



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
650 Capitol Mall, Suite 5-100
Sacramento, California 95814-4700

April 30, 2021

Melissa Dekar
Natural Resources Specialist
Environmental Compliance and Conservation Branch, CGB-152
2800 Cottage Way, Sacramento, CA 95825
Interior Region 10, Bureau of Reclamation

Re: NMFS Comments on the Sites Reservoir, Supplemental Draft Environmental Impact Statement (SDEIS)/Revised Environmental Impact Report (REIR), Chapters 1-4

Dear Ms. Dekar,

We are writing in response to the March 24, 2021 request for Cooperating Agency review of the Sites Project Authority and U.S. Bureau of Reclamation Supplemental Draft Environmental Impact Statement/Revised Environmental Impact Report (SDEIS/REIR), Chapters 1-4 for the proposed Sites Reservoir and associated facilities (Project). NOAA's National Marine Fisheries Service (NMFS) has reviewed the relevant chapters of the draft, and we are providing technical assistance comments as they relate to anadromous fishes under our jurisdiction. As a Cooperating Agency under the National Environmental Policy Act (NEPA), we have agreed to work closely with you in evaluating key sections of the SDEIS/REIR, and to provide feedback regarding the level of analysis therein. We have also taken the opportunity during this review to identify those elements of the Project that will need further scrutiny during the development of a Biological Assessment and materials required for the initiation of consultation pursuant to section 7 of the Endangered Species Act (ESA). As such, we view the analyses presented in the SDEIS/REIR as foundational for any additional analysis necessary to support the ESA consultation for the proposed action.

In our review of the SDEIS/REIR, Chapters 1-4, NMFS staff have compiled a number of comments according to chapter and identified by page number. Our comments are summarized in the following table and we anticipate that a continued dialogue will allow us to build on our understanding of the Project and its potential impacts.



Table 1: Consolidated NMFS Comments on Sites Reservoir, SDEIS/REIR, Chapters 1-4.

Section	Comment	Comment type
Chapter 1: Introduction		
1.1	Is there a lead federal agency for Project Operations?	regulatory
1.2.3	Is the December 2020, Final Feasibility Report for the North-of-Delta Offstream Storage Investigation available? Is that report the same as the August 2017 Feasibility Report?	documentation
1.2.5	Are results available for the additional analysis of “environmental effects of the new alternatives in the [Value Planning] Report”?	documentation
Chapter 2: Preliminary Project Description and Alternatives		
2.2.1	What Project alternatives were considered and rejected?	NEPA/CEQA requirements
Figure 2-4	Boxes in figure 2-4 should refer to figure 2-2 (not 2-4 1).	clarification
2.4	Appendix 1A and Chapter 5 not yet received.	documentation
2.5.1.1	Why is the RBPP increasing capacity to 2,500cfs?	operations (capacity)
2.5.1.1	Why do all alternatives require a TC Canal gate structure modification to 3,000 cfs?	operations (capacity)
2.5.1.2	Has the TRR already been permitted?	clarification
2.5.1.2	Confirm that the GCID Main Canal capacity is 1,800cfs.	operations (capacity)
2.5.1.2	What is WSE?	clarification (acronym)
2.5.1.2	Confirm the Funks pump station (for TC) flow rate: 2,100 cfs or 2,000?	operations (capacity)
2.5.1.4	Confirm that the maximum reservoir inflow is 3,900cfs (2,100 + 1,800)	operations (capacity)
2.5.1.4	Where is construction material coming from? How much is needed? How is it getting there?	construction
2.5.1.5	Confirm that the dunnigan pipeline capacity is 1,000 cfs	operations (capacity)
2.5.2.1	Confirm that Sites reservoir deliveries can be made 'upstream' through the GCID or TC Canals	operations (clarification/confirmation)

2.5.2.1	Confirm that Project diversions would be made Sept 1 - June 15.	operations (clarification/confirmation)
2.5.2.1	Define 'excess conditions'	operations (clarification/confirmation)
2.5.2.1	How would an 'expanded' Los Vaqueros Reservoir be considered?	operations (clarification/confirmation)
Table 2-5	Regarding "precipitation-generated pulse events" Would a managed spring pulse be protected?	operations (clarification)
Table 2-5	What constitutes "fish presence and migration"?	operations (clarification)
Table 2-5	Does "at all times" apply to the period of operation (i.e. Sept 1 - June 15) or year round?	operations (clarification)
2.5.2.1	Confusing description of a "qualified pulse event," is it a flow pulse or a pulse of fish?	operations (clarification)
2.5.2.1	Clarify the cessation of pulse protection after 7 days. What if fish are still present in high numbers?	operations (clarification)
Figure 2-37	Confusing figure. GCID Main Canal capacity 1,800cfs why is it depicted up to 3,000cfs? Combined capacity (GCID+TC) is 3,900 why is it depicted at 3,000?	operations (capacity)
2.5.3.8	What is the estimated volume and tonnage of off-site material? What methods would be used to transport said material to the construction site?	construction
Chapter 3: Environmental Analysis		
3.2.1	NMFS would recommend the use of a future baseline, considering the Project would not be operational until at least 2030.	Baseline assumptions
3.2.1	Is Delta Conveyance included in the baseline? Where and how is it considered in the EIS?	Baseline assumptions
3.2.1	Is the CALSIM period of record a reasonable baseline for current and future conditions (e.g. with regard to drought frequency and duration)?	Baseline assumptions
Chapter 4: Regulatory and Environmental Compliance: Project Permits, Approvals, and Consultation Requirements		
4.1	Has FWS produced a FWCA 2(b) report?	regulatory

We appreciate the opportunity to comment on this important document and for continued engagement. If you have any questions regarding our input, please contact me at stephen.maurano@noaa.gov and (916) 930-3710.

Sincerely,

A handwritten signature in cursive script that reads "A. Cathy Marcinkevage".

Cathy Marcinkevage
Assistant Regional Administrator
California Central Valley Office

cc: Vanessa King, vking@usbr.gov