



SITES PROJECT AUTHORITY - RECLAMATION REVIEW

Cooperating Agency Review Administrative Draft REIR/SDEIS
April-21

Comment Log

ADMIN USE ONLY		REVIEWER			RESPONDENT							REVIEWER		
COMMENT ID (DO NOT Edit this Column)	REVIEWER CONTACT INFO (Name, Agency)	LOCATION IN REPORT/DOC (Ch, Section, page, etc.)	DATE OF ORIGINAL REVIEW COMMENT MM/DD/YY	ORIGINAL REVIEW COMMENT	RESPONDENT CONTACT INFO (Name)	DATE OF RESPONSE MM/DD/YY	RESPONSE	CONCUR	NON-CONCUR	FOR INFO ONLY	CARRY FORWARD	CLOSED Y / N	DATE MM/DD/YY	BACK CHECK COMMENT (Needed Only if NOT Closing Comment)
	Kristal Davis-Fadtke	Chapter 1, Page 1-2	4/14/2021	This does not accurately reflect the role of DWR. DWR is not the administering agency for ecosystem benefits and does not represent the State of California in that respect. Also, funding decisions by the CA Water Commission should be separated from DWR. DWR cannot represent other state agencies on behalf of the State of California.										
	Kristal Davis-Fadtke	Chapter 1, Page 1-2	4/15/2021	Under Prop 1, ecosystem benefits are considered public benefits; whereas, water supply is not. Prop 1 can only fund public benefits. Ecosystem public benefits should be distinct from water supply benefits of the project.										
	Kristal Davis-Fadtke	Chapter 1, Page 1-3	4/14/2021	Suggest including statement that the Authority will also need to enter into a contract with the administering agencies for the public benefits prior to determining a project's final funding award.										
	Kristal Davis-Fadtke	Chapter 1, Page 1-7	4/15/2021	This is one of Sites' ecosystem benefits, but there is no mention of IL4 Refuge Water Supply being an objective of the project. Because Prop 1 requires project to provide a net ecosystem improvement, CEQA documents should analyze any potential impacts from providing said benefits. Additionally, any benefits provided by the project under WSIP, cannot be used to avoid, minimize or mitigate impacts. Suggest including all WSIP ecosystem benefits as clear objectives.										
	Kristal Davis-Fadtke	Chapter 1, Page 1-7	4/16/2021	Benefits funded by Reclamation will need to be separate than the quantity of benefit provided to the state under WSIP.										
	Kristal Davis-Fadtke	Chapter 1, Page 1-8	4/15/2021	Suggest adding CDFW will use this RDEIR/SDEIS to evaluate if Sites Reservoir provides a net ecosystem benefit, in order to make a finding that the project is consistent with Prop 1, as required by the WSIP regulations. CWC can only issue a final funding award after CDFW has made a finding and a contract for ecosystem benefits between CDFW and the Sites Authority has been executed.										
	CDFW	Chapter 2, Page 2-1	4/9/2021	The Appendices were not included in the document library or in the comment solicitation, so no comments were made concerning them.										
	CDFW	Chapter 2, Page 2-2	4/13/2021	Please, clarify exactly the who, what, when, where, why how of this statement. The way that the statement is written, it could be construed that CDFW had significant input in shaping the alternatives, which it did not.										
	CDFW	Chapter 2, Page 2-3	4/13/2021	This cannot happen without first fully mitigating the impacts of the project.										
	CDFW	Chapter 2, Page 2-4	4/9/2021	Peak winter and spring flows are essential for lateral channel migration, floodplain inundation, and maintenance of riparian habitat. Altering peak stream flows in the reach between Red Bluff/Hamilton City and Colusa may have significant effects on vital riverine ecosystems, ground water recharge, and flood waters directed through the Sutter/Yolo Bypasses, and the DEIR should analyze and mitigate this potentially significant impact.										
	CDFW	Chapter 2, Page 2-5	4/13/2021	CEQA requires EIRs to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CDFW recommends a summary table showing which significant effects of the project are avoided or substantially lessened by each alternative.										
	CDFW	Chapter 2, Page 2-5	4/13/2021	CDFW requests that "similar" be defined and described for each use in this table.										
	CDFW	Chapter 2, Page 2-7	4/9/2021	Please distinguish between benefits to water right holders and ecological function.										
	CDFW	Chapter 2, Page 2-16	4/13/2021	There should be a difference between existing conditions and the "No-project" Alternative and the "No-project" Alternative should include an analysis that is comparable to the other Project Alternatives. The purpose in CEQA of the "No-project" alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project so the impact analysis of the "No-project" alternative should include all foreseeable future impacts based on current plans and consistent with available infrastructure and community services. The existing conditions should be a set point in time (typically the NOP or the current conditions at the time of analysis), but the "No-project" Alternative would also include any future foreseeable changes in implementation of the SWP ITP and other projects that should not be included in existing conditions if they are not the current condition or baseline. CDFW commented on this in our DEIR letter that the existing conditions should more accurately reflect practice, not potential for water contractors and diverters to use their total allocation. Since we do not have the Existing Conditions section of the REIR to review, we cannot yet see how that comment was addressed.										
	CDFW	Chapter 2, Page 2-16	4/13/2021	Need clarification on what this means.										
	CDFW	Chapter 2, Page 2-17	4/9/2021	CDFW recommends the DEIR include an impact analysis to fisheries from increased winter diversion of water into the GCID oxbow, including survival rate of listed winter and spring-run Chinook Salmon, and predation rate within the oxbow during peak emigration. The increase proportion of flow will likely change the migratory path of emigrating fish species (salmon, sturgeon, etc.).										
	CDFW	Chapter 2, Page 2-20	4/9/2021	Please specify river flow conditions that would justify a 2,500 cfs pump rate.										
	CDFW	Chapter 2, Page 2-20	4/9/2021	The DEIR should describe the monitoring protocols needed to ensure the new setbacks do not increase fish entrainment.										
	CDFW	Chapter 2, Page 2-38	4/9/2021	CDFW recommends listing existing fish population in Funks reservoir, detailing the work window when the excavation will occur, and where the excavated material will be deposited.										



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	CDFW	Chapter 2, Page 2-49	4/9/2021	CDFW recommends describing the depth of the water table, describing the likelihood of it being affected, and what the impacts would be to the region if the groundwater was affected.										
	CDFW	Chapter 2, Page 2-54	4/9/2021	The DEIR should include a reservoir profile modeling to justify the different elevations of ports and to analyze operational flexibility that would be feasible based on the location of these ports.										
	CDFW	Chapter 2, Page 2-54	4/9/2021	CDFW is concerned that having a 340-foot elevation port as the lowest port may not be sufficient to allow for appropriate temperature and turbidity releases, or access to the coldest water when reservoir levels are low. CDFW recommends that ports are located throughout the profile of the reservoir to allow for maximum operational flexibility.										
	CDFW	Chapter 2, Page 2-56	4/9/2021	The DEIR should include documentation supporting a projected release flow of up to 100 cfs into Stone Corral Creek and analyze projected impacts as result of these flows.										
	CDFW	Chapter 2, Page 2-59	4/9/2021	The DEIR should include monitoring provisions to ensure that these velocities and temperatures of releases are appropriate.										
	CDFW	Chapter 2, Page 2-62	4/9/2021	The DEIR should describe why riprap was chosen over other erosion control methods.										
	CDFW	Chapter 2, Page 2-65	4/9/2021	The DEIR should include fish monitoring protocols that include triggers that will affect water operations (diversions and releases), and appropriate measures that will be implemented to minimize the impacts to migrating listed fish species.										
	CDFW	Chapter 2, Page 2-65	4/9/2021	Please clarify if all of the water conveyed to the Sacramento River will be released through the CBD.										
	CDFW	Chapter 2, Page 2-67	4/9/2021	The DEIR should include baseline conditions for Bird Creek.										
	CDFW	Chapter 2, Page 2-67	4/6/2021	CDFW recommends defining exact use planned to be allowed in the recreation area regarding angling and hunting. The reservoir is likely to attract a large contingent of migratory waterfowl, and deer, dove, and turkey populations. The fluctuating water level will likely result in regions of green vegetation due to receding water, creating a potential for increase tule elk usage. CDFW recommends considering coordination and use of lawful public hunting to manage increased populations.										
	CDFW	Chapter 2, Page 2-72	4/13/2021	Please clarify if the temporary roads will be removed restored to pre-project conditions.										
	CDFW	Chapter 2, Page 2-76	4/13/2021	The DEIR should disclose project impacts related to the increase of traffic as a result of this project. If these impacts are considered significant, the DEIR should disclose additional avoidance, minimization and or mitigation measures to offset the impacts.										
	CDFW	Chapter 2, Page 2-78	4/13/2021	As written it sounds like these conditions are mutually exclusive.	EH	5/14/21	Adjusted to remove the second "when"							
	CDFW	Chapter 2, Page 2-78	4/9/2021	CDFW recommends the DEIR discuss diversion window overlaps with Shasta/Trinity Reservoir and Keswick Reservoir release operations. Increasing withdrawals during the proposed window could place additional constraints on potential actions to avoid and minimize impacts to listed fish species. The proposed operational window has the potential to impact Shasta/Trinity Reservoir operations by diverting additional water in the upper Sacramento River during the September through December period, when Keswick Reservoir is typically reducing releases from summer deliveries to an operational minimum for the winter. During this time, Keswick Reservoir releases are driven by water needed for rice decomposition and meeting downstream requirements such as the flow metric at Wilkins Slough, while at the same time trying to minimize juvenile impacts to Chinook salmon (e.g. redd dewatering and juvenile stranding). Withdrawing additional water from the Sacramento River could limit the range of potential measures available to minimize impacts to listed fish, such as altering water flows and timing of releases.	EH	5/14/21	Noted. Releases from Shasta will not be diverted into Sites unless in a flood release condition.							
	CDFW	Chapter 2, Page 2-78	4/13/2021	Please describe how water quality will be monitored and protected when released to Sac or Liberty.										
	CDFW	Chapter 2, Page 2-78	4/13/2021	CDFW cannot fully evaluate this project without reviewing the details of these agreements.	EH	5/14/21	Operating term sheets are under development, but they cannot be finalized until the environmental document is finalized. [NOTE TO TEAM: can we share draft term sheet with CDFW this summer?]							
	CDFW	Chapter 2, Page 2-78	4/13/2021	Please, provide documentation supporting this assertion.	EH	5/14/21	Noted. Analysis can be provided.							
	CDFW	Chapter 2, Page 2-78	4/9/2021	CDFW is concerned that there may instances where "excess" conditions may be limited by existing ITPs or Biological Opinions that may interfere with Sites diversions. These limitations should be taken into consideration when modeling and calculating yield estimations.	EH	5/14/21	Note to team: I think this comment and the next are reasonable and that we can address them, but I'm not sure where the appropriate place is to do so.							
	CDFW	Chapter 2, Page 2-78	4/13/2021	What about excess with restrictions? (i.e. conditions are excess but prior water rights are not being fulfilled due to other regulatory restrictions that are curtailing exports.)										
	CDFW	Chapter 2, Page 2-79	4/13/2021	Does this mean that exports are at maximum capacity at the CVP and SWP? Or that allocations are 100% south of delta or that San Luis Reservoir is full?										
	CDFW	Chapter 2, Page 2-79	4/13/2021	Would this include SWRCB Water Quality Control Plan update if it is in place at the time of diversion?			Note to team: I assume yes but I am not familiar with the details of this plan.							
	CDFW	Chapter 2, Page 2-79	4/13/2021	What does the term 'losses' mean and what is the magnitude of these losses?										
	CDFW	Chapter 2, Page 2-80	4/9/2021	This comment is regarding the minimum bypass flows at RBPP, Hamilton City, and Wilkins Slough. The minimum bypass flows listed for RBPP, Hamilton City, and Wilkins Slough are not sufficient for the persistence of anadromous fishes. These requirements are typically driven by diversion elevation and navigational requirements, yet past and recent literature highlight flow/survival relationships that indicate flows higher than these operational minimums are necessary to be considered sufficient for anadromous fishes. Additional diversions once the river reaches these minimum flow metrics decrease the number of instances when anadromous fish may experience a realized benefit brought on by environmental conditions and will therefore need to be minimized or mitigated.										



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	CDFW	Chapter 2, Page 2-80	4/13/2021	Where and how will monitoring be conducted, so that fish presence can be detected?										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Please, provide the rationale for this minimum bypass flow, along with supporting documentation for that rationale. Is this a redd dewatering criteria for upstream of RBDD?										
	CDFW	Chapter 2, Page 2-80	4/13/2021	This seems to be actually controlled by flow up to the diversion capacity, rather than fish screen design (i.e. 1:1 except at the top end of diversion capacity maybe the last 300 cfs, or so).										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Please, provide the rationale for this minimum bypass flow, along with supporting documentation for that rationale. This does not appear to be a biologically based criteria.										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Please provide the rationale for the 8,000 cfs bypass flow, along with the supporting documentation that supports that rationale. If this is for fall run chinook emigrating at this time of the year, with the 10,000 cfs pulse flow science to be operationalized at Bend Bridge, it should be described clearly in this document.										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Freemont weir is at river mile (RM) 82 while the diversion points are at RM 205 and 243. How will real time operations stay within identified flow over weir thresholds? Will a tool be developed?										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Please provide justification for the Fremont Weir Protections. For example, how was the 600 cfs threshold chosen? Is this tied to any sort of threshold by which floodwaters in the Tule Canal/Toe Drain begin spilling onto the floodplain?										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Please provide an analysis to show how protective these measures actually are. While the CalSim-2 modelling can be used to quantify changes to the total amount of water entering the Yolo Bypass over/through the Fremont Weir on a monthly basis, this may not provide enough detail to sufficiently assess potential impacts. For the Fremont Weir Big Notch Project, changes to the amount of flow diverted on a daily time scale may be more important than monthly changes to inundated acres because it is assumed that fish access to the Bypass is the limiting factor for floodplain rearing rather than total inundated acres. Relevant questions that will need assessed: · What is the reduction in the number of days with water flowing through the notch? · How does this reduction translate into the amount of fish that will be entrained in the Yolo Bypass? · How many adult fish passage days are being lost by this reduction?										
	CDFW	Chapter 2, Page 2-80	4/13/2021	Rearing will need to be addressed for all salmon, steelhead, sturgeon, species of special concern.										
	CDFW	Chapter 2, Page 2-80	4/13/2021	What about DPS Green Sturgeon? Juvenile out-migration is highly correlated to pulse events (freshets) in the fall and early winter.										

