



# FRIENDS OF THE RIVER

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Delivered via email

To: Hon. EPA Administrator, Michael Regan [Regan.Michael@epa.gov](mailto:Regan.Michael@epa.gov)

Director of EPA's WIFIA loan program, Jorianne Jernburg [Jernberg.jorianne@epa.gov](mailto:Jernberg.jorianne@epa.gov)

Dear Administrator Regan and Director Jernberg,

We write to you today to bring your attention to a new scientific report estimating the greenhouse gas emissions from the Sites Reservoir Project in California. The study found that the Sites Reservoir Project would emit 362,000 metric tons of CO<sub>2</sub>e/year – predominantly methane – and that over the 100-year lifecycle of the project, it would emit 36.2 million metric tons of CO<sub>2</sub>e.

The full report, titled “**Estimate of Greenhouse Gas Emissions for the Proposed Sites Reservoir Project Using the All-Res Modeling Tool**”, is [posted here](#)<sup>1</sup>.

As you know, in March of 2022, the EPA announced that the proposed Sites Reservoir Project was invited to apply for a \$2.2 billion loan from the EPA's Water Infrastructure Finance and Innovation Act (WIFIA) program<sup>2</sup>, and the Project is currently listed as a “pending” project on your website<sup>3</sup>.

The findings in the All-Res Modeling Tool report underscore the unsuitability of the Sites Reservoir project for a WIFIA EPA loan, particularly given the Biden Administration's efforts to reduce climate pollution through the “Methane Emissions Reduction Action Plan.”<sup>4</sup>

While the methane emissions caused by dams and reservoirs may not be widely recognized by the public and decision-makers, it is a field of research and recognition that the EPA itself is helping to lead nationally and internationally. EPA's decision in 2022 to report greenhouse gas emissions from U.S. reservoirs to the UNFCCC using IPCC guidelines<sup>5</sup> was a breakthrough moment for this growing scientific realization, but it seems not to have yet affected loan decisions about dam and reservoir projects despite the significant climate emissions impacts.

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<sup>1</sup> <https://telledamtruth.com/wp-content/uploads/2023/08/Sites-Reservoir-Project-ect-Emissions-V4.pdf>

<sup>2</sup> <https://www.epa.gov/system/files/documents/2022-03/sites-reservoir-jpa.pdf>

<sup>3</sup> <https://www.epa.gov/wifia/wifia-pending-loans>

<sup>4</sup> <https://www.whitehouse.gov/briefing-room/statements-releases/2022/01/31/fact-sheet-biden-administration-tackles-super-polluting-methane-emissions/>

<sup>5</sup> <https://www.watereducationcolorado.org/fresh-water-news/opinion-thank-you-epa-for-reporting-greenhouse-gas-emissions-from-dams-and-reservoirs-to-the-u-n/>

As you may be aware, Patagonia, Save The Colorado, and Earthjustice submitted a formal petition to you last year requesting that the EPA add dams and reservoirs to the EPA's "Greenhouse Gas Reporting Program", a petition supported by over 125 environmental organizations<sup>6</sup>.

The All-Res Modeling Tool was developed by a team of scientists at Tell The Dam Truth. **All-Res calculates the total carbon footprint over the lifecycle of a dam and reservoir system.** The Tool is an advancement over existing modeling efforts used to estimate GHG emissions from reservoir systems because All-Res includes all of the greenhouse gas emission source categories documented in peer-reviewed scientific literature attributable to any dam and reservoir system including hydropower facilities. You can read more about [All-Res here](#)<sup>7</sup>.

The Tool uses data provided by public sources including the Revised Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement for the proposed Sites Reservoir (USBR, 2021) to calculate the total carbon footprint over its entire lifecycle.

We bring your attention to the fact that, in 2018, the EPA analyzed the Sites Reservoir and provided comments on the Draft Environmental Impact Statement<sup>8</sup>, but those comments neglected to analyze, discuss or address the GHG emissions caused by the Project.

Given that the scope of emissions – principally methane – estimated from the Sites Reservoir Project are very large, we request that you consider these results when evaluating this project and not proceed with a WIFIA loan.

We are happy to discuss this report at any time. Feel free to contact us.

Sincerely,

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<sup>6</sup> <https://telltthedamtruth.com/over-one-hundred-twenty-five-groups-petition-epa-to-report-ghg-emissions-from-dams-reservoirs/>

<sup>7</sup> <https://telltthedamtruth.com/all-reservoir-greenhouse-gas-model/>

<sup>8</sup> [https://www.epa.gov/sites/default/files/2018-05/documents/eis20170160-deis-sites\\_reservoir\\_project-2018-01-12.pdf](https://www.epa.gov/sites/default/files/2018-05/documents/eis20170160-deis-sites_reservoir_project-2018-01-12.pdf)