



Increased Risks of WaterFix and Protection by the Modified FMS



Rebuttal Testimony

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Co-Equal Objectives

- Provide a reliable and safe water supply for the region's economic health and planned development to the year 2030; and
- Preserve the fishery, wildlife, recreational, and aesthetic values of the lower American River.



Excerpt from DEIR/EIS's modeling appendix, Appendix 5A

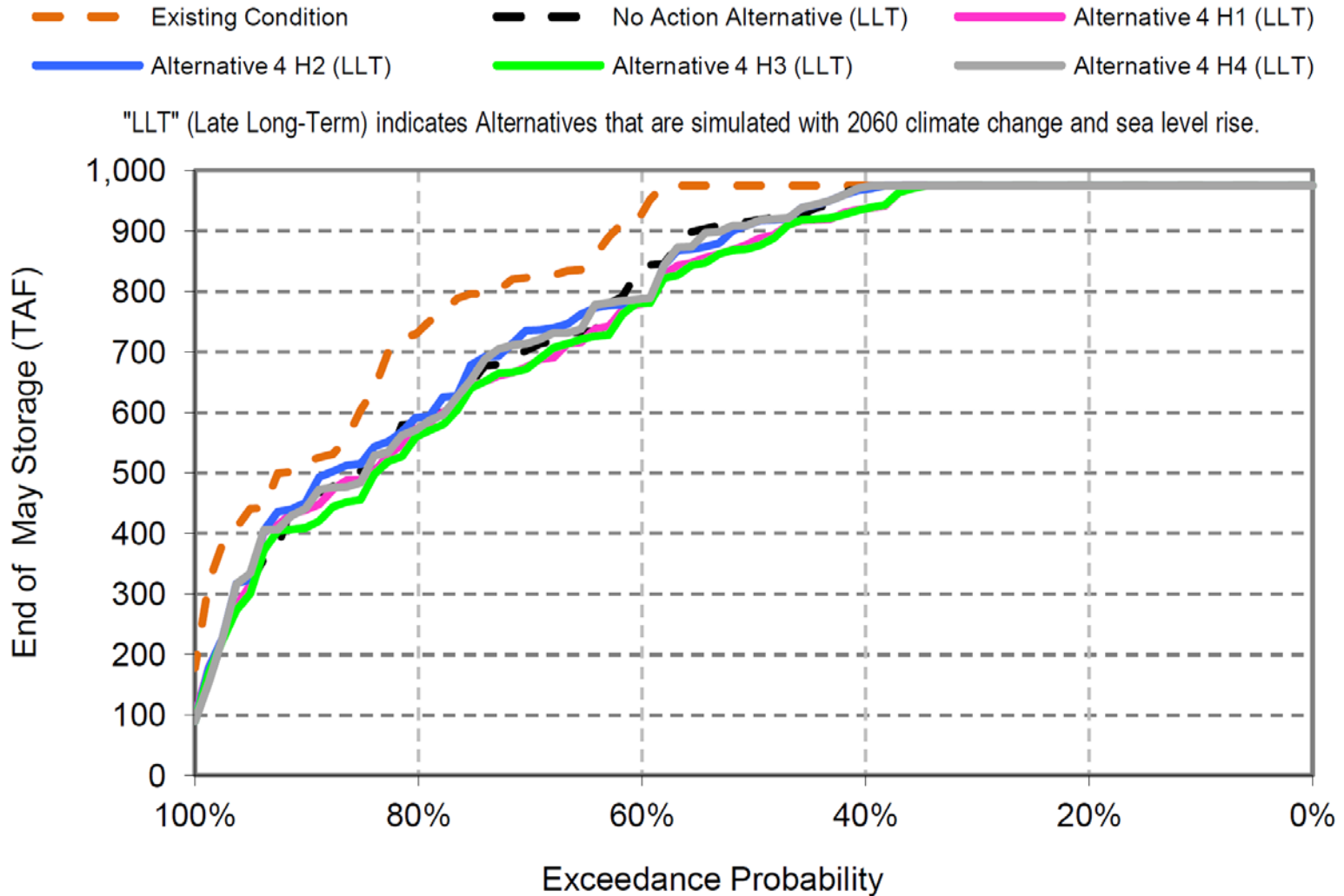


Figure C-4-1. Folsom Lake, End of May Storage

Excerpt from DEIR/EIS's modeling appendix, Appendix 5A

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Alternative 4 H3 (LLT) minus No Action Alternative (LLT)


Statistic	End of Month Storage (TAF)											
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Probability of Exceedance												
10%	7	18	0	0	0	-2	0	0	0	-34	-41	-17
20%	-28	7	3	1	4	0	0	0	-75	-38	-37	-23
30%	7	1	8	2	1	-1	0	0	-39	-37	-27	-4
40%	-3	4	1	12	1	0	0	-33	-69	-39	-17	28
50%	-4	-6	-7	-20	5	3	0	-44	-78	-51	9	3
60%	5	-17	-5	-17	-44	5	-27	-54	-52	-32	-17	-4
70%	-5	-2	-4	13	-12	-9	-5	-29	-44	-12	-13	-4
80%	-23	-15	2	-15	2	7	-17	-24	-30	7	-10	-23
90%	-2	-15	-25	-27	-47	-19	-29	-53	-80	-23	0	-1

Folsom Reservoir in 2015

The drought showed, in real time, what could happen more often with WaterFix



Modified FMS Responds to Increased Risk from WaterFix

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- Risk of exacerbating the existing dry-year dangers
 - Risk of drawing down Folsom storage prior to very dry years

Summary of Lower American River Flow Management Approaches

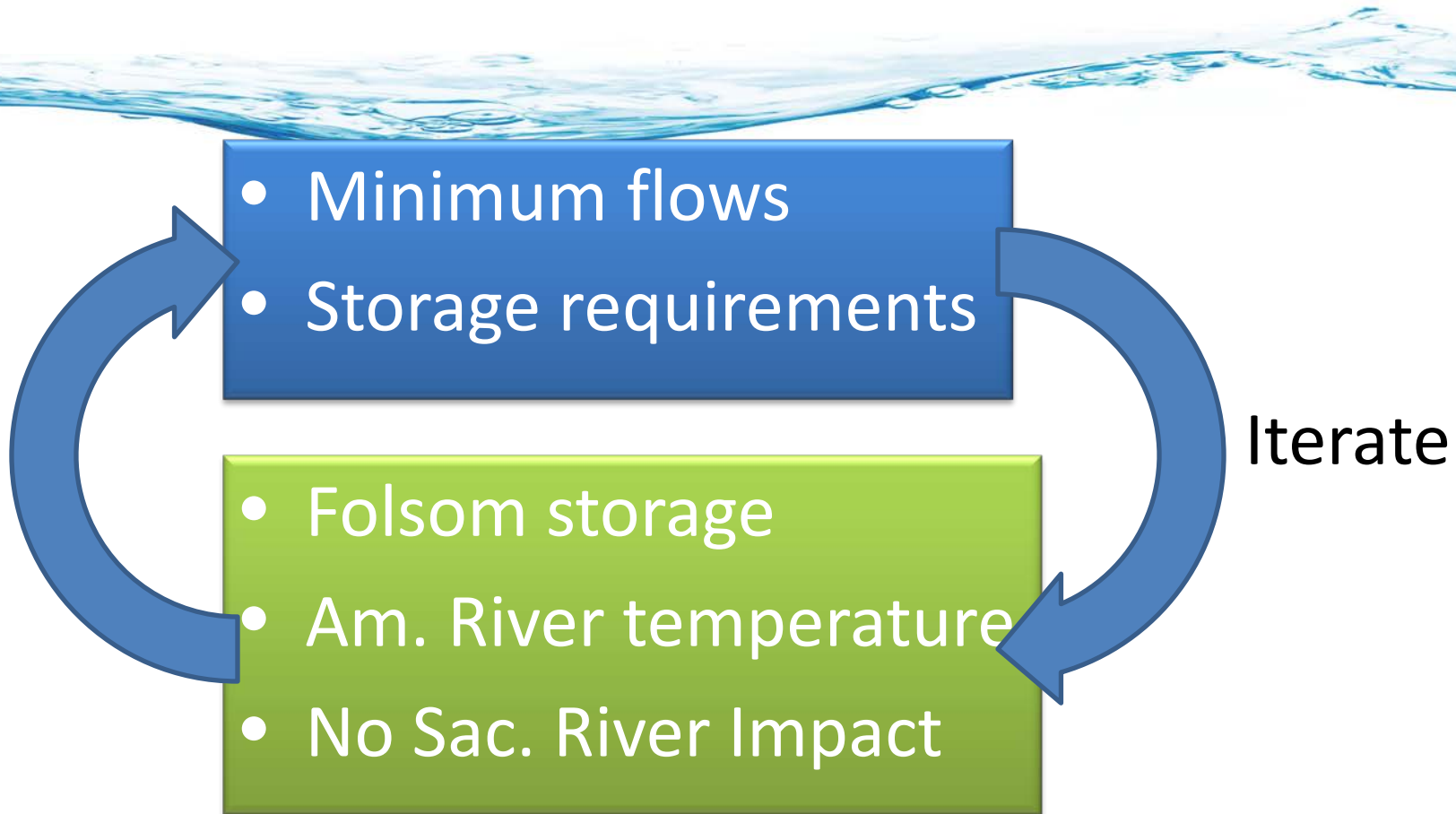
Flow Approach	Minimum Flows	Approach to Water Temperature Management	Storage Requirements	Status
Pre-2000	250 or 500 cfs	None	None	Inactive
2006 FMS	800 to 2000 cfs in most years; 250 or 500 cfs in during drought exception	Annual temperature target set by Reclamation	None	Being implemented
Modified FMS	500 to 2000 cfs	Annual temperature target set by Reclamation	End-of-December: 300 TAF most years; 230 TAF during drought exception; End-of-May: Up to 900 TAF	Proposed

Objectives of Modified FMS



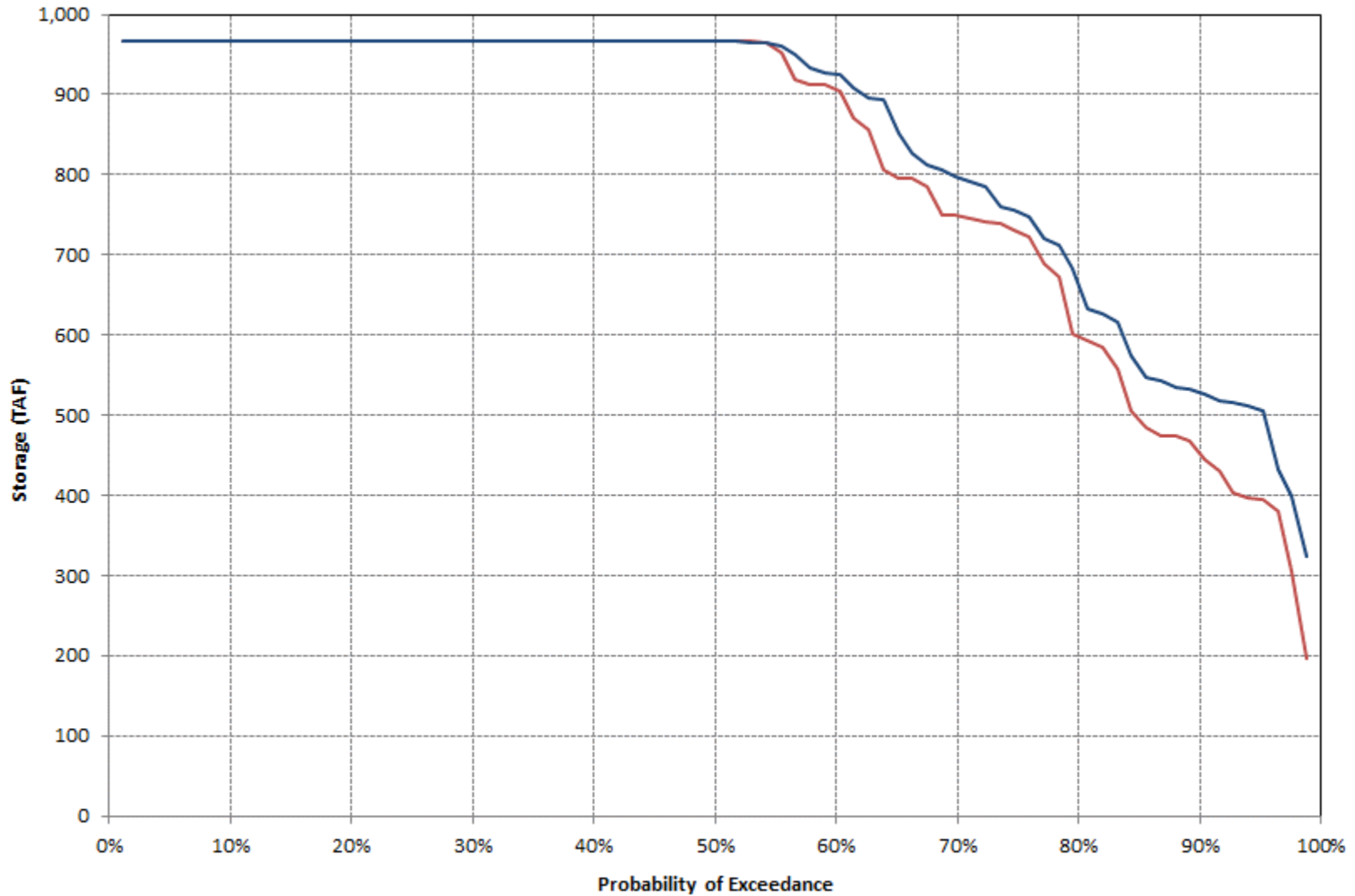
- Protect water supplies by avoiding low storage in Folsom Reservoir
- Improve fisheries conditions in the lower American River – especially water temperature
- Avoid redirected impact to Sacramento River

Multiple Objective: Sweet Spot

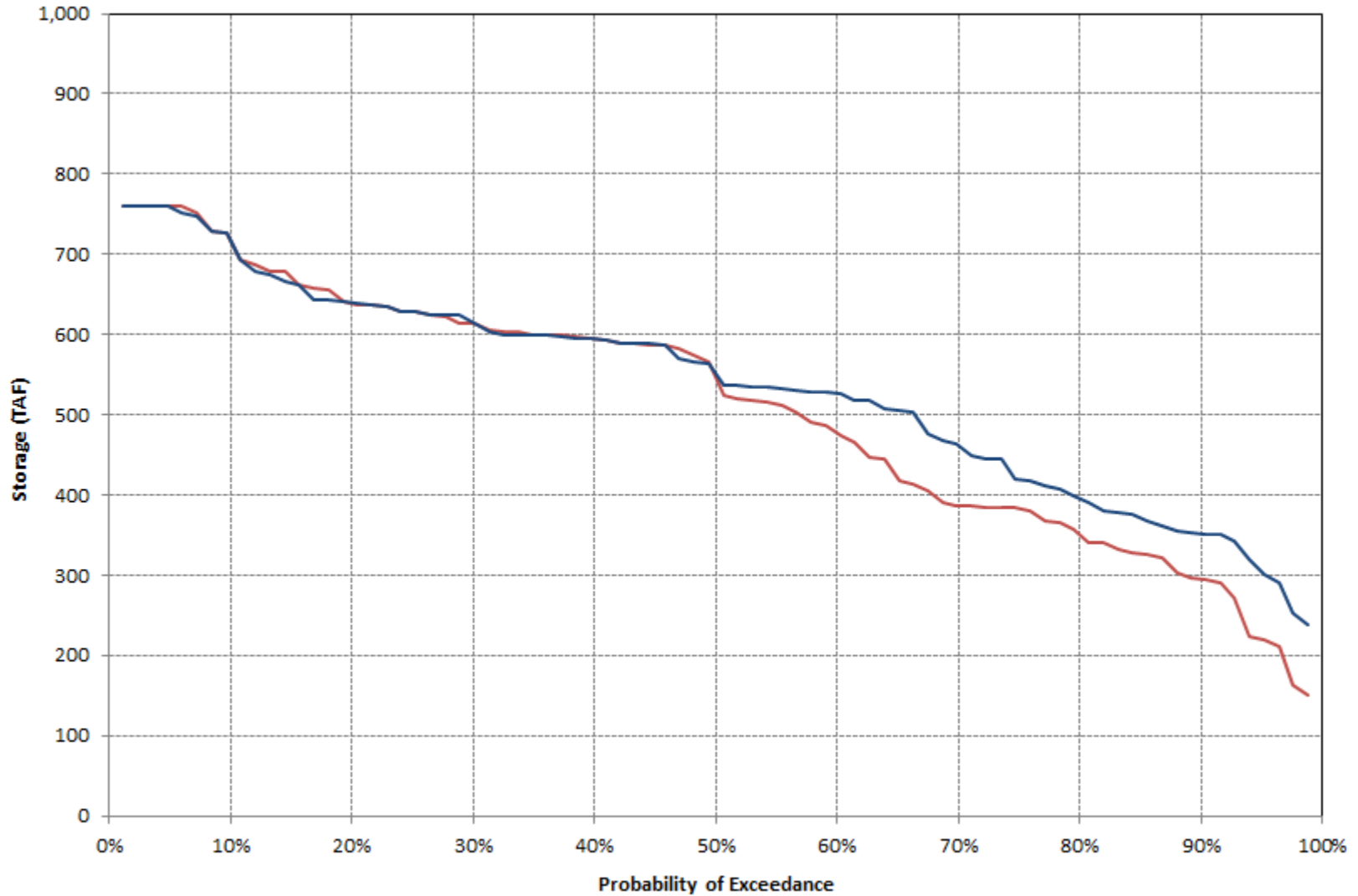


➤ Result: sweet spot meets multiple objectives

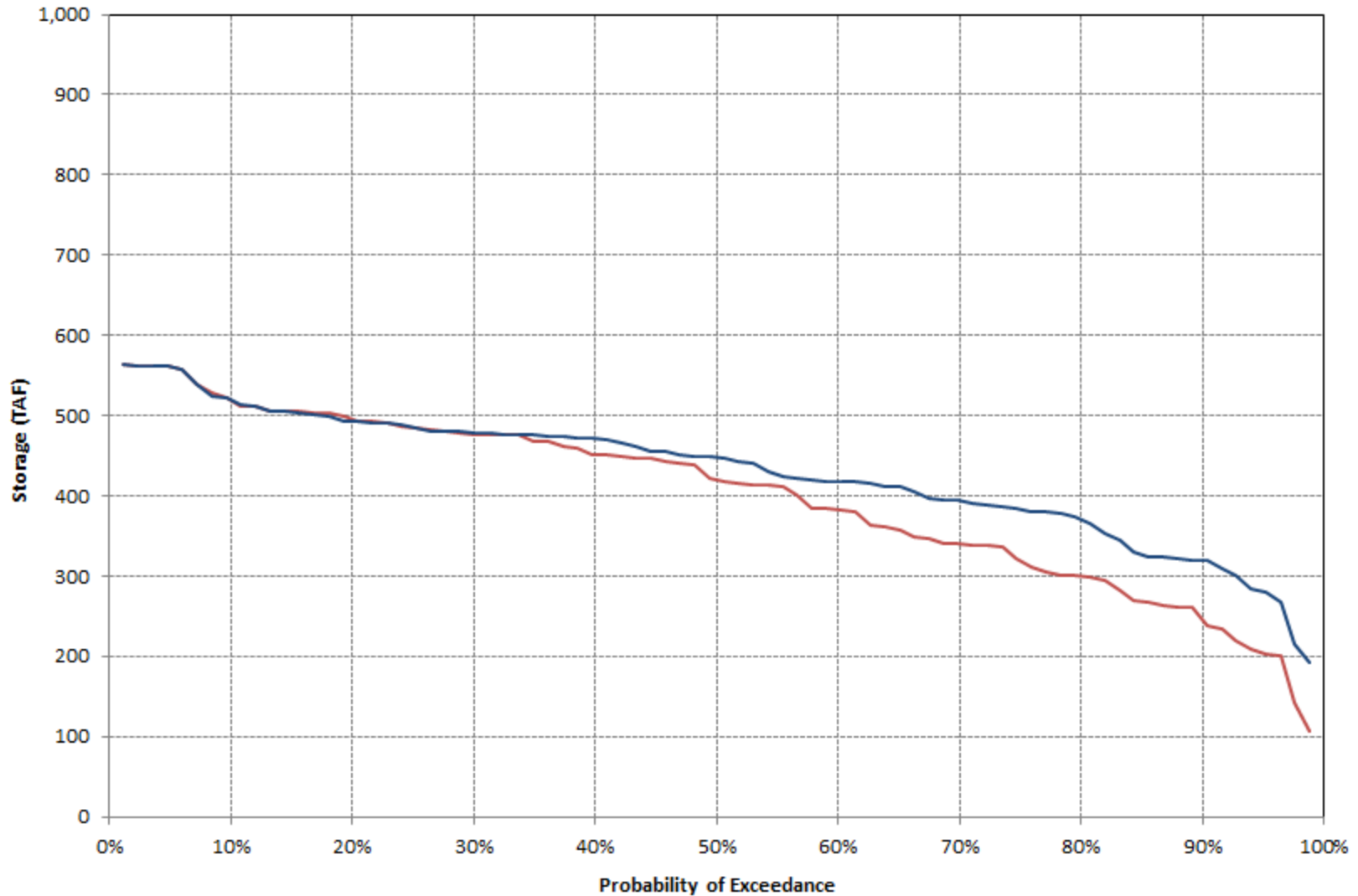
Exceedance Probability: End-of-May Folsom Reservoir Storage



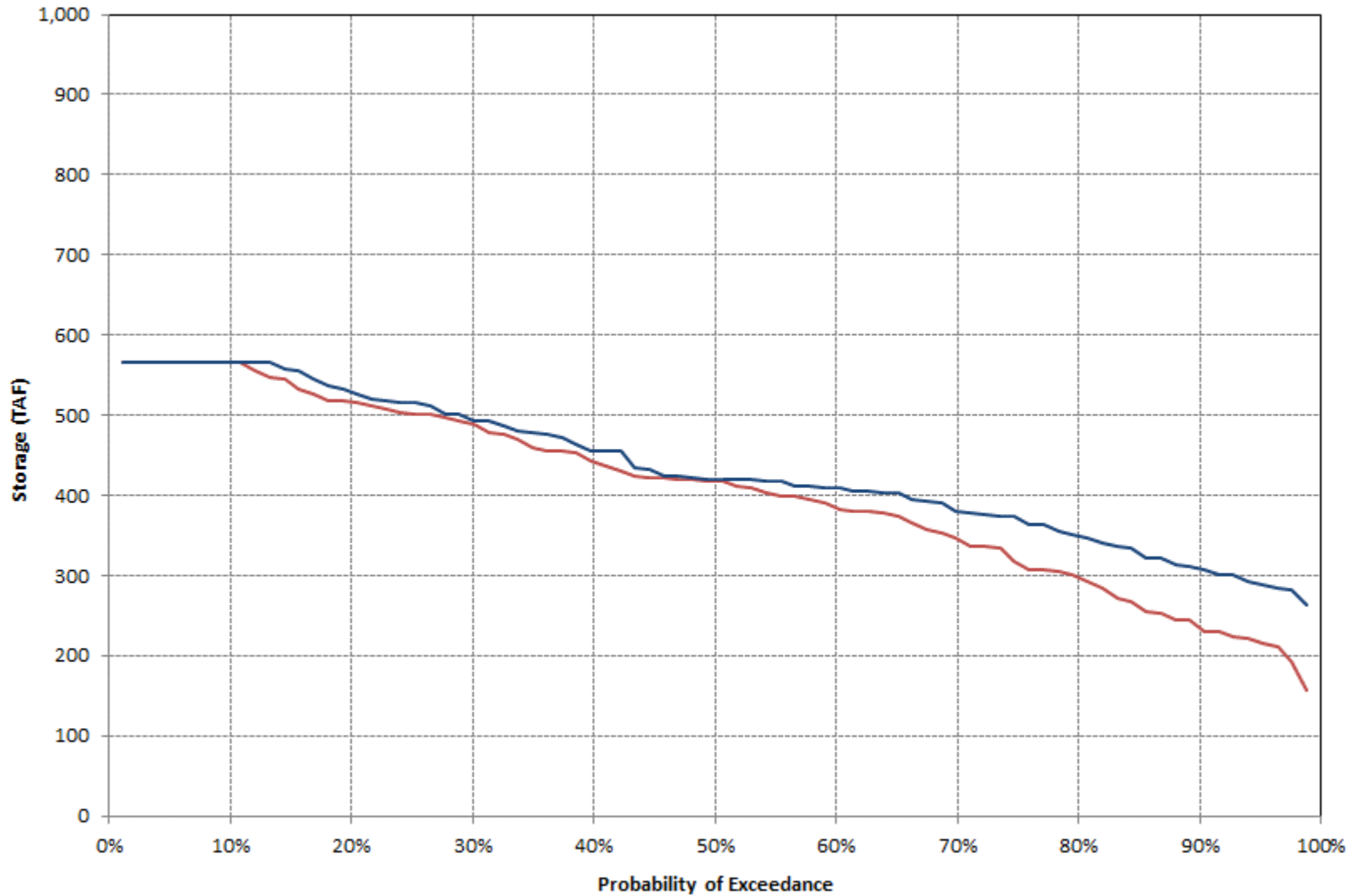
Exceedance Probability: End-of-September Folsom Reservoir Storage



Exceedance Probability: End-of-November Folsom Reservoir Storage



Exceedance Probability: End-of-December Folsom Reservoir Storage





Conclusions

- WaterFix would exacerbate severe water-supply risks associated with very low Folsom storage
- Modified FMS would protect against uncertainty and reduced storage
- Presentation of environmental concerns with WaterFix, and Modified FMS as response, in Part 2