

Chapter	Page/Line	Text in Document
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).
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.

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 plan.

9-16; unknown plan.

The X2 results generally show small reductions of up to 0.7 km during July-August through October-November (i.e., less seawater intrusion), and no change or variable small effects the rest of the year with some small 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.

6 6-75

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Appendix 21A uses calculations from IPCC and EPAs interpretation Guide.

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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.

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Comment

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).

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. 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)

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?

We appreciate the inclusion of the GHG analysis using EPA's methology when calculating land use changes from the formation of Sites Reservoir.

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.