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Subject: Request that the SWRCB require DWR to reduce the SWP allocation to zero and conserve the stored water behind Shasta Dam
Date: Friday, May 21, 2021 3:20:00 PM
Importance: High

Dear Eileen, Erik, Diane and Michael,

I am writing to request that the Board require DWR to reduce the SWP allocation to zero, and require that conserved water be added to Shasta carryover storage this year. I'm following up on my oral comments during the Board meeting to explain how and why this is appropriate.

1. We've been told that the SWP has ~200,00 acre feet in San Luis Reservoir, which is roughly equivalent to the 5% SWP allocation (210,266 acre feet; of that total, just under half – 95,575 acre feet – would go to MWD, which has record amounts of water in storage this year).
2. If the SWP allocation is cut to zero, that water in San Luis can be used to meet other obligations and thereby reduce reservoir releases and increase storage in Shasta Dam beyond what has been considered to date.
 - a. The CVP allocation currently results in more than 1 million acre feet of water delivered from the Sacramento Basin to users in the Delta and South of the Delta, including 656,717 acre feet for the San Joaquin River Exchange Contractors, 75,973 acre feet for South of Delta M&I contractors, 107,250 acre feet for Contra Costa Water District, and 203,251 for level 2 wildlife refuges. <https://www.usbr.gov/mp/cvp-water/docs/cvp-allocation.pdf> Some of that water has to come from reservoir releases from Folsom and Shasta this summer. That is presumably why the TUCP proposes to allow 1,500 cfs of pumping even when standards are not being met. In addition, it appears that DWR is anticipated to owe a significant COA debt to Reclamation, and doing this could satisfy that debt. According to the draft Temperature Management Plan, DWR will owe the CVP more than 200,000 acre feet of water under COA in August. https://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/sacramento_river/docs/2021/Attachments%201%20to%205.pdf (page 1) Reducing the SWP allocation to zero fulfils the COA obligation and allows for reduced reservoir releases upstream, thereby increasing storage in upstream reservoirs.
 - b. Alternatively, this water could be used this summer and fall to deliver the water to South of Delta parties promised pursuant to the water transfers proposed by Sacramento River Settlement Contractors, instead of releasing water from Shasta for those transfers later this year. The water that is currently in Shasta Reservoir that would be released for these proposed transfers would instead all stay in Shasta reservoir, increasing storage beyond what has been modeled to date.
 - c. In addition, carriage losses through the Delta are generally estimated to be around $1/3^{\text{rd}}$, so delivering 200,000 acre feet of water to San Luis would require more water to be released from upstream reservoirs (presumably at least ~260,000 acre feet). In either case (to replace the transfer or to meet existing CVP allocations), this approach should increase upstream reservoir storage by more than 200,000 acre feet because of carriage losses.

3. Reducing the SWP allocation to zero should therefore be able to increase Shasta storage by as much as 260,000 acre feet, if the conserved water is predominately stored in Shasta. That could significantly improve conditions for salmon this year if it helps increase end of September storage to a level closer to the 1.47 MAF modeled in NMFS' May 19, 2021 model runs.
4. DWR has filed TUCP's seeking to waive their water rights obligations, without having actually reduced their SWP allocation to zero. The Board plainly has authority to reduce the SWP allocation to zero as a condition of granting the TUCP, and there was general agreement at the SWRCB Board meeting this week that the Shasta TMP, TUCPs, and Salinity Barrier should all be considered together. This approach does so.

Finally, given that DWR's updated runoff forecast (B120) show continued declines in estimated inflow to Shasta Dam (60,000 acre feet less than May 1) and Folsom (40,000 acre feet less than May 1), it is even less likely that they will achieve the carryover storage that they have modeled.

<https://cdec.water.ca.gov/reportapp/javareports?name=B120UP.202105>.

Thank you for consideration of our views.

Sincerely,
Doug

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