

December 16, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor, Sacramento, CA 95814



### **Comment Letter – Bay-Delta Phase II Working Draft Science Report (Phase II Report)**

The Hydropower Operations Committee (HPOC),<sup>1</sup> comprised of Central Valley Project (CVP) power customers, was formed to provide technical and operational subject matter expertise in industry and regulatory forums that may impact Federal hydropower production. The HPOC is monitoring various activities at the State Water Resources Control Board (Water Board), the United States Bureau of Reclamation, as well as other industry forums that may impact the CVP hydropower production.

The Phase II Report, on page 5.1, states that the scientific evidence presented indicates that “a comprehensive regulatory approach is needed . . . that integrates inflows, outflows, and Project operational requirements . . . in a coordinated manner to the extent possible.” Consistent with that statement, the HPOC has two procedural recommendations as presented below.

1. The HPOC members are public agencies located throughout the Sacramento and San Joaquin watersheds. Accordingly, **the HPOC would support the Water Board implementing a comprehensive approach whereby the studies in Phase I and Phase II are performed conjunctively.** The HPOC believes a conjunctive approach would enable the Water Board to determine where system efficiencies and inefficiencies are present on a holistic level. In addition, having all stakeholders participating in this type of approach ensures that the system impacts are addressed with the sum of the whole in mind.
2. Since the scientific studies have thus far been conducted separately, **the HPOC would support the Water Board granting additional time for stakeholders to comment in this process.** This would accommodate stakeholders identifying any interconnected components of the Bay-Delta Plan that they had not considered due to the separate processes. In addition, additional time would help in identifying the full potential impact to the hydroelectric component of the waterways under this phase of the study. Lastly, granting additional time would enable stakeholders to determine what additional information might be required to substantiate conclusions in the scientific study. There may be a need to request additional supporting data to understand how the conclusions were derived. This is a key component of any stakeholder process. Without this component, a fair evaluation of stakeholder impacts is not possible.

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<sup>1</sup> City of Redding, City of Roseville, Modesto Irrigation District, Northern California Power Agency, Power & Water Resources Pooling Authority, Sacramento Municipal Utility District, Trinity Public Utilities District, and Turlock Irrigation District. Technical support provided by the U.S. Bureau of Reclamation and Western Area Power Administration.