

WHITE PAPER
on Coordinated Operations for the Sites Reservoir Project

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This White Paper has been developed jointly by the Sites Authority, DWR, and Reclamation. The Parties plan to enter into an Agreement to Coordinate in the Operations of the Sites Reservoir Project (the “Agreement”) on or about the date of this White Paper. The Parties’ expectation is that when the Sites Reservoir Project nears operational status, the Parties would review the Agreement and determine if the Agreement or any of the Attachments to the Agreement need to be amended to reflect the then current regulatory and operational conditions. The purpose of this White Paper is to document the Parties’ current understanding of how the Sites Reservoir Project would be operated under those regulatory and operational conditions as they exist in 2026, to assist the Parties in developing or revising the coordination and operational processes under the Agreement when the Sites Reservoir Project nears operational status.

1. DEFINITIONS

Capitalized terms not otherwise defined in this White Paper shall have the same meaning as in the Agreement.

- a. “2024 BiOps” means the 2024 biological opinions issued by the U.S. Fish and Wildlife Service and the National Marine Fisheries Service for the Long-Term Operations of the Central Valley Project and State Water Project.
- b. “2024 ITP” means the 2024 Incidental Take Permit issued by the California Department of Fish and Wildlife for the Long-Term Operation of the State Water Project in the Sacramento-San Joaquin Delta.
- c. “cfs” means cubic feet per second.
- d. “D1641” means State Water Board Water Rights Decision 1641.
- e. “Delta Export/Inflow (E/I) Ratio” means the export limits identified in D1641, and these export limits may be controlling CVP and SWP exports from the Delta.
- f. “Excess Conditions with Export Restrictions” means conditions where Excess Conditions exist, but Delta Exports are constrained by non-discretionary requirements imposed on the CVP and the SWP, as determined by DWR and Reclamation, consistent with Article 3(c) and 10(i) of the COA. Examples of Excess Conditions with Export Restrictions include the following circumstances in the 2024 BiOp, 2024 ITP, and/or D-1641:
 - i. During December through June, when OMR Flow Criteria are limiting Project Exports from the Delta (see “OMR Flow Criteria),
 - ii. During April and May, when SWP Exports are limited by Spring Outflow (see

“Export Curtailment for Spring Outflow”),

- iii. During a 30-day period in April and May, when total combined CVP and SWP Exports are limited to the greater of 1,500 cfs or 100 percent of the 3-day average flow of the San Joaquin River at Vernalis (see “Vernalis 1:1”),
 - iv. During February through June, when the Delta E/I Ratio is 35 percent, and during July through January, when the Delta E/I Ratio is 65 percent, or such variations in percentages as provided for in D1641.
- g. “Export Curtailment for Spring Outflow” is identified in the 2024 ITP and may be controlling SWP Exports from the Delta during the months of April and May of each year.
 - h. “LTO” means the operational and regulatory criteria included in the 2024 BiOps resulting from the 2024 Reinitiation of Consultation of the Long-Term Operation of the Central Valley Project and State Water Project.
 - i. “NDOI” means the Delta outflow calculation defined in D1641.
 - j. “Offramp” means an action permitted under the 2024 ITP or 2024 BiOps that allows the SWP and/or CVP, as applicable, to operate to lesser Export restrictions under certain high outflow conditions.
 - k. “OMR Flow Criteria” means the Old-Middle River Flow Criteria identified in the 2024 BiOp and the 2024 ITP and may be controlling the CVP and SWP Exports from the Delta during the months of December through June of each year.

2. COORDINATION OF OPERATIONS UNDER THE 2026 CONDITIONS

The following coordination and operational processes would apply to the diversion of water under the Sites Water Right by the Sites Authority under the 2026 regulatory and operational conditions.

- a. The Sites Authority will rely on information made publicly available by DWR and Reclamation to confirm the Delta conditions. The Sites Authority will proceed to divert water under the Sites Water Right, assuming all of its other diversion criteria are met, if the Delta is in Excess Conditions or under certain Excess Conditions with Export Restrictions. If conditions described in subsections b.i, b.ii, or b.iii exist, then the Parties will proceed as described in subsection c. The Parties will regularly meet and be in Close Coordination throughout the Sites Reservoir Project diversion period. The Sites Authority will monitor Delta conditions daily and closely coordinate with DWR and Reclamation prior to and while diversions occur to confirm that there is no change to actual or forecasted status.
- b. Under the terms of the Sites Water Right, Sites Reservoir Project diversions may not cause an Adverse Effect on the operation of the CVP or SWP under their respective

water rights. Current CVP and SWP Delta operations where the Parties anticipate Adverse Effects either will or may occur, include, but are not limited to:

- i. “Close Excess” - The Delta is forecasted within a reasonably certain period of time to change from Excess Conditions into Balanced Water Conditions or vice versa, or is forecasted to fluctuate between Balanced Water Conditions and Excess Conditions for a reasonably certain period of time, or
 - ii. “Specific Excess with Export Restrictions” - The Delta is in Excess Conditions with Export Restrictions specifically where changes to flow conditions on the Sacramento River from Sites Reservoir Project diversions could result in an Adverse Effect on CVP and/or SWP Exports (i.e., Delta E/I Ratio is governing), or
 - iii. “Offramps” - The Delta is in Excess Conditions with Export Restriction that are due to OMR Flow Criteria or San Joaquin River flow conditions and there is potential for increased CVP or SWP Exports to exist if certain Offramp threshold conditions are met that are affected by Sacramento River flows. Offramps typically provide for less restrictions on Delta Exports but do not result in the Delta transitioning to Excess Conditions. An Adverse Effect will only occur when the Sites Authority has an actual measurable effect to achieving the offramp threshold and there are measurable increases in CVP or SWP Export flow rates.
- c. The Parties will use their best efforts to assess the actual and forecasted operating conditions and will take the following actions in response to each Delta operations condition, as described in subsection b:
- i. “Close Excess” - If the Delta operations conditions identified in subsection b.i exist, then DWR and Reclamation will inform the Sites Authority to either cease or reduce diversions to a level that offsets the Adverse Effect, and the Sites Authority shall promptly comply with such a request.
 - ii. “Specific Excess with Export Restrictions” - If Delta operations conditions identified in subsection b.ii exist, then the Sites Authority, DWR, and Reclamation will jointly assess actual operations and evaluate to what extent Sites Reservoir Project diversions could result in an Adverse Effect. DWR and Reclamation will inform the Sites Authority if conditions allow for continued diversions. Specifically, but not limited to, when Delta E/I Ratio is the governing limit to CVP and/or SWP Exports, the 14-day running average of Delta Inflow may be affected by Sites Reservoir Project diversions. DWR and Reclamation will inform the Sites Authority to either cease or reduce diversions to a level that offsets the Adverse Effect, and the Sites Authority shall promptly comply with such a request.

- iii. “Offramps” - If Delta operations conditions exist as identified in subsection b.iii, a potential Adverse Effect may exist only when the remaining flow amount to achieving the Offramp threshold is less than the amount of Sites Reservoir Project diversions. If DWR and Reclamation determine that the remaining flow amount to achieving the Offramp threshold is less than the amount of Sites Reservoir Project diversions and achieving the Offramp threshold will allow for an increase in CVP and/or SWP Exports, then DWR and Reclamation will inform the Sites Authority to either cease or reduce diversions to a level that offsets the Adverse Effect, and the Sites Authority shall promptly comply with such a request.

Delta operation conditions necessitating Close Coordination under the “Offramps” scenario include, but are not limited to, the following:

1. LTO Rio Vista Flows – When Rio Vista flows are greater than 55,000 cfs, there is an Offramp from the juvenile longfin OMR Flow Criteria restriction that may reduce the OMR Flow Criteria requirement and lead to increased CVP and/or SWP Exports. The higher OMR Flow Criteria requirement is reinitiated when flows at Rio Vista drop below 40,000 cfs. Other OMR Flow Criteria restrictions still apply, but effective operations are managed to a less restrictive OMR Flow Criteria condition.
 2. 2024 ITP NDOI – When NDOI (3-day average) is greater than 44,500 cfs, there is an Offramp from Exports constrained by percentage of San Joaquin flow for Spring outflow. The Offramp eliminates the Export restriction relative to the Export Curtailment for Spring Outflow (also referred to as the San Joaquin River Inflow to Export Ratio), but other OMR Flow Criteria still apply.
- iv. The Parties will continue Close Coordination during the response actions identified in subsection c, monitor the system response to all DWR and Reclamation-directed adjustments to Sites Reservoir Project diversion, and consider further response actions to be taken (either additional reductions to Sites Reservoir Project diversions if not completely suspended, or less or no reduction of Sites Reservoir Project diversion assuming the reduction or termination that was made did not have the expected system effect and/or did not mitigate for the Adverse Effect).
 - v. The Parties will abide by a process that allows the Sites Authority to present evidence to DWR and Reclamation that demonstrates that no Adverse Effect is occurring or will occur in any of the conditions under subsections b.i, b.ii, or b.iii. DWR and Reclamation will give such evidence due consideration.