



Topic: **Authority Board Agenda Item 3.1**

**2020 August 26**

Subject: **Key Comments from Conservation Organizations and Plan for Addressing Those Moving Forward**

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**Requested Action:**

Review and comment on the approach being taken to address comments from conservation organizations on the 2017 Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in the development of the Revised EIR/Supplemental EIS.

**Detailed Description/Background:**

Staff has begun work on preparation of the Revised EIR/Supplemental EIS. As part of this effort, staff has reviewed comments on the 2017 Draft EIR/EIS from conservation organizations and has formulated draft approaches to addressing these comments in the Revised EIR/Supplemental EIS. Key comments from conservation organizations on the 2017 Draft EIR/EIS and staff's proposed approach to addressing them are provided in the attached document.

The organization assessment (OA) findings identified the need to review key comments on the 2017 Draft EIR/EIS with the Reservoir Committee and Authority Board which this report accomplishes.

Also, by posting these materials on the website they can be referenced should there be any questions or concerns raised by conservation groups or media about the intentions of the Project to review and address these comments.

**Prior Action:**

April 2020: Directed staff to begin preparation of a Revised EIR to analyze the environmental effects of the options identified in the April 2020 Value Planning Report.

**Fiscal Impact/Funding Source:**

Sufficient funding exists in the revised work plan to address these comments in the Revised EIR/Supplemental EIS.

**Staff Contact:**

Ali Forsythe

**Attachments:**

Attachment A: Key Comments from Conservation Organizations and Approach for Addressing in the Revised EIR/Supplemental EIS

**Key Comments from Conservation Organizations and  
Approach for Addressing in the Revised EIR/Supplemental EIS  
August 13, 2020**

In August 2017, the Sites Project Authority (Authority) and the Bureau of Reclamation (Reclamation) jointly issued a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Sites Reservoir Project (Project) pursuant to their respective lead agency obligations under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The public comment period on the Draft EIR/EIS was subsequently extended and then closed on January 15, 2018. A total of 137 comments letters and emails were received on the Draft EIR/EIS along with comments received at two public hearings held during the public review period. Of these 137 comment letters, 11 were from conservation organizations (generally defined as non-governmental organizations that work to conserve species and their habitats). Comments and/or issues raised in these letters include:

- Project description and range of alternatives
- Modeling approach, modeling baseline, and modeling analysis
- Operational impacts to fisheries
- Impacts to Trinity River resources
- Indian Trust Assets (ITAs) and impacts to Tribal Cultural Resources
- Impacts to terrestrial species
- Water quality
- Water rights
- Geotechnical and geological data and seismicity
- Additional cumulative impacts

Additional comments were received after the close of the public review period from conservation organizations that generally raised similar issues and concerns to those received during the public comment period.

All letters with comments on the Draft EIR/EIS, including those received after the public comment period ended, have been reviewed. Staff and the consultant teams are working to address the key comments and concerns in these letters in the preparation of the Revised EIR/Supplemental EIS. Table 1 provides a summary of the comments and concerns expressed from conservation organizations on the 2017 Draft EIR/EIS (during the comment period and in subsequent correspondence) along with a summary of the approach to addressing the comment / concern in the preparation of the Revised EIR/Supplemental EIS. A listing of the conservation organizations that commented on the 2017 Draft EIR/EIS either during the comment period or in subsequent correspondence is provided following the table.

**Table 1 - Comments and Concerns Expressed by Conservation Organizations on the 2017 Draft EIR/EIS and Summary of the Approach to Addressing in the Preparation of the Revised EIR/Supplemental EIS**

Comments and Concerns Expressed	Summary of the Approach to Addressing in the Preparation of the Revised EIR/Supplemental EIS
<b>Project Description and Range of Alternatives</b>	
<p>Inadequate project description:</p> <ul style="list-style-type: none"> <li>● Lacks detail regarding operations including who will operate</li> <li>● Operating rules too vague</li> <li>● Needs to describe prioritization of releases - needs to include an operations plan and diversion schedule</li> <li>● Inadequate statement of objectives</li> <li>● EIR/EIS should be prepared a part of a FERC license application</li> <li>● No discussion as to how water transfers would be facilitated</li> <li>● Increased Sacramento River flows and increased outflows from the Delta are necessary to support native fish and wildlife; EIR/EIS fails to provide a consistent operational plan</li> <li>● Recreational opportunities will be practically nonexistent due to shallow lake levels</li> </ul>	<ul style="list-style-type: none"> <li>● Revise project description to address changes to the Project and clarify operation of the reservoir, including Authority’s role in coordination with Reclamation and DWR.</li> <li>● Update the CEQA project objectives to better reflect the Authority’s objectives and the range of alternatives that will ultimately be analyzed.</li> <li>● Work with Reclamation to update the NEPA purpose and need, as appropriate.</li> <li>● Revise project description to reflect that hydropower would be limited to incidental power upon release for Alternatives 1 and 2 and therefore no hydropower licensing from the Federal Energy Regulatory Commission would be required.</li> <li>● Identify development of a Recreation Management Plan that would include a detailed discussion of the methods to be used to prioritize the potential recreation areas to be constructed and operated.</li> </ul>

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Comments and Concerns Expressed	Summary of the Approach to Addressing in the Preparation of the Revised EIR/Supplemental EIS
<p>Scope of alternatives is too narrow:</p> <ul style="list-style-type: none"> <li>• Need for alternative that includes WaterFix</li> <li>• Consider more restrictive bypass requirements</li> <li>• Consider smaller reservoirs</li> <li>• Include alternatives that reduce water diversions from the Sacramento River</li> <li>• Analyze more than one operational alternative</li> <li>• Consider other storage alternatives</li> </ul>	<ul style="list-style-type: none"> <li>• Simplify the description of the range of alternatives and alternatives screening process and create a new chapter (or appendix) discussing the alternatives screening process and the range of alternatives analyzed. The information in the Value Planning Report will be used for this effort and the Value Planning Report itself may be attached as an appendix.</li> <li>• Include a discussion of different operational scenarios considered and how/why different operational scenarios were screened out from further consideration.</li> <li>• Describes changes made to the operational scenario since the 2017 Draft EIR/EIS, including changes to operations resulting from the elimination of the Delevan Intake.</li> <li>• Integrate the criteria used in the Value Planning Report into a new chapter (or appendix) to tell the story of how the alternatives were further screened and refined after the 2017 Draft EIR/EIS.</li> <li>• Keep Appendix 2A, Alternatives Analysis of the 2017 Draft EIR/EIS as support for the information ultimately to be included in the document.</li> </ul>
<p>No Action Alternative and existing conditions are inappropriately defined:</p> <ul style="list-style-type: none"> <li>• The assumption that the existing conditions and No Action alternatives are the same compromises the ability to compare impacts across alternatives and may minimize the magnitude of some of the impacts</li> <li>• Use of Existing Conditions/No Project/Action baseline biases the analysis and avoids CEQA mitigation requirements</li> <li>• Does not evaluate how No Project Alternative could satisfy consumptive and instream water supply needs</li> </ul>	<ul style="list-style-type: none"> <li>• Incorporate information on the purpose for, and establishment of baseline under CEQA and NEPA along with the purpose for, and establishment of the No Project/No Action Alternative.</li> <li>• Clarify how Existing Conditions/No Project/No Action baseline is consistent with CEQA.</li> <li>• The baseline (existing conditions for CEQA and No Action Alternative for NEPA) will be revised based on updated modeling assumptions.</li> <li>• The Future No Project/No Action will be updated to reflect recent projects / actions (e.g., ROC on LTO and SWP ITP).</li> </ul>

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<b>Modeling Approach, Modeling Baseline and Modeling Analysis</b>	
<p>Inaccurate modeling baseline:</p> <ul style="list-style-type: none"> <li>• Use of old information in the modeling; outdated and insufficient model</li> <li>• Monthly modeling insufficient for addressing fisheries needs</li> <li>• Fails to include several permit conditions imposed prior to the NOP which will be implemented prior to 2030 (primarily the Revised Shasta RPA and Yolo Bypass restoration including the proposed Fremont Weir notch)</li> <li>• Entire project based on the false premise that there is excess water in the Sacramento River not needed for the environment</li> <li>• Flawed because it is assumed full contract deliveries which have never occurred (never more than 75% of contract amounts)</li> <li>• Averaging of model results masks real impacts</li> <li>• Fall X2 per 2008 Delta Smelt BO not appropriately addressed</li> <li>• Need to include climate change assumptions in baseline</li> <li>• Review of appendices indicates alarming flow impacts to the Sacramento River and Sutter Bypass, particularly in drought years</li> <li>• Must demonstrate that future instream flow requirements will not render Sites Reservoir a “stranded asset”</li> <li>• Analysis based on false premise that current flow and water quality standards for the river are adequate</li> </ul>	<ul style="list-style-type: none"> <li>• The baseline in the hydrologic model is being updated. However, some actions suggested by commenters are not included in the CALSIM modeling framework and thus, will not be updated (such as the 1959 contract between the United States and Humboldt County, monthly timestep in CALSIM, and other components that are part of the CALSIM model platform). The document will include an explanation of these components and why they were not modified.</li> <li>• Reservoir operations will be modified and system operations will be updated as compared to what was described in the 2017 Draft EIR/EIS to reflect new baseline conditions such as the ROC on LTO and SWP ITP.</li> <li>• Detailed modeling results will continue to be provided in appendices and summarized in the main document.</li> </ul>

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<b>Operational Impacts to Fisheries</b>	
<p>Evaluation of fishery impacts is lacking:</p> <ul style="list-style-type: none"> <li>• CDFW operational criteria to protect flows and reduce adverse effects on salmon, sturgeon, longfin smelt, Delta smelt, and other native fish species need to be evaluated</li> <li>• Includes arbitrary thresholds of significance for               <ul style="list-style-type: none"> <li>○ Longfin smelt impacts greater than 0 are significant (mandatory finding of significance)</li> <li>○ Operational impacts of greater than 5% are not called significant</li> </ul> </li> <li>• Does not adequately account for importance of flow fluctuations and fishery habitat needs</li> <li>• Impacts to important floodplains (including Sutter and Yolo bypasses) need to be identified</li> <li>• Assumes no impact at fish screens</li> <li>• Diversion will further impact water temperatures downstream of the proposed diversions</li> <li>• Failure to assess impacts from reduced floodplain inundation</li> <li>• Fail to use existing life cycle models</li> <li>• Consider feasible mitigation measures, including minimum bypass flows</li> <li>• Need to demonstrate compliance with California Endangered Species Act (CESA)</li> <li>• Overstates project benefits for threatened and endangered salmonids – not a net benefit</li> </ul>	<ul style="list-style-type: none"> <li>• Eliminate project components/analysis that are no longer applicable (e.g., entrainment at Delevan intake) and revised project description to reflect new alternative components.</li> <li>• Add shaded riverine aquatic habitat analysis.</li> <li>• Add missing descriptions of channel and habitat elements (e.g., bank swallow habitat, riparian veg).</li> <li>• Ensure all elements are discussed for each river reach.</li> <li>• Complete an updated analysis using revised project description and operational scenario and update document and appendices to reflect the analysis and findings.</li> <li>• Complete water temperature modeling for Sites Reservoir and releases and update document and appendices to reflect the analysis and findings.</li> <li>• Cross reference appropriately to either water resources chapters or other hydrologic appendices specifically identifying why certain aspects of the study area are eliminated.</li> <li>• Consolidate methods and delete extraneous material.</li> <li>• Develop more detailed approach to releases into Funks and Stone Corral creeks.</li> <li>• Appropriately define all mechanisms for potential impacts to special-status fish species and identify methods for those mechanisms.</li> <li>• Provide justifications for any criteria used to evaluate thresholds.</li> <li>• Address why a Natural Communities Conservation Plan is not required.</li> </ul>

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Comments and Concerns Expressed	Summary of the Approach to Addressing in the Preparation of the Revised EIR/Supplemental EIS
<p>Evaluation of Delta water quality and fishery impacts is lacking:</p> <ul style="list-style-type: none"> <li>• Reduced Delta Outflows and impacts on Delta Smelt and other important Bay-Delta species</li> <li>• Delta and Longfin Smelt impacts due to Old and Middle River reverse flows</li> </ul>	<ul style="list-style-type: none"> <li>• Cite to and incorporate current data and information regarding species.</li> <li>• Enhance/clarify numerous discussions (e.g., effects on turbidity in Delta, food web, Delta water quality, non-native species effect on native species).</li> <li>• Support impact determinations with substantial evidence, including updated modeling, and align the species evaluated with appropriate study areas.</li> <li>• Align mitigation correctly with impacts.</li> </ul>
<b>Impacts to Trinity River Resources</b>	
<p>Trinity River impacts are not adequately evaluated and mitigated:</p> <ul style="list-style-type: none"> <li>• Need to ‘honestly’ evaluate foreseeable impacts to Trinity River water temperature objectives associated with project operations – revised Trinity River Division (TRD) water operations associated with Sites Projects violates 2000 Trinity River Restoration Program (TRRP) Record of Decision (ROD)</li> <li>• Need to analyze foreseeable impacts to the Trinity River associated with Trinity Lake carryover storage – analysis assumes minimum Trinity Reservoir carryover storage, without sufficient carryover storage would not achieve Trinity River temperature objectives</li> <li>• Temperature modeling of potential impacts in Trinity River water temperatures should be conducted</li> <li>• Impacts to Klamath and Trinity River salmon populations not properly analyzed – need to reference recent legal decisions since the TRRP ROD</li> <li>• Baseline associated with TRD water operations – analysis did not consider use of Humboldt County’s 50 TAF water contract included in the Trinity River Division Act</li> <li>• Concerns expressed regarding meeting fishery/fish habitat management objectives for the Trinity River and Lower Klamath River, including cold water releases and resulting loss of power generation</li> <li>• Mitigation for Trinity River/Lower Klamath impacts needed.</li> </ul>	<ul style="list-style-type: none"> <li>• The Trinity River analysis will be fully described in the alternatives description, hydrology, and modeling and will be cross referenced in the Indian Trust Assets (ITA) chapter.</li> <li>• Appendix 6a Surface Water Resources Modeling will be revised to better explain the Trinity River and TRRP ROD and the results of the impact analysis.</li> <li>• Trinity River aquatic resource impacts will be analyzed based on the results of the revised CALSIM modeling effort.</li> <li>• Re-evaluate the analysis of effects to Trinity River resources and further support the impact determination.</li> <li>• Clarify the relationship between Reclamation’s obligation on the Trinity River including the TRRP ROD, Long-Term Plan to Protect Adult Salmon in the Lower Klamath River ROD, 1959 contract between the United States and Humboldt County, and Reclamation’s tribal trust responsibilities and the Sites Project operations.</li> <li>• Include additional discussion of operations and exchanges that include Shasta, based on alternatives description.</li> <li>• The document will be revised to be clear, including additional supporting analyses as identified above, that the Project will not negatively affect the Trinity River or fisheries on the Trinity River.</li> </ul>

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<b>Indian Trust Assets and Tribal Cultural Resources</b>	
<ul style="list-style-type: none"> <li>• Tribal Consultation and mitigation absent</li> <li>• Indian Trust Assets (ITAs) need to be identified and impacts addressed, including Tribal water demands</li> <li>• Tribal beneficial uses (i.e., water and salmon) impacts not disclosed as well as public trust resources – need to reference reintroduction of salmon and fish passage above Shasta Dam and potential Project effects</li> <li>• Compliance with Public Trust Doctrine and Tribal Trust Obligations – reduced flows would occur in Sacramento, Trinity and Klamath rivers and result in failure to comply with Public Trust doctrine and protect Tribal Trust resources</li> </ul>	<ul style="list-style-type: none"> <li>• Consult with Native American Tribes regarding ITAs.</li> <li>• Explain more fully the TRRP ROD and modeling results and why no impact would occur to Indian Trust Assets on the Trinity River.</li> </ul>
<ul style="list-style-type: none"> <li>• Tribal Consultation and Mitigation absent - no consultation outside of footprint area, need to conduct additional AB 52 consultation</li> <li>• Cultural resources evaluations, impacts, and mitigation not completed or appropriately identified (including cumulative impacts)</li> </ul>	<ul style="list-style-type: none"> <li>• Consult with Native American Tribes regarding the Value Planning Report and revised alternatives.</li> <li>• Continue tribal consultation consistent with AB 52, including identification of Tribal Cultural Resources (TCRs), impacts to TCRs, and mitigation strategies.</li> </ul>



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<b>Impacts to Terrestrial Resources</b>	
<p>Inadequate assessment of terrestrial biological resources:</p> <ul style="list-style-type: none"> <li>• Coordination with CDFW not consistently identified</li> <li>• Giant garter snake impacts and mitigation inadequate</li> <li>• Outdated survey information – inaccurate estimation of impacts</li> <li>• Inadequate assessment of impacts to wildlife refuges – bird strikes associated with powerlines and overall impacts to Delevan National Wildlife Refuge (NWR) as well as surrounding private lands; need to evaluate impacts to Colusa and Sutter NWRs</li> <li>• Additional wetland surveys and mitigation required</li> <li>• Ecological effects of the Project inadequately analyzed - should address from the top of contributing watersheds</li> </ul>	<ul style="list-style-type: none"> <li>• The environmental baseline will be updated as follows: <ul style="list-style-type: none"> <li>○ Focused updating of old references in resource sections;</li> <li>○ Desktop update based on more recent data, focusing on update for key resources (e.g., water quality, wildlife, aquatics); and</li> <li>○ Update information for threatened and endangered species habitats based on biological assessments and additional information developed for state listed special-status species information will be collected on species occurring in the expanded study area.</li> </ul> </li> <li>• The EIR/EIS analysis will be supported through the ongoing coordination/consultation with resource agencies, including CDFW.</li> <li>• Add shaded riverine aquatic habitat analysis.</li> <li>• Address why a Natural Communities Conservation Plan is not required.</li> </ul>
<p>Wildlife mitigation actions are too broad:</p> <ul style="list-style-type: none"> <li>• Mitigation measures are too broad and need to be more specific by species including ratios/performance standards</li> </ul>	<ul style="list-style-type: none"> <li>• Information/analysis in Fluvial Geomorphology Chapter would be added to Wildlife Resources chapter for impacts to various riparian species (i.e., riparian to Wildlife Resources to keep terrestrial habitat discussions together and habitat complexity to Wildlife Resources to keep habitat discussions together).</li> <li>• Information/analysis from Vegetation Resources would be cross referenced to Wildlife Resources.</li> <li>• Impacts will be addressed under umbrella headings (e.g., GGS locations/impacts), redefine/re-organize impact types and not make multiple findings for each project component but will consolidate findings.</li> <li>• Golden eagle analysis will be expanded to support future permits.</li> <li>• More robust mitigation measures will be developed to avoid deferred mitigation comments.</li> </ul>

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<p>Inadequate evaluation of rare plants and botanical resources:</p> <ul style="list-style-type: none"> <li>• Analysis should include guidelines and sufficient information for informed evaluation</li> <li>• Information is insufficient to determine the impacts on botanical resources within the Project area. Botanical surveys must be redone. Data included are from the late 1990s and early 2000s, and do not include all of the Project area</li> <li>• Accepted scientific protocols should be used to conduct surveys</li> <li>• Biological surveys, including rare plants, are inadequate</li> </ul>	<ul style="list-style-type: none"> <li>• Consolidate wetland and other waters discussion with special-status plant species discussion into one chapter called Vegetation Resources.</li> <li>• Conduct updated species desk top documentation and vegetation mapping.</li> <li>• Use available LIDAR data.</li> <li>• Base impacts primarily on updated aerial interpretations and species models rather than earlier survey results.</li> <li>• Ensure impacts appear under umbrella headings, redefine and re-organize impact types. Do not make multiple findings for each project component – consolidate findings.</li> <li>• More robust mitigation measures will be developed to avoid deferred mitigation comments.</li> </ul>
<b>Water Quality</b>	
<p>Water Quality issues related to the reservoir and downstream impacts:</p> <ul style="list-style-type: none"> <li>• Need to further address selenium, mercury, hazardous materials, salt / salinity impacts in Sites Reservoir and in the Delta</li> <li>• Reduced flows from Shasta and Keswick – concerns over metals and reduced dilution; reduced cold/fresh water to the Delta</li> <li>• Potential salinity issues from Sites Reservoir releases – need a reservoir management plan <ul style="list-style-type: none"> <li>○ Inadequate description of changes in salinity at Contra Costa Water District’s diversion facilities</li> </ul> </li> <li>• Inadequate description of impacts on Sacramento River water quality <ul style="list-style-type: none"> <li>○ Models inadequate to accurately assess temperature impacts</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Update the Surface Water Quality discussion with more information and analyses on the following: <ul style="list-style-type: none"> <li>○ Harmful Algae Blooms (HABs)</li> <li>○ Mercury</li> <li>○ Salinity changes in Sites Reservoir and downstream (in Delta)</li> <li>○ Overall water quality data, including sport fishing tissue testing</li> </ul> </li> <li>• Describe antidegradation policies as a requirement of the Water Board.</li> <li>• Complete the following updates to the Surface Water Quality analysis: <ul style="list-style-type: none"> <li>○ Update data with water quality results provided by modeling</li> <li>○ Include HAB qualitative analysis</li> <li>○ Include mercury/methylmercury analysis addressing airborne, soil born, reservoir fluctuation, other sources/mechanisms of mercury/methylmercury in the reservoir and in other areas (e.g., Yolo Bypass)</li> <li>○ Revise and expand Delta salinity evaluation</li> <li>○ Address issues related to Salt Lake water quality and revise the analysis to account for changes in Project construction or design measures that</li> </ul> </li> </ul>

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	<p>may be implemented to address this natural feature in the reservoir footprint</p> <ul style="list-style-type: none"> <li>○ Add standard construction impacts, including impacts of tunneling</li> <li>○ Add operation impacts related other Project components not specifically related to the intake/release of the reservoir</li> <li>○ Incorporate model results and address potential impacts (including beneficial effects) to water quality in the Colusa Basin Drain.</li> </ul> <ul style="list-style-type: none"> <li>● Incorporate reservoir water temperature modeling and analysis of release water temperatures to the Colusa Basin Drain and/or Sacramento River.</li> </ul>
<b>Water Rights</b>	
<ul style="list-style-type: none"> <li>● Inadequately addresses required water right amount, timing, and relationship with CVP and SWP</li> <li>● Lack of meaningful information about water rights – how will the project ensure only tributary water will be diverted to Sites</li> <li>● Compliance with California Reasonable Use Doctrine not demonstrated - reasonableness requires evaluation of alternative water supplies to meet given need and evaluation of the impacts of new water uses on existing legal uses and water users</li> </ul>	<ul style="list-style-type: none"> <li>● Identify the water rights necessary to implement the Project in the project description.</li> <li>● Describe the water rights approval process and how the information contained in the EIR/EIS will support that process. This will incorporate relevant text that is currently in the 2017 Draft EIR/EIS Public Services/Utilities chapter into the alternatives description chapter.</li> </ul>
<b>Geology and Geomorphology</b>	
<ul style="list-style-type: none"> <li>● Fluvial geomorphology analysis is adversely affected by Sacramento River between Colusa and Red Bluff being considered part of Secondary Study area</li> </ul>	<ul style="list-style-type: none"> <li>● Comments related to Delevan intake/release location would not be explicitly addressed as this is no longer part of the Project.</li> <li>● Incorporate revised model results and update / revise potential impacts, as appropriate.</li> <li>● Reference new sedimentation information included in the update to 2019 Appendix 8A, Sedimentation and River Hydraulics Model.</li> <li>● Develop components of the Reservoir Management Plan regarding sediment management and include as part of the Project to add more clarity on future operations and maintenance activities.</li> </ul>

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<p>Geology analysis is lacking information necessary to adequately evaluate impacts:</p> <ul style="list-style-type: none"> <li>• Fails to adequately address reservoir-triggered seismicity (RTS) on local communities and structures – needs to fully examine the role of frequent filling/emptying of reservoir in triggering earthquakes</li> <li>• Site-specific geotechnical data missing</li> <li>• Source of rockfill material for riprap - further field investigation is needed to verify local bedrock is suitable</li> <li>• Number of saddle dams indicative of poor project feasibility</li> </ul>	<ul style="list-style-type: none"> <li>• Include specific information from project description on how project design or environmental commitments will address impacts. For example, expand on this sentence from Chapter 17, Faults and Seismicity: “Project design would address the potential for such instability such that there would be a less-than-significant impact.”</li> <li>• Describe requirements of California Department of Water Resources (DWR), Division of Safety of Dams, for both seismic and nonseismic design.</li> <li>• Discuss the multiple lines of defense or design redundancy required to meet DWR Division of Safety of Dams design standards.</li> <li>• Cross reference information from project description to show that dams will be designed to withstand seismic events, including reservoir triggered seismicity.</li> <li>• Will update analysis based on recent and ongoing geotechnical investigations.</li> </ul>
<b>Additional Cumulative Impacts</b>	
<p>Incomplete cumulative impact assessment:</p> <ul style="list-style-type: none"> <li>• Fails to adequately analyze cumulative impacts and fails to disclose potentially significant adverse impacts to aquatic resources</li> <li>• Need to incorporate WaterFix and Shasta Lake Water Resources Investigation</li> <li>• Not fully analyzed including recent water transfers</li> <li>• Inadequate in addressing greenhouse gases - recommends use of World Bank’s guidelines on greenhouse gas measurement</li> <li>• Incomplete cumulative impact assessment pertaining to TRD operations – impact of carryover storage to meet temperature objectives during multi-year droughts; impact on CVP power generation</li> </ul>	<ul style="list-style-type: none"> <li>• Update cumulative analysis using surface model results/operational scenario and with additional projects (e.g., Delta Conveyance).</li> <li>• Clarify that Project will not affect Reclamation’s commitment to implement the TRRP ROD or Long-Term Plan to Protect Adult Salmon in the Lower Klamath River ROD.</li> <li>• Describe cumulative effects using the same methodology presented in the 2017 EIR/EIS Cumulative Chapter, but add more clarity about what projects are included in the cumulative impact analysis and why. Add additional details about the model representing cumulative conditions. Include more robust discussion of individual resources.</li> <li>• Incorporate information and identify that projects noted by commenters were (and are) included in the cumulative analysis. Crosswalk between the</li> </ul>

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	<p>commenter-suggested plans and projects and demonstrate that the commenter suggestions either were considered or were not applicable.</p> <ul style="list-style-type: none"> <li>• Update Appendix 31B, CVP-SWP Power Modeling with new operational assumptions, analysis based on these new assumptions, and resulting impact determinations.</li> </ul>

**Conservation Organizations and Tribal Nations with Species / Habitat Comments that Commented on the 2017 Draft EIR/EIS Either During the Comment Period or in Subsequent Correspondence**

AquAlliance  
Bay Institute  
Butte Environmental Council  
California Indian Water Commission  
California Native Plant Society, Sacramento Valley Chapter  
California Sportfishing Protection Alliance  
California Water Impact Network  
California Wilderness Coalition  
Center for Biological Diversity  
Chico 350  
Coast Action Group  
Colusa Indian Community Council  
Conservation Fly Fishers International Northern California Council  
Defenders of Wildlife  
Environmental Justice Coalition for Water  
Environmental Water Caucus  
Fly Fishers of Davis  
Fly Fishers International  
Freedom Earth Democracy  
Friends of the River  
Golden Gate Salmon Association  
Institute for Fisheries Resources  
Karuk Tribe  
Klamath Riverkeeper  
Natural Resources Defense Council  
The North Coast Environmental Center  
Northern California Watershed Alliance  
Pacific Coast Federation of Fishermen's Associations  
Planning and Conservation League  
Protect American River Canyons  
Sacramento River Council  
Sacramento River Preservation Trust  
Safe Alternatives for our Forest Environment  
San Francisco Baykeeper  
Save the American River Association  
Save California Salmon  
Save the Klamath-Trinity Salmon  
Sierra Club  
Southern California Watershed Alliance  
Water Climate Trust  
Winnemem Wintu Tribe  
Women's International League for Peace