Chapter	Page/Line	Text in Document	Comment
9	9-8, 9-9	All land cover type acreages are preliminary and subject to revision based on pedestrian surveys once access has been granted to the study area. Wetland and non-wetland water types are subject to further revision pending field review and verification prior to construction by the U.S. Army Corps of Engineers (USACE), State Water Resources Control Board (State Water Board), and California Department of Fish and Wildlife (CDFW).	It is important for the FEIS to have accurate estimates of the acres of wetland and other waters that will be impacted by operation and construction of the project. Please incorporate as much information from field reviews as possible before the publication of the FEIS. To support a LEDPA determination, conduct a formal and reproducible assessment of the condition of aquatic resources in the reservoir footprint using an approved conditional assessment such as the California Rapid Assessment Method (CRAM).
9	9-44	Indirect impacts due to construction of Alternative 1 or 3 would occur due to changes in hydrology of wetlands outside the construction area due to erosion and sedimentation during construction.	Include a description of how changes in timing and reductions in bypass and side-channel inundation caused by project operations may affect wetland function outside of the construction footprint.

text should be added in the FEIS to explain the Corps important role in evaluating the project under the Clean Water 404(b)1 Guidelines. I saw it here in Response to Comments but should be clarified in the body of the FEIS: The Authority has submitted a draft CWA Section 404 application to the USACE, including a 404(b)(1) analysis of Project alternatives and a preliminary determination of the LEDPA. The Authority will continue to consult with the USACE to obtain a verified delineation and Preliminary Jurisdictional Determination for the extent of aquatic resources and to subsequently confirm the LEDPA and develop the mitigation

9-16; unknov plan.

The EIS presents information relevant to the U.S. Army Corps of Engineers decision of whether to issue a Clean Water Act Section 404 permit for the proposed project, including information to evaluate compliance with the Section 404(b)(1) Guidelines (Guidelines). Information to support factual determinations of the potential short-term or long-term effects of the discharges of dredged or fill material associated with the proposed project (40 CFR 230.11) on the aquatic ecosystem will ultimately help support findings of compliance or non-compliance with the Guidelines (40 CFR 230.12). Additional information is needed to support those factual determinations and findings.

Secondary and cumulative effects on waters of the United States

While project operations have not yet been fully defined, assessment of potential operational impacts is required by 40 CFR 230. Specifically, factual determinations of the secondary effects “associated with but not resulting directly from the actual placement of dredged or fill material” (40 CFR 230.11(h)), and consideration of how the direct and secondary effects of the proposed project would contribute to cumulative effects on the aquatic ecosystem (40 CFR 230.11(g)) are required.

Potential secondary effects include, but are not limited to: (1)

6	6-75	The X2 results generally show small reductions of up to 0.7 km during JulyAugust through OctoberNovember (i.e., less seawater intrusion), and no change or variable small eaffects the rest of the year with some small increasessmall increases during December through June. In Table 6-16, the largest increase in average X2 is 0.3 km for Alternative 1B during December of Wet Water Years. Reductions in X2, with bigger changes are generally bigger during Critically Dry Water Years than Wet Water Years because more water would be released from Sites Reservoir during Critically Dry Water Years and the changes in flow during Critically Dry Water Years would represent a larger percent of total flow. The differences between Alternatives 1, 2, and 3 are small, mostly less than 0.1 km.	Include more stringent diversion criteria to meet Delta outflow objectives and protect Delta beneficial uses. In the 2018 Framework for the Sacramento/Delta Update to the Bay-Delta Plan1, the State Water Resources Control Board states that existing requirements are insufficient to protect the Bay-Delta ecosystem and proposes new inflow-based Delta outflow objectives of 55% of unimpaired flow withing an adaptive range of 45-65%.
?			What is the preferred alternative?
21		Appendix 21A uses calculations from IPCC and EPAs interpretation Guide.	We appreciate the inclusion of the GHG analysis using EPA's methology when calculating land use changes from the formation of Sites Reservoir.
9		Please see response to comment 79-41 regarding the Reservoir Management Plan (RMP) and harmful algal bloom (HAB) monitoring. In addition, text has been added to the HABs Action Plan component of the RMP to include water sampling at multiple depths near the I/O tower if visual monitoring indicates that there is a bloom near the tower.	Thank you for including important monitoring and sampling for HABs as well as specific operating criteria for the I/O tower. Please include these as enforceable commitments in the ROD.

Page	Section	Comments	Reviewer
		The GHG Emissions due to land use change are not additive to the existing emissions of current land use. For example - current sequestration in the area, GHG from any ag/grazing or etc.	
General comment		The "Net increase in emissions" needs to include this consideration of current land use and the emissions from current land use projected forward. The emissions from sites would replace the current emissions and are not additive, suggest analyzing the No Action alternative and presenting "Net increase" as the difference between the NAA and the alternatives analysed.	Kevin Thielen
General comment	--	Reccomend adding equation numbers and reference to make it easier on reader.	
		regarding second paragraph - identify what these potential mitigation options are. Are they discussed previously in the report? if so provide a reference to relevant sections. I think it is a stretch to say the GHG emissions is necessarily a conservative estimate given it is quite high level, and does not currently examine the current land use.	
		For example - If the current land use is a carbon sink (unlikely), than this document is actually a significant under estimate of GHG increase.	Kevin Thielen
21A-1	21A.1	Related to language in last paragraph on 21A-12 regarding "...indicate a rapid surge of emissions immediately following flooding, after which emissions stabilize" is this surge accounted for in values presented for "Land converted to flooded lands" if not, this is not necessarily a conservative estimate.	
		Minor comment - Is it better to have the "Land Converted to Flooded Land" section so the analysis follows the timeline? I.e. land is first flooded - than flooded lands remaining flooded.	Kevin Thielen
21A-2	21A.2	Is the current flow designed in order to separate presentation of CH_4 and CO_2 calculations?	

		For definition of variables suggest making order of definition follow order of appearance for ease of reference.	
21A-2, 21A-3	21A.2.1	For example, definitions in following order: F_{CH4tot}, F_{CH4res}, F_}ch4downstream}, \alpha, EF_{CH4...}, A_{tot}, R_d	Kevin Thielen
21A-3	21A.2.1	Definition of \alpha mentions "in reservoir i" unsure what i is? Was this language copied from the EPA chapter? Is "i" in index for \alpha_i in that document? if so remove reference to index in this document.	Kevin Thielen
		Add explanation of how monthly maximum reservoir surface area was determined	
		As this assumes some rate of fill for the reservoir post construction may need to mention how this was determined.	Kevin Thielen
21A-4	21A.2.1	Maybe this is just a reference to a section in the report where those are discussed.	
21A-5	Table 21A-3	Are the annual emissions after 20 years the important variable here, or the Net emissions for those 20 years from the inundation. the key metric for GHG impact of sites would be the cumulative impact I believe.	Kevin Thielen
21A-6	21.A.2.2.1	definition of variables doesn't match order of use in equation for EF_{CO2} (\phiappears second, defined 3rd)	Kevin Thielen
21A-7	Table 21A-4	Unclear what importance of the column "95% CL As a Percentage of the Mean" is this just saying the 95th percentile is the bottom 5%? is that necessary to say?	Kevin Thielen
		Standard error of 1.2 is 5% of mean (24), so lower and upper 95% column CL of mean is mean +- 10%. Unclear how the equation in the preceding paragraph fits in?	
		+- 1.96 standard error/mean*100 = +- 9.8 using 1.2 and 24 .	Kevin Thielen
		Potentially missing something on my end... would suggest clarifying, perhaps pulling out the in text calculation to a numbered equation.	
21A-7	Table 21A-4	order of variable definitions should match use in equations.	Kevin Thielen
21A-8	21.A.2.2.1		

21A-11	Table 21A-10	Reccomend adding NAA land use emissions as baseline. The net increase is in reference to existing and projected future emissions of current land use. Reccomend calculating net emissions after 20/40 years as opposed to Annual emissions at 20 years and 40 years.	Kevin Thielen