Topic: **Reservoir Committee Agenda Item 3.2** **2020 July 16**

Subject: **Key Operational Analysis Factors - Baseline**

Requested Action:

Review and comment on the approach being taken for the modeling baseline for the EIR/EIS analysis.

Detailed Description/Background:

OVERVIEW

As work progresses on the analysis for the Revised Draft EIR/EIS, the operations team is developing modeling parameters and criteria required for assessing the alternatives in the Revised EIR/EIS. One of the foundational decisions related to the operations modeling for the EIR/EIS analysis is the description of the modeling baseline. An adequate description of the baseline is critical to the CEQA/NEPA evaluation and to describe the of project's benefits.

Issuance of the U.S. Fish and Wildlife Service and National Marine Fisheries Service Biological Opinions for the Reinitiation of Consultation on the Coordinated Operations of the Central Valley Project (CVP) and State Water Project (ROC on LTO BiOps) and the issuance of the Incidental Take Permit for Long-Term Operations of the State Water Project (SWP) in the Sacramento-San Joaquin Delta (SWP ITP) has modified baseline conditions for the CVP-SWP system from the previous BiOp and ITP. The ROC on LTO BiOps and the SWP ITP are also subject to pending litigation by a number of parties. There is disagreement regarding the implementation of the ROC on LTO BiOps and the SWP ITP between water users, environmental stakeholders, and the federal and state water management and permitting agencies. This disagreement will likely persist throughout the Sites Project planning and permitting process. As the CEQA Lead Agency, we need to balance all of the external and internal constraints, demands and needs and identify what would provide the public and our members with the highest quality information for evaluating the project.

After careful consideration, Staff is initially proceeding with model development with the ROC on LTO BiOps baseline and incorporate the SWP ITP actions after release of DCR2019 joint model implementation as the best course at the present time. This approach provides:

1. The most defined and expedient starting point for analysis of Sites Project operations while accomplishing a high-quality analysis that meets adequacy tests under CEQA/NEPA and provides the public with a reasonable evaluation of effects from the Project.
2. Best represents Shasta Lake tiered cold water pool management which is a key operating feature to be considered when evaluating possible exchanges and coordinated operations with Sites Reservoir.

3. Use of the merged Sites version of the model developed for the Reclamation Feasibility Report will expedite model development to meet the required schedule.

Operations criteria for the SWP ITP actions will be incorporated based on DCR2019 if it available in time to meet the Project's schedule. In addition, the team will be performing additional gap and sensitivity analyses to evaluate additional operations that are needed to support the Sites Project planning and permitting process.

As more detailed analysis is completed, staff will continue to evaluate the baseline approach and may make modifications to the approach to meet the requirements of CEQA/NEPA and provide the public with a reasonable evaluation of effects from the Project.

ALTERNATIVE APPROACHES CONSIDERED

Given the uncertainties surrounding operations of the SWP and CVP, staff has identified three possible modeling baseline options, each having their own pros and cons:

1. Use of ROC on LTO Alternative 1/Proposed Action only – This baseline would be based on the ROC on LTO Proposed Action Calsim II model released by the Bureau of Reclamation (Reclamation) in December 2019.
    a. Pros:
        i. Most recent representation of Shasta Lake tiered cold water pool management.
        ii. Expedited development of the modeled baseline using existing Sites model developed for Reclamation Feasibility Report.
    b. Cons:
        i. Excludes additional actions that are included in the SWP ITP.
        ii. Potential lack of acceptance by the State since the model does not include the SWP ITP.

2. Use of SWP ITP Alternative 2b/Proposed Project only – This baseline would be based on the SWP ITP Calsim II model released by the Department of Water Resources (DWR) in March 2020.
    a. Pros:
        i. Use of a model representing the SWP ITP in the baseline for analysis in the Sites ITP application.
    b. Cons:
        i. May require additional updates to include all of the actions described in the SWP ITP.
        ii. Excludes changes made in the updated final ROC on LTO Alternative 1/Proposed Action published in December 2019.
        iii. Potential lack of acceptance by Reclamation since the model does not include ROC on LTO.

3. Combination of 2019 State Water Project Delivery Capability Report (DCR2019) / ROC on LTO / SWP ITP – DWR is currently working on a joint representation of the ROC on LTO BiOps and the SWP ITP as part of DCR2019, which would include the potential future combined CVP/SWP operations. This is expected to be released in July 2020.

a. Pros:
    i. Comprehensive representation of baseline operations currently in development.
    ii. Allow for the possibility of greater acceptance to a wider range of agencies and stakeholders.
    iii. Provide a State/Federal supported baseline.
b. Cons:
    i. Schedule for release of DCR2019 has been and may continue to be delayed (DWR originally tentatively planning for a June release).
    ii. Delays associated with developing Sites Project ITP implementation based on DCR2019 (at least four week).

Prior Action:

None

Fiscal Impact/Funding Source:

Model development is part of the Amendment 2 work plan and is a key component to other 2021 milestones within the work plan. There is sufficient funding to conduct efficient modeling whereby the baseline approach is established, and the modeling results are used to inform the EIR/EIS analysis. Multiple revisions of the modeling baseline or excessive iterations would be additional cost and time delay to the project.

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Attachments:

None