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**To:** [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)  
**Cc:** [Hsiu, I-Pei](#); [Workman, Michelle](#)  
**Subject:** EBMUD Comments – Sites Reservoir RDEIR/SDEIS  
**Date:** Friday, January 28, 2022 3:39:50 PM  
**Attachments:** [image001.png](#)  
[EBMUD Comment Letter Sites Reservoir EIR.docx](#)

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Good afternoon,

Please find attached EBMUD's comments on the Sites Reservoir RDEIR/SDEIS. Thanks again for the opportunity to comment and presentations you have provided. Jose

**Jose D. Setka**

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*Stewardship ~ Integrity ~ Respect ~ Teamwork*



January 28, 2022

Sites Project Authority  
P.O. Box 517  
Maxwell, CA 95955  
Email Address: [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)

**VIA EMAIL**

Subject: EBMUD Comments – Sites Reservoir RDEIR/SDEIS

Dear Sites Project Authority:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to provide comments on the Sites Reservoir RDEIR/SDEIS. We recognize the singular challenge of developing a major water infrastructure project such as Sites Reservoir and provide these comments in the spirit of collaborative engagement and attention. Reviews were conducted through the lens of potential adverse impacts to Mokelumne River fisheries and wildlife, in addition to EBMUD operations in general. Particular attention was provided to potential interactions between project operations and interior Delta flows and timing, which can influence migration pathway selection for returning Mokelumne origin Chinook salmon and steelhead trout.

For a full assessment of impacts to Mokelumne River salmonid populations to be completed, a detailed description of Sites Reservoir operations (including withdrawals and releases) would be needed. Specific plans that would inform a thorough assessment of Sites Reservoir impacts include a Reservoir Operations Plan, Reservoir Management Plan including fisheries management and reservoir water quality, and Standard Operating Procedures. The Sites Project Authority is working with Reclamation and DWR to develop operating agreements that would describe the approach for coordinating operations with Sites and the CVP and SWP operations, respectively. These agreements, along with the plans mentioned above, would provide the information needed to better assess potential impacts to Mokelumne River salmonid populations.

EBMUD would be interested in the flow schedules that would be incorporated into the Reservoir Operations Plan that identify the approach for releases, including release schedules and volumes, and interactions with DCC operations. Absent such plans, the RDEIR/SDEIS makes general statements such as “water would be held in storage in Sites Reservoir until requested for release by a Storage Partner. Water releases would generally be made from May to November but could occur at any time of the year, depending on a Storage Partner’s need and capacity to convey water to its intended point of delivery.” (pg. 2-29) Additional detail is needed to assess the

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significance of Sites Reservoir operations on central Delta flows that can influence migration pathway selection for adult and juvenile anadromous fish.

Notable exclusions from the RDEIR/SDEIS included impacts to straying rates of returning Mokelumne River spawners, Delta temperature assessments based on water temperature index values for fall-run Chinook salmon, interior Delta estimates of reach specific survival, and effects to predation rates based on changes to south Delta entrainment. Additions or improvements to the analysis could benefit from:

- To assess through-Delta survival, the Delta STARS Model was used. STARS stands for Survival, Travel Time, and Routing Simulation and is based on Perry et al. 2018. From the STARS model website, it is important to note that the STARS model is based on a set of relationships fitted to hatchery-origin late-fall Chinook salmon that migrated through the Delta between late November and mid-March over a five-year period (2007 - 2011). Therefore, model output should be thought of as a “historical expectation.” Limited information regarding model assumptions were provided in Appendix 11H and when model data and assumptions deviate from “historical expectation,” such deviations should be presented and reviewed within the RDEIR/SDEIS.
- For a thorough review of through-Delta survival, we need to see the full-range of model assumptions, route entrainment estimates, and estimates of survival for each of the eight unique migration reaches (in particular the Delta Cross Channel to Mokelumne River and Interior Delta reaches) through the Delta to assess impacts to Delta survival and Mokelumne origin salmon outmigrants. In addition, uncertainty interval values for the estimates of survival should be included for review.

The interior Delta provides multi benefit services to water supply, water quality, and ecosystems, among others. Many of these benefits are influenced by timing and duration of DCC operations. As a central Delta tributary, the Mokelumne River and its anadromous fish populations are heavily influenced by conditions within the interior Delta. The Lower Mokelumne River Partnership (EBMUD, CDFW, USFWS) has been actively engaged in identifying opportunities to reduce the impact on salmonid straying associated with DCC operations. EBMUD welcomes the opportunity to engage with the Sites Project Authority to further develop the analysis on operations and the influence on Mokelumne origin salmonids. Please direct any questions to I-Pei Hsiu ([ipei.hsiu@ebmud.com](mailto:ipei.hsiu@ebmud.com)) and she will forward to appropriate staff. Thank you.

Sincerely,



Jose D. Setka  
Environmental Affairs Officer

JDS:IHH