

From: [Wendy Chriss](#)
To: EIR-EIS-Comments@SitesProject.org
Cc: [Lucinda Shih](#); [Ching-Fu Chang](#)
Subject: FW: Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the Sites Reservoir Project
Date: Friday, January 28, 2022 4:35:50 PM
Attachments: [CCWD comments on Sites Jan 2022.pdf](#)

From: Wendy Chriss
Sent: Friday, January 28, 2022 4:10 PM
To: EIR-EIS-Comments@SitesProject.org
Cc: Marguerite Patil <mpatil@ccwater.com>; Lucinda Shih <lshih@ccwater.com>; Ching-Fu Chang <CChang@ccwater.com>; Maureen Martin <mmartin@ccwater.com>; Deanna Sereno <dsereno@ccwater.com>
Subject: Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the Sites Reservoir Project

Please see attached comments from Contra Costa Water District. Please contact Lucinda Shih at (925) 688-8168 or lshih@ccwater.com for further discussions.

Wendy Chriss

Administrative Secretary

CONTRA COSTA WATER DISTRICT

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January 28, 2022

Alicia Forsythe
Sites Project Authority
122 West Old Highway 99
Maxwell, CA 95955

Vanessa King
Bureau of Reclamation
2800 Cottage Way, Room W-2830
Sacramento, CA 95825

Submitted via email to: EIR-EIS-Comments@SitesProject.org

Subject: Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement of the Sites Reservoir Project

Dear Ms. Forsythe and Ms. King:

Contra Costa Water District (CCWD) appreciates the opportunity to review and provide comments on the Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the Sites Reservoir Project (Project). CCWD solely relies on the Delta to provide water diverted at its four intakes to approximately 550,000 people in Contra Costa County. Changes in water quality and water supply at CCWD intakes, even in the absence of violation of regulatory objectives, can impact CCWD's water supplies to its customers. CCWD would like to provide comments as follows regarding the evaluation of potential impacts to CCWD water supplies.

1. As described in the RDEIR/SDEIS, the diversions for the Project would be diverted under the basis of a new water right that would be, by definition, junior to all existing water rights such as the Central Valley Project (CVP) and State Water Project (SWP) water rights, and CCWD's Los Vaqueros and Mallard Slough water rights. This new water right should include limitations that are at least as constraining as the constraints presented in the RDEIR/SDEIS, including, but not limited to, the Delta excess buffer (i.e., not diverting the first 3,000 cfs beyond the required Delta outflow) and the diversion criteria listed in Chapter 2 of the RDEIR/SDEIS.
2. The conveyance of water delivered from the Project through CCWD facilities is mentioned as a possibility in Chapter 2 of the RDEIR/SDEIS, but the potential associated impacts were not analyzed in the RDEIR/SDEIS. Since CCWD and the Project team have not discussed this possible operation in any detail to date, we recommend additional coordination with CCWD to determine if there are potential

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Sites Project Authority and Bureau of Reclamation
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opportunities for coordinated operations in the future. If both parties decide to move forward with pursuing coordinated operations, more detailed impact analysis may need to be performed to fulfill the requirements of CEQA/NEPA and additional coordination with the CVP, SWP, and other key stakeholders would likely be beneficial.

3. In the RDEIR/SDEIS, conveyance of water supply to south-of-Delta Project partners is envisioned to be realized by increased exports at the Jones Pumping Plant and/or the Banks Pumping Plant, which entails through-Delta conveyance operations and thus has the potential to impact CCWD. The RDEIR/SDEIS does not include specific criteria for Sites Reservoir release and through-Delta conveyance to the same level of detail as the diversion criteria described in Chapter 2. As a result, detailed information needed to assess the potential impacts to CCWD remains unavailable; such information includes but is not limited to details about carriage water assumptions, diversion priority at Jones and Banks Pumping Plants, and potential changes in the timing and frequency of controlling Delta regulations. CCWD looks forward to coordinating with you to ensure that potential impacts of Project operations are avoided or mitigated.
4. The RDEIR/SDEIS does not fully account for the potential impacts on CCWD operations. CCWD's operations are driven by a number of factors including water quality. The DSM2 modeling results show occasions of increased salinity near CCWD's Intakes that coincide with CCWD's likely timing for use of the intakes, which has the potential to impact CCWD operations. However, in the CalSim modeling of CCWD operations the Delta salinity levels are the same for both the with and with Project scenarios, and thus does not capture CCWD's operational response to changes in Delta water quality caused by the Project. CCWD looks forward to discussing with you how to avoid or mitigate the potential Project impacts of increased salinity on CCWD.

As a project proponent and participant in the California Water Commission's Water Storage Investment Program, CCWD supports the objectives of the Water Storage Investment Program and recognizes the statewide importance of water storage projects that provide significant public benefits. In the spirit of collaboration, CCWD looks forward to the review of the final EIR/EIS for the Project and coordinating with you to achieve our mutual goals. Please do not hesitate to contact me at (925) 688-8168 or lshih@ccwater.com for further discussions.

Sincerely,



Lucinda Shih

Water Resources Manager

CFC:wec