

December 11, 2015

Ms. Felicia Marcus
Chair, State Water Resources Control Board
c/o Jeanine Townsend, Clerk
Executive Office
Cal/EPA Headquarters
1001 I Street, 24th Floor
Sacramento, California 95812-0100

VIA E-MAIL
commentletters@waterboards.ca.gov

Re: Draft Order on Temporary Urgency Change Orders for Central Valley Project/State Water Project Operations – Comments of the Cities of Folsom and Roseville and San Juan Water District

Dear Ms. Marcus:

We would like to express our appreciation for the State Water Resources Control Board's (SWRCB) consideration of temporary terms concerning Central Valley Project (CVP) operations that would require a drought operations plan for Folsom Reservoir in 2016 and would require that at least 200,000 acre-feet of water be maintained in the reservoir's storage at the end of October 2016. That order, if adopted, would provide critical water-supply assurances for our agencies, which divert directly from Folsom Reservoir to serve approximately 500,000 people in Placer and Sacramento Counties, as well as support better conditions for salmon and steelhead in the lower American River.

As we have stated in past comments before the SWRCB throughout this drought, there is significant risk that drought conditions, combined with CVP and State Water Project (SWP) operational decisions, could result in the water in Folsom Reservoir being drained low enough that it would not be physically possible to supply water. As the draft order states, the reservoir is currently at its lowest point since it initially filled. A temporary pump station currently is floating in the reservoir, and the Bureau of Reclamation has plans to use a pump off Folsom Dam's emergency outlet, to potentially serve our agencies if the reservoir continues to drop this winter. We appreciate Reclamation's efforts to ensure continued water supply for our customers, but we do not believe Folsom Reservoir should ever be low enough to force us to rely on temporary emergency facilities to serve the public in our communities. With this fall being drier than normal so far, our agencies continue to have very serious water-supply concerns.

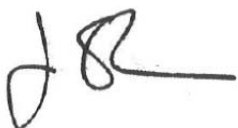
Fully understanding the impacts of an extended drought, we support the proposed minimum carryover storage requirement of 200,000 acre-feet in Folsom Reservoir at the end of October 2016 as a means to provide a reliable water supply for our communities. We appreciate the SWRCB's effort to implement the goal of its emergency water conservation regulations, namely to ensure that agencies will have adequate supplies if the drought were to continue for additional years. Our agencies were assigned conservation tiers of above 28 percent and we have invested considerable resources – including millions of dollars – to attempt to meet those standards. To date, we cumulatively have exceeded them primarily through significant reductions in outdoor water use. The proposed Folsom Reservoir carryover storage requirement is necessary to ensure that the SWRCB's goal of ensuring a water supply for our agencies for 2016 and 2017 should the drought continue.

In addition, our agencies support the proposed order because we are founding members of the Water Forum, which seeks to implement the coequal objectives of a sustainable water supply and the protection of the lower American River. Maintaining minimum carryover storage in Folsom Reservoir will help to ensure that there is at least some cold water to support the salmon and steelhead in the river, which is designated under both the state and federal Wild and Scenic Rivers Acts.


Once again, we appreciate the SWRCB's consideration of our agencies' concerns about Folsom Reservoir storage and we support the proposed carryover storage requirement for that reservoir. As for the order as a whole, we urge the SWRCB, the Bureau of Reclamation and all other interested agencies to implement their drought-management actions consistent with the requirements of the existing water-right priorities and settlement contracts. Our agencies rely on such priorities and contracts and it is crucial that they be implemented as foundational elements of water management in California.

Very truly yours,


CITY OF FOLSOM

By: 
Jeff Starsky
Vice Mayor

CITY OF ROSEVILLE

By: 
Carol Garcia
Mayor

SAN JUAN WATER DISTRICT

By: 
Edward J. "Ted" Costa
President