State Water Resources Control Board

October 20, 2025

Andrew M. Hitchings
Attorney for Sites Project Authority
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Re: The Administrative Hearings Office directs the Sites Project Authority to submit CalSim 3 modeling results and any accompanying documentation for Sites Reservoir

Dear Mr. Hitchings,

By this letter, the AHO directs the Sites Project Authority (Authority) to submit CalSim 3 modeling results that incorporate the operating conditions identified in the operations incidental take permit (ITP) for Sites Reservoir issued by the California Department of Fish and Wildlife in October 2024. The results and any accompanying documentation shall be submitted to the AHO by November 3, 2025.

By letter dated September 10, 2025, counsel for Friends of the River, California Sportfishing Protection Alliance, Sierra Club, and Save California Salmon informed the AHO that the Authority had conducted analyses of the operational effects of the ITP on Sites, the Central Valley Project (CVP), and the State Water Project (SWP) using the CalSim 3 model. The letter requested that the AHO: (1) order the Authority to provide the updated modeling and (2) provide opportunity for cross-examination of knowledgeable witnesses about the updated modeling. The Authority's September 12, 2025 response did not dispute the availability of CalSim 3 modeling with operational constraints imposed by the 2024 ITP for the proposed Sites Reservoir Project. The letter asserted that CalSim 3 modeling is not necessary for the Board to decide whether to approve the Authority's water right application because other relevant evidence is already included in the record.

The administrative record contains testimony and other evidence based on CalSim II model runs. The Authority's Final Environmental Impact Report and water availability analysis (WAA) both rely on the CalSim II model. However, there are no CalSim II analyses or results in the record that incorporate the operational limitations imposed by the 2024 ITP. In December 2024, the Authority submitted supplemental expert witness testimony and exhibits based on an updated Historical Tool that incorporated the 2024 ITP requirements. The Historical Tool does not incorporate criteria other than flows at the points of diversion that affect project operations, such as Sites Reservoir carryover

storage, reservoir release operations, and the ability to export released water through SWP and CVP facilities. Therefore, that analysis does not provide the system-wide perspective provided by a CalSim analysis. The results of a CalSim analysis would provide information about the effect of ITP criteria on Delta outflows, annual project yield, and deliveries in relation to the CVP and SWP operations and other regulatory limitations, which will assist the Board in determining whether and under what conditions to approve the proposed Sites Reservoir Project. CalSim 3 is the most recent version of the CalSim model and incorporates various improvements and enhancements to CalSim II. Therefore, CalSim 3 model results would be expected to provide the best available representation of Sites operations.

Because it is my understanding that the Authority has conducted such an analysis, the results of which would assist the Board in its consideration of the Authority's water right application and appropriate terms and conditions on any approval, I am directing the Authority to submit those results for inclusion in the evidentiary record for this proceeding.

The CalSim 3 modeling results of Sites operations with the ITP shall be submitted with a comparable level of detail and format to that used in Exhibit AHO-043. The analysis must report diversion volumes, deliveries, and changes to Delta outflow with operation of the project compared to the CalSim 3 baseline. Results should be provided for each water year in the period of record evaluated; the range, average, and probability of exceedance statistics for the full period of record evaluated; and the average, minimum, and maximum values for each metric for each water year type based on the Sacramento River Index described in D-1641. The Authority shall document and submit to the AHO the changes in modeling assumptions or parameters that were made to model operations of Sites Reservoir with the ITP constraints in the CalSim 3 model runs.

After submission of the additional model results and supporting documentation, the AHO will consider whether to allow or require testimony related to the additional evidence. Parties will have until November 21, 2025, to submit any such request.

Sincerely,

Nicole Kuenzi
Presiding Hearing Officer
Administrative Hearings Office
State Water Resources Control Board

Attachments:

- Attachment 1 – Service List

ATTACHMENT 1
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