

April 3, 2015

Tom Howard
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814

RE: Balancing 2015 CVP Water Supply Obligations

Dear Mr. Howard,

We write on behalf of the nearly two million people south of the Delta that depend upon the import of federal Central Valley Project water to serve their daily municipal, industrial, agricultural, and environmental management needs. The region we serve includes a diverse range of communities, from Silicon Valley to small, often disadvantaged, rural towns, many of the nation's top producing agricultural counties, and the second largest contiguous wetlands in the United States. We appreciate your acknowledgement of the suffering this drought disaster has caused throughout our region and, while there is much to learn regarding the cause of these unprecedented harms, we focus now upon the difficult choices that must be made in order to best balance the little water we have to work with until nature provides us all with desperately needed relief.

The State Water Resources Control Board (Board) requested of the United States Bureau of Reclamation (Reclamation) temperature modeling runs to assess the potential use of stored CVP water supply under a variety of operational assumptions, which Reclamation has provided. Regrettably, the current focus on water management actions, especially given the current hydrology; presents us with limited opportunities to protect or improve the status of fish species of concern. A more comprehensive approach is needed that addresses all of the stressors on the ecosystem. We urge the State Water Board to take a more active role in the recommended actions for other agencies listed in the program of implementation for the 2006 Bay-Delta Plan as described in the San Luis & Delta-Mendota Water Authority's March 31, 2015 letter to the Board. This is particularly important because data from prior years suggest that the average rate of survival for out-migrating salmon is very low (e.g., 2013 acoustic tag data show 84% mortality before the fish even reach the Delta).

With respect to the modelling scenarios under consideration, two of the Board requested scenarios (6b (2) & (3)) demonstrate significant periods of time where no CVP water is diverted at the Jones Pumping Plant to serve needs south of the Delta, which gravely impairs water transfer potential, while at the same time resulting in the CVP incurring greater debt to the State Water Project under the Coordinated Operations Agreement (COA). These operational scenarios are unacceptable due to the unreasonable, and avoidable, human and environmental harms they will cause. Additionally, Scenario 6b (1) results in early reliance upon the side gates at Shasta, which proved problematic in 2014, resulting in temperatures higher than desired for reproduction of protected winter-run Chinook salmon, another unacceptable consequence.

To bridge the gap, Reclamation has proposed Scenario 6b (4) to address the unacceptable and avoidable effects identified in the other model simulations. By increasing temperature compliance by one

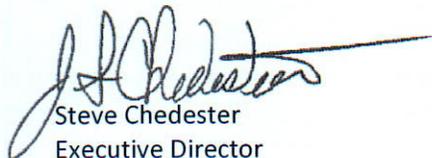
degree, thereby stretching the availability of cold water later into the season, this scenario beneficially delays reliance upon the side gates while minimizing the water diversion and COA debt impacts as well. Biologists that have examined the 6b (4) scenario have concluded it avoids the elevated water temperature conditions that impaired the reproduction of winter-run Chinook salmon in 2014, while not significantly adversely affecting other salmon runs or steelhead. In this way the 6b (4) scenario is reasonably protective of salmonids.

The Governor's drought proclamations and executive orders authorize and direct state agencies, including the Board, to improve water supplies to areas suffering from shortages, including those people we serve. A temperature management regime or order imposed by the Board that results in avoidable cessation of CVP diversions at Jones is inconsistent with the Governor's directives. Reclamation has unique operational knowledge and the expertise to identify an acceptable plan. Considering an array of conditions, and in consultation with biologists, Reclamation has determined that Scenario 6b (4) represents the best option to achieve a reasonable balance and minimize harms to people and the environment. We urge the Board to accept Reclamation's determination on this matter.

Sincerely,



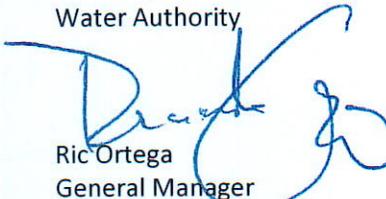
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