



**CITY OF REDDING**  
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December 5, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000  
1001 I Street, 24th Floor, Sacramento, CA 95814

**SUBJECT:** Comments on “Working Draft Scientific Basis Report for New and Revised Flow Requirements on the Sacramento River and Tributaries, Eastside Tributaries to the Delta, Delta Outflow, and Interior Delta Operations”

Dear Ms. Townsend:

The City of Redding (Redding) appreciates the opportunity to provide comments on the State Water Resources Control Board’s (Board) “*Working Draft Scientific Basis Report for New and Revised Flow Requirements on the Sacramento River and Tributaries, Eastside Tributaries to the Delta, Delta Outflow, and Interior Delta Operations*” (Report). The Report proposes what science will be relied upon in the Phase II update of the Bay-Delta Water Quality Control Plan (Plan). Redding urges the Board to analyze the impacts to water and power operations from its proposals.

As a Settlement Contractor, nearly half of Redding's domestic water supply comes from the Sacramento River through its municipally-owned water utility. Additionally, Redding's municipally-owned electric utility receives over 8 percent of the hydroelectric output from the Central Valley Project (CVP), which accounts for approximately 30 percent of the City's annual power supply. Any change to the flow and/or timing of water releases on the Sacramento River could affect Redding's water supply reliability and hydroelectric generation.

The Report notes that it does not balance the needs of all beneficial uses but instead the balancing will be analyzed as the process moves forward. Redding believes that in order to fully understand the environmental and economic impacts, the science outlined in the Report must include an additional analysis of the impacts of any flow changes to municipal water allocations and power generation.

The Board recommends evaluating a range of tributary inflow between 35 percent and 75 percent of unimpaired flow. The Sustainable Groundwater Management Act (SGMA) requires groundwater basins to be managed in a sustainable manner. Contrary to SGMA, the proposed unimpaired flows being considered in the Report could result in increased groundwater pumping throughout the Central Valley which would require additional wells, treatment facilities, and pump stations, resulting in significant capital costs and increased power use.

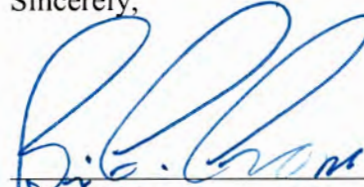
Through the passage of Senate Bill 32 (SB 32) in September 2016, California enacted a strong mandate which requires a greenhouse gas reduction of 40 percent below 1990 levels by 2030,

amplifying the importance of hydropower's carbon-free status. The Board's proposal to change unimpaired flows could affect the amount and timing of hydroelectric power produced by generators located along the Sacramento River, which may result in acquiring replacement generation. An accurate assessment of the greenhouse gases that could result from this replacement generation must be completed in order to fully recognize the cost impact to CVP power customers.

The Report explains that a multi-faceted approach needs to be taken in order to protect the Bay-Delta ecosystem, and actions other than flow management are necessary to assure a balanced and effective management approach. Understanding the associated costs from the proposed flow changes is vital in determining which actions are most effective to accomplish the Board's goals while providing the least impact to CVP water and power customers.

Redding thanks the Board for allowing us to be a part in the development of the Plan and looks forward to continuing to work with the Board in this effort.

Sincerely,



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