



— BUREAU OF —
RECLAMATION

Record of Decision

Sites Reservoir Project



Mission Statements

The U.S. Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, Native Hawaiians, and affiliated Island Communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Record of Decision

Sites Reservoir Project

Recommended by:



Adam Nickels
Acting Regional Director
Bureau of Reclamation
Interior Region 10 • California-Great Basin

Date: January 23, 2026

Approved by:



Andrea Travnicek, Ph.D.
Assistant Secretary - Water and Science

Date: January 23, 2026

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Introduction

The United States Department of the Interior, Bureau of Reclamation (Reclamation), as the Federal lead agency under the National Environmental Policy Act (NEPA), and the Sites Project Authority (Authority), as the state lead agency under the California Environmental Quality Act (CEQA), prepared the Sites Reservoir Project (Project) Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) to assess the impacts of the proposed Project. The Project proposes to develop an offstream surface water reservoir to provide water supply for agricultural, municipal, industrial, and environmental needs throughout the State of California.

Background

California is a diverse and dynamic state. The state has a diverse and rich natural environment, from the dense forests of the northern coast to the arid deserts of the southern portion of the state. The economy of California is equally diverse and robust, with major sectors of sales, manufacturing, and technology along the coastal regions and in southern California to predominantly agricultural sectors in the Sacramento and San Joaquin Valleys. The state's population, natural resources and economic diversity are what many Californians have come to value but also makes water and natural resource management in California challenging. California is home to the largest Federal and state water projects, the Central Valley Project (CVP) and State Water Project (SWP), along with a number of substantial local water projects that all move water up to hundreds of miles from its source to its end use to sustain the state's population, and natural and economic diversity.

The Federal government has recognized the challenges confronting existing water infrastructure and in 2016 Congress passed the Water Infrastructure Improvements for the Nation Act (WIIN Act) (Public Law 114-322). Under the WIIN Act, Reclamation may participate in surface water storage projects that are constructed, operated, and maintained by a state agency or an agency organized pursuant to state law and that provide a benefit in meeting any obligation under Federal law (including regulations). The Secretary of the Interior may participate in up to 25 percent of the total cost of a state-led storage project under the WIIN Act. Pursuant to Section 4007(c)(2)(C) of the WIIN Act, the Secretary of the Interior must find that a proportionate share of the Project benefits are Federal benefits.

Purpose and Need

Reclamation identified the Project need as providing off stream surface water storage north of the Delta in a manner that is consistent with WIIN Act requirements and Reclamation law. The purpose of the Project is to provide increased water supply and improved reliability of water deliveries; increased CVP operational flexibility; benefits to anadromous fish by providing additional flexibility to CVP operations; incremental Level 4 water supply for CVP Improvement Act (CVPIA) refuges as referenced in Section 3406(d)(2) of the CVPIA; and Delta ecosystem enhancement by providing water to convey food resources for delta smelt.

Reclamation's Federal discretionary actions associated with the Project include providing Project funding in the form of a cost-share pursuant to the WIIN Act, coordination of Project operations, execution of contracts to facilitate the Project's use of CVP facilities, and land use authorizations. In compliance with the National Environmental Policy Act, Reclamation evaluated the potential effects of the range of alternatives to meet the project purposes identified above.

Alternatives Considered

The Final EIS/EIR evaluates four project alternatives:

- No Action Alternative
- Alternative 1: 1.5-million-acre-foot (MAF) reservoir, bridge, release to the Colusa Basin Drain (CBD), and Reclamation investment of up to 7 percent of the Project costs
- Alternative 2: 1.3-MAF reservoir, South Road, partial release to the CBD, discharge to the Sacramento River, and no Reclamation investment
- Alternative 3: 1.5-MAF reservoir, bridge, release to the CBD, and Reclamation investment of up to 25 percent of the Project costs

No Action Alternative

"No action" represents a projection of current conditions and reasonably foreseeable actions to the most reasonable future responses or conditions that could occur during the life of the Project without any action alternatives being implemented, including the continuation of preexisting and ongoing plans, programs, and operations. Because no new facilities would be constructed or operated, the No Action Alternative would not materially change conditions of resources including land use, cultural resources, vegetation and wetland resources, surface water quality, wildlife resources, agricultural and forestry resources, air quality and emissions, and visual resources as compared to

the existing conditions in 2020 described in the Final EIS/EIR, and the Final EIS/EIR assumes the same regulatory criteria as 2020 existing conditions. When the No Action Alternative is different from 2020 existing conditions, as projected into the future for a certain resource, the differences are defined. In addition, the California Department of Water Resources' (DWR) projected future land use and water use through 2030 are used for the No Action Alternative, which assumes that the majority of the CVP and SWP water contractors would use their total demands and that most senior water rights users would also fully use their demands, depending on hydrologic conditions and resulting water made available for diversion. This increased demand, in addition to the projects currently under construction and those that have received approvals and permits at the time of preparation of this Final EIS/EIR, constitute the No Action Alternative.

Action Alternatives

Three action alternatives (Alternatives 1, 2, and 3) based on the results of the Authority's value planning process are analyzed in the Final EIS/EIR. These three alternatives have many common elements, including the use of existing infrastructure to divert unappropriated flow from the Sacramento River, the release of Sites Reservoir water back to the river when needed, the construction of two new recreation areas and a boat ramp, and use of a Terminal Regulating Reservoir (TRR). The action alternatives, including common elements among action alternatives, are described further in the following Sections. The defining characteristics of each alternative are shown in Table 1.

Table 1. Defining Characteristics of Action Alternatives

| Project Element | Alternative 1 | Alternative 2 | Alternative 3 |
|---|--|--|-----------------------|
| Sites Reservoir Size | 1.5 MAF | 1.3 MAF | Same as Alternative 1 |
| Inundation Area | 13,200 acres | 12,600 acres | Same as Alternative 1 |
| Dams (scaled to the size of the reservoir) | Golden Gate and Sites Dams; 7 saddle dams; 2 saddle dikes | Golden Gate and Sites Dams; 4 saddle dams; 3 saddle dikes | Same as Alternative 1 |
| Route Connecting East and West Sides of Reservoir | Permanent bridge crossing the reservoir | Paved roadway along south side of reservoir | Same as Alternative 1 |
| TRR | Funks Reservoir TRR East | Funks Reservoir TRR West | Same as Alternative 1 |
| Conveyance Releases | Releases 1,000 cfs into new Dunnigan Pipeline discharging into the CBD | Releases of up to 1,000 cfs into new Dunnigan Pipeline discharging into the Sacramento River with partial discharge into the CBD | Same as Alternative 1 |
| Releases into Funks Creek and Stone Corral Creek | Specific flow criteria to maintain flows to protect downstream water right | Same as Alternative 1 | Same as Alternative 1 |

| Project Element | Alternative 1 | Alternative 2 | Alternative 3 |
|-------------------------|--|---|---|
| | holders and ecological function | | |
| Reclamation Involvement | <p>Two options:</p> <ul style="list-style-type: none"> • Operational exchanges¹ only (Alternative 1A); or • Funding partner (up to 7% investment) with operational exchanges¹ (Alternative 1B) | Operational exchanges only ¹ | Funding partners (up to 25% investment) with operational exchanges ¹ |
| DWR Involvement | Operational exchanges with Oroville and use of SWP facilities South-of-Delta | Same as Alternative 1 (volumes may vary, however) | Same as Alternative 1 (volumes may vary, however) |

Notes: CBD= Colusa Basin Drain; cfs = cubic feet per second; MAF = million acre-feet; TRR = Terminal Regulating Reservoir ¹Operational Exchanges could include within-year exchanges and real-time exchanges.

Elements Common to All Action Alternatives

Many facility and operation elements are common to all three action alternatives. These common elements are briefly described below.

Facility Elements

Facility elements common to all action alternatives include:

- Improvements to and use of the existing Red Bluff Pumping Plant (RBPP), Tehama-Colusa (TC) Canal, Hamilton City Pump Station, and Glenn-Colusa Irrigation District (GCID) Main Canal for the diversion and conveyance of water from the Sacramento River.
- Construction of regulating reservoirs and a conveyance complex to control the conveyance of water between Sites Reservoir, TC Canal, and GCID Main Canal. These facilities would include the regulating reservoirs, pipelines, pumping generating plants (PGPs), electrical substations, and maintenance buildings.
- Construction of an administration and operations building and a maintenance and storage building near the existing Funks Reservoir.
- Construction of two main dams, the Golden Gate Dam on Funks Creek and the Sites Dam on Stone Corral Creek, to impound water in the new reservoir. A series of saddle dams and saddle dikes along the northern and eastern rims of the reservoir would also be constructed to close off topographic saddles in the surrounding ridges. The inlet/outlet (I/O) Works for the reservoir would be located near the Golden Gate Dam.

- Upgrades to the TC Canal and construction of a new pipeline (the Dunnigan Pipeline) to convey water from the new reservoir to the CBD and ultimately, to the Sacramento River.
- Development of two primary recreation areas and a day-use boat ramp. The recreation areas would also require a network of new roads and upgrades to existing roads for maintenance and local access. The Peninsula Hills Recreation Area would be located on up to 373 acres along the northwest shore of the new reservoir and the Stone Corral Creek Recreation Area would be located on up to 235 acres along the eastern shore of the new reservoir. These areas would provide multiple recreational amenities, including campsites, boat access, horse trails, hiking trails, and vista points. Both of the primary recreation areas would have a kiosk, access to electricity and potable water, picnic sites, hiking trails, vault toilets, and campsites. The day-use boat ramp and parking area would be located on up to 10 acres on the western side of the new reservoir.
- Construction of approximately 46 miles of new paved and unpaved roads to provide construction and maintenance access to the new facilities, as well as public access to the recreation areas.
- Acquisition and maintenance of a 100-foot buffer around the new reservoir and all related facilities, buildings, and recreation areas.

Operations and Maintenance Elements

This section describes operations and maintenance elements common to all action alternatives.

Water Operations

The Project would provide water supply and water supply-related environmental benefits to the Storage Partners¹. Water would be diverted from the Sacramento River at the existing RBPP through the TC Canal into the existing Funks Reservoir and at the GCID Hamilton City Pump Station through the GCID Main Canal into a new TRR. From the existing Funks Reservoir and a new TRR, the water would be pumped into the new Sites Reservoir. Diversions could occur between September 1 and June 14², which corresponds with the period that the Sacramento River is not fully appropriated.

Diversions would occur only when the diversion criteria are met. Water would be held in storage in the 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

¹ The governmental agencies, water organizations, and others who have funded and received a storage allocation in Sites Reservoir and any resulting water supply or water supply-related environmental benefits from the Sites Reservoir Project. Storage Partners include local agencies, the State of California, and the federal government.

² Contingent on the results of the Sites Water Rights Proceeding

year depending on the Storage Partners demonstrating a critical operational need, and system conveyance availability and capacity permit such releases outside of this window. Water would be released from Sites Reservoir via the I/O Works near the Golden Gate Dam back into a TRR or back into Funks Reservoir. Water released could be used along the GCID Main Canal, along the TC Canal, or conveyed to the new Dunnigan Pipeline and discharged to the CBD and conveyed via the Sacramento River or the Yolo Bypass to a variety of locations in the Delta and south of the Delta. Operations would be coordinated with Reclamation and DWR to prevent conflicts with the CVP and SWP, and exchanges of water may occur between the Project and the CVP and SWP. Water would also be diverted and impounded from Funks and Stone Corral Creeks, and releases from Golden Gate Dam and Sites Dam, respectively, would occur into Funks and Stone Corral Creeks to maintain flows to protect downstream water right holders and ecological function.

Energy Generation and Energy Use

All action alternatives would require power to run facilities and pump water but would also generate incidental power when water is released from Sites Reservoir at the PGPs. Hydropower generation would be an incidental benefit of stored water releases. The power needs for the Project beyond what could be generated by its operations would be purchased from market sources.

Facility Operations and Maintenance

Operations and maintenance activities for all facilities, including recreation areas, would include debris removal, vegetation control, rodent control, erosion control and protection, routine inspections (dams, tunnels, pipelines, PGPs, I/O Works, fencing, signs, and gates), painting, cleaning, repairs, and other routine tasks to maintain the facilities in accordance with design standards after construction and commissioning. Routine visual inspection of the facilities would be conducted to monitor performance and prevent mechanical and structural failures.

Alternative 1

The unique elements of Alternative 1 include the following:

- Reservoir capacity would be 1.5 MAF;
- A bridge across the reservoir would provide access between the east and west sides of the reservoir;
- TRR East;
- The Dunnigan Pipeline would extend from the TC Canal and discharge into the CBD; and

- Reclamation could provide an investment of up to 7 percent of project costs, corresponding to up to 7 percent of Sites Reservoir storage space being dedicated to Reclamation's use.

Alternative 1 would impound surface water at the Golden Gate Dam on Funks Creek and the Sites Dam on Stone Corral Creek; a series of seven saddle dams along the surrounding eastern and northern ridges would close off topographic saddles to form Sites Reservoir. The 1.5-MAF reservoir under Alternative 1 would inundate approximately 13,200 acres of Antelope Valley in Glenn and Colusa counties. Under Alternative 1, water from the Sacramento River would be conveyed through existing or upgraded conveyance facilities operated by the Tehama-Colusa Canal Authority and those owned or operated by GCID to new and upgraded regulating reservoirs and into the new Sites Reservoir.

Releases from Sites Reservoir would be made to: (1) Storage Partners based on their requests to meet their water supply portfolio needs; (2) conduct operational exchanges with Reclamation in Shasta Reservoir; (3) meet environmental purposes; and (4) conduct operational exchanges with DWR in Lake Oroville. When releases are made from Sites Reservoir, existing and new facilities would convey water from the I/O Works to the CBD for release, from which flows could enter the Yolo Bypass or Sacramento River.

Construction roads, local roads, and maintenance roads would be developed or realigned to accommodate the reservoir facilities, including the realignment of Sites Lodoga Road with a new bridge over the reservoir.

Alternative 2

The unique features of Alternative 2 include the following:

- Reservoir capacity would be 1.3 MAF;
- TRR West;
- A local access road around the southern end of the reservoir (i.e., South Road) would enable travel between the east and west sides of the reservoir;
- The Dunnigan Pipeline would extend to and discharge into the Sacramento River with primary release from the Sacramento River discharge and only a partial discharge at the CBD; and
- No Reclamation investment in the Project.

Alternative 2 would impound surface water at the Golden Gate Dam on Funks Creek and the Sites Dam on Stone Corral Creek; a series of four saddle dams (three saddle dams

less than Alternative 1) along the surrounding eastern and northern ridges would close off topographic saddles to form Sites Reservoir. The 1.3-MAF reservoir (0.2 MAF less than Alternative 1) would inundate approximately 12,600 acres (600 acres less than Alternative 1) of Antelope Valley. Alternative 2 would convey water from the Sacramento River to store in the reservoir using the same existing and new diversion facilities as described for Alternative 1. Alternative 2 would involve the construction of TRR West.

As under Alternative 1, releases from Sites Reservoir under Alternative 2 would be made to meet environmental purposes, for Storage Partners based on their requests to meet their water supply portfolio needs, and for operational exchanges with Reclamation and with DWR in Lake Oroville. However, under Alternative 2, the Dunnigan Pipeline would be extended beyond the CBD so that releases could be discharged not only to the CBD, but also directly into the Sacramento River. Alternative 2 does not include any Reclamation investment in the Project.

Construction, local, and maintenance roads would be required and developed; however, Alternative 2 does not propose a bridge for the relocated Sites Lodoga Road. Under Alternative 2, the existing Huffmaster Road would be realigned around the southern end of the reservoir, and a new South Road would connect to the realigned Huffmaster Road. The recreation areas that would be provided under Alternative 2 would be identical to those for Alternative 1. Overall, operations for Alternative 2 would be similar to those for Alternative 1 but would occur within the constraints of a smaller reservoir.

Alternative 3

Alternative 3 facilities, components, and operation would be the same as described for Alternative 1. Alternative 3 would include increased Reclamation participation and investment as compared to Alternative 1, with investment of up to 25 percent of the Project cost. The increased level of Reclamation investment would result in up to 25 percent of Sites Reservoir storage space being dedicated to Reclamation's use.

Reclamation's share of Sites water would be flexibly used by Reclamation to meet CVP objectives that provide for water supply and environmental needs. The increased level of Reclamation investment would also result in increased opportunities for maintaining cold-water pool in Shasta Reservoir and Lake Oroville. Increased Reclamation investment would require some reduction in local participation for Alternative 3 as compared with Alternative 1; it is assumed that Storage Partners that are local agencies would reduce their participation to accommodate the investment by Reclamation. All other components of Alternative 3 are the same as those for Alternative 1.

Selected Alternative

Reclamation's Selected Alternative is Alternative 3, as described in Chapter 2 of the Final EIS/EIR, modified to implement TRR West instead of TRR East. All other elements described under Alternative 3 in the Final EIS/EIR would be implemented as described, without refinement. The Selected Alternative would meet the Project's purposes by providing increased water supply and improved reliability of water deliveries, increasing CVP operational flexibility, providing benefits to anadromous fish by improving CVP operations, consistent with the laws, regulations, and requirements in effect at the time of operation, providing Incremental Level 4 CVPIA water supply for refuges, and enhancing the Delta ecosystem by providing water to convey food resources.

Basis for Decision

The EIS/EIR was written to provide flexibility in the selection and implementation of certain interchangeable construction features considered under the action alternatives. As such, Reclamation modified Alternative 3 in its decision by choosing to implement TRR West as described under Alternative 2 of the Final EIS/EIR instead of TRR East. This modification reduces the wetlands and geologic resources impacts identified in the Final EIS/EIR for Alternative 3; therefore, the impacts resulting from this refinement still fall within the range of impacts identified in the Final EIS/EIR and no additional analysis is needed.

The effects of the Selected Alternative are the same as those identified under Alternatives 1 and 3, except that the modification to implement TRR West instead of TRR East in the Selected Alternative reduces the impacts to wetlands and geologic resources compared to Alternatives 1 and 3. The Selected Alternative would have similar impacts to Alternative 2 for all resources except wildlife, land use, and traffic resources; the impacts to those resources would be less under the Selected Alternative than Alternative 2.

Although the Selected Alternative would result in substantial adverse effects even after mitigation on surface water quality, vegetation and wetlands, wildlife, agriculture and forestry, air quality, cultural resources, visual resources, and socioeconomic, it best fulfills the purposes of the Project compared to the other alternatives evaluated. The Selected Alternative balances achieving Project purposes and minimizing environmental effects by adopting all practicable means to mitigate and compensate for potential and actual adverse environmental effects of the Project. Additionally, the Selected Alternative is consistent with Reclamation Law, satisfies requirements of the WIIN Act for a state-led project, and is the Authority's preferred project under CEQA. In making this

decision, Reclamation has considered all relevant information raised in the NEPA process, including the alternatives evaluated in the Final EIS/EIR, the effects analysis, and comments submitted by Federal, state, and local agencies, interested parties, and the public, and the results of consultation and coordination with public agencies. This ROD is the conclusion of the NEPA process.

Public Involvement

Public involvement was considered throughout the planning, alternatives development, and decision-making process. Reclamation released a Notice of Intent for the Project EIS/EIR on November 9, 2001. In addition to the scoping process in January 2002, the Authority conducted two scoping meetings in February 2017 following publication of the supplemental Notice of Preparation associated with its CEQA process. During both scoping periods, the public was invited to submit comments regarding the scope, content, and format of the environmental document. A Draft EIS/EIR was released in 2017. A total of 137 comment letters and emails were received along with comments received at two public hearings held during the public review period. Responses to the comments received on the 2017 Draft EIS/EIR were provided in an appendix in the Final EIS/EIR.

As a result of comments received on the 2017 Draft EIS/EIR and the Authority's "right-size" value planning effort, the Project was further refined and optimized. Subsequently, the Authority and Reclamation released the Supplemental Draft Environmental Impact Statement (SDEIS)/Revised Draft Environmental Impact Report (RDEIR) in November 2021. The release of this public draft was noticed through a CEQA Notice of Availability on November 12, 2021, and through publication of a NEPA Notice of Availability in the Federal Register on November 12, 2021. The SDEIS/RDEIR identified four alternatives: the No Project/No Action Alternative, Alternative 1, Alternative 2, and Alternative 3, as described above. The 2021 SDEIS/RDEIR was available for public and agency review and comment from November 12, 2021, to January 28, 2022, and two virtual public meetings were held during the public review period. The Authority and Reclamation received approximately 101 unique letters and communications during the public comment period from Federal, state, and local/regional agencies; elected officials; stakeholders; non-governmental organizations; and members of the public. Comments and issues raised by commenters on the SDEIS/RDEIR include those related to stakeholder engagement and public process, alternatives description and operations of the alternatives, surface water quality impacts, aquatic biological resources impacts, terrestrial wildlife impacts, vegetation impacts, and cumulative impacts.

After the close of the public comment period on the SDEIS/RDEIR on January 28, 2022, the Authority and Reclamation made changes between the SDEIS/RDEIR and the Final EIS/EIR based on the comments received. Responses to public comments on the SDEIS/RDEIR were included in the Final EIS/EIR.

A Notice of Availability of the Final EIS/EIR was published in the Federal Register on November 3, 2023. The Final EIS/EIR was posted on Reclamation's website and a press release was issued by Reclamation. Notices of availability of the Final EIS/EIR were sent to interested parties through Reclamation's NEPA database electronic distribution list. In addition, printed copies of the Final EIS/EIR were available for viewing at the Sites Project Authority Office and Reclamation's Sacramento Regional Office as well as at seven local libraries near the Project area.

Comments Received on the Final EIS

Reclamation received comments from the following agencies or organizations on the Final EIR/EIS: Contra Costa Water District (CCWD), Environmental Protection Agency (EPA), Yocha Dehe Tribe, and Yolo County. The Authority developed detailed response memos to the comments received, which are incorporated by reference and summarized below (<https://sitesproject.org/remainder-of-the-record/>).

CCWD expressed concerns that the Final EIS/EIR inadequately addressed the potential impacts of the Sites Project on CCWD operations. CCWD was particularly concerned about salinity degrading the water quality at CCWD's intakes and raised concerns with the Water Availability Analysis (WAA) associated with the Authority's water right application.

As described in the Authority's response memo, a thorough analysis of potential water quality impacts, including those related to salinity, was included in Chapter 6, Surface Water Quality in the Final EIR/EIS. In addition, changes in Delta salinity were analyzed and described in detail in Section 6.4. CCWD's comment related to the WAA associated with the Authority's water right application is not relevant to the water quality impacts evaluated in the Final EIR/EIS.

EPA expressed concerns related to project operations and coordination with major water projects. In addition, EPA offered several recommendations related to the NEPA and Clean Water Act (CWA) analysis, mitigation, and implementation.

As described in the Authority's response memo, EPA's concerns about project operations and coordination with major water projects were addressed in the Final

EIS/EIR. EPA's recommendations were considered and may be implemented, where feasible. In keeping with Reclamation's practice, should changes occur to the project that could result in new or greater effects than previously disclosed, Reclamation would supplement its NEPA analysis and other environmental compliance documentation, as appropriate.

The Yocha Dehe Tribe raised concerns about the level of detail in the project description, the analysis of impacts on tribal cultural resources, and the proposed mitigation measures associated with impacts to tribal cultural resources.

As described in the Authority's response memo, Chapter 2 of the Final EIS/EIR provides a comprehensive description of the proposed Project and its alternatives, detailing identified reservoir sizes, physical facilities, diversion criteria, and Federal investment levels. Chapter 23 of the Final EIS/EIR includes a specific evaluation of the potential impacts to tribal cultural resources and identifies extensive mitigation measures.

Yolo County expressed concerns regarding the Project description, the reasonable range of alternatives, the necessity, ecological value, and operation of water releases into the Yolo Bypass via the Colusa Basin Drain, and the methods and effects of construction of the Dunnigan Pipeline.

As described in the Authority's response memo, a detailed and consistent description of the Project and alternatives is provided in Chapter 2, an alternatives screening and evaluation is provided in Appendices 2A and 2B, and the methods for and effects of construction of the Dunnigan Pipeline are included in the Final EIS/EIR. The information in the Final EIS/EIR is adequate to support the NEPA analysis and conclusions.

Endangered Species Act

Reclamation and the Authority coordinated with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) on the timing and approach to the Endangered Species Act (ESA) Section 7 consultation for construction and operation of the Project.

Construction

In a memo dated November 15, 2023, Reclamation initiated formal consultation for construction of the Sites Reservoir Project with USFWS pursuant to Section 7(a)(2) of the ESA (16 USC § 1536). Reclamation determined that the Project *may affect but is not likely to adversely affect* the following species and their habitat: Keck's checkermallow

(*Sidalcea keckii*), Palmate-bracted bird's beak (*Cordylanthus palmatus*)³, Greene's tectoria (*Tectoria greenei*) and Hoover's spurge (*Chamaesyce hooveri*), and that the project *may affect and is likely to adversely affect* the following species and their habitat: giant garter snake (*Thamnophis gigas*), monarch butterfly (*Danaus plexippus*), northwestern pond turtle (*Actinemys marmorata*), Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (*Branchinecta lynchi*) and vernal pool tadpole shrimp (*Lepidurus packardi*), and western spadefoot (*Spea hammondii*). There is no critical habitat within the Project Action Area for the aforementioned species.

A Biological and Conference Opinion for Construction of Sites Reservoir was issued on July 16, 2025 (Service File No 2024-0125050-S7-001). The Construction Biological and Conference Opinion contains a mix of standard consultation and framework programmatic consultation. The Section 7 consultation analyzes the effects of the Project's construction activities, geotechnical investigations, and inundation, and includes conservation measures and mitigation details for the selected alternative. All activities under the framework programmatic approach will be subject to a subsequent consultation in order to proceed.

Operations

The effects of Sites Reservoir operations were included programmatically in the current Reinitiation on Consultation of the Long-Term Operations of the Central Valley Project and State Water Project Biological Opinions (LTO BO; 2024; Service File No. 2022-0059509 and NMFS No: WCRO-2024-02917). The use of a mixed programmatic framework consultation for this Project provides information, to the extent possible given the information available at the time of consultation, to assess how the Project would operate and broadly assess the impacts of the operations of Sites Reservoir within the context of the LTO Proposed Action. The use of a mixed programmatic framework consultation for the Project provides information, to the extent possible, on how this key Project would be implemented in conjunction with the LTO operations in the future and will support subsequent regulatory processes and coordinated operations planning. Project-specific operational effects analysis for the Sites Reservoir may include: (1) diversions to Sites Reservoir, including resulting operating criteria and diversion criteria, (2) water releases from Sites Reservoir, (3) exchanges⁴ with Shasta Reservoir and Lake Oroville (4) flood control benefits, (5) operation of facilities to meet

³ This species was federally listed under the scientific name *Cordylanthus palmatus* but, palmate-bracted bird's beak was since renamed to *Chloropyron palmatum*.

⁴ These exchanges would be at the sole discretion of Reclamation and DWR, respectively.

Division of Safety of Dams criteria and requirements for emergency reservoir drawdown, and (6) the generation of energy in operations and use of energy for operations.

Indian Trust Assets

As described in Chapter 29 of the EIS, there are no Indian Trust Assets (ITA) within the construction or inundation footprint of any of the action alternatives. The Paskenta Rancheria near Black Butte Reservoir is the nearest ITA to the Selected Alternative. It is approximately 8 miles away and would not be affected by construction activities; therefore, there is no potential for ITAs to be affected by the construction of the Selected Alternative.

The Selected Alternative would not affect the operation of the Trinity River Division or the Lower Klamath River that serve ITAs and would not cause a reduction in SWP or CVP water deliveries to municipal water users that may serve ITAs. Although flows may change in several rivers (e.g., Sacramento, Feather, and American Rivers) under the Selected Alternative, the flows would be within the historical range experienced by the rivers, similar to the No Action Alternative and would not result in substantial adverse effects on Indian fishing resources. In addition, pulse flow protection measures and minimum flow criteria at Wilkins Slough will further reduce potential effects on juvenile salmonids. The modeled changes in flood flows during operations are minor when considered in the context of the larger system and would not represent a substantial increase in the amount or rate of runoff that would result in flooding or alter natural river geomorphic processes or existing geomorphic characteristics as compared to the No Action Alternative. Accordingly, potential adverse changes in erosion or quality of land trust assets are not expected under the Selected Alternative.

Based on the nature of the planned construction work and operational modeling results for the Selected Alternative, it does not appear that the Project will impact Indian hunting or fishing resources or water rights nor is the proposed activity on actual Indian lands. It is reasonable to conclude that construction of the Selected Alternative will not have any impacts on ITAs and operation of the Selected Alternative will not have any adverse impacts on ITAs.

National Historic Preservation Act

Reclamation is responsible for complying with 54 U.S.C. § 306108, commonly known as Section 106 of the National Historic Preservation Act. Reclamation determined that the Project constitutes an undertaking as defined in 36 CFR § 800.16(y) and may comprise

activities that have the potential to cause effects on historic properties under 36 CFR § 800.3(a). A preliminary review of potential impacts to cultural resources identified through limited investigations for early designs of the Sites Reservoir Project and reviews of additional existing identification efforts within the broader project footprint indicate that construction of the Sites Reservoir Project may result in adverse effects on historic properties, including prehistoric and historic-era archaeological sites, components of the built environment, and Native American traditional cultural properties.

Although Reclamation determined that the implementation of the undertaking may adversely affect historic properties listed or eligible for listing in the National Register of Historic Places, in accordance with 36 CFR § 800.14(b)(1), the full effects to historic properties cannot be determined prior to the approval of the proposed action. In a letter dated May 28, 2021, Reclamation initiated consultation with the State Historic Preservation Officer (SHPO) notifying her of Reclamation's intent to negotiate a programmatic agreement (PA) to govern the implementation of the Sites Reservoir Project and inviting her participation in its development.

Reclamation has consulted with the Advisory Council on Historic Preservation, the USACE, Native American tribes, and other potential consulting parties to notify them of the Project and invite them to participate in the development of the PA. Specifically identified were the Colusa Indian Community Council (Cachil Dehe), the Kletsel Dehe Band of Wintun Indians, the Estom Yumeka Maidu Tribe of the Enterprise Rancheria, the Grindstone Rancheria of Wintun-Wailaki, the Mechoopda Indian Tribe of Chico Rancheria, the Paskenta Band of Nomlaki Indians, the United Auburn Indian Council, the Shingle Springs Band of Miwok Indians, and the Yocha Dehe Wintun Nation as Indian tribes who might attach religious and cultural significance to historic properties in the Project area. Further, having some jurisdictional influence over the APE, the four underlying counties (Tehama, Glenn, Colusa, and Yolo) were invited to consult. Finally, seven regional and local historical and genealogical societies and museums that might have a vested interest in the Project were identified and invited. These are the Colusa County Genealogical Society, Colusa County Historical Society, Sacramento Valley Museum, Stonyford Museum, Tehama County Genealogical & Historical Society, Willows Museum, and the Yolo County Historical Society.

In a letter dated March 3, 2022, Reclamation presented the SHPO the first draft of the PA requesting comments and continued participation. As the Area of Potential Effects (APE) is not yet fully developed, the PA will allow Reclamation to use a phased process to conduct identification and evaluation efforts pursuant to 36 CFR § 800.4(b)(2). The PA defines the roles and responsibilities of all signatories and allows for the continued participation of Indian Tribes and interested parties through the consultation process.

Further, it provides for procedures for the phased identification of historic properties within the area of potential effects, the phase assessment of effects for said properties, and the resolution of adverse effects as appropriate. Reclamation signed the PA on September 19, 2025. Reclamation requested signature of the PA from all consulting parties on October 2, 2025.

Environmental Commitments

Reclamation and the Authority have adopted all practicable means to avoid, minimize, and compensate for potential adverse environmental effects caused by the Project and are committed to implementing the measures identified in the Final EIS/EIR, as well as those identified through consultation with resource agencies and tribes. Environmental commitments for the Project included mitigation measures related to surface water quality, vegetation and wetlands, wildlife and aquatic biological resources, geology, agriculture and forestry, air quality, cultural resources, air quality and emissions, and socioeconomics. Attachment A to this ROD is a Mitigation, Monitoring, and Reporting Program which organizes the environmental commitments from the Final EIS/EIR by resource category, and identifies the implementation action, responsible party for implementation, and reporting schedule.

ATTACHMENT A
RECORD OF DECISION, SITES RESERVOIR PROJECT:
MITIGATION MONITORING AND REPORTING PROGRAM