

July 6, 2015

State Water Resources Control Board
c/o Felicia Marcus
P.O. Box 100
Sacramento, California 95812-2000

VIA E-MAIL
Felicia.Marcus@waterboards.ca.gov

Re: Revised Sacramento River Temperature Management Plan

Dear Chair Marcus:

On June 26, 2015, the United States Bureau of Reclamation (Reclamation) submitted a Revised Sacramento River Temperature Plan (Plan) to the National Marine Fisheries Services (NMFS) as part of Reclamation's ongoing Drought Contingency Planning to protect winter-run Chinook salmon, as outlined in the 2009 Biological Opinion. While the plan addresses temperature management along the Sacramento River, the proposed operations to meet the temperature objectives includes major impacts to the Central Valley Project, and specifically to Folsom Reservoir. These impacts were discussed at the State Water Resources Control Board's workshop on June 24, 2015 and included in the American River Water User's Panel (ARWU) presentation.

As outlined in the ARWU presentation to the SWRCB during the June 24, 2015 Summer and Fall Central Valley Project / State Water Project (CVP/SWP) Drought-Related Operations in the Bay-Delta (Delta) Watershed, the Cities of Roseville and Folsom and San Juan Water District are extremely concerned about the proposed operations at Folsom Reservoir that would provide for approximately 120,000 acre-feet of water storage available with a water surface elevation of 343 feet at the end of September 2015. At this water surface elevation, the water supply intake that serves the Cities of Folsom and Roseville, and San Juan Water District has only about 23 feet of water above it. The 500,000 people in our communities depend on the reservoir for their primary water supply. If Folsom Reservoir is drawn down to 120,000 acre-feet by the end of September 2015, and drought conditions persist into the fall and winter, our communities would face a serious risk that at least a substantial portion of our primary water supply would be physically unavailable. We therefore must take all necessary steps to ensure that there are adequate plans to meet our communities' needs if dry conditions persist beyond September 2015.

Reclamation's most current projections for how it would operate Folsom Reservoir and the lower American River shows a 72% decline in storage volume over a three-month period from July 1, 2015 through September 30, 2015, leaving approximately 12% of Reservoir storage available at the end of September 2015. These projections specified the reservoir storage and downstream releases that Reclamation believed it would maintain during the July 2015 – September 2015 period. What is most concerning to our agencies is the potential for fall 2015 to remain dry and represent similar conditions as the fall 2013/winter 2014 time period.

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Besides potential impacts to water supplies for our agencies, the projections for streamflows during the October-January period are crucial for operations of the American River and for our agencies' planning. The American River's fall-run Chinook salmon spawn during that period. As the SWRCB is aware, it is at best difficult to change streamflows during that period because reducing streamflows during that period may lead to losses of salmon redds and juvenile salmon. The maintenance of relatively high fall-run spawning streamflows in the fall of 2013 was one of the primary reasons that Folsom Reservoir was drained so low into February 2014, to approximately 162,000 acre-feet. During the fall spawning season, however, releases from Folsom Reservoir and to the lower American River from Nimbus Dam are projected to be 500 cfs through December 2015. Given the recent operations of Folsom Reservoir to meet the needs of various downstream uses, we feel this is the best case scenario.

With an end of September 2015 storage target of 120,000 acre-feet in Folsom Reservoir, there is little operational flexibility to meet the water supply needs of our agencies and the fishery needs along the Lower American River if the fall remains dry. Using fall 2013 inflow data, a 500 cfs outflow at Folsom Reservoir for October 2015 through January 2016, provides approximately 113,000 acre-feet of storage at the end of January 2016. If using fall 2013 inflow data, and a 800 cfs outflow at Folsom Reservoir for October 2015 through January 2016, there is approximately 40,000 acre-feet of storage at the end of January 2016.

It is imperative for both our water supplies and the American River's fisheries that the operations proposed in the Revised Sacramento River Temperature Plan account for a dry fall 2015 and winter 2016. There are two significant risks associated with proposed operations in conjunction with dry conditions should they persist into the fall and early winter.

1. Should dry conditions persist into the fall and winter of the current water year, the available water supplies at Folsom Lake will be unable to meet all of the necessary demands, from water supply to contractors to water supply for environmental benefits.
2. Should proposed operations require that Reclamation install a floating pump station to meet the M&I demands to our intake, there is no historic practice that demonstrates how this type of emergency pump station will work while providing a reliable water supply.

After the experience of 2013/2014 water supply conditions at Folsom Reservoir, when our communities' primary water source came perilously close to going dry, it is imperative that Reclamation and the other agencies involved in operating Folsom Reservoir demonstrate that they will be able to operate the reservoir to meet the needs of the 500,000 people that we serve. We respectfully request that the SWRCB include terms in the Revised Sacramento River Temperature Management plan that would not allow the operation of Folsom Reservoir to daylight the existing water supply intake that serves our communities.

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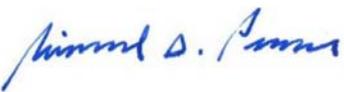
Sincerely

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CITY OF ROSEVILLE

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