

**From:** [Oliver, Mark/RDD](mailto:Oliver, Mark/RDD)  
**To:** [Black, Lyna/RDD](mailto:Black, Lyna/RDD); [Kane, Clare/SDO](mailto:Kane, Clare/SDO)  
**Cc:** [Tull, Robert/SAC](mailto:Tull, Robert/SAC)  
**Subject:** FW: CCWD DEIR comments [EXTERNAL]  
**Date:** Monday, January 15, 2018 10:55:12 AM  
**Attachments:** [CCWD Comments on EIR EIS - 01.12.18.pdf](#)

---

Here's another one

---

**From:** Jim Watson [mailto:[jwatson@sitesproject.org](mailto:jwatson@sitesproject.org)]  
**Sent:** Monday, January 15, 2018 10:45 AM  
**To:** Rob Thomson <[rthomson@sitesproject.org](mailto:rthomson@sitesproject.org)>  
**Cc:** Oliver, Mark/RDD <[Mark.Oliver@CH2M.com](mailto:Mark.Oliver@CH2M.com)>; Anne Hoagland <[anne@jb-comm.com](mailto:anne@jb-comm.com)>  
**Subject:** CCWD DEIR comments [EXTERNAL]

[Additional letter to include.](#)

Jim Watson, PE  
GM, Sites Project Authority  
530.410.8250  
[jwatson@SitesProject.org](mailto:jwatson@SitesProject.org)

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

---

**From:** Leah Orloff [mailto:[lorloff@ccwater.com](mailto:lorloff@ccwater.com)]  
**Sent:** Monday, January 15, 2018 9:42 AM  
**To:** Jim Watson <[jwatson@sitesproject.org](mailto:jwatson@sitesproject.org)>  
**Cc:** Marguerite Patil <[mpatil@ccwater.com](mailto:mpatil@ccwater.com)>; Maureen Martin <[mmartin@ccwater.com](mailto:mmartin@ccwater.com)>  
**Subject:** DEIR comments

Jim, here are CCWD's comments on the Sites DEIR. Let me know if you have any questions or want to discuss. We look forward to working with you on joint Sites-LV operations, Leah



**Board of Directors**

Lisa M. Borba, AICP  
*President*

Connstance Holdaway  
*Vice President*

Ernesto A. Avila, P.E.

Bette Boatman

John A. Burgh

**General Manager**

Jerry Brown

January 12, 2018

Jim Watson  
Sites Project Authority  
P.O. Box 517  
Maxwell, CA 95955

Submitted electronically to: [EIR-EIS-Comments@SitesProject.org](mailto:EIR-EIS-Comments@SitesProject.org)

**Subject: Comments on Draft Environmental Impact Report/Environmental Impact Statement for Sites Reservoir Project**

Dear Mr. Watson,

Contra Costa Water District (CCWD) appreciates this opportunity to provide input on the Draft Environmental Impact Report /Environmental Impact Statement (Draft EIR/EIS) for the Sites Reservoir Project (Project). CCWD depends on the Sacramento-San Joaquin Delta to supply water to over 500,000 people in eastern and northern Contra Costa County, and has a strong interest in protecting the quality of its Delta water supply. CCWD has committed to deliver high quality water to its customers, and our water supply operations are driven primarily by salinity at our four intakes in the Delta.

We appreciate that the Draft EIR/EIS included an analysis of the water quality impacts at CCWD's water intakes in the Delta. However, the data provided in the document were not sufficient to determine the existence or extent of net impacts to CCWD's water supply, water quality, and operational costs. The long-term average and average by water year type and the probability of exceedance plots provided useful information on how the Project would impact the salinity at CCWD's water intakes. However, to quantify the operational and financial impacts to CCWD, the full 82-year time series of the salinity at CCWD's intakes as well as certain hydraulic conditions in the Delta are required but were not provided. CCWD requests the modeling tools and output listed in the Attachment so that the full impacts of the Project can be analyzed.

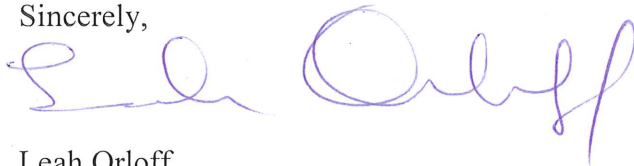
Based on the analysis included in the Draft EIR/EIS, salinity at CCWD's intakes at Rock Slough and Old River would be increased by up to 17.5% during the winter and spring in some water year types. An increase in salinity of this magnitude would increase the cost of providing water to customers, reduce the quality of water delivered to customers, reduce the volume of water stored in Los Vaqueros Reservoir, and reduce CCWD's water supply by reducing the opportunities to divert under our Los Vaqueros water right. These impacts may be balanced by water quality improvements in other times, but without access to the data listed the Attachment we are unable to determine whether this is the case.

In the absence of the appropriate modeling information, CCWD does not concur with the conclusions in Draft EIR/EIS that changes in water quality due to the Project would not result in significant impacts (Chapter 7.3) and would not require mitigation (Chapter 7.4). The Project could have significant impacts on CCWD's water supply and water quality even in the absence of standards violations. The incremental effects of the Project could also contribute to significant cumulative impacts to water quality at CCWD's intakes.

Project impacts and benefits depend strongly on Project operations. To ensure that the degradation of water quality at CCWD's intakes will not exceed a significant level, CCWD would like to better understand the Project's operations. As you move toward a final analysis we would like to work collaboratively with you to minimize and, where necessary, mitigate impacts to less than significant levels.

CCWD believes that the thoughtful development of innovative off-stream storage facilities is a very important part of the state's future water supply. CCWD appreciated the opportunity to work with you and several other storage project proponents on the development of the 2017 Storage Integration Study prepared by the Association of California Water Agencies that demonstrated the value of coordinated operations. CCWD would be happy to work with you as you continue to develop your Project operations to identify ways to avoid impacts to CCWD's water supply and Delta water quality. Furthermore, we look forward to future opportunities to work together to determine how the Project could be operated in coordination with the Los Vaqueros Reservoir Expansion Project and other existing and planned water projects to avoid impacts and provide state-wide benefits. If you have any questions about this letter, please call me at 925-688-8083 or call Maureen Martin at 925-688-8323.

Sincerely,



Leah Orloff  
Water Resources Manager

LO:wec

Attachment

## Modeling Information Requested

In order to assess the full suite of potential impacts of the Project, a review of changes in Delta conditions, Delta salinity, and changes to statewide water operations is necessary.

### **CalSim II Request**

We request that the CalSim models used to develop the EIR/EIS. If the models in their entirety cannot be provided, we would require, at a minimum, the 82-year time series of the following modeling output to be provided:

1. Delta outflow – required outflow and surplus
  - a. D407,
  - b. C407,
  - c. C407\_ann
2. Water quality at all our intakes
  - a. Rock Slough,
  - b. Old River,
  - c. Victoria Canal
3. Exports
  - a. D409
4. OMR flow and requirement
  - a. C408,
  - b. C408\_lbound

### **DSM 2 Request**

In addition to the CalSim models requested, we also request a daily average timeseries of DSM2 electrical conductivity at our intakes. CCWD's intakes are represented at the following nodes in DSM2:

Mallard Slough Intake – RSAC075  
Rock Slough Intake – CHCC006 and ROLD024  
Old River Intake – ROLD034  
Middle River Intake – CHVCT000