



Department of Utilities
Office of the Director

CITY OF SACRAMENTO
CALIFORNIA

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March 10, 2014

Mr. Tom Howard
Executive Director
State Water Resources Control Board
Post Office Box 100
Sacramento CA 95812-0100
VIA E-MAIL: Tom.Howard@waterboards.ca.gov

Re: CVP/SWP Temporary Urgency Change-Folsom Reservoir Operations

Dear Mr. Howard:

The City of Sacramento (City) submits the following comments in response to the SWRCB's March 3, 2014 *Notice Of Modifications To Order Approving A Temporary Urgency Change In Water Right License And Permit Terms And Conditions Of The Department Of Water Resources And U.S. Bureau Of Reclamation Requiring Compliance With Delta Water Quality Objectives In Response To Drought Conditions*.

The City has senior water rights, is within the area of origin, and also is party to a settlement contract with the U. S. Bureau of Reclamation which was entered into in part to allow issuance of water rights to Reclamation for the Folsom Reservoir project. Pursuant to that contract, Reclamation releases water from Central Valley Project facilities to make water available for City diversion. Sufficient storage must be maintained in Folsom Reservoir to make those releases.

The City and Reclamation are presently coordinating closely with respect to American and Sacramento River flows, in order to avoid water elevations so low that the City is not able to divert water. During this January and February, river levels dropped so low that some of the City's Fairbairn diversion pumps on the Lower American River were at risk of cavitating and had to be shut down. The City is taking extraordinary measures, including the installation of submersible pumps, to avoid further such occurrences. This was the topic of my comments at the Board's February 18, 2014 drought workshop.

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The City believes that a plan for operating Folsom Reservoir to meet water supply and Lower American River needs in the American River region, as described in the comment letter submitted by the Cities of Roseville and Folsom, and the San Juan Water District, would be beneficial. The City would certainly work collaboratively with Reclamation and other regional stakeholders on such a plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "DJB" followed by a stylized flourish.

Dave Brent, Director
Department of Utilities

Cc: Felicia Marcus
Frances Spivy-Weber
Tam Dudoc
Steven Moore
Dorene D'Adamo
Michael Buckman
Tom Gohring
John Shirey, City Manager
Martha Lennihan, Lennihan Law