project/No Action Condition) in GHG Emissions (mt/yr CO ₂ e)
Existing Conditions/No Project/No Action Condition	132	39,081.1	Not Applicable
Alternative A	499	147,738.5	108,657.4
Alternative B	498	147,442.4	108,361.3
Alternative C	543	160,765.5	121,684.4
Alternative C ₁	700	207,248.4	168,167.3
Alternative D	477	141,225.0	102,143.8

13 ^aSource: Table 31B-2, Power and Pumping Cost Reporting Metrics - Summary of All CVP, SWP and Proposed Sites Facilities, Sites
14 Administrative Draft Environmental Impact Reports and Feasibility Study Alternatives, January 27, 2017. Negative values for net
15 electricity generation in Table 31B-2 indicate net electricity use.

16 ^bSource for Emission Factors: The Climate Registry (2016), General Reporting Protocol, Version 2.1, 2016 Climate Registry Default
17 Emission Factors, Table 14.1, U.S. Emission Factors by eGRID Subregion - updated to eGRID 2015 (2012 data) Version 1.0.
18 eGRID 2015 Subregion Western Electricity Coordinating Council California. Table updated April 2016.

19 Although operation of the proposed Alternative A facilities would result in a long-term average net use of
20 electricity, the way the facilities would be operated and integrated into the California electricity market
21 would actually result in annual reductions in GHG emissions. As discussed in Chapter 31 Power
22 Production and Energy, water pumping would occur to the extent possible during times when renewable
23 (zero emissions) electricity is available, and releases of water, which generate electricity, would be done
24 to the extent possible when electricity is in high demand. Therefore, electricity generated at the proposed
25 Alternative A facilities – with no emission of GHGs – would offset some of the most inefficient and
26 highest emitting generating resources in the electricity market.

27 In addition to the analysis provided above, the proposed Alternative A facilities would be configured to
28 allow substantial pumpback operations; i.e., pumping water from the proposed Holthouse Reservoir into
29 the proposed Sites Reservoir during nighttime hours (when excess clean/cheap electricity is available) and
30 then releasing the water back from the proposed Sites Reservoir to the proposed Holthouse during peak

1 demand hours during the day (when the electricity generated can displace high emitting/high cost
2 sources).

3 Alternative A would also be able to provide critical renewable integration services to the California grid
4 that would facilitate additional renewable energy generation and further reduce GHG emissions. Solar and
5 wind power are intermittent electricity sources; the electricity generated at a solar or wind power station
6 fluctuates unpredictably as clouds obscure the sun or wind speeds decrease. To effectively integrate solar
7 and wind power into an electricity grid, there must be appropriate backup power supplies to ensure that
8 fluctuations in solar or wind generation are smoothed out so that sufficient supply exists in the grid to
9 meet demand. Alternative A could provide this renewable integration service. Both in the pumping and
10 generating phase, Alternative A would have the flexibility to modify its operations to balance generation
11 from intermittent renewable electricity supplies. In the pumping phase, Alternative A would have ample
12 storage at the proposed Holthouse Reservoir and variable speed pumps at the proposed Sites Pumping
13 Plant that could quickly ramp up or down so that pumping from the proposed Holthouse Reservoir to the
14 proposed Sites Reservoir could be slowed or delayed for up to several days to coincide with available
15 renewable electricity. In the generation phase, the proposed Sites Pumping Plant's variable speed turbines
16 could quickly ramp up or ramp down to provide additional generation when renewable electricity
17 decreases or additional pumping load when renewable generation increases.

18 Assuming use of the TCAPCD threshold of 900 mt/yr as a trigger for "further analysis and mitigation
19 with regard to Climate Change," the potential increase in GHG emissions associated with Alternative A
20 above the Existing Conditions/No Project/No Action Condition has been quantified and evaluated.
21 Construction of Alternative A would generate approximately 239,000 metric tons of CO₂e emissions
22 total, over the 9-year construction period. Once operations begin, Project facility maintenance activities
23 would increase yearly GHG emissions by approximately 5,100 mt/yr of CO₂. As presented in Table 25-3,
24 over the long term, the net increase in energy consumption associated with Alternative A would result in
25 an increase of indirect yearly GHG emissions of approximately 109,000 mt/yr of CO₂e above the Existing
26 Conditions/No Project/No Action Condition. These emission levels have been estimated to represent the
27 maximum potential indirect effects and could potentially be lower because of multiple sources of
28 uncertainty and the assumptions used to estimate electricity generation. These potential electricity-related
29 impacts may add to emissions and potentially significant impacts, depending on how and where the
30 electricity is generated.

31 The GHG emissions estimate for construction, operation, and maintenance of Alternative A would
32 contribute to a cumulatively considerable effect and would, therefore, be a **potentially significant impact**
33 when compared to the Existing Conditions/No Project/No Action Condition

34 **Open Water Surfaces and Tailraces Emissions**

35 Implementation of Alternative A would include the construction of a surface storage reservoir and would
36 result in the conversion of land that is currently used predominantly for cattle grazing to an open water
37 surface. Research indicates that the surfaces of some reservoirs may be emitting or absorbing GHGs at
38 material rates as a result of diffusion of CO₂ and CH₄ from the water into the atmosphere or from the
39 atmosphere into the water. In addition, as stored water passes through hydroelectric turbines, GHGs that
40 had been dissolved in the water come out of solution and are released to the atmosphere (also known as
41 tailrace emissions). These types of emissions could represent sources or sinks of emissions from
42 Alternative A; however, there are several factors that are not yet fully understood that make it difficult to
43 adequately quantify potential emissions rates from the proposed Alternative A surface storage facilities.

1 These factors have been identified in both the absorption and emission of GHGs from reservoirs and other
2 aquatic systems. In general, organic inputs, soil type and vegetation inundated, water quality parameters
3 (dissolved oxygen, CO₂, and CH₄, temperature, pH), and duration of inundation have all been found to
4 affect the GHG absorption and emissions characteristics of aquatic systems. In addition to these factors,
5 natural aquatic systems have been shown to be the primary pathway in the global carbon cycle for
6 transmitting carbon sequestered at the watershed level back to the atmosphere, into sediment deposition,
7 or as dissolved carbon to the oceans (Cole et al., 2007). Thus, even if emissions from the surface and
8 tailraces of reservoirs could be accurately quantified, it would not be clear whether the emissions of
9 GHGs measured at the reservoir were different from the emissions that would have occurred within the
10 watershed had the reservoir not been built. Because rivers are significant GHG emissions pathways, it is
11 necessary to compare pre-reservoir watershed emissions with post-reservoir watershed emissions to
12 determine the effect of the reservoir.

13 Recent studies have provided useful information about the potential scale of emissions from open water
14 systems in temperate areas. Fifty-nine hydropower reservoirs, natural lakes, and rivers in the western and
15 southwestern United States have been sampled to date (Soumis et al., 2004). This sampling shows that
16 some reservoirs in California, Oregon, and Washington are GHG sinks and others have gross emissions
17 equal to or less than natural lakes and rivers of the region (Tremblay et al., 2005). These studies suggest
18 that the proposed Sites Reservoir, Holthouse Reservoir, and other open water facilities associated with
19 Alternative A are unlikely to produce substantial GHG emissions.

20 Further, ARB has determined that, for the purpose of AB 32 Mandatory GHG Accounting, generation of
21 hydroelectric power shall be excluded from the regulation². The USEPA in its eGrid database
22 (USEPA, 2012) of emissions factors for electricity generating facilities also associates a zero emissions
23 factor to hydroelectric power generation. And finally, excluding biogenic sources of emissions from
24 short-term changes in the form of carbon at stages of the active carbon cycle is a widely accepted practice
25 in GHG accounting as indicated by the lack of protocols, guidance, and tools provided for accounting for
26 these emissions in several important GHG protocols including: The GHG Protocol
27 (www.ghgprotocol.org), The Climate Registry (www.theclimateregistry.org), and The American Carbon
28 Registry (www.americancarbonregistry.org).

29 Based on these studies of emissions from open water systems, emissions associated with Alternative A's
30 open water surfaces and tailraces would be a **less-than-significant impact** when compared to the Existing
31 Conditions/No Project/No Action Condition. Emissions from the surface or tailraces of proposed
32 Alternative A facilities were not estimated because the quantification would be speculative, considering
33 the lack of protocols, guidance, and tools to do so.

34 **Impacts Associated with Alternative B**

35 *Impact GHG-1: Generation of Cumulative GHG Emissions*

36 *Construction, Operation, and Maintenance of the Proposed Project*

37 **Project Construction Emissions**

38 Construction-related GHG emissions associated with Alternative B would result primarily from fuel
39 combustion in construction equipment, trucks, and worker vehicles, and from the production of concrete

² California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 2, Section 95100.

1 used for construction. Total estimated GHG emissions resulting from construction of Alternative B are
2 summarized in Table 25-4.

3 **Table 25-4**
4 **Estimated Total GHG Emissions from Construction of Alternative B (Metric Tons CO₂e)***

Emissions from Mobile Construction Equipment*	Emissions From Concrete Production	Total Construction-Related Emissions
212,369	73,269	285,638

5 *Calculated emissions based on Table 24A.B-5 in Appendix 24A Methodology for Air Quality and GHG Emissions Calculations.

6 The emissions shown in Table 25-4 are the estimated total cumulative CO₂e emissions that would occur
7 over the 9-year construction period of Alternative B. Similar to Alternative A, annual emissions would
8 fluctuate within the construction period, and after construction is complete, emissions from these sources
9 would cease.

10 **Project Operation and Maintenance Emissions**

11 Similar to Alternative A, maintenance of Alternative B facilities would include regular inspections, land
12 management activities, sediment removal from forebays, and servicing of pumping plants. Estimated
13 emissions from maintenance activities are detailed in Appendix 24A Methodology for Air Quality and
14 GHG Emissions Calculations, in Table 24A.D-8. Like Alternative A, the estimated total for annual
15 operations and maintenance of Project facilities under Alternative B is approximately 5,100 mt/yr of CO₂.

16 Construction of Alternative B would generate approximately 286,000 metric tons of CO₂e emissions over
17 the 9-year construction period. Once operations begin, maintenance activities would increase GHG
18 emissions by approximately 5,100 mt/yr of CO₂. As presented in Table 25-3, over the long term, the net
19 increase in energy consumption associated with Alternative B would result in indirect GHG emissions of
20 approximately 108,000 mt/yr of CO₂e above the Existing Conditions/No Project/No Action Condition.

21 The GHG emissions estimated for construction, operation, and maintenance of Alternative B would
22 contribute to a cumulatively considerable effect and would, therefore, be a **potentially significant impact**
23 when compared to the Existing Conditions/No Project/No Action Condition

24 **Open Water Surfaces and Tailraces Emissions**

25 Refer to the **Impact GHG-1** discussion for Alternative A for open water surfaces and tailraces. That
26 discussion also applies to Alternative B.

27 **Impacts Associated with Alternative C**

28 *Impact GHG-1: Generation of Cumulative GHG Emissions*

29 *Construction, Operation, and Maintenance of the Proposed Project*

30 **Project Construction Emissions**

31 Construction-related GHG emissions would result primarily from fuel combustion in construction
32 equipment, trucks, and worker vehicles, and from the production of concrete used for construction. Total
33 GHG emissions resulting from construction of Alternative C are summarized in Table 25-5.

1 **Table 25-5**
 2 **Estimated Total GHG Emissions from Construction of Alternative C (Metric Tons CO₂e)***

Emissions from Mobile Construction Equipment*	Emissions From Concrete Production	Total Construction-Related Emissions
212,369	73,269	285,638

3 *Calculated emissions based on Table 24A.B-5 in Appendix 24A Methodology for Air Quality and GHG Emissions Calculations.

4 The emissions shown in Table 25-5 are the estimated total cumulative CO₂e emissions that would occur
 5 over the 9-year construction period of Alternative C. Similar to Alternative A, annual emissions would
 6 fluctuate within the construction period, and after construction is complete, emissions from these sources
 7 would cease.

8 **Project Operation and Maintenance Emissions**

9 Similar to Alternative A, maintenance of Alternative C facilities would include regular inspections, land
 10 management activities, sediment removal from forebays, and servicing of pumping plants. Estimated
 11 emissions from maintenance activities are detailed in Appendix 24A Methodology for Air Quality and
 12 GHG Emissions Calculations, in Table 24A.D-8. Like Alternative A, the estimated total for annual
 13 operations and maintenance of Project facilities under Alternative C is approximately 5,100 mt/yr of CO₂.

14 Construction of Alternative C would result in approximately 286,000 metric tons of CO₂e emissions over
 15 the 9-year construction period. Once operations begin, maintenance activities would increase GHG
 16 emissions by approximately 5,100 mt/yr of CO₂. As presented in Table 25-3, over the long term, the net
 17 increase in energy consumption associated with Alternative C would result in indirect GHG emissions of
 18 approximately 122,000 mt/yr of CO₂e above the Existing Conditions/No Project/No Action Condition.

19 The GHG emissions estimated for construction, operation, and maintenance of Alternative C would
 20 contribute to a cumulatively considerable effect and would, therefore, be a **potentially significant impact**
 21 when compared to the Existing Conditions/No Project/No Action Condition.

22 **Open Water Surfaces and Tailraces**

23 Refer to the **Impact GHG-1** discussion for Alternative A for open water surfaces and tailraces. That
 24 discussion also applies to Alternative C.

25 **Impacts Associated with Alternative C₁**

26 *Impact GHG-1: Generation of Cumulative GHG Emissions*

27 *Construction, Operation, and Maintenance of the Proposed Project*

28 **Project Construction Emissions**

29 Estimated construction-related GHG emissions would be the same as those described for Alternative C
 30 and are presented in Table 25-5.

31 **Project Operation and Maintenance Emissions**

32 Like Alternative A, maintenance of Alternative C₁ facilities would include regular inspections, land
 33 management activities, sediment removal from forebays, and servicing of pumping plants. Estimated
 34 emissions from maintenance activities are detailed in Appendix 24A Methodology for Air Quality and

1 GHG Emissions Calculations, in Table 24A.D-8. Like Alternative A, the estimated total for annual
2 operations and maintenance of Project facilities is approximately 5,100 mt/yr of CO₂.

3 In addition, Alternative C₁ would involve the use of electricity but no generation of electricity by
4 Alternative C₁ facilities, as described in Chapter 31 Power Production and Energy. The amount of GHG
5 emissions from operation of Alternative C₁ would depend on the specific sources of energy used for
6 pumping water into the reservoir and other operational parameters.

7 Like Alternative B, construction of Alternative C₁ would result in approximately 286,000 metric tons
8 of CO_{2e} emissions over the 9-year construction period. Once operations begin, maintenance activities
9 would increase GHG emissions by approximately 5,100 mt/yr of CO₂. As presented in Table 25-3, over
10 the long term, the net increase in energy consumption associated with Alternative C₁ would result in
11 indirect GHG emissions of approximately 168,000 mt/yr of CO_{2e} above the Existing Conditions/
12 No Project/No Action Condition.

13 The GHG emissions estimated for construction, operation, and maintenance of Alternative C₁ would
14 contribute to a cumulatively considerable effect and would, therefore, be a **potentially significant impact**
15 when compared to the Existing Conditions/No Project/No Action Condition.

16 **Open Water Surfaces and Tailraces**

17 Refer to the **Impact GHG-1** discussion for Alternative A for open water surfaces and tailraces. That
18 discussion also applies to Alternative C₁.

19 **Impacts Associated with Alternative D**

20 *Impact GHG-1: Generation of Cumulative GHG Emissions*

21 *Construction, Operation, and Maintenance of the Proposed Project*

22 **Project Construction Emissions**

23 Construction-related GHG emissions would result primarily from fuel combustion in construction
24 equipment, trucks, and worker vehicles; from the production of concrete used for construction; and from
25 the generation of electricity used during construction. Total GHG emissions resulting from construction
26 of Alternative D are summarized in Table 25-6.

27 **Table 25-6**

28 **Estimated Total GHG Emissions from Construction of Alternative D (Metric Tons CO_{2e})***

Emissions from Mobile Construction Equipment*	Emissions From Concrete Production	Total Construction-Related Emissions
212,296	73,269	285,565

29 *Calculated emissions based on Table 24A.B-5 in Appendix 24A Methodology for Air Quality and GHG Emissions Calculations.

30 The emissions shown in Table 25-6 are the estimated total cumulative CO_{2e} emissions that would occur
31 over the 9-year construction period of Alternative D. Within the 9-year construction period, annual
32 emissions would fluctuate, with most of the work completed in the first 7 years. After construction is
33 complete, emissions from these sources would cease.

1 **Project Operation and Maintenance Emissions**

2 Like Alternative A, maintenance of Alternative D facilities would include regular inspections, land
3 management activities, sediment removal from forebays, and servicing of pumping plants. Estimated
4 emissions from maintenance activities are detailed in Appendix 24A Methodology for Air Quality and
5 GHG Emissions Calculations, in Table 24A.D-8. The estimated total for annual operations and
6 maintenance of Project facilities is approximately 5,100 metric tons of CO₂ per year.

7 Construction of Alternative D would result in approximately 286,000 metric tons of CO₂e emissions over
8 the 9-year construction period. Once operations begin, maintenance activities would increase GHG
9 emissions by approximately 5,100 mt/yr of CO₂. As presented in Table 25-3, over the long term, the net
10 increase in energy consumption associated with Alternative D would result in indirect GHG emissions of
11 approximately 102,000 mt/yr of CO₂e above the Existing Conditions/No Project/No Action Condition.

12 The GHG emissions estimated for construction, operation, and maintenance of Alternative D would
13 contribute to a cumulatively considerable effect and would, therefore, be a **potentially significant impact**
14 when compared to the Existing Conditions/No Project/No Action Condition.

15 **Open Water Surfaces and Tailraces**

16 Refer to the **Impact GHG-1** discussion for Alternative A for open water surfaces and tailraces. That
17 discussion also applies to Alternative D.

18 **Mitigation Measures**

19 Mitigation measures are provided below and summarized in Table 25-7 for the GHG emissions impacts
20 that have been identified as potentially significant.

21 Assuming use of the TCAPCD threshold of 900 mt/yr as a trigger for “further analysis and mitigation
22 with regard to Climate Change,” the potential increase in GHG emissions associated with each of the
23 Project alternatives has been quantified and evaluated. The GHG emissions estimated for construction,
24 operation, and maintenance of the Project under each alternative would contribute to a cumulatively
25 considerable effect and would therefore, be a **potentially significant impact** when compared to the
26 Existing Conditions/No Project/No Action Condition.

27 Consistent with the requirements of the DWR Greenhouse Gas Emissions Reduction Plan (DWR, 2012a),
28 construction activities undertaken for the Project would implement DWR’s Construction best
29 management practices (BMPs). If feasible, the same BMPs would be implemented during facility
30 maintenance activities. Further, implementation of mitigation measure Air Qual-1b to reduce equipment
31 and vehicle exhaust emissions would also reduce some Project-related GHG emissions.

32 The following measures are considered BMPs for DWR construction and maintenance activities.
33 Implementation of these practices will reduce GHG emissions from construction projects by minimizing
34 fuel usage by construction equipment, reducing fuel consumption for transportation of construction
35 materials, reducing the amount of landfill material, and reducing emissions from the production of cement.

36 *Pre-Construction and Final Design BMPs*

37 Pre-construction and final design BMPs are designed to ensure that individual projects are evaluated and
38 their unique characteristics taken into consideration when determining whether specific equipment,
39 procedures, or material requirements are feasible and efficacious for reducing GHG emissions from the

1 project. While all projects will be evaluated to determine whether these BMPs are applicable, not all
2 projects will implement all of the following BMPs:

3 **BMP 1.** Evaluate project characteristics, including location, project work flow, site conditions, and
4 equipment performance requirements, to determine whether specifications of the use of
5 equipment with repowered engines, electric drive trains, or other high-efficiency
6 technologies are appropriate and feasible for the project or specific elements of the project.

7 **BMP 2.** Evaluate the feasibility and efficacy of performing onsite material hauling with trucks
8 equipped with on-road engines.

9 **BMP 3.** Ensure that all feasible avenues have been explored for providing an electrical service drop
10 to the construction site for temporary construction power. When generators must be used,
11 use alternative fuels such as propane or solar to power generators to the maximum extent
12 feasible.

13 **BMP 4.** Evaluate the feasibility and efficacy of producing concrete onsite and specify that batch
14 plants be set up onsite or as close to the site as possible.

15 **BMP 5.** Evaluate the performance requirements for concrete used on the project and specify
16 concrete mix designs that minimize GHG emissions from cement production and curing,
17 while preserving all required performance characteristics.

18 **BMP 6.** Limit deliveries of materials and equipment to the site to off-peak traffic congestion hours.

19 *Construction BMPs*

20 Construction BMPs apply to construction and maintenance projects that DWR completes or for which
21 DWR issues contracts. Projects are expected to implement all Construction BMPs unless a variance is
22 granted by the Division of Engineering Chief, Division of Operation and Maintenance Chief, or Division
23 of Flood Management Chief, as applicable, and the variance is approved by the DWR CEQA Climate
24 Change Committee. Variances will be granted when specific project conditions or characteristics make
25 implementation of the BMP infeasible and where omitting the BMP will not be detrimental to the
26 project's consistency with the Greenhouse Gas Reduction Plan. Construction BMPs are the following:

27 **BMP 7.** Minimize idling time by requiring that equipment be shut down after 5 minutes when not
28 in use (as required by the State airborne toxics control measure [Title 13, Section 2485 of
29 the California Code of Regulations]). Provide clear signage that posts this requirement for
30 workers at the entrances to the site and provide a plan for the enforcement of this
31 requirement.

32 **BMP 8.** Maintain construction equipment in proper working condition and perform preventative
33 maintenance. Required maintenance includes compliance with manufacturer's
34 recommendations, proper upkeep and replacement of filters and mufflers, and maintenance
35 of engine and emissions systems in proper operating condition. Maintenance schedules will
36 be detailed in an Air Quality Control Plan prior to commencement of construction.

37 **BMP 9.** Implement tire inflation program on job site to ensure that equipment tires are correctly
38 inflated. Check tire inflation when equipment arrives onsite and every 2 weeks for
39 equipment that remains onsite. Check vehicles used for hauling materials off-site weekly
40 for correct tire inflation. Procedures for the tire inflation program will be documented in an
41 Air Quality Management Plan prior to commencement of construction.

1 **BMP 10.** Develop a project-specific ride share program to encourage carpools, shuttle vans, and
2 transit passes, and secure bicycle parking for construction worker commutes.

3 **BMP 11.** Reduce electricity use in temporary construction offices by using high-efficiency lighting
4 and requiring that heating and cooling units be Energy Star compliant. Require that all
5 contractors develop and implement procedures for turning off computers, lights, air
6 conditioners, heaters, and other equipment each day at close of business.

7 **BMP 12.** For deliveries to project sites where the haul distance exceeds 100 miles and a heavy-duty
8 Class 7 or Class 8 semi-truck or 53-foot or longer box type trailer is used for hauling, a
9 SmartWay³ certified truck will be used to the maximum extent feasible.

10 **BMP 13.** Minimize the amount of cement in concrete by specifying higher levels of cementitious
11 material alternatives, larger aggregate, longer final set times, or lower maximum strength
12 where appropriate.

13 **BMP 14.** Develop a project-specific construction debris recycling and diversion program to achieve
14 a documented 50 percent diversion of construction waste.

15 **BMP 15.** Evaluate the feasibility of restricting material hauling on public roadways to off-peak
16 traffic congestion hours. During construction scheduling and execution, minimize, to the
17 extent possible, uses of public roadways that would increase traffic congestion.

18 With regard to the electricity use associated with the Project alternatives, the annual rate of GHG
19 emissions would depend on the specific sources of the electricity used. Further, electricity use and
20 generation would vary annually and seasonally, depending on hydrologic conditions, renewable system
21 integration, timing of generation and use, and use of pumpback operations. Beyond implementation of
22 construction BMPs and Mitigation Measure **Air Qual-1b**, project optimization, and use of renewable
23 electricity sources, there are no feasible mitigation measures that could reduce the potential impact to a
24 less-than-significant level. The impact would, therefore, remain **potentially significant and**
25 **unavoidable.**

26 **Table 25-7**
27 **Summary of Mitigation Measures for Project Impacts from Greenhouse Gas Emissions**

Impact	Associated Project Facility	LOS Before Mitigation	Mitigation Measure	LOS After Mitigation
Impact GHG-1: Generation of Cumulative GHG Emissions	Construction, Operation, and Maintenance of Project Facilities	Significant	No Feasible Mitigation	Significant and Unavoidable

28 Note:
29 LOS = Level of Significance

³ The USEPA has developed the SmartWay truck and trailer certification program to set voluntary standards for trucks and trailers that exhibit the highest fuel efficiency and emissions reductions. These tractors and trailers are outfitted at point of sale or retrofitted with equipment that significantly reduces fuel use and emissions including idle reduction technologies, improved aerodynamics, automatic tire inflation systems, advanced lubricants, advanced powertrain technologies, and low rolling resistance tires.

25.4 Climate Change

25.4.1 Environmental Setting/Affected Environment

25.4.1.1 Climate

Hot dry summers and mild rainy winters characterize the Mediterranean climate of the Sacramento Valley. During the year, the temperature ranges from 25 degrees Fahrenheit (°F) to 105°F, with average annual rainfall approximately 20 inches and snowfall very rare (California Irrigation Management Information System, 2011 and WRCC, 2011). The prevailing winds are moderate in strength, and vary from moist clean breezes from the south to dryland flows from the north. Summer conditions in the northern Sacramento Valley Air Basin are typically characterized by high temperatures and low humidity, with prevailing winds from the south. Winter conditions are characterized by rainstorms interspersed with stagnant and sometimes foggy weather. Winter daytime temperatures average in the low 50s and nighttime temperatures average in the high 30s. During winter, north winds become more frequent, but winds from the south predominate. Rainfall occurs mainly from late October to early May.

Table 25-8 provides climate summaries for selected locations in Glenn and Colusa counties. As shown, the counties are similar in temperature, but differ in levels of precipitation and snowfall.

Table 25-8
Climatic Conditions in Glenn and Colusa Counties

Parameter	Glenn County (Willows) ^a	Colusa County (Colusa) ^b
Average Maximum Temperature (°F)	75.0	75.0
Average Minimum Temperature (°F)	47.5	47.6
Average Total Precipitation (inches)	18.29	16.43
Average Total Snowfall (inches)	0.5	0.1

^aPeriod of record for the City of Willows: 7/1/1948 to 12/31/2005.

^bPeriod of record for the City of Colusa: 10/1/1948 to 12/31/2005.

Source: Desert Research Institute, Western Regional Climate Center, 2009.

25.4.1.2 Global Climate Trends

Recent Trends

A vast amount of scientific research on climate change, both its causes and effects, at all geographic scales has been conducted during the last 50 years. Scientific measurements have shown that changes in the global climate system are already occurring. These include rising air temperatures; rising ocean temperatures; rising ocean salinity; rising ocean acidity; rising global sea levels; changes in precipitation patterns; and increased intensity and frequency of extreme events such as storms, droughts, and wildfires (IPCC, 2007b; DWR, 2009).

Global average surface temperature has risen at an average rate of 0.15°F per decade since 1901. Worldwide, 2015 was the warmest year on record, and 2006 to 2015 was the warmest decade on record since thermometer-based observations began (USEPA, 2017b). The rate of warming over the last half of that period was almost double that for the period as a whole (IPCC, 2007a). Fourteen of the 15 years from 1997 to 2011 rank among the 15 warmest years in the instrumental record of global average temperature (going back to 1880) (Blunden and Arndt, 2012).

1 During the same period over which this increased global warming has occurred, many other changes have
2 occurred in other natural systems. Sea levels have risen on average 1.8 millimeters (0.07 inch) per year;
3 precipitation patterns throughout the world have shifted, with some areas becoming wetter and others
4 drier; tropical cyclone activity in the North Atlantic has increased; peak runoff timing of many glacial and
5 snow-fed rivers has shifted earlier; and numerous other changed conditions have been observed. Although
6 it is difficult to prove a definitive cause and effect relationship between global warming and other
7 observed changes to natural systems, there is high confidence in the scientific community that these
8 changes are a direct result of increased global temperatures (IPCC, 2007a).

9 Much of the western United States has experienced warming during the 20th century (approximately 2°F
10 [1.1°C]) and is projected to experience further warming during the 21st century with central estimates
11 varying from roughly 5°F to 7°F (2.8°C to 3.8°C), depending on location (Reclamation 2016a). Historical
12 trends in annual precipitation are less apparent. Future projections suggest that the northwestern and
13 north-central portions of the United States gradually may become wetter (e.g., Columbia Basin and
14 Missouri River basin) while the southwestern and south-central portions may gradually become drier
15 (e.g., San Joaquin, Truckee, and Rio Grande river basins and the Middle to Lower Colorado River Basin).
16 Areas in between have median projected changes closer to no change, meaning they have roughly equal
17 chances of becoming wetter or drier (e.g., Klamath and Sacramento basins and the Upper Colorado
18 Basin). These summary statements refer to median projected changes in temperature and precipitation,
19 characterized generally across the western United States. Projections show that there is significant
20 variability and uncertainty about these projected conditions both geographically and with time
21 (Reclamation, 2016a).

22 Warming trends appear to have led to a shift in cool season precipitation toward more rain and less snow,
23 which has caused increased rainfall runoff volume during the cool season accompanied by less snowpack
24 accumulation in some western United States locations (Reclamation, 2016a). Hydrologic analyses-based
25 future climate projections suggest that warming and associated loss of snowpack would persist over much
26 of the western United States. However, there are some geographic contrasts. Snowpack losses are
27 projected to be greatest where the baseline climate is closer to freezing thresholds (e.g., lower lying valley
28 areas and lower altitude mountain ranges). It also appears that, in high altitude and high latitude areas,
29 there is a chance that cool season snowpack actually could increase during the 21st century (e.g., Columbia
30 headwaters in Canada, Colorado headwaters in Wyoming), because precipitation increases are projected
31 and appear to offset the snow-reduction effects of warming in these locations (Reclamation, 2016a).

32 Average sea level rise over the period from 1880 to 2013 was 0.06 inch per year; however, since 1993,
33 the average sea level has risen at a rate of 0.11 to 0.14 inch per year (USEPA, 2017c). Total average
34 worldwide sea level rise over the 20th century has been approximately 8.5 inches (USEPA, 2017c).
35 Observed trends in sea level rise can be attributed to thermal expansion of the world's oceans and the
36 melting of ice sheets (polar and alpine). Over the period of record from 1901 to 2015, the sea surface
37 temperature rose at an average rate of 0.13°F per decade (USEPA, 2017d). Also during a similar period
38 (1900 to 2007), measurements have shown a decline in the extent of mountain glaciers and global snow
39 cover; increased atmospheric water vapor content; loss in mass of the polar ice sheets; decreased extent of
40 Arctic sea ice; increased precipitation in the eastern portions of North and South America, northern
41 Europe, and northern and central Asia; drying conditions in the Sahel region of the Sahara Desert in
42 Africa, the Mediterranean, and southern Africa; strengthening in mid-latitude westerly winds (since the
43 1960s); more intense and longer drought conditions in the tropics and sub-tropics (since the 1970s);
44 increased frequency of extreme precipitation events over land areas; higher average night time

1 temperatures; decreased frost days and increased frequency and duration of extreme heat events (since the
2 1950s); and increased tropical cyclone activity in the North Atlantic (IPCC, 2007a). There may also be
3 additional synergistic impacts of extreme weather events, such as the sea level rise coupled with high tide
4 and extreme storm surges. The above listed changes are, in turn, resulting in changes to the climate of
5 California as the regional climate is moderated by sea surface temperature, westerly wind patterns, and
6 the El Niño Southern Oscillation and Pacific storm patterns.

7 **Projections to 2100**

8 Climate models indicate that global average surface temperature would increase at a rate of approximately
9 0.4°F (0.2°C) per decade for the period 2000 to 2020, and would increase by at least that amount per
10 decade during the period 2020 to 2080. Based on a number of emissions scenarios, the IPCC projected an
11 average increase in surface temperatures of 3.2 to 7.2°F by 2100 compared to 1980 through 1999 levels,
12 with a likely range of 2.0 to 11.5°F when accounting for the uncertainty in climate science (IPCC, 2007a).
13 Approximately half of this warming is the result of past GHG emissions and would occur even if GHG
14 emissions were halted at 2000 levels. Some regions of the globe, particularly high latitudes, would
15 experience much larger changes relative to Existing Conditions. Corresponding global average sea level
16 rise during the period 2000 to 2100 are estimated to be between 7 inches (18 centimeters) and 23 inches
17 (58 centimeters) (IPCC, 2007a). However, scientific data now strongly suggest that these sea level rise
18 projections are likely too low and that actual sea level rise may be significantly greater than initially
19 estimated (Rahmstorf, 2007; National Research Council [NRC], 2012; California Ocean Protection
20 Council [COPC], 2017). COPC (2017) indicated that the “most likely range” of sea level rise above the
21 mean sea level between 1991 and 2009 could be from 12 inches to 41 inches (104 centimeters),
22 depending upon the basis of the climate and sea level rise projections.

23 The following additional changes to the global climate system are projected: increased ocean acidity due
24 to increased CO₂ uptake by the oceans; reduced global snow cover; increased thaw depth in permafrost
25 regions; decrease in sea ice with potential full disappearance in summer months; increased frequency in
26 heat waves and heavy precipitation events; increased intensity of tropical cyclone events; northward
27 movement of extra-tropical storm tracks; increased precipitation at high latitudes and decreased
28 precipitation in tropical and sub-tropical regions; and increased melting of the ice sheets (IPCC, 2007a).

29 ***25.4.1.3 Climate Change Effects on California***

30 **Recent Trends**

31 Scientific measurements and observations indicate that California’s climate is already changing in a
32 manner consistent with what would be expected from global climate change. Since 1920, California’s
33 average temperature has been increasing, although this change, or any climate change impact, is not
34 uniform across California. Nighttime temperatures are rising across California and at a higher rate than
35 daytime temperatures. Further, daytime and nighttime heat wave events throughout California have
36 increased in intensity, particularly the nighttime component (Moser et al., 2009). Since the 1970s the
37 Central Valley has experienced a steady warming trend (Reclamation, 2016a)

38 Water level measurements from the San Francisco gage (CA Station ID: 9414290) indicate that mean sea
39 level rose by an average of 2 millimeters (0.08 inch) per year from 1897 to 2006, equivalent to a change
40 of 8 inches in the last century (CCCC, 2009; Reclamation 2016b).

1 California's water supply system is dependent on snowpack storage in the Sierra Nevada. Temperatures
2 over the Sierra Nevada have increased during the last 100 years, resulting in less snowfall (and more
3 rainfall) and an earlier snowmelt (Moser et al., 2009). From 1930 to 2009, the peak timing of Sierra
4 Nevada runoff analyzed by Kapnick and Hall (2009) exhibited a trend toward earlier in the season of
5 0.4 day per decade. The average early spring snowpack in the Sierra Nevada has decreased by
6 approximately 10 percent since the early 20th century, a loss of 1.5 million acre-feet of snowpack storage
7 (DWR, 2008).

8 Data also show evidence for the following additional changes to California climate and conditions during the
9 last 50 years: the warming of Lake Tahoe; decreasing chill hours and increased stresses on California
10 agriculture; shifts and disturbances in managed landscapes; increased frequency of wildfire; changes in Santa
11 Ana winds; increases in photochemical smog production in southern California; increased frequency and
12 intensity of heat wave events; changes in the El Niño Southern Oscillation and the impact on California
13 temperatures; and changes in extreme precipitation events and daily average precipitation (CEC, 2011).⁴

14 Plants and animals around the globe are already reacting to changes caused by increasing temperatures. In
15 California, species are also reacting to extreme conditions, including heat waves (and the fires generated
16 by that heat), cold snaps, droughts (and the Delta saltwater intrusion that droughts often cause), floods,
17 and coastal upwelling. Observed changes also include altered timing of animal and plant lifecycles
18 (phenology), disruption of biotic interactions, changes in physiological performance, species range and
19 abundance, increase in invasive species, altered migration patterns of fishes, aquatic-breeding
20 amphibians, birds and mammals, changes in forage base, local extinction of plant and animal populations,
21 and changes in habitat, vegetation structure, and plant and animal communities (DFG, 2010).

22 **Projections to 2100**

23 Average annual surface temperatures for California are projected to increase by between 2°F and 5°F by
24 2050 and between 5°F and 7°F by 2100, depending on the GHG emissions scenario assumed. Warming
25 would not be uniform seasonally or across California. In the Central Valley, warming is projected to
26 increase by about 1°C (1.6°F) in the early 21st century and about 2°C (3.2°F) at mid-century, reaching
27 almost 3°C (4.8°F) by late in the 21st century (Reclamation, 2016b). Climate models project a greater
28 amount of warming during summer months, during nighttime, and in the interior regions of California.
29 Chill hours in the Central Valley are expected to decrease, but unprecedented extremes of cold weather
30 are still possible (Gershunov, 2011). Changes in temperature and humidity have implications for
31 agriculture in the Central Valley; as the climate warms, crop diversity and production would be affected
32 by unpredictability associated with the changing climate (Jackson, 2011). Extreme events would also
33 stress California's energy system (Auffhammer, 2011).

34 Best available data indicate that California, as a whole, would experience changes in precipitation;
35 however, there is a larger range of variability than that of temperature. It is likely that some areas in
36 California would experience higher annual rainfall amounts and precipitation in other regions would
37 decrease (Gershunov, 2011). Projected changes in the Central Valley basins show a north-to-south trend
38 of decreasing precipitation, with a slight increase of about 2 percent in the northern part of the
39 Sacramento Valley around the mid-century period, continuing into the late century. Cayan et al. (2009)

⁴ The State of California under the auspices of the California Energy Commission (CEC) is conducting comprehensive and detailed research into a range of climate change impacts in California as well as research aimed at developing adaptation strategies to deal with impacts already underway and that can no longer be avoided. The majority of this research is available through the California Climate Change Portal. Available at: <<http://www.climatechange.ca.gov/>>.

1 estimates California, particularly southern California, would be 15 to 35 percent drier by 2100. Snowpack
 2 volumes are expected to diminish by 25 percent by 2050 (DWR, 2008). By 2025, the Sacramento Valley
 3 watershed is projected to experience decreases in the April 1st snow water equivalent between 10 percent
 4 in higher portions of the watershed to 70 percent in the lower elevations; however, by the end of the
 5 century, higher elevations may also experience decreases of up to 70 percent (Reclamation, 2016b).

6 Frequency and intensity of large storms and precipitation events may be influenced by changes in
 7 atmospheric rivers. An atmospheric river is a narrow band of concentrated moisture in the atmosphere
 8 that transports large amounts of water vapor. In California, nearly all major historical flood events have
 9 been associated with the presence of atmospheric rivers, which form in fall and winter and transport warm
 10 moister air from the tropical Pacific near Hawaii to the Pacific coast of the continental United States. It is
 11 estimated that future changes in climate would increase the frequency of years with atmospheric river
 12 storms, but the number of storms per year is not likely to be affected. More importantly, occasional
 13 “much-larger-than-historical-range storm intensities” are projected to occur under most warming
 14 scenarios. Changes in the frequency and magnitude of atmospheric rivers may result in increases in major
 15 flood and storm events (Dettinger, 2011).

16 Sea level rise along the California coast is expected to accelerate during the 21st century. A study
 17 completed by the NRC looked at both global (e.g., thermal expansion, land ice melting) and local
 18 (e.g., tectonic land movement, localized subsidence) factors affecting sea level relative to land surface.
 19 Table 25-9 shows the projection and the range of uncertainty for expected sea level rise along the coast of
 20 San Francisco at 2030, 2050, and 2100.

21 **Table 25-9**
 22 **Sea Level Rise Projections and Ranges for San Francisco, California 2030, 2050, and 2100**

Location	Units	2030		2050		2100	
		Projection	Range	Projection	Range	Projection	Range
San Francisco	centimeter	14.4 ± 5.0	4.3 to 29.7	28.0 ± 9.2	12.3 to 60.8	91.9 ± 25.5	42.4 to 166.4
	inch	5.7±2	1.7 to 11.7	11±3.6	4.84 to 23.9	36.2±10	16.7 to 65.5

23 Source: NRC, 2012.

24 Sea level rise would continue to threaten coastal lands and infrastructure, increase flooding at the mouths
 25 of rivers, place additional stress on levees in the Sacramento-San Joaquin Delta (Delta), and would
 26 intensify the difficulty of managing the Delta as the heart of the State’s water supply system
 27 (DWR, 2008). These changes in temperature, precipitation, and sea level may have substantial effects on
 28 other resources areas. Potential effects of climate change anticipated in California (and discussed in this
 29 chapter) are listed below (CNRA, 2009):

- 30 • Increased average temperatures (air, water, and soil)
- 31 • Changes in annual precipitation amounts
- 32 • Change from snowfall (and spring snowmelt) to rainfall
- 33 • Decreased Sierra snowpack (earlier runoff, reduced maximum storage)
- 34 • Increased frequency and intensity of Pacific storms (flood events)
- 35 • Increased severity of droughts
- 36 • Increased frequency and severity of extreme heat events
- 37 • Increased frequency and severity of wildfire events

- 1 • Sea level rise (with increased salt water intrusion in the Delta)
- 2 • Changes in species distribution and ranges
- 3 • Decreased number of species
- 4 • Increased number of vector-borne diseases and pests (including impacts to agriculture)
- 5 • Altered timing of animal and plant lifecycles (phenology)
- 6 • Disruption of biotic interactions
- 7 • Changes in physiological performance, including reproductive success and survival of plants and animals
- 8 • Increase in invasive species
- 9 • Altered migration patterns of fishes, aquatic-breeding amphibians, birds, and mammals
- 10 • Changes in food (forage) base
- 11 • Changes in habitat, vegetation structure, and plant and animal communities

12 These changes have significant implications for water quality, water supply, flooding, aquatic ecosystems,
13 energy generation, and recreation throughout the State. Several guidance documents have been drafted or
14 have been published to discuss strategies to protect resources from climate change in California, such as
15 the 2009 California Climate Adaptation Strategy (CNRA, 2009).

16 **25.4.1.4 Climate Change and Sea Level Rise Effects on California’s Water Resources**

17 Although measured effects of climate change are occurring, significant uncertainty remains about the
18 specific magnitude and in some cases even the direction of changes expected in the future. Temperature,
19 precipitation, and sea level are all expected to change and would affect California’s water resources in
20 measurable ways.

21 Numerous studies and publications have noted the importance of considering climate change in water
22 resources planning. The California Water Plan update 2009 states, “planning for and adapting to [climate]
23 changes ... will be among the most significant challenges facing water and flood managers this century”
24 (DWR, 2009). Both DWR and Reclamation have noted the need to consider climate change effects in
25 water resources planning studies (Reclamation, 2016b). For the purposes of this Draft EIR/EIS and the
26 companion Draft Feasibility Report, the potential effects of climate change on California’s water
27 resources, as well as on the Project alternatives, are considered.

28 **25.4.1.5 Water Management and Climate**

29 Water management includes the development and fulfillment of operating schemes on a variety of time
30 scales from days to decades (Reclamation, 2016b). Within water management planning, climate
31 characterization informs estimations of future water supplies, future water demands, and boundaries of
32 system operation. Climate information influences evaluation of resource management strategies through
33 assumptions or characterization of future potential temperature, precipitation, and runoff conditions
34 among other weather information. Water supply estimates are developed by making determinations of
35 what Wet, Dry, and Normal periods may be like in the future and include the potential for hydrologic
36 extremes that can create flood risks and droughts. Water demand estimates are developed across water
37 management system uses, which include both the natural and the socioeconomic systems, including
38 agriculture, municipal and industrial, environmental, and hydroelectric power generation.

39 **25.4.1.6 Water Management, Climate Change Effects, and Associated Challenges**

40 There are climate change effects and challenges that are especially relevant to water resources. These
41 effects and challenges are described below as background to the climate change sensitivity analysis.

1 **Reclamation Literature Synthesis**

2 To support longer-term planning processes, Reclamation has created a region-specific literature synthesis
 3 of studies relating to climate change implications for Reclamation operations and activities in the
 4 17 western states (Reclamation, 2013). This report summarizes recent literature on the past and projected
 5 effects of climate change on hydrology and water resources, and summarizes implications for key
 6 resource areas featured in Reclamation planning processes. The Mid-Pacific Region section of the report
 7 describes scientific studies related to climate change for an area that includes most of California, as well
 8 as the Klamath River watershed that originates in southern Oregon and the Lahontan watershed that is
 9 mainly in Nevada. The Colorado River basin of California is not included within the region. Several
 10 observations from the Mid-Pacific Region literature synthesis are listed below by category:

11 *Historical Climate and Hydrology*

- 12 • Western United States spring temperatures increased 1 to 3°C (1.8 to 5.4°F) between the 1970s and
 13 late 1990s. Increasing winter temperature trends observed in central California averaged
 14 approximately 0.5°C (0.9°F) per decade from the late 1940s to the early 1990s (Dettinger and Cayan,
 15 1995).
- 16 • Increased winter precipitation trends are noted during 1950 to 1999 at many western United States
 17 sites, including several in California’s Sierra Nevada; but a consistent region-wide trend is not
 18 apparent.
- 19 • Coincident with these trends, the western United States and Mid-Pacific Region also experienced a
 20 general decline in spring snowpack, reduced snowfall to winter precipitation ratios, and earlier
 21 snowmelt runoff from the late 1940s to early 2000s.
- 22 • On explaining historical trends in regional climate and hydrology, several studies indicate that most
 23 observed trends for the snow water equivalent, soil moisture, and runoff in the western United States
 24 are the result of increasing temperatures rather than precipitation effects (Barnett et al., 2008).
- 25 • In many Mid-Pacific Region headwater basins, even with precipitation being equal, warmer
 26 temperatures in these watersheds cause reduced snowpack development during winter, more runoff
 27 during the winter season, and earlier spring peak flows associated with an earlier snowmelt.

28 *Projected Future Climate and Hydrology*

- 29 • Several studies have been conducted to relate potential future climate scenarios to Mid-Pacific Region
 30 runoff and water resources management impacts (Reclamation, 2015, 2016b). In general, there is
 31 greater agreement reported between model projections of temperature and, thus, higher confidence in
 32 future temperature change relative to precipitation change.
- 33 • Several studies have examined potential hydrologic impacts associated with projected climate change.
 34 Analyses show that runoff could occur as much as 2 months earlier than what currently occurs, and
 35 earlier runoff timing of at least 15 days in early-, middle-, and late-season flow is projected for almost
 36 all mountainous areas where runoff is snowmelt driven.
- 37 • Future impacts on hydrology have been shown to have implications for water resources management.
 38 Management of western United States reservoir systems is very likely to become more challenging as
 39 net annual runoff decreases and interannual patterns continue to change as the result of climate
 40 change.

- 1 • Future climate scenarios suggest that temperature increases are projected to continue, resulting in
2 decreased snowpack, differences in the timing and volume of spring runoff, and increases in peak
3 flows (Reclamation, 2016a). Warming is expected to continue causing further impacts on supplies,
4 changing agricultural water demands, and affecting the seasonal demand for hydropower electricity.

5 *Studies of Impacts on Natural Resources*

- 6 • Biodiversity may be affected by climate change (Janetos et al., 2008), and many studies have been
7 published about the impacts of climate change on individual species and ecosystems. Climate change
8 also has affected forest insect species range and abundance through changes in insect survival rates,
9 increases in life cycle development rates, facilitation of range expansion, and the effect on host plant
10 capacity to resist attack (Ryan et al., 2008). Predicted future impacts are primarily associated with
11 projected increases in air and water temperatures and are expected to result in poleward shifts in the
12 range of many species, adjustment of migratory species arrival and departure, amphibian population
13 declines, and effects on pests and pathogens in ecosystems.
- 14 • Studies of the effects of climate change on agriculture and water resources focus on the many issues
15 associated with future agricultural water demands, including climate change impacts on irrigation
16 demands. Limited study findings suggest significant irrigation requirement increases for corn and
17 alfalfa, demand decreases due to crop failures caused by pests and disease exacerbated by climate
18 change, and demand increases if growing seasons become longer or farming practices are adapted by
19 planting more crop cycles per growing season.
- 20 • Increased air temperatures could increase aquatic temperatures and affect fisheries habitat. In general,
21 studies of climate change impacts on freshwater ecosystems are more straightforward with streams
22 and rivers, which are typically well mixed and track air temperature closely, as opposed to lakes and
23 reservoirs, where thermal stratification and depth affect habitat (Allan et al., 2005).
- 24 • Warmer water temperatures also could exacerbate invasive species issues (e.g., quagga mussel
25 reproduction cycles would respond favorably to warmer water temperatures); moreover, climate
26 change could decrease the effectiveness of chemical or biological agents used to control invasive
27 species (Hellmann et al., 2008). Warmer water temperatures also could facilitate the growth of algae,
28 which could result in eutrophic conditions in lakes, declines in water quality (Barnett et al., 2008),
29 and changes in species composition.
- 30 • Another potential effect of climate change impacts on ecosystems and watershed hydrology involves
31 changes in vegetation disturbances due to wildfires and forest dieback. In the western United States,
32 increases in spring-summer temperatures lead to reduced snow melt, soil moisture, and fuel moisture
33 conditions. These reductions, in turn, affect wildland fire activity.

34 **25.4.2 Environmental Impacts/Environmental Consequences**

35 **25.4.2.1 Evaluation Criteria**

36 **Climate Change Effects on the Project – NEPA and CEQ Guidance**

37 The Council on Environmental Quality released the Final *Guidance for Federal Departments and*
38 *Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National*
39 *Environmental Policy Act Reviews* on August 1, 2016 (CEQ, 2016). With respect to the National
40 Environmental Policy Act (NEPA) analysis, the analysis should consider whether climate change would

1 result in beneficial or adverse effects on environmental or human resources under the action alternatives
2 as compared to the No Action Alternative (with climate change assumption) in a different manner than
3 would occur without consideration of climate change.

4 Overall, the NEPA document must identify substantial beneficial or adverse impacts based upon
5 incremental differences in environmental and human resources conditions under the action alternatives as
6 compared to future No Action Alternative, with an analysis of the incremental differences that would
7 occur with future climate change conditions.

8 **Principles and Requirements for Investments in Federal Water Resources**

9 The 2013 Principles and Requirements for Federal Investments in Water Resources and the 2015 Draft
10 Procedures for Implementing CEQ Principles and Requirements for Investments in Federal Water
11 Resources (Department of the Interior, 2015) discusses that the Principles, Requirements, and Guidelines
12 (PR&Gs) apply to NEPA analyses for Federal investments that affect water quality or quantity, and that
13 the PR&Gs should be integrated into the NEPA analysis. The PR&Gs require the analysis to consider
14 current trends and variability in key environmental and economic indicators, including climate change,
15 under the action alternatives and No Action Alternative.

16 Unlike the range of alternatives identified under a NEPA analysis, the PR&Gs establish objectives to
17 define action alternatives to maximize public benefits and to maximize sustainable economic
18 development; attempt to avoid the unwise use of floodplains and flood-prone areas and minimize adverse
19 impacts and vulnerabilities in any case in which a floodplain or flood-prone area must be used; and
20 protect and restore the functions of natural systems and mitigate any unavoidable damage to natural
21 systems.

22 Overall, the PR&Gs require the action alternatives to be compared to the No Action Alternative with
23 future trends, including climate change, to identify the incremental differences in conditions, as under the
24 NEPA analyses. In addition, the PR&Gs require the action alternatives to be presented in a manner to
25 allow comparison between alternatives. The results should be used to compare the ability of the action
26 alternatives to respond to changing conditions, including climate change, and the ability to meet the
27 PR&G objectives.

28 **Climate Change Effects/Impacts from the Project**

29 The California Water Commission (CWC) Water Storage Investment Program (WSIP) application
30 requires comparison of the Project to the without-project future conditions (similar to the No Action
31 Alternative) to quantify the physical and economic benefits of the proposed project. The approach to
32 climate change for the WSIP applications is based upon November 2016 Draft Technical Reference
33 for WSIP.

34 Overall, the CWC WSIP application requires the use of CALSIM II model output to compare the Project
35 to the without-project future conditions, including climate change, with specific emphasis on water
36 resources, socioeconomic, ecosystem, water quality, recreation, flood control conditions, and emergency
37 response conditions.

38 Under the WSIP application climate change is evaluated to quantify the public benefits of water storage
39 projects to comply with Executive Order B-30-15 (2015) and AB 1482 (2015), which require state
40 agencies to account for climate change in project planning and investment decisions. Therefore, the WSIP
41 application is considering climate change assumptions to respond to the following questions:

1 • What are the project benefits at “near-future,” or the 2030 reference point that represents climate
2 conditions for the 30-year period surrounding 2030 (2016 to 2045).

3 • What are the project benefits at “late-future,” or the 2070 reference point that represents climate
4 conditions for the 30-year period surrounding 2030 (2056 to 2085).

5 The results of these analyses are presented in Appendix 25B Climate Change and Sea Level Rise
6 Sensitivity Analysis.

7 **[APPENDIX 25B IS UNDER DEVELOPMENT AND WILL BE COMPLETED FOLLOWING**
8 **COMPLETION OF THE CALSIM MODELING FOR THE WSIP PROGRAM]**

9 **25.4.2.2 Impact Assessment Assumptions and Methodology**

10 **Methodology**

11 *Climate Change and Sea Level Rise Sensitivity Analysis*

12 A detailed and comprehensive analysis of the effects of climate change and sea level rise on the Project
13 alternatives is presented for each of the resource chapters (i.e., Chapters 6 through 31). The climate
14 change and sea level rise sensitivity analyses and results are described in greater detail in Appendix 25A
15 Methodology for Air Quality and GHG Emissions Calculations. The sensitivity analysis attempts to help
16 answer the following questions:

- 17 • How would climate change and sea level rise effects (especially modified runoff and hydrology)
18 influence diversion to Project storage?
- 19 • How would climate change and sea level rise affect the Project’s ability to provide system flexibility
20 (i.e., water in storage)?
- 21 • How would climate change and sea level rise affect the ability of the Project to provide primary
22 objective benefits, including water supply reliability, fish survival, Delta water quality, and flexible
23 hydropower generation?
- 24 • How would climate change and sea level rise affect the environmental effects of the Project?

25 The sensitivity analysis provides a context for consideration of uncertainty and anticipated trends due to
26 climate change throughout the planning horizon for the Project. A comparison of the Existing
27 Conditions/No Project/No Action Condition, with and without climate change and sea level rise, is
28 intended to help the reader understand the trend and potential range of effects upon California’s major
29 water systems associated with climate change and sea level rise. In addition, the sensitivity analysis is
30 intended to help the reader understand how the trend and range of potential climate change and sea level
31 rise effects would impact the performance of the Project action alternatives.

32 *Limitations of Sensitivity Analysis*

33 There are limitations associated with the application and use of the Project climate change and sea level
34 rise sensitivity analysis. The limitations are summarized below and described in greater detail in
35 Appendix 25A Methodology for Air Quality and GHG Emissions Calculations.

36 The sensitivity analysis is limited by uncertainty related to climate change and sea level rise modeling.
37 There is uncertainty in each sequenced step depicted on Figure 25-2. There are also specific uncertainties

- 1 Insert Figure
- 2 **25-2 Graphical Depiction of the Analytical Process for Incorporating Climate Change into the**
- 3 **CALSIM II Model for Water Resources Planning Purposes**
- 4 (size: 8.5 x 11)

1 related to how operations may need to be modified to adapt to climate change, especially to mitigate the
2 frequency of dead storage conditions at reservoirs caused by climate change and sea level rise. In
3 addition, Project operations may need to be modified to adapt to climate change and sea level rise effects
4 to maximize the effectiveness of the additional storage provided by potential Project implementation.
5 These latter two limitations are related to the adjustment of operations that occur over time. Operators
6 have learned how to operate the system of reservoirs and delivery facilities effectively with the historical
7 and current climate. Operators, as well as modelers, understand and learn what works and what does not
8 work for the current climate, system requirements, and commitments. Consequently, operations
9 effectively become “tuned” to the current climate. As climate change effects intensify, modified
10 operations, or refinements, would likely be necessary to meet the multiple objectives of the CVP, SWP,
11 and Central Valley systems. Also, Project operations have been refined for the current climate analysis
12 associated with the detailed evaluation of reasonably foreseeable conditions described in the remainder of
13 the DEIR/EIS. As described below, information available as a result of the detailed and iterative modeling
14 of the current climate was helpful in developing operations that minimize impacts and maximize benefits
15 associated with adding offstream surface storage north of the Delta.

16 *Project Detailed Evaluation Scenarios*

17 The CALSIM II simulations of the Project action alternatives were developed and refined to the
18 conditions of the existing water resources system and current climate. This process was iterative using the
19 full suite of hydrologic, operations, water quality, fisheries, power, and economics models applied to the
20 detailed evaluation of Project action alternatives. A description of the suite of models is provided in
21 Appendix 6B Water Resources for System Modeling. This refinement process was performed for each
22 individual operational element that depends on the proposed Sites Reservoir, and included definition of
23 metrics, assessment of beneficiary performance, modification of assumptions and inputs to improve
24 performance, and prioritization of beneficiary performance.

25 All quantitative analyses used in this EIR/EIS are based on output from the CALSIM II model. As
26 described in Chapter 6 Surface Water Resources, the CALSIM II model uses a monthly time step and
27 long-term operational assumptions developed for each water year type, including compliance with water
28 quality and flood control criteria, biological opinions, and water demand patterns for users of SWP and
29 CVP water supplies. The analyses assume that these assumptions do not change with climate change and
30 sea level rise and would continue in a consistent manner in the future. It is recognized that it is probable
31 that water quality and flood control criteria and biological opinions would change in the future in
32 response to climate change, sea level rise, changes in the status of threatened and endangered species,
33 changes in water quality that affects beneficial uses of water, and changes in water demands due to
34 physical and social reasons. However, it would be speculative to predict these changes quantitatively,
35 because most of these changes would require subsequent NEPA and/or CEQA evaluations. For example,
36 changes in population that would occur due to future changes in municipal general plans would require
37 EIRs to consider related land use and water demand changes. Therefore, the analyses in this EIR/EIS
38 includes the same assumptions for non-project items in the Existing Conditions/No Project/No Action
39 Condition as under Alternatives A through D.

40 Because all of the water quality, fisheries, power, and economic models rely on the output of CALSIM II
41 modeling, changes in the model results between the Existing Conditions/No Project/No Action Condition
42 under Alternatives A through D greatly influence the outcome of the comparison of other environmental
43 resources conditions. For example, changes in reservoir storage under Alternatives A through D as
44 compared to the Existing Conditions/No Project/No Action Condition would influence the outcome of the

1 water quality model that projects changes in water temperatures in the reservoirs and streams downstream
2 of the reservoirs, which would influence the outcome of the models that project changes in the potential
3 for salmonid mortality downstream of the reservoirs. Therefore, if the reservoir storage conditions under
4 Alternatives A through D are similar to conditions under the Existing Conditions/No Project/No Action
5 Condition, the changes in conditions in the downstream rivers are generally similar. The results presented
6 in Chapter 6 Surface Water Resources and Chapter 12 Aquatic Biological Resources indicate this type of
7 trends. Therefore, in the sensitivity analyses for climate change, only the CALSIM II model was used for
8 the sensitivity analysis to indicate the trend resulting from climate change under Alternatives A through D
9 as compared to the Existing Conditions/No Project/No Action Condition. Changes in water temperatures,
10 salinity, fisheries, power, and the regional economy were projected to follow similar trends as the
11 CALSIM II model results.

12 As described in Chapter 6 Surface Water Resources, because the CALSIM II model uses a monthly time
13 step and long-term assumptions for each water year type, the model results include a noticeable amount of
14 model “noise.” Due to this model noise, changes between model results for Alternatives A through D and
15 model results for the Existing Conditions/No Project/No Action Condition of 5 percent or less are
16 considered to be “similar” because these variations cannot be relied upon to indicate changes in
17 environmental conditions.

18 *Limitations Considerations*

19 The results of the sensitivity analysis should be considered as a tool to provide a comparative
20 understanding of the trend of climate change effects and the relative performance of Project alternatives
21 with climate change. Any conclusions derived from the sensitivity analysis results should be considered
22 to be qualitative and as an indicator of potential changes related to climate change and sea level rise.
23 Consequently, the results of this analysis should not be used independently for decision-making purposes,
24 but rather as supplemental to the detailed evaluations in the Draft Feasibility Report and DEIR/EIS.

25 In the CALSIM II model, dead pool conditions are assumed at 240 thousand acre-feet (TAF) for Trinity
26 Lake, 550 TAF for Shasta Lake, 30 TAF for Lake Oroville, and 90 TAF for Folsom Lake. These are
27 extreme operational limits and are well below the range of reasonable reservoir operations. In real-time
28 reservoir operations, operators and regulators would significantly modify operations to avoid a dead pool
29 condition. As storage in a reservoir approaches dead pool, operators and regulators would initiate an
30 emergency consultation and agree on a modified operational strategy to meet various commitments in a
31 more limited way. This type of modified operation is not included in the CALSIM II operations
32 simulation since the circumstances of an emergency consultation can vary in significant ways. While
33 CALSIM II results are not considered to be predictive generally, the limitations regarding results that
34 indicate dead pool conditions at a reservoir are especially important to understand. Dead pool occurrences
35 in this document should be understood to mean that a reservoir, and more broadly a system of reservoirs,
36 would likely be operating in an emergency condition. The ability to meet one or more system objectives
37 would be impaired and normal operations cannot be sustained.

38 *Climate and Sea Level Scenarios*

39 For the Project sensitivity analysis, four climate and sea level scenarios were used to compare to
40 “Current” hydrological conditions assumed under the Existing Conditions/No Project/No Action
41 Condition. The Current conditions were based on historical hydrological conditions compiled and
42 analyzed by the DWR to represent conditions in 2005 for the purposes of the CALISM II model

1 operations. The four climate and sea level scenarios used in the sensitivity analysis for this EIR/EIS are
2 described in Appendix 25A GHG Emissions Analysis, and summarized below:

- 3 • The Early Long Term (ELT) scenario assuming the median (Q5) of an ensemble of Global Climate
4 Model (GCM) projections at approximately 2025 and a sea level rise of 15 centimeters (6 inches).
5 The ELT Q5 scenario is referred to later in this section as one point in the climate change trend.
- 6 • The Late Long Term (LLT) Q5 scenario assuming the median of an ensemble of GCM projections at
7 approximately 2060 and a sea level rise of 45 centimeters (18 inches). The LLT Q5 scenario is also
8 referred to later in this section as one point in the climate change trend.
- 9 • The LLT Q2 scenario assuming the “drier, more warming” lower bound (Q2) of an ensemble of GCM
10 projections at approximately 2060 and a sea level rise of 45 centimeters (18 inches). The LLT Q2
11 scenario is referred to later in this section as the Lower potential range of effect associated with
12 climate change.
- 13 • The LLT Q4 scenario assuming the “wetter, less warming” upper bound (Q4) of an ensemble of
14 GCM projections at approximately 2060 and a sea level rise of 45 centimeters (18 inches). The LLT
15 Q4 scenario is referred to later in this section as the Upper potential range of effect associated with
16 climate change.

17 This analysis included a range of uncertainty in the climate change projections, as described in
18 Appendix 25A GHG Emissions Analysis.

19 The quantitative results of the sensitivity analyses summarized in this chapter and presented in detail in
20 Appendix 25A GHG Emissions Analysis were based on a comparison of conditions at 2030 and 2060
21 using climate change and sea level rise model assumptions developed for the CALSIM II model by DWR
22 and Reclamation for previous projects, including the *Environmental Impact Statement for the Long-Term*
23 *Coordinated Operation of the Central Valley Project and State Water Project* (Reclamation, 2015).

24 As described in Section 25.4.2.1, the NEPA analysis should consider whether climate change would
25 result in beneficial or adverse effects on environmental or human resources under the action alternatives
26 as compared to the Existing Conditions/No Project/No Action Condition (with climate change
27 assumption) in a different manner than would occur without consideration of climate change. The NEPA
28 analysis also needs to consider the PR&G criteria to evaluate federal investments in water resources to
29 consider current trends and variability in key environmental and economic indicators, including climate
30 change, under the action alternatives and the Existing Conditions/No Project/No Action Condition,
31 especially over the long-term life of the project. This EIR/EIS does not identify the extent of the project
32 life; however, for practical purposes the useful life of a water resources project is generally considered to
33 be no more than 100 years.

34 To conduct a sensitivity analyses for 2060 (60 years from the Current Conditions), this EIR/EIS includes
35 an evaluation using information from the *Sacramento and San Joaquin Rivers Basin Study* (2016 Basin
36 Plan) (Reclamation, 2016), which analyzes changes to water supply conditions of the SWP and CVP due
37 to climate change and sea level rise through 2100. The 2016 Basin Plan used a more recent climate
38 change projection methodology, which is more similar to the analysis used in the WSIP process
39 (Appendix 25A GHG Emissions Analysis) than the analysis presented in Appendix 25A GHG Emissions
40 Analysis. The 2016 Basin Plan also includes assumed annual projected changes in land use and other
41 socioeconomic factors that affect the water demand for 2012 through 2099. These land use and

1 socioeconomic factors are difficult to include under the Existing Conditions/No Project/No Action
2 Condition in a NEPA analysis; the projected changes have not been evaluated in a separate environmental
3 document and cannot be directly evaluated in this EIR/EIS because they are not part of the purpose and
4 need and project objectives.

5 For the analysis in this EIR/EIS, the sensitivity analysis is conducted using two separate methods. First,
6 this EIR/EIS analysis compares the projected changes in reservoir storage, stream flows, Delta outflow,
7 X2 position, and Delta exports based on CALSIM II output for changes at 2030 and 2060 under
8 Alternatives A through D as compared to the Existing Conditions/No Project/No Action Condition,
9 presented in Appendix 25A GHG Emissions Analysis.

10 Second, this EIR/EIS compares the projected changes in reservoir storage, stream flows, Delta outflow,
11 X2 position, and Delta exports based on CALSIM II output for changes at 2030 and 2060 under
12 Alternative D as compared to the Existing Conditions/No Project/No Action Condition using the updated
13 climate change and sea level rise projections used for the WSIP process, as presented in Appendix 25B
14 Climate Change and Sea Level Rise Sensitivity Analysis. These results are subsequently considered in a
15 qualitative manner to project potential changes that could occur through 2100 by comparing changes in
16 reservoir storage, stream flows, Delta outflow, X2 position, and Delta exports for the Existing
17 Conditions/No Project/No Action Condition for model runs without climate change and sea level rise and
18 model runs through Year 2060 using the WSIP CALSIM II model output (included in Appendix 25B
19 Climate Change and Sea Level Rise Sensitivity Analysis) and results for the WSIP No Action Alternative
20 from the 2016 Basin Plan for 2060. Then, changes in model results from the 2016 Basin Plan for the
21 WSIP No Action Alternative between 2060 and 2100 would be used to estimate potential changes that
22 could occur under the action alternatives as compared to the Existing Conditions/No Project/No Action
23 Condition under 2100 conditions, as described in Appendix 25B Climate Change and Sea Level Rise
24 Sensitivity Analysis. The results of the projected changes for Alternative D as compared to the Existing
25 Conditions/No Project/No Action Condition would then be used to qualitatively estimate potential
26 changes for Alternatives A through C as compared to the Existing Conditions/No Project/No Action
27 Condition.

28 ***[WILL ADD DISCUSSION OF WSIP CLIMATE CHANGE METHODOLOGY BASED UPON***
29 ***COMPLETION OF APPENDIX 25B].***

30 *Use of Analytical Tools for the Quantitative Analysis of Climate Change and Sea Level Rise for* 31 *Alternatives A through D*

32 The analytical process for incorporating climate and sea level scenarios into the CALSIM II simulation
33 model includes the use of several sequenced analytical tools. These tools and the analytical process are
34 discussed in Appendix 25A GHG Emissions Analysis. This process includes modified hydrologic inputs
35 (inflow time-series) and modified flow-salinity relationships for Delta salinity compliance modeling.

36 For the Project sensitivity analysis, ELT and LLT scenario representations (called scenarios) were
37 selected. These scenarios were developed from a larger set of projections and were statistically derived
38 from those projections. The ELT scenario considers climate conditions (temperature and precipitation) for
39 a period of 30 years centered on analysis year 2025 (years 2011 to 2040) and projected sea level
40 conditions at year 2025. Likewise, the LLT scenario considers climate conditions for a period of 30 years
41 centered on analysis year 2060 (years 2046 to 2075) and projected sea level conditions at year 2060.

1 For evaluating Project alternatives along the trend in climate and sea level conditions over the next
2 50 years, the ELT and LLT Q5 scenarios were selected. For evaluating Project alternatives throughout the
3 potential range of climate and sea level conditions at 50 years, near the mid-point of the Project planning
4 period, the LLT Q2 (drier, more warming) and Q4 (wetter, less warming) scenarios were selected because
5 these scenarios would likely capture the bounding conditions of climate change and sea level rise relevant
6 to the Project alternatives being considered.

7 Sea level projections were based on an existing empirical method (Rahmstorf, 2007). This method better
8 reproduces historical sea levels and generally produces larger estimates of sea level rise than those
9 indicated by the IPCC (IPCC, 2007a). When evaluating all projections of global air temperature, this
10 method projects a mid-range sea level rise of 70 to 100 centimeters (28 to 40 inches) by the end of the
11 century, and when factoring the full range of uncertainty, the projected rise is 50 to 140 centimeters
12 (20 to 55 inches). Using this method, the projected sea level rise at year 2025 would be approximately
13 12 to 18 centimeters (5 to 7 inches), and at year 2060 would be approximately 30 to 60 centimeters
14 (12 to 24 inches). These sea level rise estimates are also consistent with those outlined in the USACE
15 guidance circular for incorporating sea-level changes in civil works programs (USACE, 2009). For the
16 Project sensitivity analysis, a sea level rise of 15 centimeters (6 inches) was assumed for the ELT scenario
17 and a sea level rise of 45 centimeters (18 inches) was assumed for all LLT scenarios.

18 As described in Section 2.5.4.1.2, scientific data now strongly suggest that these sea level rise projections
19 are likely too low and that actual sea level rise may be significantly greater than initially estimated
20 (Rahmstorf, 2007; National Research Council [NRC], 2012; COPC, 2017). COPC (2017) indicated that
21 the “most likely range” of sea level rise above the mean sea level between 1991 and 2009 could be from
22 12 inches (30 centimeters) to 41 inches (104 centimeters), depending on the basis of the climate and sea
23 level rise projections.

24 **25.4.3 Effects of Climate Change and Sea Level Rise on the Project**

25 **25.4.3.1 Existing Conditions/No Project/No Action Condition**

26 Climate change and sea level rise are projected to change conditions even without implementation of a
27 Project. As described in Appendix 25A GHG Emissions Analysis, it is anticipated that climate change
28 and sea level rise would result in the following trends:

- 29 • Increased runoff in late winter/early spring due to more rainfall and less snowfall, and reduced runoff
30 in late spring and summer because of less snow melt flows. The increased runoff in the late
31 winter/early spring generally fill the reservoirs earlier than under historical conditions, and there
32 would be more runoff earlier in the year than there would be with higher snow fall amounts. As water
33 is released from the reservoirs for pre-irrigation water demands and Delta water quality in the spring,
34 there would be less snowpack to refill the reservoirs in the late spring. Therefore, assuming no
35 changes in water demand patterns, there would be lower reservoir storage in the summer, except in
36 wet and some above normal years.
- 37 • Reduced river flows and Delta inflow due to decreases in runoff in summer months..
- 38 • Increased release of reservoir storage to maintain flow, temperature, and Delta salinity requirements,
39 assuming no changes in federal and State water quality and biological criteria.

- 1 • Increased variability and overall decreased SWP and CVP water availability due to decreased
2 reservoir storage conditions and uncertain changes in frequency of annual refilling of existing
3 reservoirs.
- 4 • Increased occurrence of dead pool⁵ storage at reservoirs and potential operational interruptions.
- 5 Increased air temperatures due to climate change also would result in increased water temperatures in
6 reservoirs and rivers. To mitigate the impacts of higher water temperatures on aquatic resources, additional
7 water could be required to be released from the reservoirs, which would further reduce SWP and CVP
8 water availability. In some years when the reservoir storage was extremely low, there would be limited
9 cold water to release to the streams to support aquatic resources, and it is anticipated that significant
10 adverse changes would occur to aquatic resources with or without implementation of Alternatives A
11 through D, as shown in recent projects (Reclamation, 2015; DWR and Reclamation, 2016).

12 **25.4.3.2 Comparison of Alternatives A through D to the Existing Conditions/No** 13 **Project/No Action Condition**

14 Changes in SWP and CVP reservoir storage in the Sacramento Valley flows downstream of those
15 reservoirs, Delta outflow, and X2 positions under Alternatives A through D as compared to the Existing
16 Conditions/No Project/No Action Condition are presented in detail in Appendix 25A GHG Emissions
17 Analysis for the Current, ELT Q5, LLT Q5, LLT Q2, and LLT Q4 scenarios.

18 The results of these analyses indicate that under the ELT Q5, LLT Q5, LLT Q2, and LLT Q4 scenarios,
19 the storage in Shasta Lake, Lake Oroville, and Folsom Lake at the end of May and end of September and
20 flows in the rivers downstream of these reservoirs would be similar or greater with implementation of
21 Alternatives A through D as compared to the Existing Conditions/No Project/No Action Condition with
22 the same climate change and sea level rise assumptions. These results are similar to the results presented
23 in Appendix 6B Water Resources System Modeling for these surface water comparisons without climate
24 change and sea level rise. Similarly, changes in X2 position under all of the climate change and sea level
25 rise scenarios considered in Appendix 25A GHG Emissions Analysis for Alternatives A through D as
26 compared to the Existing Conditions/No Project/No Action Condition would be similar or more positive.
27 These results are similar to the results presented in Appendix 6B Water Resources System Modeling for
28 these surface water comparisons without climate change and sea level rise.

29 **25.4.4 Climate Change Effects/Impacts from the Proposed Project**

30 The following discussion provides a general understanding of how environmental resources and effects
31 associated with implementation of Alternatives A through D as compared to the Existing Conditions/No
32 Project/No Action Condition may be altered with climate change and sea level rise. Each of the
33 environmental resource categories are described with consideration of the anticipated general climate
34 change effects to the resource at 2060 for conditions with and without implementation of Alternatives A
35 through D. The descriptions of the effects are qualitative and the extent of the changes would depend
36 upon the climate change and sea level rise scenario. However, as indicated in model results presented in
37 Appendix 25A GHG Emissions Analysis, in most cases the trends in the changes in surface water
38 conditions would be similar in extent for all climate change and sea level rise scenarios considered.

⁵ For the purposes of this analysis, “dead pool” occurs when the operating storage in a reservoir equals zero. For most reservoirs, some water would remain in storage as described previously, but it could not be released for any downstream purpose because the water is at or below the lowest intake level.

1 **25.4.4.1 Surface Water Resources (Chapter 6)**

2 Climate change and sea level rise would be expected to affect surface water resources due to the
3 anticipated increased air, water, and soil temperatures; altered runoff; increased frequency and severity of
4 floods and droughts; and Delta salinity intrusion. The sensitivity analysis results indicate that most
5 metrics of surface water resources, including reservoir storage, streamflow, and deliveries, would trend
6 negatively as climate change and sea level rise effects increase in the future. However, with
7 implementation of Alternatives A, B, C, and D, SWP and CVP Delta exports generally would be similar
8 under the LLT Q5 and LLT Q2 scenarios as compared to the Existing Conditions/No Project/No Action
9 Condition; however, Delta exports would increase under the LLT Q4 scenario.

10 With implementation of Alternatives A, B, C, and D, storage in SWP and CVP Sacramento Valley
11 reservoir storage generally would be similar under the LLT Q5 and LLT Q2 scenarios as compared to the
12 Existing Conditions/No Project/No Action Condition with the same climate change and sea level rise
13 scenario assumptions. Total reservoir storage would increase under the LLT Q4 scenario as compared to
14 the Existing Conditions/No Project/No Action Condition with the same climate change and sea level rise
15 scenario assumptions. Therefore, under the LLT Q4 scenario the additional water in storage, both in the
16 proposed Sites Reservoir and in existing SWP and CVP reservoirs, would allow water system operators
17 and managers to more easily adapt to a number of future uncertainties.

18 **25.4.4.2 Surface Water Quality (Chapter 7)**

19 Climate change and sea level rise would be expected to affect surface water quality due to the anticipated
20 increased water temperatures, altered runoff, increased frequency and severity of floods and droughts, and
21 increased Delta salinity. As noted previously, salinity in the western and central Delta is expected to
22 increase due to sea level rise, changes in runoff, and increased reservoir releases to maintain salinity in
23 the Delta even with sea level rise, especially during summer/fall months and drier year type conditions.
24 According to the sensitivity analysis, incremental changes to the X2 position under Alternatives A
25 through D as compared to the Existing Conditions/No Project/No Action Condition with climate change
26 would be similar to The comparative results without climate change (see Appendix 6B Water Resources
27 System Modeling).

28 **25.4.4.3 Fluvial Geomorphology and Riparian Habitat (Chapter 8)**

29 Climate change and sea level rise may change geomorphic characteristics and associated riparian habitat.
30 Changes could occur as a result of the anticipated increased frequency and severity of high flow events
31 and erosion, and changes in runoff timing. Recent studies (Reclamation, 2016) indicate that there would
32 be limited changes in floodplain processes and flow-dependent processes under the Existing
33 Conditions/No Project/No Action Condition as compared to the Current Condition.

34 **25.4.4.4 Flood Control and Management (Chapter 9)**

35 Climate change and sea level rise would be anticipated to affect flood management. Water storage levels
36 in existing reservoirs with climate change and sea level rise would be expected to trend down. This result
37 is shown in the sensitivity analysis of the Existing Conditions/No Project/No Action Condition. This
38 effect could provide some improvement in flood management capability by providing more space in
39 reservoirs for flood events. However, expected increases in the frequency and severity of high flow events
40 would diminish flood management capability. As noted in Chapter 9 Flood Control and Management,
41 there would be some flood management benefit for the areas immediately downstream of the SWP and
42 CVP dams that are prone to flooding. The adaptive capability related to flood management is less certain.

1 As noted above, water system operators and managers would have more water to manage with Project
2 implementation than without. The expected additional water in storage could potentially provide
3 operators and flood and water managers additional system resources to shift additional flood management
4 protection to existing reservoirs, thus providing some resilience. This type of operation was not included
5 in the Project action alternatives formulations. Although this type of adaptive operation would be
6 possible, this type of flood management operational change is speculative.

7 **25.4.4.5 Groundwater Resources (Chapter 10)**

8 Groundwater resources would likely be affected by climate change and sea level rise. Recent studies
9 (Reclamation, 2016) indicate that groundwater elevations would decline under drier climate change
10 scenarios (e.g., LLT Q2) and increase under wetter climate change scenarios (e.g., LLT Q4). As described
11 in Section 25.4.4.1, with implementation of Alternatives A, B, C, and D, SWP and CVP Delta exports
12 generally would be similar under the LLT Q5 and LLT Q2 scenarios as compared to the Existing
13 Conditions/No Project/No Action Condition with the same climate change and sea level rise scenario
14 assumptions. Delta exports would increase under the LLT Q4 scenario as compared to the Existing
15 Conditions/No Project/No Action Condition with the same climate change and sea level rise scenario
16 assumptions. Therefore, groundwater use by users of SWP and CVP water would be expected to be
17 similar under Alternatives A, B, C, and D with climate change scenarios LLT Q5 and LLT Q2, and
18 groundwater use would be expected to increase with climate change scenarios under the LLT Q4 scenario
19 as compared to the Existing Conditions/No Project/No Action Condition with the same climate change
20 and sea level rise scenario assumptions. Comparative effects of the Project would likely be similar to
21 impact analysis results without climate change and sea level rise conditions, as presented in Chapter 10
22 Groundwater Resources.

23 **25.4.4.6 Groundwater Quality (Chapter 11)**

24 Climate change and sea level rise would be expected to affect groundwater quality due to anticipated
25 changes in groundwater elevations, as described in Section 25.4.4.6. If groundwater elevations decline as
26 compared to conditions without climate change and sea level rise, it is anticipated that groundwater
27 quality could decline in areas with poorer groundwater quality at lower elevations. Increased or similar
28 groundwater elevations would be anticipated to not result in changes in groundwater quality, such as
29 would occur under Alternatives A through D as compared to the Existing Conditions/No Project/No
30 Action Condition under all climate change scenarios.

31 **25.4.4.7 Aquatic Biological Resources (Chapter 12)**

32 Climate change and sea level rise would be expected to affect aquatic biological resources due to the
33 anticipated increased air and water temperatures, altered runoff and erosion, and Delta salinity intrusion.
34 Increased air temperatures would be expected to lead to increased water temperatures in streams and
35 reservoirs. Under wetter climate change scenarios, there could be increased Delta outflows, especially if
36 upstream reservoirs are full; this would improve conditions for some aquatic resources in the Delta,
37 depending on the patterns of increased Delta outflows (Reclamation, 2016).

38 Alternatives A through D would result in similar conditions as under the Existing Conditions/No
39 Project/No Action Condition with the same climate change and sea level rise scenario assumptions,
40 except under the LLT Q4 scenario when conditions for aquatic resources could improve depending on
41 management of the additional flows in wetter periods.

1 **25.4.4.8 Botanical Resources (Chapter 13)**

2 Climate change and sea level rise would be expected to affect botanical resources due to the anticipated
3 increased air and water temperatures and altered runoff patterns. With respect to the botanical resources
4 that could be affected by Alternatives A through D it is anticipated that conditions would be similar to the
5 Existing Conditions/No Project/No Action Condition with the same climate change and sea level rise
6 scenario assumptions, except under the LLT Q4 climate change scenario, which would increase stream
7 flows. The increased stream flows could provide localized benefits to botanical resources in the riparian
8 corridor.

9 **25.4.4.9 Terrestrial Biological Resources (Chapter 14)**

10 Climate change and sea level rise would be expected to affect terrestrial biological resources due to the
11 increased air and water temperatures and altered runoff patterns. With respect to the terrestrial biological
12 resources that could be affected by Alternatives A through D it is anticipated that conditions would be
13 similar to the Existing Conditions/No Project/No Action Condition with the same climate change and sea
14 level rise scenario assumptions, except under the LLT Q4 climate change scenario, which would increase
15 stream flows. The increased stream flows could provide localized benefits to terrestrial biological
16 resources in the riparian corridor..

17 **25.4.4.10 Wetlands and Other Waters (Chapter 15)**

18 Climate change and sea level rise would be expected to affect wetlands and other waters of the U.S.
19 Because wetlands and waters of the U.S. are a subset of surface water resources, the effects described for
20 surface water resources would also apply to this resource. Climate change and sea level rise would be
21 expected to affect wetlands and other waters due to the increased air and water temperatures and altered
22 runoff patterns. With respect to wetlands and other water resources that could be affected by Alternatives
23 A through D it is anticipated that conditions would be similar to the Existing Conditions/No Project/No
24 Action Condition with the same climate change and sea level rise scenario assumptions, except under the
25 LLT Q4 climate change scenario, which would increase stream flows. The increased stream flows could
26 provide localized benefits to wetlands and other water resources.

27 **25.4.4.11 Geology, Minerals, Soils, and Paleontology (Chapter 16)**

28 Climate change and sea level rise could affect geology, minerals, soils, and paleontology due to the
29 altered runoff, which could result in erosion. As discussed in Section 25.4.4.3, recent studies
30 (Reclamation, 2016) indicate that there would limited changes in floodways due to flow-dependent
31 processes under the Existing Conditions/No Project/No Action Condition as compared to the Current
32 Condition.

33 **25.4.4.12 Faults and Seismicity (Chapter 17)**

34 Faults and seismicity would not be expected to be affected by climate change and sea level rise.

35 **25.4.4.13 Cultural/Tribal Cultural Resources (Chapter 18)**

36 Climate change and sea level rise could affect cultural resources due to altered runoff, which could result
37 in erosion. As discussed in Section 25.4.4.3, recent studies (Reclamation, 2016) indicate that there would
38 limited changes in floodways due to flow-dependent processes under the Existing Conditions/No
39 Project/No Action Condition as compared to the Current Condition.

1 25.4.4.14 Indian Trust Assets (Chapter 19)

2 The nature of Indian Trust Assets indicates a potential connection to other resource areas including land
3 use, surface water, minerals, and terrestrial and aquatic biological resources. However, as noted in
4 Chapter 19, there are no Indian trust assets within the vicinity of the Project study areas.

5 25.4.4.15 Land Use (Chapter 20)

6 Municipal land use in the study area is not expected to change due to climate change because the State
7 requires that all general plans for cities and counties include vulnerability assessments and water
8 strategies that address methods to adapt to climate change. Agricultural land use could change with
9 respect to the total acreage in cultivation or cropping patterns, because of air temperatures and water
10 supply availability. These changes are considered in this EIR/EIS as part of the cumulative impact
11 analysis, because of their uncertainty as compared to the current general plans that are included in the
12 Existing Conditions/No Project/No Action Condition and Alternatives A through D with the same climate
13 change and sea level rise scenario assumptions.

14 Long-term land use conditions under Alternatives A through D would be expected to be similar to the
15 Existing Conditions/No Project/No Action Condition under the LLT Q5 and LLT Q2 climate change
16 scenarios because the Delta exports would be similar. Under the LLT Q4 climate change scenario which
17 would increase Delta exports and decrease the use of groundwater to continue to support the same long-
18 term land use conditions that would occur under the Existing Conditions/No Project/No Action Condition
19 with the same climate change and sea level rise scenario assumptions.

20 25.4.4.16 Recreation Resources (Chapter 21)

21 Climate change and sea level rise would be expected to affect recreation resources due to less snowpack
22 that supports winter sports, altered runoff patterns that could affect reservoir storage in the summer
23 months, and availability of fish that support sport fishing. Under Alternatives A through D, reservoir
24 storage and stream flows that support recreational activities would be similar under the LLT Q5 and LLT
25 Q2 climate change scenarios as compared to the Existing Conditions/No Project/No Action Condition
26 with the same climate change and sea level rise scenario assumptions, and it would increase under the
27 LLT Q4 climate change scenario.

28 25.4.4.17 Socioeconomics (Chapter 22)

29 Climate change and sea level rise would be expected to affect socioeconomics due to changes in the cost
30 of adaptation measures that would be implemented by communities, industries, agricultural enterprises,
31 and recreational enterprises. These adaptation measures would require a range of responses including
32 infrastructure expansion and modification to accommodate higher flood flows and sea level rise, and
33 development of additional water supplies, such as desalination and recycled water (Reclamation, 2016).
34 These measures would increase employment in certain sectors; however, the measures also would
35 increase the cost of living, including the cost of water. Long-term socioeconomic conditions under
36 Alternatives A through D would be expected to be similar to the Existing Conditions/No Project/No
37 Action Condition under the LLT Q5 and LLT Q2 climate change scenarios because the Delta exports
38 would be similar. Under the LLT Q4 climate change scenario, which would increase Delta exports and
39 decrease the use of alternative water supplies, would be similar to the Existing Conditions/No Project/No
40 Action Condition.

1 25.4.4.18 Environmental Justice (Chapter 23)

2 Climate change and sea level rise would be expected to affect the general population. Consequently, the
3 direct effects of climate change and sea level rise would be expected to be similar with all populations,
4 including minorities and low-income populations (i.e., environmental justice populations) due to the
5 anticipated increased temperatures, increased severity and frequency of flood and drought events, Delta
6 salinity intrusion, changes in species range, and distribution, and increased fire risk. However, the indirect
7 effect of climate change and sea level rise due to the need for additional infrastructure to address climate
8 change and sea level rise measures would be to increase the cost of living, including the cost of water
9 supplies (see Section 25.4.4.17). These measures would increase employment in certain sectors; however,
10 the measures also would increase the cost of living, including the cost of water. Socioeconomic
11 conditions under Alternatives A through D would be to be similar to the Existing Conditions/No
12 Project/No Action Condition under the LLT Q5 and LLT Q2 climate change scenarios because the Delta
13 exports would be similar. Under the LLT Q4 climate change scenario, which would increase Delta
14 exports and decrease the use of alternative water supplies, socioeconomic conditions would be similar or
15 improve as compared to the Existing Conditions/No Project/No Action Condition.

16 25.4.4.19 Air Quality (Chapter 24)

17 Climate change and sea level rise would be expected to affect air quality because of the anticipated
18 increased air temperatures. These conditions would be similar under Alternatives A through D as under
19 the Existing Conditions/No Project/No Action Condition with the similar climate change and sea level
20 rise scenarios.

21 25.4.4.20 Climate Change and Greenhouse Gas Emissions (Chapter 25)

22 The effects upon total GHG emissions associated with the Project and pumping specifically would be
23 compensated by the GHG emission improvements related to the renewable integration operation of the
24 Project, as described in the GHG emissions portion of this chapter. These conditions would be similar
25 under Alternatives A through D as under the Existing Conditions/No Project/No Action Condition with
26 the same climate change and sea level rise scenarios.

27 25.4.4.21 Navigation, Transportation, and Traffic (Chapter 26)

28 Climate change and sea level rise would be expected to affect navigation, transportation, and traffic due to
29 the anticipated increased frequency and severity of floods unless infrastructure modifications were
30 completed. These conditions would be similar under Alternatives A through D as under the Existing
31 Conditions/No Project/No Action Condition with the same climate change and sea level rise scenarios.

32 25.4.4.22 Noise (Chapter 27)

33 Noise is not expected to be affected by climate change and sea level rise.

34 25.4.4.23 Public Health and Environmental Hazards (Chapter 28)

35 Climate change and sea level rise would be expected to affect public health and environmental hazards
36 due to the anticipated increased temperatures, increased frequency and severity of floods and droughts,
37 Delta salinity intrusion, spread of pests, and increased fire risk. These conditions would be similar under
38 Alternatives A through D as under the Existing Conditions/No Project/No Action Condition with the
39 same climate change and sea level rise scenarios.

1 **25.4.4.24 Public Services and Utilities (Chapter 29)**

2 Climate change and sea level rise is expected to potentially affect public services and utilities due to
3 changes in availability of surface water and groundwater resources (see Sections 25.4.4.1 and 25.4.4.5).
4 Public service and utilities conditions under Alternatives A through D would be similar to the Existing
5 Conditions/No Project/No Action Condition under the LLT Q5 and LLT Q2 climate change scenarios
6 because the Delta exports would be similar. Under the LLT Q4 climate change scenario, which would
7 increase Delta exports and decrease the use of alternative water supplies, public services and utilities
8 conditions would be similar or improve as compared to the Existing Conditions/No Project/No Action
9 Condition.

10 **25.4.4.25 Visual Resources (Chapter 30)**

11 Climate change and sea level rise would be expected to affect visual resources due to construction of new
12 infrastructure to adapt to climate change and sea level rise and changes in reservoir elevations. Under
13 Alternatives A through D, reservoir storage would be similar under the LLT Q5 and LLT Q2 climate
14 change scenarios as compared to the Existing Conditions/No Project/No Action Condition, and it would
15 increase under the LLT Q4 climate change scenario. Therefore, the visual resources would not be
16 adversely affected under Alternatives A through D as compared to the Existing Conditions/No Project/No
17 Action Condition with the same climate change and sea level rise scenarios.

18 **25.4.4.26 Power Production and Energy (Chapter 31)**

19 Climate change and sea level rise would be expected to affect power production and energy due to the
20 anticipated increased temperatures that would increase electricity demand for air conditioning and altered
21 runoff patterns that could affect hydropower generation. Some of these climate change and sea level rise
22 effects would increase or decrease hydropower production; some would increase or decrease energy
23 needs associated with the SWP and CVP systems (Reclamation, 2016).

24 The potential for hydropower generation at the SWP and CVP facilities is dependent on reservoir storage.
25 Under Alternatives A through D, reservoir storage would be similar under the LLT Q5 and LLT Q2
26 climate change scenarios as compared to the Existing Conditions/No Project/No Action Condition, and it
27 would increase under the LLT Q4 climate change scenario. Therefore, the potential for hydropower
28 generation at the SWP and CVP reservoirs related to reservoir storage would not be adversely affected
29 under Alternatives A through D as compared to the Existing Conditions/No Project/No Action Condition
30 with the same climate change and sea level rise scenarios.

From: Hughes, Brian [mailto:bhughes@usbr.gov]

Sent: Monday, May 15, 2017 8:22 AM

To: Alison Willy <alison_willy@fws.gov>; Brett Matzke <bmatzkewepa@gmail.com>; Charles Jachens <charles.jachens@bia.gov>; Gerald Robbins <grobbins@wapa.gov>; Jeanne Haas <haas@wapa.gov>; Kathleen Duncan <kduncan@usbr.gov>; Michael Mosley <mmosley@usbr.gov>; Nathaniel Martin <nmartin@usbr.gov>; Rob Thomson <rthomson@sitesproject.org>; Rocky Montgomery <rocky_montgomery@fws.gov>; SHANA KAPLAN <skaplan@usbr.gov>; Anastasia Leigh <aleigh@usbr.gov>; Andrea Meier <ameier@usbr.gov>; Charlie Wright <cww281@gmail.com>; dgomez@colusa-nsn.gov; Dunning, Connell/EXT <dunning.connell@epa.gov>; gordon.stephanies@epa.gov; jeff.herrin@aecom.com; jwatson@sitesproject.org; kvann@countyofcolusa.org; Oliver, Mark/RDD <Mark.Oliver@CH2M.com>; matthew.p.kelley@usace.army.mil; michael.g.nepstad@usace.army.mil; oserrano@colusa-nsn.gov; Russell Grimes <rwgrimes@usbr.gov>

Cc: Michael Dietl <mdietl@usbr.gov>; Black, Lyna/RDD <Lyna.Black@CH2M.com>

Subject: Sites Reservoir Project Admin Draft EIR/EIS for Cooperating Agency Review [EXTERNAL]

All,

Good morning. The Bureau of Reclamation is pleased to announce the release of the Administrative Draft EIS/EIR for the NODOS project to all Cooperating Agencies. We welcome you to review the Administrative Draft EIS/EIR and provide comments and questions. The review period for Cooperating Agencies is 2 weeks, with all comments and questions due to Reclamation by May 29, 2017.

The link to all documents for your review is below:

<https://ch2m.box.com/s/v4aikoqyoskyjdzj07vtejbger0kqxmi>

If you have trouble with the above link please contact Lyna Black at lyna.black@ch2m.com.

Reclamation will respond and incorporate your concerns as much as possible into the EIS/EIR before the public release. Tentatively, Reclamation is planning on a 60-day public release review period from August 14 - October 16, 2017.

To assist in your review, Reclamation will host a NODOS project update presentation on May 17, 2017, from 1:00pm – 3:00pm, at 2800 Cottage Way, Sacramento, in Cafeteria Conference Room C1003. If you have not received an email invite to this meeting and would like to attend please contact us.

Please direct all comments or questions to either Mr. Brian Hughes at bhughes@usbr.gov or 916-978-5074, or Mr. Mike Dietl at MDietl@usbr.gov or 916-397-4483.

Regards,

Brian Hughes

Project Manager, Planning Division
U.S. Bureau of Reclamation, Mid-Pacific Region 2800 Cottage Way, MP-720
Sacramento, CA 95825
Office: 916.978.5074
bhughes@usbr.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 13 2016

David G. Murillo
Regional Director
U.S. Bureau of Reclamation
Mid-Pacific Regional Office
12800 Cottage Way
Sacramento, CA 95825

Subject: Request for Cooperating Agency Participation for the North-of-the-Delta Offstream Storage Investigation Feasibility Study

Dear Mr. Murillo:

The U.S. Environmental Protection Agency received Reclamation's letter inviting the EPA to serve as a cooperating agency for the North-of-the-Delta Offstream Storage Investigation Feasibility Study. We appreciate Reclamation's interest in working with EPA and accept your invitation.

As a cooperating agency, and to the extent that time and resources allow, the EPA intends to:

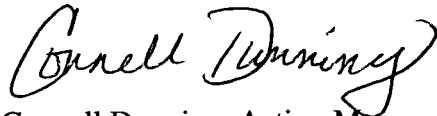
- 1) Participate in the EIS process, including attending inter-agency coordination meetings, reviewing draft documents, and participating in the public scoping process. Due to limited travel funding, participation is likely to occur via teleconference;
- 2) Assist Reclamation in identifying significant environmental issues, particularly those that relate to the EPA's special expertise and jurisdiction;
- 3) Strive to provide comments to Reclamation on preliminary versions of the draft and final EIS within 30 days;
- 4) If requested by Reclamation, assist with responses to public comments that concern the EPA's areas of expertise and jurisdictional responsibilities; and
- 5) Work with Reclamation to ensure that the EIS content is consistent with EPA program or agency requirements.

Please note that the EPA's status as a cooperating agency does not affect our independent responsibilities under Section 309 of the Clean Air Act to review and comment publicly on all draft EISs. Participation as a cooperating agency does not imply endorsement of the proposed project, nor can it be used as the basis to obligate, commit, or transfer funds. The EPA's cooperating agency status may be acknowledged in the document, but the EPA seal or symbol should not be used unless Reclamation receives prior written approval from the EPA, and then only if a disclaimer is attached stating that the

use of the Agency seal or symbol on this document does not imply any agency's endorsement of the proposed action. Please reference or incorporate this acceptance letter into the Draft and Final EIS.

We appreciate the opportunity to be a cooperating agency on this project. Please send one hard copy and two CDs of the Draft EIS to this office (mail code ENF-4-2) at the same time it is officially filed with our Washington D.C. Office. If you have any questions, please contact me at (415) 947-4161 or Stephanie Gordon at (415) 972-3098 and gordon.stephanieS@epa.gov

Sincerely,

A handwritten signature in black ink that reads "Connell Dunning". The signature is written in a cursive style with a large initial "C".

Connell Dunning, Acting Manager
Environmental Review Section

Cc: Michael Dietl, Project Manager, U.S. Bureau of Reclamation
Garwin Yip, National Marine Fisheries Service
Kaylee Allen, U.S. Fish and Wildlife Service
Michael Nepstad, U.S. Army Corps of Engineers
Chuck Jachens, Bureau of Indian Affairs