

Common Response 7.10

Greenhouse Gas Emissions and Mitigation

Introduction

This introduction provides important context to this common response. A similar introduction is provided in each common response to ensure that the reader has the appropriate context when reviewing common responses. For ease of reference, a table of contents is included after this introduction to guide readers to specific subject areas.

Protecting the San Francisco Bay/Sacramento-San Joaquin Delta (Bay-Delta) watershed and its many beneficial uses of water is one of the State Water Resources Control Board's (State Water Board) primary responsibilities and top priorities. In response to declines of several native aquatic species since the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed (Bay-Delta Plan or Plan) was last comprehensively updated, the State Water Board commenced a process to update the Bay-Delta Plan for the Sacramento River and its tributaries, Delta eastside tributaries (including the Calaveras, Cosumnes, and Mokelumne Rivers), and Delta for the reasonable protection of fish and wildlife beneficial uses, referred to as the Sacramento/Delta Update to the Bay-Delta Plan. The Bay-Delta Plan identifies beneficial uses of water to be protected in the Bay-Delta watershed, water quality objectives and program of implementation to achieve the reasonable protection of those beneficial uses, monitoring, evaluation, and special study provisions. The State Water Board's proposed action to update the Bay-Delta Plan is supported by a Staff Report/Substitute Environmental Document (Staff Report), which provides an evaluation of the environmental impacts and economic effects in support of consideration of different alternatives to update the Bay-Delta Plan to achieve reasonable protection of fish and wildlife beneficial uses in the Sacramento/Delta. The Staff Report is functionally equivalent to an Environmental Impact Report under the California Environmental Quality Act (CEQA) but also provides the additional analyses that support the State Water Board's consideration of the action under the Clean Water Act and Porter-Cologne Water Quality Control Act (Porter-Cologne Act).

Development of the final Staff Report and final draft Bay-Delta Plan were informed by several opportunities for public comment over multiple years. This common response may address issues that were raised during any of those public comment periods. In September 2023, the State Water Board released the 2023 draft Staff Report evaluating different alternatives for the Sacramento/Delta Update to the Bay-Delta Plan for public review and comment. Following release of the 2023 draft Staff Report, the State Water Board released draft amendments to the Bay-Delta Plan in October 2024 (2024 draft Plan) for public review and comment that incorporated alternatives identified in the 2023 draft Staff Report with revisions based on public comments. The State Water Board released revised draft Plan updates in July 2025 (July 2025 revised draft Plan) but delayed public comment on that version of the Plan pending further updates, though some parties did submit public comments on the July 2025 draft that are part of the State Water Board's response to comments. In December 2025, the State Water Board released Chapter 13, *Revised Proposed Plan Amendments*, as a limited recirculation of the 2023 draft Staff Report (2025 partially recirculated draft Staff Report) together with the December 2025 revised draft Plan for public review and comment. These documents reflect the updated proposed project, referred to as the revised proposed Plan amendments, which brings together in the Bay-Delta Plan program of

implementation a voluntary agreement (VA) pathway that incorporates commitments identified in the Healthy Rivers and Landscapes (HRL) proposal and would apply to specified HRL water rights, and a regulatory pathway based on the proposed Plan amendments that would apply to other water rights and to any HRL water rights no longer covered under the VA pathway. In August 2026, the State Water Board released a final draft Bay-Delta Plan that included refinements to the revised proposed Plan amendments based on public comments received on the December 2025 revised draft Plan. At the same time, the State Water Board released this final Staff Report, including responses to comments previously received on the draft Staff Report. The final Staff Report informs the State Water Board's consideration of adoption of the Sacramento/Delta updates to the Bay-Delta Plan.

With respect to the CEQA impact conclusions, it is important that they be understood in the context of the overall nature of the proposed project, which is intended to be an environmental restoration action. CEQA only considers changes that could negatively impact the existing environment and does not recognize or offset negative changes with improvements that could result from an environmentally beneficial project. Here, the impacts that could potentially result from implementation of the restoration action occur in a system that has been highly altered, and the project would be expected to improve conditions for native fish and wildlife in the Sacramento/Delta watershed over time. However, the project will also result in changes in hydrology and changes in water supply that could result in some potentially significant adverse environmental impacts at certain times and locations that must be analyzed under CEQA. These potentially significant environmental impacts should be viewed in light of the overall purpose and goals of the Sacramento/Delta update to the Bay-Delta Plan.

The State Water Board reviewed all comments on the Staff Report for the proposed Sacramento/Delta update to the Bay-Delta Plan and developed this common response to address recurring comments and common themes with respect to greenhouse gas (GHG) emissions. Most comments were focused on the potential impacts of the proposed Plan amendments that are described in Chapter 7, *Environmental Analysis*, of the 2023 draft Staff Report.

This common response addresses the following two topics:

- Quantification and analysis of GHG emissions from reduced hydropower generation.
- Mitigation of GHG emissions from changes in groundwater pumping.

Staff Report Section 7.10, *Greenhouse Gas Emissions*, describes potential impacts and mitigation measures from GHG emissions impacts that may result from changes in hydrology or changes in water supply. The Staff Report concludes that changes in hydrology under the proposed Plan amendments could result in GHG emissions at natural-gas facilities to compensate for the estimated reductions in hydropower. However, emissions from displaced purchases of hydropower within the state's electric grid would achieve carbon neutrality by 2045, pursuant to regulatory mandates for expanding power procured from renewable resources. Prior to 2045, fossil-fueled electric generating facilities that increase production to replace lost hydropower would be required to purchase emissions allowances under the California cap-and-trade program, which will ensure emissions do not conflict with the state's near-term GHG reduction goals. Thus, reduced hydropower generation would not have a significant GHG impact.

Several comments express concern that the quantification of GHG emissions from reduced hydropower generation did not account for the timing and magnitude of substitute generation. Because the statewide electric grid is a mix of renewable and non-renewable resources, the

emissions intensity of power generation varies substantially during each day and season. Thus, the comments argue that GHG emissions from reductions in hydropower should be quantified using an alternative method that accounts for the timing of generation.

With respect to GHGs from changes in groundwater pumping, the Staff Report concludes that emissions would be potentially significant. While it is currently unknown what types of pumps (e.g., electric, diesel, gas, other fuel) would be used to pump groundwater, increased use of diesel or other fossil fuel pumps would result in emissions that could cumulatively affect GHG emissions across the study area. These emissions would affect the state's ability to meet its 2030 and 2045 GHG reduction goals. The Staff Report identifies Mitigation Measures MM-GHG-a and MM-GHG-b to reduce the severity of GHG impacts. Mitigation Measure MM-GHG-a requires implementation of water use efficiency, water conservation, energy efficiency, and irrigation system management strategies. Mitigation Measure MM-GHG-b requires compliance with applicable air quality plans, programs, rules, and regulations and promotes use of renewable energy sources to minimize GHG emissions.

A few comments assert that Mitigation Measures MM-GHG-a and MM-GHG-b do not adequately compensate for GHG emissions that would be generated from changes in groundwater pumping resulting from implementation of the proposed Plan amendments. The comments state that the measures focus on water conservation, which is already being pursued by various water agencies throughout the state. Another comment claims that Mitigation Measures MM-GHG-a and MM-GHG-b are deficient because the 2023 draft Staff Report does not state if the measures are feasible or enforceable.

The reoccurring comment themes related to GHG emissions quantification from reduced hydropower generation and mitigation of emissions from changes in groundwater pumping are addressed in the following sections. Refer to Common Response 7.8, *Energy and Hydropower*, for additional information regarding hydropower generation. Comments concerning more general issues related to mitigation measures are addressed in Common Response 7.1, *General CEQA and Approach to the Analysis*.

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GHG Emissions from Reduced Hydropower Generation

Some comments expressed concern with the methodology used to quantify GHG emissions from reduced hydropower generation. As explained in Impact GHG-a in Sections 7.10, *Greenhouse Gas Emissions*, 9.7.10, *Greenhouse Gas Emissions*, and 13.7.10, *Greenhouse Gas Emissions*, of the final Staff Report, the revised proposed Plan amendments could change the amount and timing of flows in the Sacramento River watershed and Delta eastside tributaries regions, which could alter the production of hydropower generation. Electricity generating units throughout the state may therefore need to increase production to compensate for reduced hydropower electricity generation and meet electricity demands from end-users. While additional electricity may be produced by renewable energy facilities (e.g., solar and wind facilities), which do not generate any GHG emissions, the Staff Report conservatively assumes that all displaced hydropower generation resulting from implementation of the revised proposed Plan amendments would be supplied by natural-gas facilities.

GHG emissions associated with replacement natural-gas power were estimated using annual emission factors from the U.S. Environmental Protection Agency's (USEPA) Emissions and Generation Revenue Integrated Database (eGRID) for the California/Mexico portion of the Western Electricity Coordinating Council (CAMX). eGRID is the preeminent source of emissions data for the electric power sector and is cited by numerous emission inventory and registry protocols, including California's Mandatory GHG emissions reporting program under Assembly Bill 32 and The Climate Registry's General Reporting Protocol (USEPA 2024a). The California Air Resources Board (CARB), Climate Registry, and Climate Action Reserve also all cite eGRID as the recommended tool to estimate GHG emissions from electricity purchases (or reductions) in the United States (USEPA 2024b). Annual eGRID emission factors are based on available plant-specific data for all electricity generating plants that provide power to the electric grid and report data to the Energy Information Administration (USEPA 2024a). The annual factors account for emissions generated by individual facilities, and thus reflect environmental, regulatory, and economic considerations that influence facility operations and their associated emissions intensities over a single year.

Because the annual eGRID emission factors are averaged over a year, some commenters asserted that the factors do not provide sufficient resolution to accurately estimate GHG emissions from reduced hydropower generation resulting from implementation of the revised proposed Plan amendments. Specifically, comments argue that while annual emission factors can be used to capture differences in the long-term net magnitude of emissions from the consumption or reduction of electricity, they can diminish the influence of hourly, daily, and seasonal factors that can affect the mix of generating resources and grid emissions. In their comment letter, the Western Area Power Administration (WAPA) provided a spreadsheet tool and proposed methodology to calculate GHG emissions from reductions in hydropower generation using representative 24-hour generation profiles and hourly grid emission factors. Suggestions from this comment letter were used to perform an alternative emissions evaluation that applied monthly and water year type variations in fossil fuel use and a marginal emissions factor to the estimated hydropower effects of the revised proposed Plan amendments. The following steps were taken:

- Emission factors from WAPA that vary by month and water year type based on California Independent System Operator (CAISO) data (WAPA-SNR 2024) were used to determine factors applicable to all months of the 1922–2015 Sacramento Water Allocation Model (SacWAM) runs. These factors indicate the percent increase or decrease in carbon dioxide (CO₂) emissions for a given month relative to average emissions.

- These factors were applied to the monthly changes in hydropower generation calculated for the flow scenarios described in Section 7.8, *Energy*. The adjusted hydropower values do not represent a change in hydropower effects but instead are used to increase or decrease the emissions associated with the changes in the hydropower values. The analysis was not performed on an hourly basis because the hydropower calculations are based on monthly SacWAM results. (Also, see Common Response 7.8, *Energy and Hydropower*, regarding increases in hydropower peaking operations in response to reductions in water storage).
- The scaled hydropower generation values were multiplied by the average CO₂ emissions factor suggested by WAPA, which was the CO₂ emission factor for marginal generation of electricity estimated by the California Public Utilities Commission (CPUC) (WAPA-SNR 2024). The marginal factor is the rate of emissions associated with ramping up electricity generation, which typically occurs at facilities with flexible and more costly operations, particularly natural gas facilities. The marginal grid emission factor recommended by WAPA was 0.376 metric tons CO₂ per megawatt-hour (MWh), whereas the eGRID natural gas facility emission factor used in the Staff Report analysis, which assumes that all reductions in hydropower generation would be compensated by increased generation at natural gas facilities, is 0.406 metric tons CO₂ per MWh.

The resulting net change in power generation and GHG emissions are presented in Table CR 7.10-1 in terms of gigawatt-hours (GWh) and metric tons of CO₂ per year, respectively. The results are presented for informational purposes in response to comments received on the draft Staff Report.

Table CR 7.10-1. Replacement Power due to Reductions in Hydropower Generation: Comparison of Net Annual Hydropower Generation and GHG Emissions from the Staff Report (as corrected) and Calculated Using Alternative Methodology (metric tons CO₂ per year)

Flow scenario	Net Reduction in Hydropower (GWh/year) ^a		Net Increase in CO ₂ (metric tons/year) ^a	
	Table A5-8 of the Staff Report	Alternative Method ^b	Corrected Table 7.10-2 of the Staff Report ^c	Alternative Method ^d
35 Scenario	-141	-151	57,421	56,853
45 Scenario	-257	-290	104,435	109,129
55 Scenario	-413	-484	167,765	181,906
65 Scenario	-649	-753	263,569	282,957
75 Scenario	-1,149	-1,266	466,787	475,966

^a Values are net from baseline condition.

^b With the alternative method, the reductions in hydropower generation are increased to account for seasonal and water-year type differences in replacement emissions.

^c GHG emissions were estimated by multiplying the eGRID CO₂ emission factor for natural-gas facilities by the net change in hydropower generation (Table A5-8 of the Staff Report). Refer to Impact GHG-a in Staff Report Section 7.10, *Greenhouse Gas Emissions*.

^d GHG emissions were estimated by multiplying WAPA's suggested average marginal CO₂ emission factor by the net change in hydropower generation that was adjusted to account for seasonal and water-year type differences in replacement emissions.

In the process of estimating GHG emissions using the alternative emissions methodology, it was determined that GHG emissions presented in Table 7.10-2 of the 2023 draft Staff Report were inadvertently quantified using the reduction in energy at only small hydropower facilities (i.e., Table A5-9 in Appendix A5, *Hydropower, Energy Grid, and Export Energy Analyses*). Table 7.10-2 of the 2023 draft Staff Report has been corrected to present emissions estimates from replacement power due to reductions in total hydropower generation (i.e., Table A5-8 in Appendix A5). The emissions were estimated using the eGRID natural gas emission factor, as described above and under Impact

GHG-a of the Staff Report. The corrected GHG emissions estimated using the eGRID factor are also presented in Table CR 7.10-1 for comparison to the emissions estimates calculated using the alternative approach.

Table CR 7.10-2 below presents the absolute and percent change in power generation and GHG emissions between the Staff Report (as corrected) and alternative method.

Table CR 7.10-2. Replacement Power due to Reductions in Hydropower Generation: Absolute and Percent Change in Net Annual Hydropower Generation and Net GHG Emissions between the Staff Report (as corrected) and as Calculated Using the Alternative Method

Flow scenario	Equivalent Reduction in Hydropower (Alternative Method vs. Table A5-8 of the Staff Report) ^a		Difference in CO ₂ (Alternative Method vs. Corrected Table 7.10-2 of the Staff Report) ^b	
	Absolute (GWh/yr equivalent)	Percent Change	Absolute (CO ₂ /yr)	Percent Change
35 Scenario	10	7%	-568	-1%
45 Scenario	33	13%	4,693	4%
55 Scenario	71	17%	14,142	8%
65 Scenario	104	16%	19,389	7%
75 Scenario	117	10%	9,178	2%

^a These values show the effect of seasonal and water-year type differences in emissions in terms of equivalent reductions in hydropower generation (e.g., under the 45 scenario, emissions would be 13 percent greater than the approach used in the Staff Report if adjustments were based solely on the seasonal and water-year type differences in emissions).

^b These values account for both the effect of seasonal and water-year type differences in emissions and the difference between the average marginal emissions factor suggested by WAPA and the emission factor used in the Staff Report.

As shown in Table CR 7.10-1, using the eGRID CO₂ emission factor for natural-gas facilities to quantify GHG emissions from changes in hydropower under the revised proposed Plan amendments results in a net increase of 104,435 to 263,569 metric tons CO₂ per year (45 to 65 scenarios) (see Table CR 7.10-1). Using the alternative method results in a net increase of 109,129 to 282,957 metric tons CO₂ per year (45 to 65 scenarios).

Compared to the Staff Report (as corrected), the alternative method results in higher emissions estimates under the 45 to 65 flow scenarios—as shown in Table CR 7.10-2, CO₂ emissions are 4,693 to 19,389 metric tons (45 to 65 scenarios) greater under the alternative method. This increase in emissions represents the net result of implementing two recommendations from WAPA: accounting for seasonal changes in emissions, which increases the estimated emissions, and using a marginal emissions factor, which decreases the estimate emissions. As discussed above and in Section 7.10, *Greenhouse Gas Emissions*, the Staff Report assumes all replacement power will be met by natural-gas facilities, instead of a mix of marginal generating units.

While there are alternative methods to estimate GHG emissions from reduced hydropower generation, the quantified result under differing methods would not change the impact finding of the Staff Report. Likewise, the magnitude of estimated emissions has no bearing on the impact finding. This is because the Staff Report does not use a numeric threshold (e.g., metric tons CO₂e) to evaluate the significance of changes in hydropower on GHG emissions. Impact GHG-a recognizes the variability of the state power grid and acknowledges that many factors can influence the magnitude of GHG emissions from electricity consumption, as evidenced by the exercise presented above in Tables CR 7.10-1 and CR 7.10-2. Thus, the impact of reduced hydropower generation evaluated

under Impact GHG-a is based on whether the revised proposed Plan amendments would conflict with the state's GHG reduction trajectory.

As explained for Impact GHG-a in Staff Report Section 7.10, *Greenhouse Gas Emissions*, regulatory mechanisms exist to reduce GHG emissions from reductions in hydropower generation resulting from implementation of the revised proposed Plan amendments. The California cap-and-trade program ensures that emissions from reduced hydropower generation statewide would comply with the state's 2030 GHG reduction goal. The state's Renewables Portfolio Standard (RPS) requires state agencies to rely on 100 percent renewable energy and zero-carbon resources to serve their own facilities by 2030, and the statewide grid to achieve carbon neutrality by 2045. Thus, while replacement hydropower resources required under the revised proposed Plan amendments could result in increased emissions in the near-term, emissions would decline consistent with the state's GHG reduction trajectory. This conclusion is reached regardless of the quantification method or magnitude of estimated GHG emissions.

GHG Mitigation for Changes in Groundwater Pumping

Some comments assert that Mitigation Measures MM-GHG-a and MM-GHG-b are deficient because they include strategies that do not relate to groundwater pumping or are already being implemented by agency plans, policies, or regulations. Some comments also state that the 2023 draft Staff Report does not address whether the measures are feasible, enforceable, or would create secondary impacts.

CEQA requires lead agencies to propose and describe mitigation measures that will minimize the significant environmental effects that the environmental impact report has identified. (Pub. Res. Code, § 21100, subd. (b)(3); Cal. Code Regs., tit. 14, § 15126, subd. (e).) Mitigation measures must be feasible and enforceable. (Cal. Code Regs., tit. 14., § 15126.4, subds. (a)(1) & (a)(2).) "Feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Res. Code, § 21061.1.) "CEQA does not require analysis of every imaginable alternative or mitigation measure; its concern is with feasible means of reducing environmental effects." [Citation and italics omitted.] (*Concerned Citizens of South Central L.A. v. Los Angeles Unified School Dist.* (1994) 24 Cal.App.4th 826, 841.)

Impact GHG-a in Section 7.10, *Greenhouse Gas Emissions*, concludes that, depending on the extent of groundwater pumping, the combined emissions level from increases in fossil-fuel groundwater pumping in the study area could exceed the threshold of significance used in the analysis, resulting in a potentially significant impact. Impact GHG-b further finds that these emissions could hinder attainment of the state's near-term (2030) and long-term (2045) GHG reduction goals, resulting in a significant impact with respect to conflicts with GHG reduction plans. The Staff Report explains that multiple relevant GHG mitigation measure guidance documents and agency best practices were reviewed to determine if any measures could be identified and proposed to reduce these GHG impacts potentially resulting from the revised proposed Plan amendments. Impact GHG-a specifically cites the following documents:

- California Air Pollution Control Officers Association's (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers* (Handbook)

- Department of Water Resources' *Climate Action Plan*
- State Water Board's Resolution No. 2017-0012: Comprehensive Response to Climate Change
- USEPA's *Water Conservation Plan Guidelines*
- USEPA's *Energy Efficiency in Water and Wastewater Facilities*

Twenty-one strategies from the reviewed documents are listed in Mitigation Measure MM-GHG-a as example measures relevant to water use efficiency; water conservation; energy efficiency; irrigation efficiency; and restoration, pricing strategies, and mitigation credits (see Section 7.10.5, *Mitigation Measures*). The measure also requires implementation of Mitigation Measures MM-EN-a-e: 1–6 in Section 7.8, *Energy*, and Mitigation Measure MM-GHG-b, which requires facility compliance with GHG plans, programs, rules, and regulations and implementation of DWR's Renewable Energy Procurement Plan.

As explained in Section 7.10.2, *Environmental Setting*, GHG emissions are global pollutants and the effects of GHG emissions on the environment are the result of individual contributions of countless past, present, and future sources. The magnitude or impact of one molecule of a GHG is characterized in terms of carbon dioxide equivalent (CO₂e), which accounts for the warming potential of individual gases according to a normalized scale. Presenting GHGs in terms of CO₂e makes them interchangeable from an environmental impact standpoint, where reducing one metric ton CO₂e from a fossil-fueled stationary source achieves the same level of GHG reduction as reducing one metric ton CO₂e from an automobile or different source. Thus, while the Staff Report concludes that GHG emissions from changes in groundwater pumping are potentially significant, mitigation to address the impact need not focus exclusively on emissions from groundwater pumps. Limiting Mitigation Measures MM-GHG-a and MM-GHG-b to only actions that relate to groundwater pumps would constrain their effectiveness, reduce the overall level of GHG reduction achieved by the measures, and would be inconsistent with State CEQA Guidelines section 15126.4(c), which encourages lead agencies to consider all feasible means to mitigate the significant effects of GHG emissions.

Water and energy conservation programs have been proven to reduce GHG emissions, with numerous strategies, technologies, and policies available to reduce emissions across the spectrum of conservation. For example, the CAPCOA (2021) Handbook identifies 13 independent energy efficiency measures and seven independent water measures. As noted above, the twenty-one strategies included in Mitigation Measure MM-GHG-a are consistent with these measures, and many of these measures are likewise identified in conservation plans adopted by water and energy management agencies throughout the state. There is overlap between Mitigation Measure MM-GHG-a and agency conservation plans and the programs are not necessarily mutually exclusive, but Mitigation Measure MM-GHG-a could independently achieve GHG reductions. The strategies outlined under Mitigation Measure MM-GHG-a provide a broad framework for the reduction of GHG emissions, consistent with state and local guidance, including CEQA Guidelines section 15126.4(c), which specifically identifies "measures in an existing plan or mitigation program for the reduction of emissions" as an acceptable strategy to mitigate GHG emissions.

The Staff Report acknowledges that components of Mitigation Measures MM-GHG-a and MM-GHG-b would be within the responsibility and jurisdiction of public agencies other than the State Water Board and would be implemented through separate environmental review (Section 7.10.4, *Impact Analysis*, Impact GHG-a). Thus, Impacts GHG-a and GHG-b are conservatively characterized as significant and unavoidable because the State Water Board, as the CEQA lead agency, cannot be

certain that the other parties will (1) undertake the exact action that the State Water Board is describing, and (2) implement the proposed mitigation to reduce the potentially significant GHG impacts. Further, because the GHG impacts from changes in groundwater pumping are indirect in nature, it is speculative to determine now whether any measures imposed by the State Water Board in a subsequent implementation proceeding would reduce GHG emission impacts to below significant. Thus, it is infeasible for the State Water Board to enforce Mitigation Measures MM-GHG-a and MM-GHG-b at this early stage of plan development or analyze potential secondary impacts that may result from implementation of the mitigation. As noted in Impact GHG-a, individual projects associated with the revised proposed Plan amendments would be subject to the appropriate level of environmental review at the time they are proposed, and site-specific, project-specific mitigation would be identified to avoid or reduce significant effects prior to any project-level action.

References Cited

- California Air Pollution Control Officers Association. (CAPCOA). 2021. *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers*. December.
- United States Environmental Protection Agency. 2024a. eGRID2022. Technical Guide. January.
- United States Environmental Protection Agency. 2024b. Frequent Questions about eGRID. Last revised: June 20, 2024. Available: <https://www.epa.gov/egrid/frequent-questions-about-egrid#egrid1>. Accessed: June 20, 2024.
- Western Area Power Administration – Sierra Nevada Region (WAPA-SNR). 2024. Letter to State Water Resources Control Board. Subject: Comment Letter - Sacramento/Delta Draft Staff Report. January 19.