

**DEPARTMENT OF WATER RESOURCES**

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April 19, 2017

Thomas Howard  
Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, California 958514

Request for a Short-Term Exemption from JPOD Limits

Dear Mr. Howard:

This letter is to inform you of recent operational measures taken by the State Water Project (SWP) in response to needed emergency repairs at the Clifton Court Forebay (CCF) intake structure and to request a short-term exemption to export limits on the use of Joint Point of Diversion (JPOD) by the SWP at the Central Valley Project (CVP) Jones Pumping Plant in association with the repair work. The Department of Water Resources (DWR) believes that a short-term exemption would be consistent with the authorization and provisions for JPOD specified in Decision 1641 as described below.

**I. CCF Facility Outage and Emergency Repairs**

The DWR Operations Control Center learned of damage to the concrete apron attached to the radial gate structures at the SWP's CCF on March 1, 2017. To allow DWR time to fully assess the extent of the damage at the CCF facilities, flows into CCF were restricted from March 4 through 14. From March 15 to April 15, the inflows to CCF from the Delta were zero in order to perform the needed repairs to the apron structure. The CCF restriction of zero inflow ended on April 16. However, the inflows will be limited through the middle of May, when we expect that the full operational capability of CCF will be restored. Therefore, DWR will need to rely on JPOD operations to pump SWP water at Jones Pumping Plant until mid-May.

In the interest of assisting DWR with its water supply obligations due to the repairs, the United States Bureau of Reclamation offered unused pumping capacity at the CVP Jones Pumping Plant to DWR for SWP Delta exports. From March 20-24, a continuous rate of approximately 720 cfs of SWP water was pumped at Jones Pumping Plant, and from March 25<sup>th</sup> to present, a continuous rate of 2440 cfs of SWP water has been pumped at Jones Pumping Plant.

The offer by one water Project to make unused pumping capacity available to the other Project via JPOD in the event of emergency repairs is consistent with the discussion in D-1641 on SWP use of JPOD. (See D-1641, Section 11.5, page 96, recognizing that the SWP is expected to use JPOD for emergency repairs and that JPOD might help the Projects continue to supply demands when pumping is reduced in response to emergencies or facility outages.)

In light of this recognition by the SWRCB, DWR requests a short-term exemption to the export limits in the use of JPOD by the SWP at the Jones PP from March 20 through mid-May, the duration of time that the repairs to CCF is expected to affect the water supply delivery capability of the SWP. To support the granting of a short-term exemption, DWR provides information below to show that the exemption "will not have a significant adverse effect on the environment and will not cause injury to other legal users of water." (See D-1641, pages 156 and 158.)

## **II. Support for Short-Term Exemption Based on No Significant Effects on Environment and No Injury to Legal Users of Water**

### **A. Hydrologic Conditions**

The winter and spring of 2017 have been extremely wet in the Central Valley. As of this date, 2017 is the wettest individual water year for the "8-station" precipitation index for the northern Sierra Nevada. Flow conditions in the Sacramento-San Joaquin Delta have been classified as "excess" (as defined by the Coordinated Operation Agreement) since December 15, 2016. In addition, the position of the two parts per thousand (2 ppt) salinity zone (X2) has been west of Martinez (the most western location in the estuary where X2 position is measured) since mid-January.

Flows and stages within the Delta have also been extremely high over the last several months. The flow on the San Joaquin River at Vernalis (San Joaquin River entering the southern Delta) has been above 15,000 cfs since mid-January, and it is currently above 20,000 cfs. The combined net tidal flow on Old and Middle River (OMR flow) has been positive since mid-February, and it is currently at +8000 cfs, much more positive than requirements under the federal biological opinions. The high Vernalis and OMR flows are expected to continue for at least another month, through mid-May. In addition, these high flows have provided water level and water quality conditions that well-support delta water diverters' uses. These conditions indicate that a short-term exemption to export limits under JPOD when SWP uses the Jones Pumping Plant will not significantly affect the Delta environment, including sensitive fish, nor injure legal users of water.

### **B. Communications with Fishery Agencies and Stakeholders**

Since the CCF facility outage began, DWR has openly discussed the emergency use of the Jones Pumping Plant to convey SWP water during various interagency and stakeholder operations conference calls. These conference calls have included, but were not limited to, the Water Operation Management Team (WOMT), the Delta Operations Salmonid and Sturgeon (DOSS) group, the Delta Smelt Workgroup (SWG), the Data Assessment Team (DAT), the Delta Conditions Team (DCT), the CALFED Operations Group, and a monthly coordination call with the South Delta Water Agency. DWR will continue to report to these groups the Delta conditions and the status of the CCF repair and need for SWP use of JPOD. Therefore, based on the current Delta hydrologic conditions and that these conditions are expected to continue to mid-May, DWR believes there is support for the Executive Director to find that the requested JPOD exemption is appropriate.

In conclusion, please consider this request for a short-term exemption from the JPOD export limits and authorization of the SWP to use available pumping capacity at the CVP's Jones Pumping Plant from March 20 to mid-May to be for the express purpose of meeting SWP water supply obligations while emergency repairs are being conducted at the CCF intake structure.

Please call me at (916) 574-2722 if you would like additional information or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Leahigh". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John Leahigh, Chief  
Water Operations Office  
Division of Operations and Maintenance