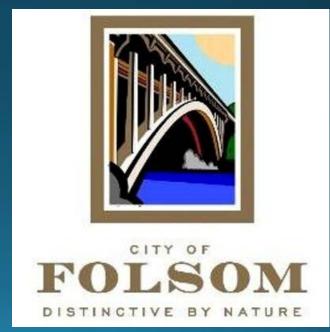
Rebuttal Testimony of San Juan Water District & City of Folsom





Reclamation's temperature model of our March Operations Forecast, 6b (1) is based on a 90 percent exceedance Operation Outlook Forecast (monthly flows, reservoir release, and end of month reservoir storage). The temperature profiles used for Shasta, Trinity, and Whiskeytown were taken on March 10, 2015. The meteorological inputs were derived from a database of 86 years of meterological data (1920-2005).

The Reclamation's temperature model run provides a balance of operations within the Central Valley Project. There is a reasonable storage at Shasta and Folsom and the Sacramento River flows at Wilkins Slough is manageable. There is minimal CVP pumping at the Tracy Pumping Plant. This operation also balances out the COA within the system. With this year's Shasta storage, the temperature compliance point is set at 56 degrees at Clear Creek.

The second scenario is labeled the Salmonid Plan, 6b (2). This scenario was submitted to Reclamation on March 17, 2015. In this temperature model run, Shasta storage is higher in September, but Folsom storage reaches dead pool by July. Wilkins Slough is at un-manageable stage with the river potentially running about 450 cfs in May. This model run would result to no Delta pumping at Tracy with no summertime water available for public safety and M&I in the south delta. This operation would also create COA debt for Reclamation. In this study the compliance point would also be 56 degrees at Clear Creek. This scenario does show that there is more cold water available in the fall.

The third scenario is labeled as the "temperature optimal" plan from the SWRCB, 6b (3). This plan was also submitted on March 17, 2015. In this temperature model run, Shasta storage also increases but the Folsom storage drops to dead pool later in the year (November 2015). The Wilkins Slough problems continue in this model run, it also runs the river to very low levels. This run produces similar concerns to the salmonid plan where there is no CVP export in the Delta with the same impacts as the previous plan. The COA also develops a debt to Reclamation. In this study the compliance point is also set at 56 degrees at Clear Creek. This scenario also shows an increase in the cold water pool available for the fall temperature operations.

March 26, 2015 email from Ron Milligan, Reclamation, to Tom Howard, State Water Resources Control Board, Re: "March Temperature Runs - Item 6(b) of January 2015 TUC Order," p. 2:

In 2 of the 3 operational scenarios Reclamation presented, Folsom storage "reaches dead pool."

90% Salmonid Plan

Storages Federal End of the Month Storage/Elevation (TAF/Feet)

		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Trinity	1147	1192	1162	975	855	748	642	538	520	507	503	510	546
	Elev.	2275	2272	2252	2238	2224	2209	2191	2188	2186	2185	2187	2193
Whiskeytown	207	206	238	238	238	238	238	230	206	206	206	206	206
	Elev.	1199	1209	1209	1209	1209	1209	1207	1199	1199	1199	1199	1199
Shasta	2613	2752	2785	2667	2389	2063	1736	1558	1433	1363	1315	1436	1637
	Elev.	996	998	992	979	961	941	929	921	915	912	921	935
Folsom	564	600	537	426	296	59	16	-6	-	-	-	-	
	Elev.	428	421	407	386	313	271	_	-	-	_	-	-
New Melones	606	583	518	424	349	268	188	132	118	126	133	137	144
	Elev.	874	861	840	822	799	771	747	740	744	748	749	753
San Luis	357	385	327	224	107	-31	-132	-17					
	Elev.	480	463	438	401	342							473
Total		5717	5567	4953	4233	3345	2688	2435					

90% Temperature optimal SWCB scenario

Storages Federal End of the Month Storage/Elevation (TAF/Feet)

		Mar	Apr	May	Jun	Jul	AUG	Sep	Oct	Nov	Dec	Jan	Feb
Trinity	1147	1192	1162	975	855	748	642	538	520	507	503	510	546
	Elev.	2275	2272	2252	2238	2224	2209	2191	2188	2186	2185	2187	2193
Whiskeytown	207	206	238	238	238	238	238	230	206	206	206	206	206
	Elev.	1199	1209	1209	1209	1209	1209	1207	1199	1199	1199	1199	1199
Shasta	2613	2752	2785	2606	2298	1911	1554	1377	1251	1278	1337	1458	1660
	Elev.	996	998	989	974	952	929	916	907	909	913	922	936
Folsom	564	600	537	487	386	210	196	172	159	58	-2		
	Elev.	428	421	415	401	369	366	360	356	312	#N/A	#N/A	#N/A
New Melones	606	583	518	424	349	268	188	132	118	126	133	137	144
	Elev.	874	861	840	822	799	771	747	740	744	748	749	753
San Luis	357	385	327	224	107	-31	-132	-17	163	308	511	744	764
	Elev.	480	463	438	401	342			345	390	431	472	470
Total		5717	5567	4953	4233	3345	2686	2431	2416	2482			



MP-100 WTR-4.10 United States Department of the Interior

BUREAU OF RECLAMATION Mid-Pacific Regional Office 2800 Cottage Way Sacramento, CA 95825-1898

DEC 1 1 2015

(12/15/16) Board Meeting- Item 7 TUCP Deadline: 12/14/15 by 9:00 am



December 11, 2015 letter from David Murillo, Regional Director, Mid-Pacific Region, United States Bureau of Reclamation to State Water Resources Control Board, asking the SWRCB not to impose "substantive carryover requirements"

Ms. Jeanine Townsend Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814 Reclamation is working in earnest with DWR and Board staff on a strategy for 2016 operations, should drought conditions persist. Reclamation asks the Board not to adopt the proposed Order in its current form, and allow for further and fuller information on 2016 hydrology and water temperatures to be realized before imposing additional requirements, such as substantive carryover requirements.

Reclamation intends to make additional comments at the Board's regularly scheduled meeting of December 15, 2015. We look forward to resolving these concerns and continued collaborative efforts with the Board staff, and fishery agencies throughout the coming months.

Sincerely,

David G. Murillo Regional Director